

Stakeholder Engagement Plan (SEP)

Regional Distributed Access Through Renewable Energy Solutions – Sierra Leone (P507938)

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Table of contents

1.	Introduction/Project Description	10
1.1.	Institutional Arrangements	11
1.2.	Integration of E&S Aspects into the DARES Regional Program	11
1.2.1.	Presentation of the Diagram	12
1.2.2.	Explanation of the Flowchart – Operating Logic and Flows	12
2.	Objective/Description of SEP	14
2.1.	Purpose of the SEP	14
2.2.	Objectives of the SEP	15
2.3.	Link to Environmental and Social Risk Management	15
2.4.1.	Environmental Protection and Management Law	16
2.4.2.	Role of the Environmental Protection Agency (EPA)	17
2.4.3.	Right to Access Information Act (2013)	17
2.4.4.	Sector-Specific Frameworks	17
2.4.5.	EES10 Versus National Legislation	18
3.	Stakeholder identification and analysis per project pillar	22
3.1.	Methodology	22
3.2.	Stakeholder analysis by project pillar	22
3.2.1.	Pillar 1: Connecting People	24
3.2.2.	Pillar 2: Powering Economic Transformation	27
3.2.3.	Pillar 3: Energy as a Service (EaaS)	30
3.2.4.	Pillar 4: Implementation Support, Technical Assistance, and Capacity Building 32	36
4.	Stakeholder engagement program	36
4.1.	Engagement objectives	36
4.2.	Engagement principles	36
4.5.	Phase 2 consultations – government-selected priority regions and investment typologies	44
4.6.	Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement	49
4.7.	Proposed strategy to incorporate the views of vulnerable groups	53
4.8.	Adaptive engagement (Living SEP)	53
4.8.1.	Review triggers and frequency	53

4.8.2.	Responsibility for review	53
4.8.3.	Approval and disclosure	54
4.8.4.	Documentation and version control.....	54
5.	Resources and responsibilities for implementing stakeholder engagement	56
5.1.	Regional-level roles and stakeholder engagement	56
5.2.	National Level	57
5.3.	Modalities for SEP Implementation	60
5.4.	Human Resources for SEP Implementation.....	60
5.5.	SEP Implementation Budget	61
6.	Grievance Mechanism	61
6.1.	Objectives and Principles	62
6.1.1.	Objectives	62
6.1.2.	Guiding Principles.....	62
6.2.	Institutional arrangements.....	62
6.3.	Grievance Uptake Channels and Accessibility	63
6.4.	Grievance Resolution Procedure.....	64
6.4.1.	Grievance Resolution Steps detailed.....	65
6.5.	Special Protocols for SEA/SH and AML/CFT-Related Grievances	67
6.5.1.	SEA/SH Grievances	67
6.5.2.	AML/CFT, Fraud, and Corruption Grievances	69
6.6.	Grievance Escalation and Appeals Process	69
6.6.1.	Institutional Arrangements for Escalation and Appeals	70
6.7.	GM Documentation, Reporting, and Learning.....	71
6.8.	Measures to Ensure GM Accessibility and Inclusion	71
6.9.	Public Awareness and Disclosure of the Grievance Mechanism.....	72
7.	Monitoring and Reporting.....	73
7.1.	Monitoring Objectives	74
7.2.	Roles and Responsibilities	75
7.3.	Summary of how SEP will be monitored and reported upon (including indicators) 76	
7.3.1.	Adaptive Management.....	77
7.3.2.	Reporting back to stakeholder groups	77
7.3.3.	Indicators	77

8. Budget for SEP Implementation	79
9. Annex.....	82
9.1. Annex 1 : National regulation.....	82
9.2. Annex 2. Template to capture minutes/records of consultation meetings.....	85
9.3. Annex 3. Sample Table: Monitoring and Reporting on the SEP	86
9.4. Annex 4 : Minutes of the first phase consultation	88
10. Other Annexes.....	101
10.1. Annex 5. Stakeholder Mapping Matrix.....	101
10.2. Annex 6. Consultation Log (KoboToolbox Form)	101
10.3. Annex 7. Subproject Stakeholder Engagement Checklist (can be on KoboToolbox Form) 101	
10.4. Annex 8. Grievance Mechanism Forms and Registry Templates	104
Table 1: Stakeholder for mini-grid, standalone and household electrification.....	24
Table 2:Stakeholders in Agriculture Value Chain.....	27
Table 3 : Stakeholders for institutional electrification.....	30
Table 4: Stakeholders rely on project management and implementation	32
Table 5: Institutional and technical consultations conducted during project preparation....	41
Table 6 : Phase 2 consultations – Government-selected priority regions and investment typologies (planning table, standard).....	46
Table 7 : Summarizes engagement by project stage, stakeholders, topics, methods, responsibilities, and frequency.....	50
Table 8 : Roles of regional entity in the stakeholder engagement.....	57
Table 9: Roles of national entity in the stakeholder engagement.....	59
Table 10 : Principle of the regional DARES GM.....	62
Table 11 ; Institutional arrangements and roles for the grievance mechanism	63
Table 12 : Grievance mechanism uptake channels and responsible entities.....	64
Table 13 : Grievance resolution process.....	65
Table 14 : Level of escalation on the grievance mechanism	69
Table 15 : SEP implementation budget	80

Glossary

ACC — Anti-Corruption Commission
AfDB — African Development Bank
AML/CFT — Anti-Money Laundering / Countering the Financing of Terrorism
AMI — Advanced Metering Infrastructure (smart meters and related systems)
AU — African Union
CBO — Community-Based Organization
CLO — Community Liaison Officer
CSO — Civil Society Organization
DARES — Distributed Access through Renewable Energy Scale-Up
D-MRV — Data, Monitoring, Reporting and Verification
DRE — Distributed Renewable Energy
ECOWAS — Economic Community of West African States
ECREEE — ECOWAS Centre for Renewable Energy and Energy Efficiency
EDSA — Electricity Distribution and Supply Authority (Sierra Leone)
EPA — Environment Protection Agency (Sierra Leone)
ESCP — Environmental and Social Commitment Plan
ESF — Environmental and Social Framework
ESIA — Environmental and Social Impact Assessment
ESIRT — Environmental and Social Incident Response Toolkit
ESMP — Environmental and Social Management Plan
ESS — Environmental and Social Standard
EWRC — Electricity and Water Regulatory Commission
FGD — Focus Group Discussion
FIU — Financial Intelligence Unit
FM — Financial Management
GHG — Greenhouse Gas
GM — Grievance Mechanism
GMIS — Grievance Mechanism Information System
GRS — Grievance Redress Service (World Bank)
IVA — Independent Verification Agent
KPI — Key Performance Indicator
LMP — Labor Management Procedures
M&E — Monitoring and Evaluation
MoE — Ministry of Energy
MoF — Ministry of Finance
MoH — Ministry of Health
MSME — Micro, Small and Medium Enterprises
NDC — Nationally Determined Contribution
NGO — Non-Governmental Organization
OIP — Other Interested Party
PAP — Project-Affected People

PDO — Project Development Objective

PIU — Project Implementation Unit

RCU — Regional Coordination Unit

SEA/SH — Sexual Exploitation and Abuse / Sexual Harassment

SEP — Stakeholder Engagement Plan

SHS — Solar Home System

TA — Technical Assistance

ToR — Terms of Reference

WB — World Bank

WBG — World Bank Group

Executive Summary

The Stakeholder Engagement Plan (SEP) has been prepared for the Sierra Leone pillar of the Distributed Access through Renewable Energy Scale-Up (DARES) Project, financed by the World Bank. The overall objective of the Project is to increase access to affordable and clean energy through distributed renewable energy (DRE) solutions, particularly in rural and peri-urban areas.

In Sierra Leone, the Ministry of Energy Project Implementation Unit (PIU) will implement the Project. The Project Implementation Unit (PIU), hosted by the Ministry of Energy, will be responsible for day-to-day coordination, environmental and social (E&S) risk management, and stakeholder engagement.

Purpose of the SEP

This SEP has been developed in accordance with the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure.

The SEP describes the strategies and actions to engage with stakeholders throughout the Project lifecycle. It aims to ensure that all affected and interested parties are informed, consulted, and able to participate meaningfully in Project design and implementation. The SEP also establishes a structured mechanism for receiving and addressing grievances.

Stakeholders

Stakeholders identified under the Project include:

Project-affected parties (PAPs): households, small businesses, and communities benefiting from or potentially affected by electrification activities, including those located near DRE installation sites or in areas where land access may be required for installations.

Other interested parties (OIPs): national and local government institutions, private sector actors, civil society organizations, community-based organizations, and development partners.

Vulnerable groups: women, persons with disabilities, youth, and low-income or remote populations requiring targeted engagement measures to ensure accessibility and inclusion.

Stakeholder mapping has been completed to guide continuous engagement and ensure inclusiveness.

Engagement Process

Stakeholder engagement will rely on participatory and inclusive approaches adapted to local contexts across Sierra Leone. Engagement methods include community meetings, focus group discussions, radio programs, and the dissemination of information through

Commented [H1]: Comment: Please be informed that I have reviewed this document and made minor adjustments to reflect the updated implementing arrangements. Specifically, the National Project Implementation Unit (PIU) will now be hosted by the Ministry of Energy (MoE) instead of the Electricity Distribution and Supply Authority (EDSA). All references to EDSA as the implementing partner have been updated accordingly to reflect this change. These modifications have been highlighted in the document in Red for easy identification. Please review the revised version to ensure that all references accurately reflect the new implementation structure and to confirm that the document aligns with the current project arrangements.

appropriate national and local disclosure channels, including implementing agency communication platforms and local notice boards.

Community Liaison Officers (CLOs) / social mobilization teams will facilitate ongoing communication and feedback between communities and the PIU, working in coordination with District Councils, local authorities, and Chiefdom/community leadership structures.

All consultation activities will be documented and monitored using appropriate tools (including digital tools where feasible) and integrated into project monitoring systems.

Grievance Mechanism

A Grievance Mechanism (GM) has been established to ensure that concerns and complaints related to the Project are received, recorded, and addressed promptly, fairly, and transparently.

Grievances can be submitted through multiple channels, including Community Liaison Officers (CLOs), community-level grievance committees, Local Councils (District and City Councils) and traditional authorities at chiefdom level, the Project Implementation Unit (PIU), or direct contact points (such as phone, email, or suggestion boxes). All grievances will be formally registered in the grievance tracking system managed by the PIU to ensure traceability, confidentiality, and consistent follow-up.

The GM includes specific confidential procedures for handling SEA/SH (Sexual Exploitation and Abuse / Sexual Harassment) and integrity-related complaints (including fraud, corruption, and AML/CFT risks). Sensitive cases will be handled through restricted-access protocols and referred to appropriate service providers or competent authorities, as relevant. Unresolved cases may be escalated to the World Bank's Grievance Redress Service (GRS), in accordance with World Bank procedures.

Institutional Arrangements

Stakeholder engagement and GM implementation involve both regional and national levels:

Regional Level: the Regional Coordination Unit (RCU) supports consistency and reporting across participating countries; the Fund Manager evaluates private sector applications and monitors performance; the Independent Verification Agent (IVA) conducts verification and compliance checks; and regional fiduciary oversight actors support financial integrity and handle integrity-related grievances referred by the PIU, as applicable.

National Level (Sierra Leone): the PIU hosted by MOE leads stakeholder engagement activities, coordinates with national institutions, manages the GM, and ensures monitoring and reporting. CLOs / social mobilization teams act as local entry points for grievance submission and community outreach, in coordination with District and Chiefdom structures and relevant community leaders.

Resources and Budget

An indicative budget has been allocated for SEP implementation in Sierra Leone. The budget covers staffing, consultations, communication materials, training, operation of the Grievance Mechanism, monitoring, and disclosure activities. The budget will be refined and updated annually through the PIU's work plan to ensure adequate resourcing for continuous and inclusive stakeholder engagement throughout Project implementation.

An indicative budget has been allocated for SEP implementation in Sierra Leone. This budget covers staffing, stakeholder consultations, communication and disclosure materials, capacity building and training activities, operation of the project-level Grievance Mechanism, monitoring, and reporting. The budget will be refined and updated annually through the PIU's work plan to ensure adequate resourcing for continuous and inclusive stakeholder engagement throughout Project implementation. An estimated total of USD 970,000 has been allocated for the implementation of the Stakeholder Engagement Plan over the Project lifecycle.

Monitoring and Reporting

The PIU will monitor and report on SEP implementation through quarterly and annual progress reports. These reports will include the number of consultations conducted, issues raised, grievances received and resolved, and lessons learned.

Aggregated information will be shared publicly through community meetings, local radio, and other appropriate disclosure channels. The SEP will be reviewed annually and updated as needed to reflect implementation experience and evolving stakeholder engagement requirements.

Conclusion

The SEP establishes a framework for inclusive and transparent engagement between the Project and its stakeholders in Sierra Leone. Through proactive communication, accessible grievance management, and continuous feedback, the Project seeks to build trust, promote accountability, and ensure that communities benefit equitably from renewable energy development.

1. Introduction/Project Description

The Regional Distributed Access through Renewable Energy Solutions (DARES) Project is a World Bank–financed program designed to expand electricity access in fragile and low-access countries in Sub-Saharan Africa. The program covers Liberia, Sierra Leone, Central African Republic, Chad, Guinea and Benin. The Sierra-Leone DARES Project builds on the regional program and reflects the country’s specific challenges of low electricity access, institutional fragility, and reliance on private sector–led distributed renewable energy solutions. The Project Development Objective is to increase electricity access for households, businesses, and public institutions through private sector–led Distributed Renewable Energy (DRE) solutions, including solar mini-grids, standalone solar home systems, and productive-use equipment.

The DARES Program is structured around four pillars. In Sierra-Leone, the project will support decentralized renewable energy market development to accelerate electricity access in rural and peri-urban areas. The indicative activities to be financed will be aligned with the following pillars:

- **Pillar 1: Connecting People** – Supports expanded access to electricity for households and micro and small enterprises, particularly in rural and peri-urban areas, through privately delivered decentralized renewable energy solutions, including solar mini-grids and standalone solar systems.
- **Pillar 2: Powering Economic Transformation** – Promotes the productive use of electricity by supporting energy-enabled agricultural technologies and rural economic activities, such as solar irrigation, agro-processing, cold storage, and other income-generating uses, with a focus on strengthening local value chains and climate resilience.
- **Pillar 3: Energy as a Service (EaaS)** – Provides clean, reliable, and sustainable electricity services to public institutions, such as schools and health facilities, through long-term, performance-based energy service contracts implemented by private operators, ensuring service quality, maintenance, and continuity.
- **Pillar 4: Implementation Support, Technical Assistance, and Capacity Building** Strengthens the enabling environment for decentralized renewable energy scale-up through institutional capacity building, regulatory and technical support, environmental and social management systems, and regional coordination.

The specific scope and budget for Sierra-Leone will be confirmed during project appraisal and detailed in the Project Appraisal Document (PAD) and Financing Agreement.

In Sierra-Leone, DARES will prioritize rural and remote communities with low electricity access. Implementation will rely on private Distributed Renewable Energy (DRE) companies to deliver off-grid services through a results-based financing mechanism managed by a Fund

Manager, while institutional coordination and oversight will be ensured by the National PIU and relevant government agencies.

The National Project Implementation Unit (PIU) will be hosted by the Ministry of Energy PIU and will coordinate the implementation of activities under Pillar 1 and Pillar 3. Pillar 2 will focus on productive-use market development targeting farmers, producer groups, and agribusinesses. Pillar 4 will provide regulatory and institutional support to national entities, including the Electricity and Water Regulatory Commission (EWRC), the Ministry of Energy (MoE), the Environmental Protection Agency (EPA-Sierra-Leone), and other relevant institutions involved in energy sector governance, regulation, and oversight

Interventions will prioritize rural and peri-urban areas with limited grid coverage. Planned activities include deployment of solar mini-grids and standalone systems; support for productive technologies (irrigation, cooling, agro-processing, storage); electrification of public institutions (schools, health centers, water facilities); and capacity building for national institutions.

1.1. Institutional Arrangements

The project has a **multi-layered institutional structure** designed to ensure strong governance, financial transparency, and robust environmental and social (E&S) risk management. Detailed roles are provided in Section 5.

This SEP has been prepared in line with the World Bank's ESS10 and includes a project-level Grievance Mechanism.

1.2. Integration of E&S Aspects into the DARES Regional Program

The **DARES regional program** integrates environmental and social (E&S) aspects in a cross-cutting manner across its entire institutional, operational, and financial framework, in accordance with the requirements of the World Bank's **Environmental and Social Framework (ESF)**. This integration aims to anticipate, prevent, and manage potential environmental and social risks and impacts associated with investments, while maximizing benefits for affected communities and relevant stakeholders.

The adopted approach is based on close articulation between the Program's framework instruments, regional and national governance mechanisms, and operational procedures applied at the project level. It ensures that E&S requirements are taken into account from the early stages of planning and financing and are subsequently translated into operational measures throughout the full investment cycle, including project preparation, implementation, and monitoring.

The diagram below provides a synthetic overview of the architecture for integrating E&S aspects within the DARES regional program, illustrating the interactions between financial

flows, technical processes, and environmental and social management, supervision, and control mechanisms.

1.2.1. Presentation of the Diagram

The diagram below illustrates the institutional and operational architecture of the DARES regional program, as well as the cross-cutting integration of environmental and social (E&S) aspects throughout the investment preparation, financing, implementation, and monitoring cycle. It highlights the interactions between regional, national, and private actors, as well as the functional linkages between financial flows, technical processes, and E&S management and supervision mechanisms, in line with the requirements of the World Bank's Environmental and Social Framework (ESF).

This flowchart makes it possible to visualize how E&S requirements are integrated from the early stages of the Program, starting with financing agreements and framework instruments (**ESCP/PEES, ESMF/CGES, SEP/PEPP**), and subsequently operationalized at the sub-project level. This includes investment identification, permitting processes, implementation activities, as well as verification, reporting, and independent control mechanisms.

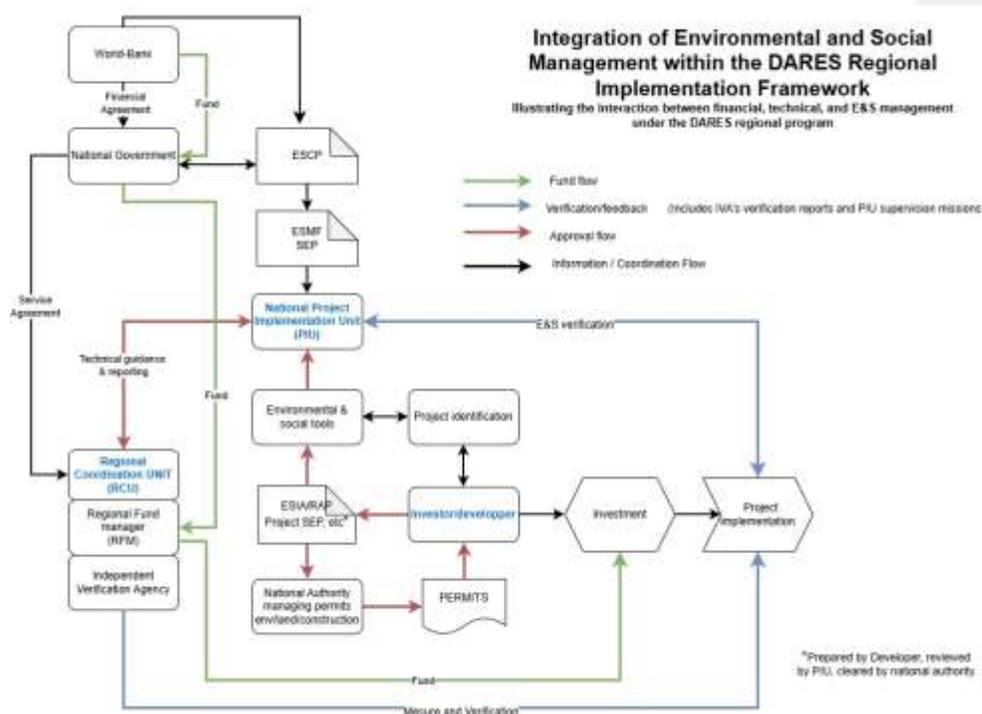
1.2.2. Explanation of the Flowchart – Operating Logic and Flows

The flowchart presents, on the one hand, the **financial flows** linking the World Bank, beneficiary governments, the **Regional Coordination Unit (RCU)**, and the **Project Implementation Units (PIUs)**, and, on the other hand, the **information, coordination, and approval pathways** associated with the Program's environmental and social management. The E&S framework instruments (**ESCP/PEES, ESMF/CGES, and SEP/PEPP**) constitute the normative foundation of the Program and guide all project preparation and implementation activities.

At the operational level, the **PIU** plays a central role in coordinating technical, financial, and E&S aspects, in close collaboration with the RCU, investors/developers, and the competent national authorities. Identified projects undergo specific E&S preparation (ESIA, RAP, project-specific SEP, etc.), which is carried out by developers, reviewed by the PIU, and submitted to national authorization and permitting procedures. Investment implementation is supported by monitoring, verification, and supervision mechanisms, including independent control and reporting functions, to ensure continuous compliance with national requirements and World Bank standards throughout the project cycle.

The diagram should be read from top to bottom, distinguishing between financial flows, approval pathways, and E&S supervision mechanisms.

Figure 1 :Diagram illustrating the integration of environmental and social aspects into the DARES Program



Key Messages of the Diagram

- Environmental and social requirements are integrated from the early stages of the DARES Program through the framework instruments (ESCP/PEES, ESMF/CGES, SEP/PEPP) and are operationalized at the project level.
- The Program’s institutional architecture is based on a clear allocation of roles among regional, national, and private actors, with the PIU serving as the central coordination and supervision hub.
- Control mechanisms, independent verification, and reporting ensure continuous compliance of investments with national requirements and World Bank standards throughout the project cycle.

2. Objective/Description of SEP

The Stakeholder Engagement Plan (SEP) is a key instrument of the DARES Sierra-Leone Project. It provides a framework for **systematic, inclusive, and transparent engagement** with all stakeholders throughout the project life cycle.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the project cycle. The SEP outlines how the National PIU (hosted by the Ministry of Energy PIU) will communicate and engage with stakeholders and provides a mechanism by which people can raise concerns, provide feedback, or make complaints about the project. The SEP emphasizes methods to engage vulnerable groups and those at risk of exclusion.

At the project preparation stage, stakeholder engagement has been limited to national and sector-level stakeholders, including government authorities, private sector actors, and existing project implementation structures. Community-level consultations will be conducted during project implementation, once specific subprojects, locations, and affected communities have been identified.

Grant recipient DRE companies will be responsible for conducting stakeholder engagement activities at the local level for each subproject, in line with the guidance, tools, and minimum requirements established by the National PIU under this SEP.

2.1. Purpose of the SEP

The SEP ensures that all stakeholders particularly affected peoples/communities and vulnerable groups are provided with **timely and relevant information**, that their concerns are heard, and that their feedback is integrated into project design, implementation, and monitoring. It also supports accountability by setting out clear mechanisms for consultation, disclosure, and grievance management.

In the context of DARES Sierra-Leone, the SEP is essential because:

- The project will operate in **rural and peri-urban areas** with low electricity access and limited institutional presence.
- The interventions involve **private sector operators** whose accountability to communities must be reinforced through transparent engagement.
- The project context includes risks of **elite capture, corruption, and potential misuse of funds**, requiring safeguards and a strong fiduciary framework.
- The World Bank's Environmental and Social Standard 10 (ESS10) requires Borrowers to engage with stakeholders as an integral part of environmental and social risk management.

The SEP will be implemented throughout the project lifecycle and updated as needed during implementation to reflect operational realities and stakeholder feedback.

2.2. Objectives of the SEP

The SEP has multiple objectives. It is not only a communication tool but also a governance instrument that strengthens accountability and inclusion in project delivery. It ensures that all stakeholders, especially vulnerable groups, have the opportunity to participate and influence decisions. The following objectives will guide stakeholder engagement under the Sierra-Leone DARES Project.

- Define principles for stakeholder engagement in line with applicable requirements.
- Provide an identification and analysis of key stakeholders.
- Define the strategies for meaningful consultations of stakeholders, to include and recognize their opportunities, needs, and concerns in the Project.
- Set a procedure for updating the Stakeholder Engagement Plan (SEP)
- Define roles and responsibilities for the implementation of the SEP.
- Propose an appropriate communication strategy to initiate dialogue between all stakeholders.
- Propose a grievance management mechanism for stakeholders to raise concerns, provide feedback, and make grievances regarding the Project activities.
- Define measures for reporting on and monitoring the implementation of the SEP.

2.3. Link to Environmental and Social Risk Management

The SEP is directly linked to the Project's Environmental and Social instruments (e.g., ESIA, ESMP, LMP, SEA/SH Action Plan) prepared by the Regional Coordination Unit (RCU). It ensures that prevention, mitigation measures, and commitments outlined in these instruments are effectively communicated to stakeholders and that their implementation is subject to continuous community oversight and monitoring.

In addition to its integration with Project-specific environmental and social instruments, the SEP is also grounded in the national legal and institutional framework governing stakeholder engagement and information disclosure in Sierra Leone. The following section summarizes the key statutory and institutional requirements that inform and shape the design of the Project's stakeholder engagement approach.

2.4. Institution and national requirements for stakeholder engagement

Stakeholder engagement in Sierra Leone is governed by a combination of statutory requirements, regulatory instruments, and institutional mandates that establish obligations for consultation, disclosure, transparency, and public participation in development projects. These national provisions constitute the legal baseline for stakeholder engagement under the Project.

Key elements of the national framework include environmental legislation requiring public participation in environmental assessment processes, as well as transparency and access-to-

information laws that promote accountability and citizen access to public information. Together, these instruments require that affected communities and relevant stakeholders be informed of proposed activities, consulted during project preparation and implementation, and provided with access to relevant documentation in a timely and accessible manner.

For the purposes of the Project, these national requirements are complemented and strengthened by the World Bank's Environmental and Social Framework (ESF), Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. ESS10 establishes a systematic and life-cycle approach to stakeholder engagement, emphasizing early engagement, inclusive participation, meaningful consultation, accessible grievance mechanisms, and ongoing information disclosure.

Accordingly, the Project's Stakeholder Engagement Plan (SEP) has been designed to align with both national legal requirements and ESS10, ensuring that stakeholder engagement processes meet domestic statutory obligations while applying international good practice standards.

2.4.1. Environmental Protection and Management Law

Environmental governance in Sierra Leone is governed by the **Environmental Protection Agency Act, 2022 (Act No. 15 of 2022)**, which repealed and replaced the former Environmental Protection Agency Act of 2008 and modernized the national framework for environmental protection and management. The 2022 Act establishes the Environmental Protection Agency (EPA) as the competent authority responsible for environmental regulation, oversight, and enforcement, including the management of environmental and social assessment processes.

Under this legal framework, projects with the potential to generate environmental and social risks or impacts are required to undergo an Environmental and Social Impact Assessment (ESIA) and obtain the necessary environmental approvals prior to implementation. The EPA Act, 2022 is implemented through subsidiary legislation, including the **Environment Protection Agency (Environmental Impact Assessment Licence) Regulations (2010)**, which remain in force pending the adoption of updated regulations under the 2022 Act.

A core requirement of the ESIA process in Sierra Leone is public participation, which is embedded throughout project preparation and review. This includes,

- Notification of affected communities and relevant stakeholders regarding the proposed project and its potential environmental and social impacts,
- Disclosure of draft ESIA documentation in accessible formats and, where appropriate, in languages understandable to affected stakeholders.
- Public hearings and/or public consultations convened or facilitated by the Environmental Protection Agency, particularly for projects with significant impacts or high levels of public interest.

- Integration of stakeholder feedback into the final ESIA and associated Environmental and Social Management Plans (ESMPs), including documentation of how concerns, comments, and recommendations have been addressed.

These national legal requirements provide a robust statutory basis for stakeholder engagement in Sierra Leone and are fully consistent with, and complementary to, the objectives and requirements of **Environmental and Social Standard 10 (ESS10)** on stakeholder engagement and information disclosure under the World Bank Environmental and Social Framework.

2.4.2. Role of the Environmental Protection Agency (EPA)

The EPA is responsible for ensuring compliance with public participation requirements during environmental assessment and licensing processes. Project developers are required to submit ToRs, conduct consultations, disclose ESIA documentation, and document how stakeholder feedback has been addressed.

For the Project, these requirements reinforce the need to conduct early and continuous consultations, document stakeholder inputs, and demonstrate responsiveness to concerns in line with ESS10.

2.4.3. Right to Access Information Act (2013)

The **Right to Access Information Act (RAIA), enacted in 2013**, guarantees the right of every person in Sierra Leone to access public information held by public authorities and public-interest institutions, subject to defined exceptions. The Act promotes transparency, accountability, and civic participation by requiring timely disclosure of information requested by citizens and by encouraging proactive disclosure of information of public interest.

For the Project, this legal framework reinforces compliance with World Bank ESS10 on stakeholder engagement and information disclosure. Accordingly, key project documents such as the SEP, ESCP, environmental and social assessment instruments (including Terms of Reference, draft and final reports), and periodic reports on stakeholder engagement and the Grievance Mechanism (GM) will be made publicly accessible through appropriate disclosure channels. These may include relevant government or implementing agency websites, local notice boards, district offices, and community meetings.

Where disclosure involves sensitive information (including SEA/SH-related cases), confidentiality and survivor-centered principles will be strictly applied, and reporting will use anonymized and aggregated formats to protect personal data and ensure safety.

2.4.4. Sector-Specific Frameworks

In addition to the general legal framework on environmental governance and transparency, Sierra Leone has sector-specific legislation and regulatory arrangements that directly affect

the energy sector and stakeholder engagement. These frameworks define the mandates of key institutions responsible for sector planning, utility service delivery, rural electrification, consumer protection, and regulatory oversight. They are critical for ensuring that stakeholder engagement processes are consistent with national energy policies, regulatory requirements, and sectoral practices.

Key sector Framework include:

- Electricity and Water Regulatory Commission Act (2011): Establishes the Electricity and Water Regulatory Commission (EWRC) and mandates regulatory oversight, including licensing and the regulation of service quality and consumer protection measures. The EWRC plays a central role in ensuring transparency and stakeholder engagement on regulatory matters, including licensing requirements and the development of regulatory instruments relevant to distributed renewable energy (DRE), mini-grids, and emerging service delivery models such as Energy-as-a-Service (EaaS).
- Institutional implementation arrangements under the Ministry of Energy PIU and the national project implementation structure: In Sierra Leone, the Project will be implemented through the national implementation structure hosted by the Ministry of Energy (MoE), in coordination with the Electricity and Water Regulatory Commission EWRC on relevant technical and policy matters. The implementing structure (including the national PIU functions and associated environmental and social specialists) will lead the implementation of stakeholder engagement activities under the SEP and ensure the operation of the Project-level GM in line with ESS10.
- These sector arrangements will be complemented by continued technical and institutional consultations particularly on regulatory development for mini-grids and EaaS ensuring that stakeholder engagement remains responsive to evolving policy and market conditions throughout Project implementation.

2.4.5. EES10 Versus National Legislation

While Sierra Leone's legal framework establishes important requirements for public participation and information disclosure particularly under the EPA Act (2022) and the Right to Access Information Act (2013) certain elements required under ESS10 go beyond national statutory provisions.

In particular, ESS10 introduces.

- A life-cycle approach to stakeholder engagement
- Systematic identification and mapping of stakeholders, including vulnerable groups,
- Structured and documented engagement planning (SEP)
- Ongoing disclosure throughout implementation;
- A formalized, accessible, and time-bound Grievance Mechanism
- Enhanced provisions for inclusion and SEA/SH-sensitive engagement.

The Project addresses these gaps through the implementation of this SEP and the Project-level Grievance Mechanism, which apply ESS10 standards alongside national legal requirements.

A detailed comparative analysis is provided in the next table coming from the Project ESMF.

2.5. Annex 8: Gap analysis on the ESS10 and national's requirements (ESMF extract)

Scope/Objective	Description of Bank Policy	Description of the Government of Sierra Leone Regulation	Gaps Identified	Gap Bridging Actions
<ul style="list-style-type: none"> To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life 	<p>ESS10 seeks to encourage open and transparent engagement between the Borrower and the project stakeholders (project-affected parties) throughout the project life cycle. The standard establishes a systematic approach to stakeholder engagement that potentially helps the Borrower to identify stakeholders and build and maintain a constructive relationship with them, as well as disclose information on the environmental and social risks and impacts to stakeholders in a timely, understandable, accessible, and appropriate manner and format. It recommends that stakeholder engagements are commenced as early as possible in the project development process and continued throughout the lifecycle of the Project. This allows for stakeholders' views to be</p>	<p>The EPA Act (2022) requires parties seeking permits to implement environmentally sensitive projects to develop an ESHIA and organise public disclosures following procedures that allow stakeholders at different levels to understand sources of risks and agree with proposed measures for monitoring and mitigation.</p> <p>The Right to Information Act (2013) provides for the disclosure of information held by public authorities or persons providing services to the public. It requires public disclosure processes that foster transparency and meaningful engagement.</p>	<p>The regulations to the RTI Act, has not been developed to fully operationalize mechanisms for disclosure or dissemination of information and grievance redress.</p>	<ul style="list-style-type: none"> The project has developed a stakeholder Engagement Plan. The SEP also includes a GRM based on an existing grievance redress mechanism for resolving grievances for DARES The GRM is a decentralized and transparent system which ensured quick resolution of complaints and disputes, it also has the structure for disclosing vital information to requisite stakeholders It also provides means for effective and inclusive engagement. This instrument which satisfies almost all the requirements of ESS 10 will be applied during project implementation to bridge the gaps in national regulations and policies

Scope/Objective	Description of Bank Policy	Description of the Government of Sierra Leone Regulation	Gaps Identified	Gap Bridging Actions
<p>cycle on issues that could potentially affect them.</p> <ul style="list-style-type: none"> • To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances. 	<p>considered in the project design and environmental and social performance. The Borrower is also expected to implement a grievance mechanism to receive and facilitate resolution of concerns and grievances.</p>			

3. Stakeholder identification and analysis per project pillar

This section identifies and analyzes the stakeholders relevant to the Sierra-Leone DARES Project and its pillars. Stakeholder identification is essential to ensure inclusive and meaningful engagement throughout the project lifecycle. Stakeholder engagement of the project is anchored in the Sierra Leone national regulatory framework (the Right to Access Information Act (2013), the EPA Act (2022) and the World Bank's Environmental and Social Framework (ESF), ESS10. Not unlike ESS 10, the Sierra Leone national regulatory framework pertaining to stakeholder engagement requires consultation, disclosure, and transparency particularly through the environmental licensing framework and the national right to access information regime. Those are the guiding principles to be applied to stakeholder engagement throughout the implementation of the project.

3.1. Methodology

For the Sierra-Leone DARES regional Program, the Stakeholders were first identified using the ESRS and ESCP analyses, complemented by scoping discussions with sector agencies and county authorities. Stakeholders are grouped as affected parties, other interested parties, and disadvantaged/vulnerable individuals or groups.

3.2. Stakeholder analysis by project pillar

This section identifies the key stakeholders of the Sierra-Leone DARES Project, categorized in alignment with World Bank Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure. Stakeholder identification has been conducted **per project pillar** to reflect the distinct nature of project activities and the different groups affected or interested at each level.

Stakeholders include:

- **Project-Affected Parties (PAPs):** individuals, groups or communities who are directly affected by the project, either positively as beneficiaries or negatively through potential economic, environmental or social impacts.
- **Other Interested Parties (OIPs):** entities that have an interest in the project, including government institutions, private sector actors, civil society, and development partners.
- **Disadvantaged or Vulnerable Groups:** individuals or groups who may be disproportionately affected by project impacts or may face barriers to accessing project benefits, such as women-headed households, youth, persons with disabilities and remote rural populations.

The stakeholder analysis considers the **level of influence** and **degree of interest** of each group, to ensure that engagement methods are tailored accordingly. The tables below present stakeholders identified under each pillar of the project along with their expected roles, engagement needs, and appropriate engagement approaches.

3.2.1. Pillar 1: Connecting People

Deployment of mini-grids, standalone systems (SHS), and household electrification

Table 1: Stakeholder for mini-grid, standalone and household electrification

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Rural households in target communities	PAP	Positive (beneficiaries)	Access to electricity for basic needs (lighting, phone charging, refrigeration, services)	High	Medium	Community meetings; radio messaging; leaflets; use of local languages; inclusive outreach through Chiefdom/Community leaders
Local businesses (MSMEs)	PAP	Positive (beneficiaries)	Productivity improvements and business expansion through energy access	High	Medium	Business outreach forums; focus group discussions with traders associations; targeted sessions for women entrepreneurs
Land users and property owners at mini-grid / DRE sites	PAP	Potential adverse impact	Temporary or permanent land use (land take, access restrictions, easements)	High	High	Land access will be based on willing buyer-willing seller arrangements or, in exceptional cases, voluntary land donations, in full compliance with ESS5 and applicable national land legislation. Transparent disclosure of land requirements and documentation of consent; community verification and grievance access.
Community-based organizations (CBOs)	OIP	-	Support inclusion and mobilization; awareness raising; facilitation of consultations	Medium	Medium	Capacity-building & outreach; engagement as information intermediaries; support dissemination of GM information
Community leaders (Paramount Chiefs, Section Chiefs, Village Heads, elders, women leaders)	OIP	-	Local decision influence; access facilitation; community acceptance and dispute prevention	High	High	Consultation and local agreements; validation meetings; culturally appropriate engagement; continuous feedback loops

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
District Councils and local authorities	OIP	–	Local coordination, permits/notifications, facilitation of consultations and dispute resolution	Medium	High	Coordination meetings; formal notifications; joint outreach sessions; integration into consultation schedules
Chieftdom authorities and customary landholding structures (including family landowners / landholding groups)	OIP	–	Customary land negotiations; local legitimacy for land access arrangements	Medium	High	Land agreement facilitation; public disclosure of land terms; community verification; involvement in boundary demarcation and documentation
DRE companies (mini-grid, SHS, standalone providers / EaaS service providers)	OIP	–	Subproject implementation; community interface; OHS and performance responsibilities; customer service	High	High	Technical workshops; OHS briefings; requirements briefings (ESS10/ESS5/ESS2); mandatory subproject SEP/GM entry points aligned with Project GM
Private solar equipment importers / distributors	OIP	–	Market participation; supply chain for solar equipment and spare parts	High	Medium	Supplier engagement; market sounding sessions; information on technical standards and quality requirements
Ministry of Energy (MoE)	OIP	–	Policy oversight; strategic guidance; coordination with sector ministries (notably for standalone/EaaS)	High	High	Steering; inter-ministerial coordination; periodic reporting and policy consultations
Electricity Distribution and Supply Authority (EDSA)	OIP	–	Co-implementation under ESLEAP-aligned structure; operational coordination and interface with national electricity service arrangements (where relevant)	High	High	Steering; implementation coordination meetings; technical exchanges; joint outreach where appropriate
Project Management Unit/Team (PMU/PMT) &	OIP	–	Leads implementation, oversight and reporting; ensures stakeholder engagement, disclosure and	High	High	Regular coordination meetings; reporting; stakeholder engagement planning; GM oversight and monitoring

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Project Implementing Team (PIU) – MoE <i>(National PIU structure – ESLEAP model)</i>			inclusion; manages Project-level GM			
MOE and Water Regulatory Commission (EWRC)	OIP	–	Regulatory oversight (licensing/tariffs where applicable); consultation for regulatory reforms (mini-grid regs, EaaS policy)	High	High	Policy alignment; technical consultations; disclosure/awareness sessions on regulatory requirements
Women-headed households	Vulnerable	Risk of exclusion	Affordability and accessibility risks; risk of being excluded from benefits	High	Low	Targeted support; women-only focus group discussions; tailored messaging on tariffs/connection packages; facilitation through women leaders
Youth and unemployed groups	Vulnerable	Risk of exclusion	May feel bypassed; risk of frustration linked to employment expectations	Medium	Low	Youth-focused consultations; local employment expectation management; engagement through youth groups and District structures
Persons with disabilities (PWDs)	Vulnerable	Risk of exclusion	Accessibility barriers; risk of exclusion from consultations and benefits	Medium	Low	Inclusive engagement; focus group discussions, accessible venues; adapted communication methods; proactive outreach through disability organizations where present
Informal diesel generator vendors / fuel sellers	PAP	Potential adverse economic impact	Potential loss of revenue as communities transition to DRE	High	Medium	Transition dialogues; information on opportunities (O&M services, alternative livelihoods, supply chain inclusion where feasible)
Local workers not hired by developers	PAP	Potential grievance risk	Social tension, perceived unfair hiring practices	Medium	Medium	Fair hiring communication; transparent recruitment messaging; community briefings on labor needs; GM access and worker GM entry points

3.2.2.Pillar 2: Powering Economic Transformation

Productive use of energy for agriculture and rural value chains (irrigation, milling, cold storage, agro-processing, fishing, etc.) Energy access is a critical enabling factor for rural value chains, as it supports mechanization and post-harvest processing (milling, drying, refrigeration, and cold storage), reduces losses, and improves product quality and marketability for both staple crops and cash crops (including cocoa and coffee).

Table 2:Stakeholders in Agriculture Value Chain

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Smallholder farmers	PAP	Positive (beneficiaries)	Improved productivity and resilience through access to solar irrigation, cold storage and agro-processing equipment	High	Medium	Farm-level demonstrations; cooperative meetings; community outreach through extension services; radio messaging in local languages
Farmer cooperatives & producer groups	PAP	Positive (beneficiaries)	Aggregated productive use of energy; collective investment and operational models	High	Medium	Cooperative engagement; group consultations to identify priority needs and operational modalities; training sessions
Agribusinesses and value chain actors (rice mills, cassava processors, cocoa and coffee buyers/processors/exporters, agro-processing firms)	PAP	Positive	Increased industrial activity and value addition through reliable and affordable energy	High	Medium	Business stakeholder roundtables; targeted consultations on energy needs, service standards and tariffs
Rural MSMEs (mills, welders, carpenters, mechanics, cold-chain operators)	PAP	Positive	Expansion of services and income generation using productive energy	High	Medium	Information sessions; local business forums; engagement through trade associations and local councils
Land users and property owners near productive-use installation sites	PAP	Potential adverse impact	Land access/use concerns for irrigation pumps, storage facilities, cold rooms or mini-processing sites	High	Low to Medium	Prior consultation and transparent disclosure of land requirements; land agreements following willing buyer-willing seller (or voluntary land donation

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
						in exceptional cases) in full compliance with ESS5 and national legislation; grievance access
Ministry of Agriculture and Food Security (MAFS)	OIP	–	Policy alignment; support to rural development priorities; coordination with extension services and value chain programs	High	High	Technical coordination meetings; joint planning for site selection criteria and farmer targeting; integration with existing agricultural programs
Ministry of Fisheries and Marine Resources (MFMR) <i>(and relevant agencies)</i>	OIP	–	Productive energy for fisheries and coastal livelihoods (e.g., ice plants, cold storage, processing)	Medium	Medium	Sector consultations; targeted engagement with fishing communities and landing site committees; coordination on safeguards and service models
Equipment suppliers (irrigation pumps, milling machines, solar freezers, cold rooms, storage systems)	OIP	–	Market expansion; provision of equipment, spare parts and after-sales support	High	Medium	Technical workshops; supplier engagement sessions; dissemination of quality standards and performance requirements
Microfinance institutions (MFIs), rural banks and financial service providers	OIP	–	Potential co-financing and financial products for productive-use equipment and services	Medium	Medium	Finance facilitation meetings; consultations on affordability, repayment models and bundled energy+equipment solutions
NGOs/CSOs working in agriculture, food security and rural livelihoods	OIP	–	Community mobilization; inclusion support; monitoring and social accountability	Medium	Low to Medium	Partnership dialogue; outreach support; engagement as information intermediaries and feedback channels
Women farmers and women agri-entrepreneurs	Vulnerable	Risk of exclusion	Lower access to land, finance, and equipment; risk of exclusion from productive-use benefits	High	Low	Gender-sensitive outreach; women-only focus group discussions; targeted support through women associations; tailored

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
						communication on eligibility and access mechanisms
Youth farmers and agribusiness start-ups	Vulnerable	Risk of exclusion	Barriers to finance, equipment and market entry; risk of frustration if not supported	High	Low	Youth-focused consultations; engagement through youth groups and agribusiness incubators; targeted outreach on opportunities and transparent eligibility criteria
Remote rural communities (hard-to-reach areas)	Vulnerable	Risk of exclusion	Low access to information, markets and finance; risk of being left behind	High	Low	Tailored communication; mobile outreach teams; use of radio and community notice boards; engagement via Chiefdom structures and local CSOs
Chiefdom authorities and community leaders (Paramount Chiefs, Section Chiefs, elders, women leaders)	OIP	-	Farming community coordination; legitimacy for land access arrangements and dispute prevention	High	High	Chiefdom and community dialogues; culturally appropriate engagement; validation meetings and local agreements (including land-related matters)
District Councils and Local Authorities	OIP	-	Local coordination; support for community engagement and permits/notifications; dispute resolution support	Medium	High	Coordination meetings; inclusion in consultation schedules; formal notifications and local dissemination of project information

3.2.3. Pillar 3: Energy as a Service (EaaS)

Electrification of schools, health facilities, and water systems (social services facilities)

Table 3 : Stakeholders for institutional electrification

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Students and teachers in public schools	PAP	Positive (beneficiaries)	Improved learning environment; extended study hours; access to digital education and ICT services	High	Medium	School-based meetings; PTA/School Management Committee (SMC) consultations; information sessions on system use and maintenance responsibilities
Patients and health staff in clinics / health centers	PAP	Positive (beneficiaries)	Better service delivery (cold chain for vaccines, lighting, diagnostic equipment, maternal services)	High	High	Facility-level engagement; meetings with facility staff and community health structures; targeted sessions on service continuity and safety
Water users in rural communities (WASH services)	PAP	Positive (beneficiaries)	Reliable water pumping and storage through solar power; improved access and reduced downtime	High	Medium	Community water committee consultations; community meetings; coordination with local water management structures
Host communities around public facilities	PAP	Potential adverse impact	Risk of disputes over access / prioritization; concerns over equitable service provision and perceived favoritism	High	Medium	Community fora; local agreement protocols; grievance mechanism awareness and disclosure; continuous feedback channels
Ministry of Basic and Senior Secondary Education (MBSSE)	OIP	-	Oversight of school electrification; coordination on eligibility, site selection and integration with education sector priorities	High	High	Coordination and disclosure meetings; joint planning; integration into education sector communications
Ministry of Health (MoH)	OIP	-	Oversight of health facility electrification; alignment with service delivery priorities; coordination for implementation	High	High	Joint planning meetings; technical coordination on facility readiness and operating requirements

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
Ministry of Water Resources (MWR) <i>(and/or relevant WASH institutions)</i>	OIP	–	Oversight and coordination for rural water systems; ensures alignment with water sector policy and community water management arrangements	Medium	Medium	Technical coordination meetings; joint planning and disclosure
School Management Committees (SMCs) / Parent-Teacher Associations (PTAs)	OIP	–	Local planning, security of installations, and support for community oversight; facilitation of school-level engagement	High	Medium	School committee engagement; participatory planning sessions; awareness on system use, safety and reporting channels
District health management structures / District Health Management Teams (DHMTs) <i>(or equivalent)</i>	OIP	–	Support oversight of health facility selection and coordination at district level; interface between facilities and central MoH	Medium	Medium	District health review sessions; coordination meetings; dissemination of project information and eligibility criteria
Project Management Unit/Team (PMU/PMT) & Project Implementing Team (PIT) – MoE <i>(National PIU structure – ESLEAP model)</i>	OIP	–	Overall coordination; E&S supervision; implementation of SEP and ESF instruments; operation of Project-level GM; monitoring and reporting	High	High	Regular reporting; ESF compliance meetings; stakeholder engagement planning and monitoring; disclosure events
Electricity and Water Regulatory Commission (EWRC)	OIP	–	Regulatory oversight relevant to EaaS and institutional electrification; supports consultations and disclosure on regulatory requirements	High	High	Policy alignment consultations; technical meetings; dissemination of regulatory information to stakeholders
Equipment suppliers / EaaS service providers for social facilities	OIP	–	Provide solar systems, installation, O&M services; ensure service continuity and performance under contractual arrangements	High	Medium	Procurement briefings; contractor/service provider E&S requirements briefings; OHS briefings; performance and service-level consultations
Women and girls in rural areas	Vulnerable	Risk of exclusion and SEA/SH	Benefit from safer school and health environments and improved services; risk of	Hugh	Medium	Safe-space consultations; targeted outreach through women groups; clear

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest level	Influence Level	Engagement Approach
			SEA/SH during installation/operation if not managed			information on GM access (including confidential SEA/SH intake) and referral pathways
Persons with disabilities (PWDs)	Vulnerable	Risk of service inaccessibility	Require inclusive facility access and service design (lighting, accessibility, communication)	Medium	Low	Inclusive communication & design; accessible venues; engagement through disability associations where present
Marginalized / remote rural communities	Vulnerable	Risk of low participation	Often hard-to-reach; low access to information and services	High	Low	Tailored engagement plan; mobile outreach; radio and community notice boards; engagement through Chiefdom structures and local CSOs

3.2.4. Pillar 4: Implementation Support, Technical Assistance, and Capacity Building

Support to national institutions, regulatory development, market systems, and project governance

Table 4: Stakeholders rely on project management and implementation

Stakeholder Group	ESS10 Category	Impact Type	Role / Interest in Project	Interest Level	Influence Level	Engagement Approach
Project Management Unit/Team (PMU/PMT) & Project Implementing Team (PIU) – MoE <i>(National PIU structure – ESLEAP model)</i>	OIP	–	Leads national implementation and oversight; coordinates stakeholder engagement and ESF instruments; manages Project GM; ensures reporting and compliance	High	High	Steering meetings; technical coordination; reporting and disclosure
Ministry of Energy (MoE)	OIP	–	Sector policy direction; energy planning; leadership on EaaS policy for public institutions and national coordination	High	High	Bilateral coordination; inter-ministerial working sessions; policy consultations
Electricity Distribution and Supply Authority (EDSA)	OIP	–	Co-implements the Project; supports operational coordination,	High	High	Implementation coordination meetings;

			implementation oversight and interface with national electricity service operations (where relevant)			operational planning; joint field missions
Electricity and Water Regulatory Commission (EWRC)	OIP	-	Regulates licensing, tariffs and quality/service standards; leads / supports development of regulatory instruments (mini-grid regulations, licence templates, technical standards) and consultations for EaaS policy and standalone systems	High	High	Policy dialogue; regulatory consultations; technical working sessions; public disclosure support for regulatory updates
Ministry of Finance (MoF) and relevant public finance institutions	OIP	-	Oversight of public financing and budgeting aspects; coordination on financing flows and fiduciary control	High	High	Financial briefings; coordination meetings; reporting
Environmental Protection Agency (EPA-Sierra-Leone)	OIP	-	ESIA approvals/licensing; environmental compliance monitoring; oversight of national environmental requirements	High	High	Compliance meetings; ESF alignment workshops; review and monitoring coordination
Anti-Corruption Commission (ACC) - Sierra Leone <i>(Anti-Corruption Act, 2008; Amendment Act, 2019)</i>	OIP	-	National oversight for integrity, transparency and anti-corruption compliance; supports prevention, investigation and enforcement related to fraud and corruption risks, including in donor-funded projects	High	High	Integrity and compliance consultations; coordination on reporting channels; awareness and prevention sessions; collaboration on addressing alleged fraud and corruption cases
Financial Intelligence Unit (FIU) - Sierra Leone <i>(Anti-Money Laundering and Combating of Financing of Terrorism Act, 2012; AML/CFT & PF Act, 2024)</i>	OIP	-	National authority for receiving, analysing and disseminating financial intelligence related to money laundering and terrorist financing; supports AML/CFT compliance measures relevant to project financial flows, screening	High	High	ML/CFT screening and reporting procedures; coordination meetings with fiduciary actors (Fund Manager, Fiduciary Agent, MoF); capacity building /

			and reporting requirements (as applicable)			sensitisation on relevant compliance obligations
District Councils and local government structures	OIP	-	Local governance and public administration; supports local coordination, consultation logistics and dispute resolution	Medium	Medium	District coordination meetings; joint outreach planning; disclosure support
Chiefdom authorities and traditional governance structures	OIP	-	Local legitimacy; community access; dispute prevention and support to culturally appropriate engagement	Medium	Medium to High	Chiefdom dialogues; facilitation of consultations; local agreements and mediation support
Fund Manager (DARES Financing Facility)	OIP	-	Manages results-based financing (RBF) grants and private sector financing operations; ensures operational compliance and reporting	High	High	Operational coordination meetings; reporting; compliance and performance reviews
Independent Verification Agent (IVA)	OIP	-	Independently verifies results and (where applicable) safeguards compliance linked to disbursements	High	High	Independent reporting; verification missions; coordination with PIU and Fund Manager
Regional Fiduciary Agent / Fiduciary Agent (FM/Procurement)	OIP	-	Ensures financial accountability, procurement compliance and fiduciary controls across project operations	High	High	Compliance support; fiduciary reviews; training for PIU teams
Local universities and technical institutes	OIP	-	Capacity building; skills development; training and local technical support (including renewable energy training)	Medium	Medium	Academic partnerships; training programs; internships and applied research collaboration
Industry associations (solar/DRE associations, energy and MSME networks)	OIP	-	Market development; private sector coordination; feedback channel for regulatory and operational issues	Medium	Medium	Dialogue forums; market consultations; dissemination of technical standards and program opportunities

NGOs/CSOs active in governance/transparency and citizen engagement	OIP	-	Promote accountability and citizen oversight; support inclusion and communication; feedback and monitoring role	Medium	Low to Medium	Civil monitoring dialogues; partnership discussions; information dissemination support
Development partners (EU, AfDB, ECRREE, UN agencies, etc.)	OIP	-	Co-financing, technical assistance and policy coordination; alignment with national energy sector programs	High	High	Donor coordination platforms; joint technical meetings; information-sharing

4. Stakeholder engagement program

Effective stakeholder engagement is central to the success of the Sierra-Leone DARES Project, given its reliance on private sector operators and its focus on rural and peri-urban communities with limited access to reliable energy. The engagement program provides a structured approach for informing, consulting, and involving stakeholders throughout the project cycle. It combines national legal requirements, World Bank standards, and lessons from other energy access projects in Sierra-Leone. This section outlines the objectives, guiding principles, methods, and phased approach that will ensure stakeholders are meaningfully engaged and that their feedback informs project decisions.

The stakeholder engagement program for the Sierra-Leone DARES Project is designed to ensure systematic, inclusive, and culturally appropriate interactions with all stakeholder groups throughout the project life cycle. Engagement will be guided by the principles of inclusivity, transparency, accessibility, responsiveness, and accountability.

4.1. Engagement objectives

The engagement objectives define the purpose of stakeholder interactions and guide the design of activities across the project cycle. They ensure that consultations are not one-off events but an ongoing dialogue that builds trust, supports accountability, and enables adaptive management.

- To provide stakeholders with timely, relevant, and understandable information.
- To ensure affected communities and vulnerable groups have opportunities to participate meaningfully.
- To build trust between project implementers and stakeholders.
- To integrate stakeholder feedback into project design and implementation.
- To establish accessible channels for grievances and responses.
- To promote transparency and prevent risks of elite capture, fund diversion, or corruption.

4.2. Engagement principles

The principles of engagement provide the foundation for how consultations and communication will be conducted. They are aligned with ESS10 and reflect Sierra-Leone's national priorities for inclusivity, equity, and transparency.

- **Inclusivity:** Ensure participation of all groups, especially disadvantaged and vulnerable.

- **Transparency:** Share accurate and complete project information in accessible formats.
- **Accessibility:** Use local languages, community radio, and visual materials to reach remote and low-literacy groups.
- **Responsiveness:** Ensure feedback loops so stakeholder concerns influence project decisions.
- **Flexibility:** Adjust engagement methods to evolving project needs, cultural sensitivities, and security context.

In implementing the engagement plan, the following guidelines will also be followed in all activities on related to SEA/SH, and those involving minors or unaccompanied children:

- Ensure safety and security of those involved in information gathering, as well as respondents.
- No data collection from anyone who may be a SEA/SH survivor, without having the necessary information for making referral services available to them.
- No asking about personal experience during focus groups discussions
- No direct questions on SEAH/GBV. Questions to be centered on safety and security in general terms.
- Basic care and support for survivors must be available locally beforehand or before any consultations.
- Confidentiality and Consent for all discussions are paramount.

4.3. Three-stage stakeholder consultation approach under the Regional DARES MPA

In line with the Regional DARES Multi-Phase Programmatic Approach (MPA), stakeholder engagement is structured around a three-stage consultation process designed to progressively deepen participation as project decisions become more spatially and socially specific. This sequencing ensures that stakeholders are engaged at the point where decisions remain influenceable, and that consultation intensity increases as geographic footprints and potential impacts become clearer, consistent with the principles of meaningful consultation, inclusiveness, proportionality, and iterative feedback loops under ESS10.

4.3.1. Phase 1 – Strategic, regulatory, and market consultations (during preparation)

Phase 1 consultations are conducted during project preparation to address upstream technical, operational, legal, and regulatory issues critical to the feasibility and scalability of the DARES Program. Engagement at this stage focuses primarily on institutional and market stakeholders, including relevant ministries, regulators, implementing entities, environmental authorities, and private sector actors. Phase 1 supports the validation of the enabling framework, clarification of institutional arrangements, and identification of regulatory and operational actions needed prior to geographic targeting and site selection.

4.3.2. Phase 2 – Site identification and Environmental & Social Scoping (prior to detailed site selection)

Phase 2 consultations take place once the Government confirms **priority regions/zones** and, where applicable, indicative investment typologies by region. Engagement shifts to regional and district levels to support early, location-informed decision-making. In line with ESS10 and the ESMF, Phase 2 includes multi-stakeholder workshops and targeted consultations to disclose and gather feedback on siting criteria and deployment plans, identify early environmental and social risks and sensitivities, strengthen local coordination arrangements, and ensure the project grievance mechanism is known and accessible at local level. Phase 2 outputs inform subproject preparation and the design of Phase 3 engagement.

4.3.3. Phase 3 – Local and community-level engagement (during implementation)

Phase 3 consultations are subproject-specific and are carried out by DRE operators / winning bidders under PIU oversight. Engagement at this stage ensures informed participation of project-affected parties, confirms site-level arrangements (including land access where relevant), discloses service conditions and implementation schedules, and operationalizes subproject-level engagement and grievance intake points consistent with the Project GM architecture.

Across all phases, consultation outcomes are documented and disclosed in appropriate and accessible formats, and stakeholder feedback is tracked and integrated into project decisions and SEP updates, consistent with the SEP being a **living document**.

Stakeholder engagement requires a diverse set of methods tailored to different audiences and contexts. The project will employ both traditional and modern communication channels to maximize inclusivity.

4.3.4. Methods and tools

- Public meetings and community assemblies (chiefdom/village level).
- Focus group discussions (FGDs) for women, youth, and vulnerable groups.
- Key informant interviews with government officials, developers, and community leaders.
- Workshops and stakeholder forums at national and Local Government levels.
- Radio programs and call-in shows for broad outreach.
- Printed information (flyers, posters, newsletters, GM number printed on sticker on equipment and promotional paper).
- Digital communication (social media, SMS blasts).
- Participatory monitoring activities (community scorecards, feedback surveys).

4.4. Phase 1 stakeholder consultations – purpose, scope, and key outputs (common across participating countries)

Phase 1 stakeholder engagement was conducted during project preparation to address upstream technical, operational, legal, and regulatory questions that are critical to the feasibility and scalability of the DARES Program prior to geographic targeting and detailed site selection. Building on a legal and regulatory gap analysis, consultations were designed to:

- validate the compatibility of national legal and regulatory frameworks with the DARES program architecture, including decentralized renewable energy (DRE), mini-grids, solar home systems (SHS), and Energy-as-a-Service (EaaS) models.
- review and agree on regulatory amendments, clarifications, and/or harmonisation strategies required to operationalize DARES at scale.
- test the commercial viability and implement ability of proposed service delivery, tariff, and licensing arrangements with regulators and market actors; and
- delineate which issues could be resolved at framework level (Phase 1) versus those requiring area-based and subproject-level engagement in subsequent phases (Phase 2 and Phase 3), consistent with ESS10 requirements for meaningful consultation once geographic targeting and potentially affected stakeholders are known.

Phase 1 consultations engaged a broad range of institutional and market stakeholders (Other Interested Parties), including: (i) ministries responsible for energy, finance, planning, education, and health; (ii) rural electrification agencies / implementing entities and project implementation units; (iii) electricity and energy regulators; (iv) environmental authorities responsible for EIA/ESIA oversight; and (v) private sector market actors such as mini-grid and SHS/PAYGo companies, industry associations, EPC contractors, O&M providers, financiers and investors, as well as selected regional partners and technical assistance providers.

Key Phase 1 outputs include:

- validation of a technology-neutral, service-based DRE deployment approach, covering mini-grids, SHS, and EaaS solutions for households, MSMEs, and public institutions;
- broad endorsement of Results-Based Financing (RBF) and competitive allocation mechanisms as core instruments to crowd in private investment while supporting affordability and value for money;
- confirmation that existing legal and regulatory frameworks are broadly compatible with DARES but may require targeted amendments, secondary regulations, and/or contractual harmonization rather than wholesale legislative reform;
- agreement on specific regulatory recommendations (licensing regimes, tariff methodologies, ESIA proportionality, grid encroachment compensation, portfolio-level licensing, and service standards), with indicative timelines for adoption;

- where immediate regulatory change is not feasible, consensus on the use of standardized contractual templates, tariff tools, and operational guidelines to bridge remaining gaps; and
- clarification of institutional roles and sequencing, notably the respective responsibilities of implementing entities, regulators, PIUs, and private operators in licensing, tariff approval, subsidy allocation, and monitoring.

Electronic waste (e-waste) considerations were also raised during Phase 1 consultations, particularly in relation to the anticipated scale-up of SHS, batteries, inverters, and mini-grid pillars. While no site-specific solutions were defined at this stage, stakeholders agreed that Phase 2 area-based consultations will be important to inform country-appropriate e-waste collection, take-back, and recycling/disposal arrangements, including clarification of roles among operators, local authorities, and licensed waste handlers.

While the Phase 1 consultation approach and key outputs are common across participating countries under the regional DARES MPA, each country-specific SEP documents the actual consultation process undertaken during preparation through the meeting records, stakeholder participation, and consultation summaries presented in the tables below.

The findings from Phase 1 consultations were documented and will inform the iterative updating of the SEP as a living document. Key outputs will be disclosed through appropriate channels and in accessible formats, and stakeholder feedback will continue to be integrated throughout subsequent engagement phases, including the planned Phase 2 area-based consultations and Phase 3 subproject-level consultations.

Minutes of the meeting are in the annex 4

Table 5: Institutional and technical consultations conducted during project preparation

Date	Venue	Participants (#M / #F)	Key issues discussed (technical / institutional)	Relevance for project implementation and future stakeholder engagement
16 June 2025	Online (virtual meeting)	INENSUS; Sierra Leone Government (EWRC + Ministry of Energy); World Bank (approx. 7; gender balance to be confirmed)	Introduction to R-DARES (DRE + EaaS for public institutions); clarification of regulatory gaps, particularly for EaaS; licensing requirements for renewable energy systems (mini-grids, SHS); confirmation of "legal vacuum" for EaaS models under existing mini-grid/captive power frameworks; discussion of options (new regulation vs. adapting existing frameworks); agreement on continuing weekly technical calls.	Established the initial institutional alignment on the need to develop a dedicated policy/regulatory pathway for EaaS; clarified licensing expectations and the need to communicate them clearly to private operators; confirmed follow-up consultation mechanism to maintain stakeholder engagement and regulatory coordination.
24 June 2025	Online (virtual meeting)	INENSUS; Sierra Leone Government (EWRC + Ministry of Energy); (consultation summary)	Clarification on SHS regime ("free regime" for household SHS); need for an EaaS policy draft as basis for future EaaS regulation; confirmation of openness to private ownership/operation and performance-based procurement; discussion on NEP validation timeline; clarification that bilateral financing agreements may supersede national procurement law; local content requirements and waivers; technology-agnostic regulatory framing (mesh grids, SHS, MG); mini-grid licensing thresholds (<100 kW) and discussion on possible revision; stabilization clause discussion linked to investor risk and MIGA guarantees.	Supported the design of enabling regulatory measures and procurement approach for implementation; identified key policy messages that must be integrated into disclosure/communication; confirmed that stakeholder engagement during implementation should clarify licensing categories, threshold interpretation and local content pathways to reduce community and investor disputes.
30 June 2025	Online (virtual meeting)	INENSUS; Ministry of Energy; SE4All (approx. 5; gender balance to be confirmed)	Divergent understanding regarding the adoption status of Mini-Grid Regulations (passed vs. still negotiable); confirmation that earlier regulatory recommendations were drafted prior to structured consultations; agreement for SE4All to share the final	Helped reconcile information flows and ensure that subsequent stakeholder engagement and disclosure are based on accurate regulatory status; informed the need for clear sequencing and communication strategy to avoid misinformation during implementation.

Date	Venue	Participants (#M / #F)	Key issues discussed (technical / institutional)	Relevance for project implementation and future stakeholder engagement
			regulatory draft for review and alignment before the next call.	
28 July 2025	Online (virtual meeting)	EWRC; World Bank; INENSUS / R-DARES team (approx. 5; gender balance to be confirmed)	Update on EWRC Act 2025 and Solar Mini Grid Regulation 2025 (Act passed; MG regulation submitted to Parliament); discussion on Parliament request to review license templates; EWRC preference to keep templates outside regulation for flexibility; amendment authority for license agreement to be confirmed; agreement that stabilization clause will be added to license agreement post-adoption; confirmation of basic license for systems <100 kW and portfolio licensing >100 kW per site; acknowledgement of regulatory vacuum for standalone EaaS for public institutions; confirmation that EWRC can draft licensing templates if MoE policy exists; agreement on preparing bullet points for EaaS policy; recommendation to keep policy discussions initially closed-door with MoE leadership.	Clarified the pathway for regulatory finalization and stakeholder engagement sequencing; confirmed that EaaS policy development is a prerequisite for scalable implementation; shaped the institutional approach for targeted consultations (EWRC + MoE) and defined next steps to integrate regulatory updates into implementation guidance and grievance management arrangements.
4 August 2025	Online (virtual meeting)	EWRC DG; World Bank; INENSUS (approx. 5; gender balance to be confirmed)	Confirmation that MG regulation still pending in Parliament (delays); no clarity yet on EWRC authority to amend license agreements; Electricity Act 2025 passed but pending Presidential signature; EaaS policy bullet points shared for early discussions; suggestion to form a local technical team supported by WB; licensing threshold discussion and clarification (kWh vs kW); local content law discussed (no specific % for energy sector).	Supported risk management and adaptive stakeholder engagement planning under regulatory uncertainty; reinforced need for local expertise in policy development; highlighted key messages requiring careful disclosure to avoid confusion (licensing threshold units, regulatory status and timelines).

Date	Venue	Participants (#M / #F)	Key issues discussed (technical / institutional)	Relevance for project implementation and future stakeholder engagement
8 September 2025	Online (virtual meeting)	EWRC; World Bank; INENSUS (approx. 6; gender balance to be confirmed)	Mini-grid regulation laid in Parliament for 21 working days (expected end Sept 2025); license terms & conditions confirmed as addendum and potentially adaptable; EaaS policy development endorsed by EWRC Chairman and Deputy Minister; requirement for local involvement (energy specialist/lawyer); Cabinet approval required for policy (not Parliament), compatible with early 2026 rollout; agreement that programme-level technical standards can be referenced in license agreements; clarification of exclusivity for duration of license; update on EWRC Act passed and awaiting signature; planning of WB country office meetings with Health/Education Ministries to advance EaaS pillar discussions.	Consolidated institutional consensus on implementation sequencing and future engagement strategy; confirmed approach for managing regulatory updates through flexible license addendums; defined concrete next steps (draft EaaS policy in Oct 2025, end Sept update, local support), which should be reflected in SEP monitoring and information disclosure to stakeholders.

4.5. Phase 2 consultations – government-selected priority regions and investment typologies

Phase 2 stakeholder engagement will take place once the Government confirms the priority regions/zones for DARES investments, based on agreed eligibility and prioritization criteria. Depending on regional characteristics and needs, the Government may also define priority investment typologies by region (e.g., mini-grids, standalone/household solutions, electrification of social services facilities through EaaS, and productive-use interventions).

Purpose and link to Phase 1 and Phase 3. Phase 2 is designed to establish a clear bridge between:

- (i) **Phase 1**, which focused on upstream technical, operational, legal, and regulatory consultations primarily with institutional and market stakeholders; and
- (ii) **Phase 3**, which will involve subproject-level engagement and meaningful consultations with project-affected parties once specific sites and beneficiary communities are identified.

In line with ESS10, Phase 2 consultations will focus on meaningful engagement and consultation at regional and district levels, with tailored measures to ensure the inclusion of disadvantaged and vulnerable groups (women, youth, persons with disabilities, remote or marginalized communities). Phase 2 consultations will aim to:

- Communicate Government decisions on priority regions/zones and indicative investment typologies;
- Disclose and gather feedback on proposed siting criteria and deployment approaches (including how sites will be screened and selected);
- validate regional priorities and confirm the relevance and acceptability of the proposed investment mix;
- Identify early environmental and social risks, sensitivities, and potential exclusion factors (including land tenure issues, social tensions, SEA/SH risks, misinformation, and potential conflict dynamics);
- Undertake preliminary environmental and social scoping and screening consultations aligned with the ESMF and SEP, to support proportionate risk management prior to detailed site selection;
- Agree on local coordination arrangements, community entry protocols, and a consultation calendar to guide Phase 3 subproject-level consultations; and
- Ensure that the Project Grievance Mechanism (GM) is introduced, understood, and accessible at district and chiefdom/community levels, including confidential channels for SEA/SH- and integrity-related grievances.

Documentation and feedback loops.

Outcomes from Phase 2 consultations will be documented and summarized through standardized consultation templates, attendance records (sex-disaggregated), and a feedback matrix linking issues raised to agreed follow-up actions. Key outputs will be disclosed through appropriate channels and in accessible formats. Phase 2 findings will inform project planning and sequencing, stakeholder mapping updates, tailored communication materials, and the preparation of Phase 3 engagement requirements for DRE operators and contractors.

The table below presents the planned Phase 2 consultations and coordination arrangements, including triggers, geographic scope, lead and supporting entities, stakeholder groups to be invited, consultation topics, methods and tools, expected outputs, and indicative timing. This plan will be refined once priority regions/zones and investment typologies are confirmed and will be updated as part of the SEP's iterative implementation.

Table 6 : Phase 2 consultations – Government-selected priority regions and investment typologies (planning table, standard)

Consultation stage (Phase 2)	Trigger / starting point	Geographic scope	Lead entity	Supporting entities	Stakeholders invited (regional/district level)	Key topics (tailored by region and investment type)	Methods / tools	Outputs / deliverables	Indicative timeline
2A – Regional launch consultation (per priority region/zone)	Government confirms priority regions/zones and indicative investment typologies	Each selected priority region/zone (regional hub + key districts)	National PIU (country-specific host institution)	Relevant sector ministries; district councils/local authorities; chiefdom authorities; regulator (as needed); environmental authority (as needed)	District councils/local authorities; paramount/section chiefs; community leaders; women leaders; youth groups; persons with disabilities (PWD) representatives; CSOs/CBO as the LEAP Network; MSME associations; farmer/producer groups; consumer associations (where available)	Government decision and criteria; overview of planned investment typologies; roles and responsibilities; inclusion measures; introduction of GM channels and escalation routes; early risks/sensitivities (land, SEA/SH, misinformation); next steps toward Phase 3	Multi-stakeholder regional workshop; Q&A sessions; radio announcements; distribution of simplified factsheets; disclosure posters/notice boards	Minutes and attendance list (sex-disaggregated); stakeholder mapping update for the region; risk & sensitivity log; feedback matrix (issues raised → response/action); agreed Phase 3 consultation calendar	Once per selected region/zone
2B – District/chiefdom coordination	After 2A and prior to detailed site	Target districts/chiefdoms in the selected region	National PIU + district councils/local	Chiefdom authorities; CSOs/CBOs; sector reps	District authorities; chiefdom leadership; local CSOs/CBOs;	Local entry protocols; disclosure channels and trusted	District coordination meetings; key informant interviews;	District stakeholder list; agreed local entry	1–2 rounds per selected

Consultation stage (Phase 2)	Trigger / starting point	Geographic scope	Lead entity	Supporting entities	Stakeholders invited (regional/district level)	Key topics (tailored by region and investment type)	Methods / tools	Outputs / deliverables	Indicative timeline
consultations	identification		authorities	(education/health/water)	facility committees; local service providers; vulnerable group representatives	intermediaries; local GM intake points; expectations management; security/access constraints; preparation for Phase 3	targeted FGDs (women/youth/PWD, as needed)	points; local disclosure plan; GM awareness evidence; updated risk/sensitivity log	region/zone
2C – Sector consultations for social services electrification (EaaS)	If EaaS/social facilities electrification is prioritized in the region	District level + relevant line ministries	National PIU	Relevant line ministries; district health/education teams; WASH units	Facility managers (schools/health centers); school management committees/PTA; district health teams; water user committees; local authorities	Facility selection criteria; responsibilities for O&M/security; accessibility/inclusion; management of expectations; GM access; SEA/SH risk awareness	Sector planning sessions; facility-level meetings; targeted consultations	Candidate facility list and prioritization rationale; agreed responsibilities and O&M arrangements; consultation records; feedback matrix	Once per selected region/zone where applicable
2D – Productive-use consultation	If productive-use intervention	District hubs /	National PIU	Agriculture extension services;	Farmers; producer organizations/co-operatives;	Value chain priorities; productive-use equipment	Roundtables; demonstrations (where feasible);	Productive-use needs assessment note;	Once per selected

Consultation stage (Phase 2)	Trigger / starting point	Geographic scope	Lead entity	Supporting entities	Stakeholders invited (regional/district level)	Key topics (tailored by region and investment type)	Methods / tools	Outputs / deliverables	Indicative timeline
ns (Pillar 2)	ons are prioritized in the region	value-chain clusters		cooperatives; CSOs; MFIs	agribusiness; rural MSMEs; MFIs; women/youth entrepreneurs	needs; financing constraints; siting considerations; land sensitivities; inclusion and affordability	FGDs (women/youth groups); SME outreach sessions	updated stakeholder mapping; tailored outreach plan; feedback matrix	region/zone where applicable
2E - Private sector / market consultations (regional or national)	After investment typologies and implementation approach are confirmed; repeated per grant cycle	National + regional hubs	Fund Manager + National PIU	Regulator; sector ministry; PIU communications; relevant agencies	DRE/EaaS providers; suppliers; MFIs; industry associations; EPC/O&M firms	Requirements for Phase 3 consultations; E&S screening and reporting obligations; GM requirements (subproject entry points); integrity/AML expectations; consumer protection; e-waste responsibilities (take-back / collection mechanisms)	Briefings; webinars; technical sessions; Q&A clinic	Updated guidance package for operators (Phase 3 checklist); Q&A log; disclosure materials; training attendance records	At least once early + per grant cycle

4.6. Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement

This section provides a consolidated summary of stakeholder engagement needs and the corresponding methods, tools, and techniques to be applied at different stages of the project cycle. It serves as an operational planning tool to ensure that relevant stakeholder groups receive timely, appropriate, and accessible information, and that engagement activities are conducted in a consistent and structured manner throughout project preparation, implementation, and monitoring.

This summary is aligned with the three-stage consultation approach adopted under the Regional DARES MPA (Phase 1 – strategic/regulatory consultations; Phase 2 – area-based consultations and environmental and social scoping; Phase 3 – subproject-level engagement and community consultations). While Phase 1 engagement is largely completed during preparation and documented through consultation records, Phases 2 and 3 will be implemented as the Government confirms priority regions/zones and as specific subprojects are identified and rolled out.

The table below identifies stakeholder groups that are concerned by, or are recipients of, engagement activities at each project stage, including Project-Affected Parties (PAPs), Other Interested Parties (OIPs), and vulnerable or disadvantaged groups requiring tailored engagement measures. The inclusion of institutional actors in this summary reflects their need to receive information, data, and outputs generated through stakeholder engagement processes (including disclosure and reporting) and to coordinate on implementation aspects. It does not imply consultation for validation purposes, decision-making authority, or endorsement roles, unless explicitly provided for under applicable legal and institutional mandates.

Implementation of these engagement activities will be monitored by the PIU through consultation logs, disclosure records, and GM reporting, and will be reflected in quarterly and annual SEP implementation reports.

Table 7 : Summarizes engagement by project stage, stakeholders, topics, methods, responsibilities, and frequency

Project stage	Target stakeholders	Topic of consultation / message	Methods, tools and techniques	Responsibilities	Frequency / timeline
Preparation (Phase 1 and early Phase 2 planning)	General public; national authorities (MoE, EWRC, EPA-SL); District Councils and Chiefdom authorities; DRE/EaaS companies; EDSA-hosted PIU (PMU – existing structure); Regional Coordination Unit (RCU)	Project objectives and scope; eligibility criteria; environmental and social requirements; stakeholder engagement framework; grievance mechanism principles; key regulatory messages (licensing, tariffs/service conditions as applicable); overview of planned consultation phases	Public meetings; technical workshops; document disclosure via websites, radio and local notice boards; targeted briefings with sector ministries (e.g., Health/Education for EaaS); publication of key project information in accessible formats	PIU (MOE/PMU); RCU; (oversight); EWRC (regulatory inputs)	Project launch; as needed during preparation
Grant Application & Review (pre-implementation)	Private developers/service providers; (MOE PIU /PMU); Fund Manager; EWRC (as relevant to licensing/regulatory requirements); potential host communities (information disclosure); Independent Verification Agent (IVA)	Grant eligibility criteria; E&S screening requirements; community engagement obligations (Phase 3 requirements); GM requirements (including local entry points and escalation); licensing/regulatory compliance requirements (as applicable); integrity/AML	Information sessions; bilateral meetings; publication of eligibility and E&S criteria; disclosure of subproject engagement requirements and GM entry points; standardized guidance package for operators (as applicable)	Fund Manager (review); PIU (information and guidance); EWRC (regulatory clarifications as needed)	Per grant cycle

Project stage	Target stakeholders	Topic of consultation / message	Methods, tools and techniques	Responsibilities	Frequency / timeline
		expectations (as applicable)			
Implementation (Phase 3 subproject-level engagement)	Communities; MSMEs; schools; health facilities; water user committees; District Councils; Chiefdom/community leaders; vulnerable groups; DRE/EaaS providers; PIU (MOE/PIU)	Connection procedures; tariffs/service conditions; construction impacts and mitigation measures; community expectations; safety and OHS messages; GM access and procedures (including confidential channels for SEA/SH); inclusion measures; e-waste and end-of-life equipment handling messages (as applicable)	Community meetings; focus group discussions; surveys; local radio communication; facility-level engagement (schools/clinics/water systems); site signage and disclosure materials; targeted outreach to vulnerable groups; subproject-level engagement checklist and reporting	PIU (oversight and monitoring); Community Liaison Officers (CLOs)/social mobilization teams; DRE/EaaS providers (subproject-level engagement); District/Chiefdom structures (facilitation)	Quarterly and as needed (with intensified engagement during mobilization and construction phases)
Verification & Monitoring	Communities; CSOs/CBOs; DRE/EaaS operators; District authorities; MOE/PIU (PMU); Independent Verification Agent (IVA)	Verification of commitments; compliance with E&S and engagement obligations; feedback on project performance; grievance trends and resolution effectiveness; lessons learned and corrective actions	Field visits; spot checks; monitoring missions; beneficiary feedback surveys; disclosure of summary results (non-sensitive); review of operator engagement records and GM functionality	IVA (verification); PIU (follow-up and reporting); Fund Manager (as applicable for RBF)	Semi-annual (or aligned with disbursement verification cycles)

Project stage	Target stakeholders	Topic of consultation / message	Methods, tools and techniques	Responsibilities	Frequency / timeline
Capacity Building	District authorities; Chiefdom/community leadership structures; CSOs/CBOs; women and youth groups; DRE/EaaS providers; MOE-PIU (MOE/PIU/PMU); RCU; CLOs/social mobilization teams; GM focal points/operators; project workers/contractors (as applicable)	Energy literacy; stakeholder engagement practices; GM awareness and operation; SEA/SH prevention and mitigation; inclusion of vulnerable groups; Code of Conduct; case reporting, management and referrals; data confidentiality and responsible information management	Training sessions; workshops; awareness campaigns; practical tools and guidelines; peer-learning sessions	PIU; RCU; NGOs/CSOs (as relevant); EWRC (regulatory capacity sessions where needed)	Semi-annual (and as needed based on implementation schedule and risk profile)

4.7. Proposed strategy to incorporate the views of vulnerable groups

Engagement with vulnerable groups will use tailored strategies to overcome barriers to participation: separate meetings for women and youth; accessible venues for persons with disabilities; use of local translators and community radio; and confidential SEA/SH reporting channels within project GM at all levels. CLOs will proactively identify vulnerable stakeholders and track their participation in consultation logs (Kobo).

Engagement approaches in rural communities will prioritize oral communication methods, culturally appropriate facilitation, and the use of trusted community structures. Special attention will be given to the inclusion of women, youth, and groups traditionally excluded from decision-making processes.

4.8. Adaptive engagement (Living SEP)

The SEP is designed as a living instrument to ensure that stakeholder engagement remains responsive to evolving project conditions, emerging risks, and stakeholder feedback throughout the Project lifecycle.

In accordance with the Environmental and Social Commitment Plan (ESCP), the SEP shall be updated by the PIU within two (2) months of the Project Effective Date and resubmitted to the World Bank for approval. Thereafter, the SEP shall be reviewed periodically and revised as necessary to reflect the engagement of new stakeholders, changes in stakeholders' consultations, adaptive management of Project changes, unforeseen circumstances, or implementation performance.

4.8.1. Review triggers and frequency

Following the initial update required under the ESCP, the SEP will be reviewed by the PIU and resubmitted to the World Bank for approval:

- At least annually during Project implementation.
- Following significant changes in Project scope, design, institutional arrangements, or geographic focus.
- Where monitoring findings, stakeholder feedback, grievance trends, or incidents indicate the need to adjust engagement strategies.

4.8.2. Responsibility for review

The Project Implementation Unit (PIU), hosted within the Ministry of Energy, shall be responsible for conducting the review of the SEP.

The Environmental and Social Specialists within the PIU shall:

- Assess the effectiveness of stakeholder engagement activities.
- Review stakeholder identification and engagement approaches.

- Consolidate inputs from consultation records, grievance data, monitoring reports, and supervision findings.
- Prepare proposed revisions to the SEP where required.

The PIU Coordinator shall validate the revised draft prior to submission.

4.8.3. Approval and disclosure

In accordance with the ESCP, any revision of the SEP shall be submitted to the Association for prior written agreement.

Following receipt of such agreement, the updated SEP shall be:

- Formally adopted by the Ministry of Energy.
- Publicly redisclosed through the same channels as the original SEP.

No revised version of the SEP shall be implemented prior to obtaining the Association's written agreement.

4.8.4. Documentation and version control

Each revised version of the SEP shall:

- Indicate the revision date and version number.
- Include a summary of changes introduced.
- Be archived by the PIU to ensure traceability and institutional continuity.

Through this structured process, stakeholder engagement under the Project shall remain consistent with ESS10 requirements and fully aligned with the obligations set out in the ESCP.

4.9. Stakeholder engagement at the subproject level

In line with the three-phase consultation approach described in Section 4.12, Phase 3 is the engagement of stakeholders at the **subproject level** once specific sites, beneficiary communities, and local implementation arrangements are identified. This phase is essential to ensure **meaningful consultation and information disclosure** with Project-Affected Parties (PAPs) and other relevant local stakeholders, confirm site-level expectations and risks, and operationalize accessible grievance intake points. Subproject-level engagement will be implemented by DRE/EaaS operators under PIU oversight and will be documented through standardized tools and reporting requirements consistent with ESS10.

While the SEP defines the overall framework for stakeholder engagement at the national and regional levels, the Sierra Leone DARES Project also requires each subproject implemented by private operators (DRE/EaaS companies) to undertake stakeholder engagement activities at **site and community level**. This requirement is essential to ensure that local stakeholders

are informed and consulted on specific interventions, that local risks and sensitivities are identified early, and that communities have accessible channels to raise questions and concerns related to the subproject.

To operationalize this requirement, the Project will establish a standardized Subproject Stakeholder Engagement Checklist to be completed by each DRE/EaaS company as part of subproject preparation and implementation. The checklist will serve both as:

- a guide for minimum engagement and disclosure requirements; and
- a reporting tool to document compliance and enable PIU supervision, consistent with ESS10.

Minimum requirements for subproject-level stakeholder engagement include:

- Identification and mapping of local stakeholders, including Project-Affected Parties (PAPs), local authorities, traditional/community leaders, vulnerable groups, and relevant CSOs/CBOs. At a minimum, two consultations will be conducted at subproject level:
 - (i) an initial consultation to inform communities about proposed activities, timelines, and siting considerations; and
 - (ii) a follow-up consultation to discuss planned commitments, expected benefits, potential disturbances, mitigation measures, community expectations, and limitations or constraints of the intervention.
- Disclosure of key subproject information in accessible formats and local languages as needed, including tariffs and service conditions, safety messages, implementation schedules, and the local grievance mechanism (GM) entry points and escalation pathways.
- Maintenance of a simple record of consultations, including minutes, attendance lists (sex-disaggregated), photos, signed forms, and a short summary of issues raised and responses provided (feedback loop).
- Submission of the completed checklist and supporting documentation to the National PIU for verification, record-keeping, and inclusion in project reporting.

Supervision and accountability

- The Fund Manager will review subproject stakeholder engagement documentation (including the completed checklist) as part of the grant application and approval process, where applicable.
- The National PIU will provide guidance to DRE/EaaS companies, compile and archive the documentation, track compliance, and integrate subproject engagement reporting into national SEP implementation reports.

- The Independent Verification Agent (IVA) will verify, through spot checks and field missions, that engagement obligations have been fulfilled at the community level and that the GM is accessible and functional.

Subproject-level stakeholder engagement requirements will be reflected in relevant procurement/grant documentation and contractual arrangements to ensure enforceability and consistent implementation. By ensuring that stakeholder engagement is implemented not only at the programmatic level but also at the subproject level, the Sierra Leone DARES Project reinforces transparency, accountability, and community trust across all scales of intervention.

5. Resources and responsibilities for implementing stakeholder engagement

Effective stakeholder engagement requires clear coordination mechanisms, defined roles, and adequate resources. This section defines the institutional responsibilities for implementing the Stakeholder Engagement Plan (SEP) for the Sierra Leone DARES Project, along with the human and financial resources required to ensure inclusive, transparent, and accountable engagement throughout the project lifecycle.

5.1. Regional-level roles and stakeholder engagement

While stakeholder engagement is implemented at the national level in each participating country, coordination at the regional level ensures alignment across the multi-country DARES Program. Regional entities provide technical guidance, fiduciary oversight, and quality assurance, but they do not interact directly with project-affected parties at the community level in Sierra Leone. Direct engagement with stakeholders is conducted by the national implementing entity and the private sector implementers at the subproject level.

Table 8 : Roles of regional entity in the stakeholder engagement

Regional Entity	Role	Engagement Modality
Regional Coordination Unit (RCU)	Provides technical guidance on Environmental and Social Framework (ESF) compliance, including ESS10 implementation; consolidates SEP progress reporting from national PIUs and supports quality assurance across countries.	Quarterly virtual coordination meetings with the Sierra Leone MOE/PIU (hosted PMU); review of national SEP progress and reporting.
Fund Manager	Manages the regional Results-Based Financing (RBF) facility and screens private companies for eligibility, including minimum E&S requirements. Reviews grievances related to grant eligibility and compliance (via PIU referral only). Ensures financial transparency and integrity. Handles integrity-related grievances (fraud, corruption, AML/CFT) referred by the PIU; provides fiduciary oversight and supports strengthened compliance procedures.	Technical exchanges with the PIU on private sector pipeline; joint information sessions for DRE/EaaS companies; supports fiduciary compliance and integrates integrity/AML-CFT checks with SEP and GM processes.
Independent Verification Agent (IVA)	Verifies RBF results and assesses compliance with SEP and Grievance Mechanism (GM) requirements at subproject level, including verification of stakeholder engagement activities and disclosure requirements.	Field verification missions: validation reports shared with the PIU and the World Bank; follow-up meetings with the PIU to address findings and corrective actions.

Regional engagement remains coordinative only. All stakeholder engagement activities in Sierra Leone are implemented at the national level by the Project Implementation Unit (PIU). and by the DRE companies

5.2. National Level

The Environmental Protection Agency (EPA-Sierra Leone) is mandated to regulate the environmental licensing and ESIA process and to ensure compliance with public participation requirements during environmental assessment and permitting.

Developers and project entities are generally expected to:

- Submit Terms of Reference (ToRs) for ESIA studies to the EPA for review and approval, where required.
- Conduct consultations during the scoping, draft, and final phases of the ESIA process, including engagement with affected communities and relevant stakeholders.
- Provide evidence of stakeholder engagement as part of the ESIA submission package (e.g., meeting minutes, attendance lists, disclosure records, stakeholder feedback summaries)

- Document how stakeholder comments and concerns have been addressed, including the integration of mitigation measures into project design and ESMPs.

For the Project, these requirements reinforce the need to conduct early and continuous consultations, document stakeholder inputs, and demonstrate responsiveness to concerns in line with ESS10.

The SEP will be implemented under the leadership of the Ministry of Energy (MoE) through its Project Implementation Unit (PIU). The PIU is the main entity responsible for planning, coordinating, implementing, and reporting stakeholder engagement activities in Sierra Leone, including information disclosure, consultations, inclusion of vulnerable groups, and the operation of the Project-level Grievance Mechanism (GM), in line with national requirements and the World Bank Environmental and Social Framework (ESS10 and relevant ESF instruments).

Table 9: Roles of national entity in the stakeholder engagement

Institution	Responsibilities
Ministry of Energy (MoE)	<p>Provides overall policy oversight and strategic guidance for the Project; leads high-level coordination with Government stakeholders (including sector ministries relevant to EaaS such as Health and Education); ensures alignment with national energy sector priorities. The Project will leverage existing Project implementation arrangements used under ESLEAP (P171059) project at the ministry.</p> <p>implements the Project in line with the ESLEAP institutional arrangement; provides operational coordination and implementation support for field-level activities where applicable; supports information disclosure and engagement with end-users, communities, and service providers, building on MoE established stakeholder engagement practices.</p>
Project Implementation Unit/Team (MOE-PIU)	Functions as the National Project Implementation Unit (PIU) for the Project. Leads the implementation of the SEP and related reporting; ensures stakeholder consultation, disclosure, accessibility and inclusion; coordinates the stakeholder engagement program with local authorities and community structures; leads overall operation of the Project-level Grievance Mechanism (GM) in line with ESS10.
Electricity and Water Regulatory Commission (EWRC)	Provides regulatory oversight relevant to the Project (mini-grids/DRE licensing, regulatory reforms, EaaS policy development); supports stakeholder engagement and disclosure of regulatory information; contributes to consultations on regulatory instruments (licence templates/terms and conditions, technical standards referenced in agreements).
Environmental & Social Specialists (E&S) – PIU	Coordinate SEP implementation; prepare consultation plans and tools; document stakeholder engagements; ensure compliance with ESS10 and other applicable standards (e.g., SEA/SH risk management and referral pathways); support integration of SEP requirements into contractor/service provider obligations.
GBV/SEA/SH Specialist / Focal Point – PIU	Supports SEA/SH-sensitive engagement and grievance handling; ensures survivor-centered approach, confidentiality, and appropriate referral pathways; supports awareness and mitigation measures during implementation.
Grievance Mechanism (GM) Focal Point – PIU	Manages grievance intake, resolution process, documentation, and reporting; ensures the GM is accessible, confidential, and responsive, including for sensitive grievances; ensures continuous monitoring of grievance trends and timely escalation of complex cases.
Communications and Outreach Officer – PIU	Develops and disseminates project information (including accessible formats); leads awareness campaigns; supports disclosure requirements and proactive communication to stakeholders and communities.
Community Liaison Officers (CLOs) / Social Mobilization Teams (PMU/PIU or contracted as needed)	Facilitate consultations at local level; conduct community mobilization; support grievance intake and follow-up as an entry point for the GM; ensure outreach to vulnerable and hard-to-reach groups; coordinate with Chiefdom structures.

District Councils and Local Authorities	Facilitate engagement at the district level; support information disclosure; assist in dispute prevention and resolution; provide administrative coordination for consultations and local feedback loops.
Chiefdom authorities (Paramount Chiefs, Section Chiefs, Village Heads) and community leaders	Enable local acceptance and culturally appropriate engagement; facilitate access to communities; support participation of vulnerable groups; support grievance mediation at the community level when appropriate, while ensuring all grievances are formally registered and tracked by the PMU/PIU GM system.
Civil Society Organizations (CSOs) and Community-Based Organizations (CBOs)	Support community outreach, inclusion of vulnerable groups, and awareness-building; contribute to feedback collection and dissemination of project information.
Private sector actors (DRE/EaaS service providers)	Conduct stakeholder engagement at the subproject level following PMU/PIU guidance and SEP tools; disclose subproject information; establish subproject-level GM entry points consistent with the Project GM architecture; ensure contractor/community engagement obligations are met.

5.3. Modalities for SEP Implementation

The following operational modalities will guide stakeholder engagement activities:

- Development of a communication and consultation plan updated annually
- Disclosure of project information in English and local languages
- Consultations during planning, implementation, and monitoring
- Inclusion strategies for vulnerable and disadvantaged groups
- Coordination meetings with national and local stakeholders
- Documentation of stakeholder engagement through Kobo Toolbox and field reports
- Integration of stakeholder feedback into project decision-making
- Grievance Mechanism operation at national and community level
- Quarterly reporting to MoE and the World Bank

5.4. Human Resources for SEP Implementation

SEP implementation will be supported by the following dedicated personnel:

- 1 Social and Gender-based Violence (GBV) Specialist
- 1 Communications & Outreach Officer
- 1 GM Focal Point
- 4–6 Community Liaison Officers (CLOs)
- Technical support (gender/SEA–SH specialist, facilitation experts) as needed

5.5. SEP Implementation Budget

An indicative budget of **USD 969,500** has been allocated to support SEP implementation. The budget covers stakeholder consultation costs, communication, grievance redress operations, capacity-building, and monitoring. The budget will be refined during project appraisal and integrated into the National PIU Annual Work Plan.

6. Grievance Mechanism

The Grievance Mechanism (GM) for the Sierra Leone DARES Project is a structured, accessible, and transparent system that allows project stakeholders to submit complaints, concerns, inquiries, or suggestions related to project activities. The GM enables the Project Implementation Unit (PIU) to receive, register, assess, and resolve grievances in a timely and fair manner, while promoting accountability and preventing project-related risks, including social tension, exclusion, misconduct, fraud, and abuse.

The GM applies to all pillars of the Sierra Leone DARES Project and covers grievances related to project impacts, access to project benefits, service delivery by Distributed Renewable Energy (DRE) / Energy-as-a-Service (EaaS) companies, labor issues, land access, exclusion of vulnerable groups, environmental and social risks, financial integrity concerns, and cases of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).

The mechanism operates nationwide and is centralized at the National PIU hosted by the Electricity Distribution and Supply Authority (EDSA), with community-level accessibility ensured through Community Liaison Officers (CLOs) / social mobilization teams, District Councils and Local Authorities, and Chiefdom and community leadership structures. The PIU is the sole entity authorized to formally register and track grievances to prevent manipulation, suppression, or conflict of interest by any intermediary, including private developers or service providers. Grievances may be received locally through multiple channels; however, all cases must be formally registered and managed through the PIU grievance tracking system to ensure traceability, confidentiality, and consistent follow-up.

If grievances are not resolved satisfactorily at the project level, complainants may escalate their concerns through existing national channels and/or submit complaints to the World Bank's Grievance Redress Service (GRS). Complaints may also be referred, as appropriate, to relevant regional-level project entities (e.g., Regional Coordination Unit, Fund Manager, and fiduciary oversight actors) in cases related to grant eligibility, integrity, or compliance, while ensuring that the complainant's confidentiality is protected.

Where relevant, the Project GM will coordinate with existing grievance handling arrangements within the Ministry of Energy PIU and relevant government institutions, including referral pathways for SEA/SH cases and integrity-related complaints, while ensuring full compliance with ESS10 requirements and the survivor-centered approach for SEA/SH-related cases.

6.1. Objectives and Principles

The objective of the GM is to strengthen project transparency, enable trust-based communication with communities, and prevent conflict through early identification and resolution of project-related concerns.

6.1.1. Objectives

The GM aims to:

- Provide safe, accessible, and inclusive grievance channels for all stakeholders.
- Ensure systematic registration and tracking of all grievances in the GM Information System (GMIS);
- Resolve grievances fairly, transparently, and in a timely manner.
- Refer sensitive cases (SEA/SH, corruption, AML/CFT) through specific confidential protocols; and to relevant and accessible service providers/ local complaints and redressal systems.
- Promote constructive dialogue and social cohesion in project areas.
- Use grievance trends to improve project implementation and prevent recurrence.
- Grievances related to fraud, corruption, or AML/CFT risks will follow a separate confidential process and may be referred to relevant national authorities.
- Complainants retain the right to access administrative and judicial remedies at any stage of the process.

6.1.2. Guiding Principles

The Sierra-Leone DARES GM is based on the following principles:

Table 10 : Principle of the regional DARES GM

Principle	Description
Accessibility	Multiple safe channels (local, phone, online) without barriers of cost, literacy, location, or gender
No retaliation	Complainants are protected from intimidation or retaliation
Confidentiality	Sensitive complaints handled under strict confidentiality
Centralized intake	All grievances officially logged at PIU level to prevent interference
Fair resolution	Complaint handling guided by neutrality and respect
Transparency	Each case tracked with a unique number and status updates
Responsiveness	Clear service standards for acknowledgment and resolution
Appeal rights	Every complainant may escalate a grievance if not satisfied

6.2. Institutional arrangements

The Grievance Mechanism (GM) relies on clear institutional responsibilities to ensure that grievances are received, processed, and resolved in a timely and accountable manner. The GM is managed at national level and coordinated with entities at local and regional levels as required.

Table 11 ; Institutional arrangements and roles for the grievance mechanism

Institution / Entity	Responsibility within the GM
National PIU (MOE)	The PIU is the official registration and coordination authority of the GM. Grievances may be received locally by CLOs or community structures but must be formally recorded through the PIU GMIS Can also serves as intake for grievances, registers Must tracks all cases in the GM Information System (GMIS); refers grievances to the appropriate entity for resolution; validates resolution with complainants; ensures documentation
GM Focal Point (within PIU)	Manages day-to-day GM operations, including intake verification, classification, referrals, resolution tracking, communication with complainants, and preparation of GM reports
Community Liaison Officers (CLOs)	Serve as local access points for grievances at community level; support filing of cases; facilitate awareness and inclusion of vulnerable groups; ensure transmission of complaints to the PIU
District Councils + Chiefdom/community structures.	Support CLOs in grievance communication and facilitate local dialogue where needed
DRE Companies	Address grievances related to service delivery, tariffs, installation works, labor issues, or local impacts at the project site level when cases are referred to them by the PIU
Fund Manager (Regional Level)	Handles grievances related to Results-Based Financing (RBF) grant eligibility criteria and performance-based payments Addresses grievances related to financial irregularities, fraud, corruption, or potential money laundering, in coordination with the Financial Intelligence Unit (FIU) if required
Independent Verification Agent (IVA)	Conducts independent verification of grievance resolution and carries out spot checks to ensure fair handling
Regional Coordination Unit (RCU)	Consolidates grievance reports submitted by national PIUs and oversees consistency of GM performance across countries
National legal system	Complainants may seek recourse through national judicial or administrative systems at any time, should they not be satisfied with the project GRM
World Bank	Provides oversight and may receive escalated grievances through the Grievance Redress Service (GRS) if complainants are not satisfied with project-level resolution

6.3. Grievance Uptake Channels and Accessibility

The Sierra-Leone DARES Grievance Mechanism is designed to be accessible to all stakeholders, including individuals with low literacy, those in remote locations, and members of vulnerable groups. Multiple channels are available to ensure that grievances can be submitted safely and without barriers. Cases may be submitted anonymously if requested by the complainant.

Grievances may be submitted through any of the following channels

Table 12 : Grievance mechanism uptake channels and responsible entities

Community Liaison Officers (CLOs)	In-person submission at community level during meetings or field visits	CLOs (forward to PIU)
Local authorities	Submission through town chiefs, elders, or district offices	CLOs and PIU
GM Hotline	Toll-free or standard call line managed by the PIU	PIU GM Focal Point
SMS/WhatsApp line	Allows discreet communication and simplified submissions	PIU GM Focal Point
GM Email	Dedicated project email for written complaints	PIU GM Focal Point
Web form/online submission	Digital submission through project or EDSA website	PIU GM Focal Point
Suggestion/complaint boxes	Boxes located in public facilities such as schools, clinics or local offices	CLOs (secure collection and transfer)
Written letters	Delivered directly to the PIU office at MOE headquarters	PIU Secretariat
Referral from other mechanisms	Cases referred by civil society, NGOs, traditional leaders or World Bank GRS	PIU GM Focal Point

Measures will be taken to ensure accessibility:

- Information on the GM will be disclosed in plain language in English and relevant local languages (e.g., Krio, Temne, Mende, Limba, and others as appropriate depending on the target districts and communities).
- Community Liaison Officers (CLOs) / social mobilization teams will receive training on inclusive grievance support, including how to assist complainants who are unable to read or write.
- Vulnerable groups, including women, youth, persons with disabilities, and remote communities, will receive targeted awareness activities and dedicated focus group discussions to ensure they can freely express their views and concerns.
- Anonymous reporting will be permitted to protect complainants from retaliation and to encourage reporting of sensitive issues.
- Special confidential channels will be used for sensitive cases, including SEA/SH-related grievances and integrity-related complaints (e.g., fraud, corruption, and other financial misconduct), with strict confidentiality protocols and restricted access to case information.

6.4. Grievance Resolution Procedure

The Sierra Leone DARES Grievance Mechanism follows a structured and time-bound process to ensure consistency, traceability, fairness, and transparency. All grievances are handled according to the steps below. No grievance may be rejected or dismissed without registration and follow-up by the PIU. DRE companies and contractors will address grievances at first level related to service delivery, installation works, and local impacts, under the oversight of the PIU and within a centralized grievance management system.

Table 13 : Grievance resolution process

Step	Description	Timeframe	Responsibility
Step 1: Uptake	Grievance received through CLOs, hotline, SMS/WhatsApp, email, website, written letter, or grievance box	Day 0	CLOs and PIU
Step 2: Registration and Acknowledgment	PIU logs the case in the GM Information System (GMIS), assigns tracking number, and acknowledges receipt to complainant	Within 2 working days	PIU GM Focal Point
Step 3: Screening and Categorization	Complaint classified by type (service, land, labor, environment, SEA/SH, AML/CFT, etc.) and urgency	Within 2 working days	PIU GM Focal Point
Step 4: Referral	PIU assigns complaint to responsible entity for resolution (DRE Company, Fund Manager, Fiduciary Agent, Contractor, Local Authority)	Immediately after screening	PIU GM Focal Point
Step 5: Investigation and Resolution	Responsible entity investigates and proposes resolution based on agreed standards and procedures	10 to 15 working days	Assigned entity
Step 6: Verification of Resolution	PIU contacts complainant to confirm satisfaction before closing the case. If unresolved, escalation applies	Within 5 working days	PIU GM Focal Point
Step 7: Closure or Escalation	Case closed if resolved; otherwise escalated to PIU Management, RCU, or World Bank GRS	As needed	PIU / RCU / WB GRS
Step 8: Independent Verification	IVA conducts random verification and field validation to ensure fairness	Periodically	Independent Verification Agent

A complainant may submit a grievance at any stage without fear of retaliation. Complaints may also be filed anonymously, although this may limit the ability to provide feedback to the complainant.

6.4.1. Grievance Resolution Steps detailed

The grievance resolution process outlined in Table 13 is implemented through a structured and traceable system managed by the PIU. The eight steps operate as follows:

Step 1 – Uptake

Grievances may be submitted through multiple accessible channels, including Community Liaison Officers (CLOs), hotline, SMS/WhatsApp, email, website, written submissions, or grievance boxes. Complaints may be submitted anonymously. No grievance shall be rejected at intake stage.

Step 2 – Registration and Acknowledgment

Upon receipt, the PIU GM Focal Point records the grievance in the centralized Grievance Management Information System (GMIS). A unique tracking number is assigned, and acknowledgment is communicated to the complainant within two working days, unless the complaint is anonymous.

Step 3 – Screening and Categorization

The PIU GM Focal Point reviews the grievance to determine:

- The type of complaint (service delivery, land, labor, environmental, SEA/SH, fiduciary, etc.);
- The subproject or entity concerned;
- The level of urgency and potential risk;
- Whether the complaint falls within Project scope.

SEA/SH-related complaints are handled confidentially and in accordance with the Project's SEA/SH protocol, ensuring survivor-centered response and safe referral mechanisms.

Step 4 – Referral

Based on categorization, the grievance is formally assigned through the GMIS to the appropriate responsible entity (DRE Company, Contractor, Fund Manager, Fiduciary Agent, Local Authority, or relevant PIU unit). The PIU retains oversight authority throughout the process.

Step 5 – Investigation and Resolution

The assigned entity investigates the complaint, consults relevant stakeholders as necessary, and proposes corrective actions consistent with Project standards, contractual obligations, and ESS requirements. A response must be submitted to the PIU within 10–15 working days.

Step 6 – Verification of Resolution

The PIU contacts the complainant to confirm whether the proposed resolution is satisfactory. If the complainant agrees, the grievance proceeds to closure. If not, escalation mechanisms are activated.

Step 7 – Closure or Escalation

If resolved, the case is formally closed in the GMIS.

If unresolved or disputed, the grievance is escalated (see section 6.6)

At any stage, complainants may access the World Bank's Grievance Redress Service (GRS).

Step 8 – Independent Verification

The Independent Verification Agent (IVA) conducts periodic spot checks and field validation missions to verify that grievance handling procedures are followed and that resolutions are fair and properly documented.

Access to Judicial and External Remedies

Use of the Project's Grievance Mechanism does not prevent complainants from seeking recourse through national judicial or administrative systems at any stage, should they not be satisfied with the project GRM. Further, complainants may also submit concerns to the World Bank's Grievance Redress Service (GRS) in accordance with its procedures.

6.5. Special Protocols for SEA/SH and AML/CFT-Related Grievances

Certain categories of grievances require specific handling protocols to ensure confidentiality, survivor protection, and compliance with national and international safeguards. Two sensitive types of grievances fall under this category: cases related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and grievances related to financial integrity risks, including fraud, corruption, and Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT).

6.5.1. SEA/SH Grievances

SEA/SH-related grievances shall be handled under a survivor-centered approach, in accordance with the World Bank Good Practice Note on SEA/SH and the provisions of the Project ESMF. These cases are managed through specialized procedures integrated within the Project's Grievance Mechanism.

Intake and Referral

Upon receipt of a SEA/SH complaint, the designated SEA/SH GM Focal Point or a trained Community Liaison Officer (CLO) acting as intake officer shall complete a confidential intake form. Only personnel trained in survivor-centered principles and confidentiality protocols may perform this function.

Before proceeding, the survivor's informed written consent shall be obtained. The intake officer shall document only essential information, limited to the survivor's account in their own words, age, and any potential project linkage. No detailed investigation shall be conducted at intake stage.

If the survivor is not yet connected to support services, immediate referral shall be facilitated to qualified medical, psychosocial, legal, or security service providers, in accordance with established referral pathways.

Case Management and Project Linkage Assessment

All SEA/SH cases shall be promptly referred to the PIU Social and GBV Specialist. The Specialist shall conduct a case assessment within ten (10) days to determine potential project linkage and recommend appropriate administrative actions where relevant.

Final disciplinary measures remain the responsibility of employers, while criminal accountability rests with national judicial authorities.

Survivors shall be informed of case outcomes within fourteen (14) days, subject to confidentiality constraints, and retain the right to appeal through the PIU Grievance Committee.

Reporting and Escalation

The GM Focal Point shall acknowledge receipt of the complaint within three (3) working days. SEA/SH incidents shall be reported to the World Bank in accordance with ESIRT requirements and the timelines established under the ESCP.

If the complaint is submitted through an accredited GBV service provider, communication with the survivor may be managed through that provider to ensure safety and confidentiality.

Confidentiality and Data Protection

All SEA/SH case information shall be stored separately from general GM records in a secure, restricted-access system. No personally identifiable information shall be entered into the GMIS; only anonymized case codes shall be used for tracking purposes.

Access to case information shall be strictly limited on a need-to-know basis. Protection measures shall be activated immediately to prevent retaliation.

Institutional Safeguards and Prevention Measures

Community Liaison Officers and relevant GM personnel shall receive specialized training on:

- Survivor-centered engagement and active listening.
- Secure referral procedures;
- Confidential documentation and data protection.

Additional safeguards shall apply for cases involving children under 18, including the involvement of trained professionals specialized in child protection.

DRE companies and contractors shall sign and comply with the Project's SEA/SH Code of Conduct as part of contractual obligations.

6.5.2. AML/CFT, Fraud, and Corruption Grievances

Complaints related to financial misconduct, misuse of funds, bribery, extortion, collusion, or corruption are treated as integrity grievances and handled under enhanced confidentiality and escalation procedures.

Key provisions:

- These grievances are formally registered by the PIU and referred, as appropriate, to the Regional Fiduciary Agent and/or relevant regional fiduciary oversight actors (including the Fund Manager) for initial review and follow-up, in line with project fiduciary controls.
- Where appropriate, integrity-related grievances may be referred to the Anti-Corruption Commission (ACC) of Sierra Leone for investigation and enforcement action, consistent with national legislation and institutional mandates.
- Complaints indicating possible money laundering, terrorist financing, or proliferation financing risks are referred to the Financial Intelligence Unit (FIU) (or any successor authority established under applicable AML/CFT legislation).
- The identity of the complainant and any witnesses will be protected, and information will be shared strictly on a need-to-know basis to prevent retaliation and ensure confidentiality.
- Where allegations are serious or indicate systemic integrity risks, the case may be escalated to the World Bank Integrity Vice Presidency (INT) in accordance with the World Bank's procedures.

These protocols complement the general grievance process and reinforce project accountability, fiduciary integrity, and compliance with national and World Bank requirements.

6.6. Grievance Escalation and Appeals Process

If a complainant is not satisfied with the proposed resolution at the initial handling level, the grievance may be escalated through a structured appeal mechanism. Escalation ensures impartial review and reinforces trust in the grievance process.

Table 14 : Level of escalation on the grievance mechanism

Escalation Level	Description	Responsibility
Level 1	Resolution attempted by responsible entity (e.g. DRE company, Fund Manager, contractor, or local authority) after referral from PIU	Responsible entity under PIU supervision
Level 2	Appeal to the PIU Grievance Committee for re-evaluation of the case	PIU Management and GM Focal Point
Level 3	Escalation to the Regional Coordination Unit (RCU) for independent review if dissatisfaction persists	RCU GM Coordinator
Level 4	Submission to World Bank Grievance Redress Service (GRS) as last resort	Complainant
National legal system	Complainants may seek recourse through the national legal system at anytime.	Complainant
Optional Path for Integrity Cases	Referral to WB Integrity Vice Presidency (INT) for fraud/corruption	PIU/RCU

6.6.1. Institutional Arrangements for Escalation and Appeals

The grievance escalation system operates through formally designated review bodies to ensure impartiality, procedural fairness, and accountability.

Level 2 – PIU Grievance Committee

A PIU Grievance Committee shall be established and formally designated by the Project Coordinator. The Committee shall include:

- The PIU Coordinator
- The Environmental and Social Specialist;
- The Social/GBV Specialist (where relevant);
- The GM Focal Point (Secretary, non-voting);
- A representative from the technical unit concerned (as needed).

The Committee shall review escalated grievances independently of the initial handling entity. Members directly involved in the first-level decision shall recuse themselves to prevent conflicts of interest.

The quorum for deliberation shall be at least three voting members, including the Chairperson or designated alternate. Decisions shall be taken by simple majority and formally recorded in meeting minutes.

The Committee shall issue a written determination within ten (10) working days of receiving the appeal.

Level 3 – Regional Coordination Unit (RCU)

If dissatisfaction persists, the grievance may be escalated to the Regional Coordination Unit (RCU). The RCU GM Coordinator shall conduct an independent review of the case file, assess procedural compliance, and determine whether corrective measures are warranted.

The RCU review shall be completed within fifteen (15) working days and communicated in writing to the complainant and the PIU.

Level 4 – World Bank GRS

Complainants may submit complaints directly to the World Bank’s Grievance Redress Service (GRS) at any time. Access to the GRS does not require prior exhaustion of project-level mechanisms.

Conflict of Interest and Safeguards

Any committee member with a potential conflict of interest shall recuse themselves from deliberations. All decisions shall be documented and archived within the GMIS to ensure traceability.

6.7. GM Documentation, Reporting, and Learning

To ensure transparency and accountability, all grievances received under the Sierra-Leone DARES Project will be documented and tracked in a secure digital Grievance Management Information System (GMIS) managed by the PIU. The GMIS enables real-time tracking of grievance status, category, responsible entity, resolution actions, and timelines.

Documentation requirements:

- All grievances must be registered in GMIS, including those received orally through CLOs or local authorities.
- Each case is assigned a unique tracking number.
- Resolution actions and response dates are recorded.
- Evidence of communication with the complainant is stored.
- SEA/SH cases are coded anonymously and handled separately.
- Sensitive GM data is stored with restricted access.

Reporting:

- Monthly internal GM updates are prepared for PIU management.
- Quarterly GM reports are shared with the Ministry of Energy and the World Bank as part of environmental and social reporting.
- Semi-annual public summaries are disclosed in aggregated form without personal data and published on the MOE website.
- Recurrent grievance trends are analyzed to strengthen mitigation measures and improve project performance.

Learning:

- The PIU will periodically review GM performance indicators such as resolution time, satisfaction rate, and number of escalated cases.
- Regular GM review meetings will be held with CLOs and partner entities to identify systemic issues.
- Lessons learned will inform stakeholder engagement planning and mid-term SEP adjustments.

6.8. Measures to Ensure GM Accessibility and Inclusion

The Grievance Mechanism will be designed and operated to ensure that all stakeholders, including those in remote or vulnerable situations, can access it without discrimination or barriers.

The following measures will be implemented:

Geographic accessibility

- Community-based grievance intake through CLOs deployed across counties and districts.
- Grievance boxes placed in accessible public locations such as community centers, health facilities, and schools.
- Mobile grievance support during PIU field missions to remote communities.

Cultural and social inclusion

- Engagement with traditional leaders to promote trust and acceptance of the GM.
- Dedicated awareness sessions for women's groups, youth, elders, and minority communities.
- Prevention of domination or influence by local elites over grievance submissions.

Linguistic accessibility

- GM information disclosed in English and translated verbally into local languages (e.g., Krio, Temne, Mende, Limba, and others as appropriate depending on the target districts and communities).
- Use of radio in local languages to raise awareness of grievance channels and rights.

Literacy access

- Verbal grievance submission allowed through CLOs for illiterate complainants.
- Assistance provided to fill grievance forms without any fee.
- Simplified messages included in outreach materials.

Inclusion of vulnerable groups

- Dedicated grievance outreach conducted for vulnerable groups including persons with disabilities (PWDs), widows, internally displaced families, and poor rural households.
- Confidential reporting pathways ensured for SEA/SH and sensitive grievance cases.
- No requirement of documentation or legal representation to submit a grievance.

No retaliation and confidentiality

- All complainants are protected from retaliation or intimidation.
- Identity of complainants is kept confidential upon request.
- Anonymous grievances are accepted and addressed.

6.9. Public Awareness and Disclosure of the Grievance Mechanism

For a grievance mechanism to be effective, stakeholders must be informed about its existence, purpose, procedures, and access channels. The Sierra-Leone DARES Project will actively

promote awareness of the GM at national, county, and community levels throughout the project lifecycle.

The Project Implementation Unit (PIU) will implement a GM communication plan to ensure that communities and other stakeholders are aware of their right to submit grievances. This will include:

Information disclosure methods

- Public announcements during community consultations and stakeholder meetings.
- Radio broadcasts in English and local languages explaining how to submit grievances.
- Distribution of posters, brochures, and grievance forms through local authorities and community structures.
- Posting of GM notices in public places such as town halls, schools, markets, and health centers.
- Publication of GM information on the EDSA website and project information pages.
- Integration of GM information during contract signing and onboarding of DRE companies.

Information to be disclosed

- Purpose of the GM and who can use it.
- Available grievance submission channels.
- Steps and timelines for grievance resolution.
- Rights of complainants, including confidentiality and non-retaliation.
- Special handling procedures for SEA/SH and fraud-related cases.
- Contact information for escalation to the World Bank GRS.

Visibility commitments

- GM posters will be displayed in all project-affected communities before implementation begins.
- CLOs will be responsible for continuous awareness raising during field missions.
- Private operators engaged under the DARES Project will be required to display GM information at all work and service locations.

7. Monitoring and Reporting

Monitoring and reporting are essential to ensure that stakeholder engagement activities are implemented as planned, that grievances are addressed, and that lessons learned are integrated into project management. For the Sierra-Leone DARES Project, monitoring will operate at two complementary levels: (i) programmatic monitoring by institutional actors

(MOE PIU, Fund Manager, IVA, RCU), and (ii) subproject-level monitoring conducted by private operators (DRE companies) using standardized checklists. This dual system ensures accountability at both macro and micro levels of project implementation.

Regular consultations will be held with women and girls in order to establish and then to help monitor the effectiveness of the GM procedures, including those specifically designed to address SEA/SH risks, and whether the GM is in fact accessible, safe, and adequate to address the needs and risks of women and other vulnerable social groups (persons with disabilities, minority groups, older persons, young persons and children, etc.). These consultations should not seek out or discuss personal experiences of violence or abuse of individual survivors but ask for overall feedback and suggestions for improvement.

7.1. Monitoring Objectives

The monitoring system aims to capture not only whether engagement is happening, but also whether it is effective, inclusive, and adaptive.

Objectives

- Track whether engagement activities are conducted by both national institutions and subproject operators.
- Assess inclusiveness, particularly regarding women, youth, and vulnerable groups.
- Verify that grievances are received, documented, and resolved and related systems accessible and effective.
- Ensure compliance of DRE companies with minimum engagement standards.
- Provide evidence-based feedback for adaptive management and learning.

The monitoring report during the planning and implementation phases will concentrate on the following areas:

- Engagement activities tracking all consultations and outreach efforts to take stakeholder inputs and feedback.
- Stakeholder feedback analysis categorizing input by type, location and source.
- Summary of grievance management monitoring, resolution, timelines and outcomes.
- Compliance assessment against SEP targets and indicators.
- Corrective actions documenting responsiveness to stakeholder concerns.
- Lessons learned identifying improvements for future engagement.

Monthly reports will capture routine interactions, while quarterly and annual reports will offer more detailed analyses. Monitoring reports will involve multiple data sources, including meeting documentation, grievance log summaries, feedback mechanisms, and field observations.

7.2. Roles and Responsibilities

Monitoring responsibilities are distributed across multiple levels to ensure internal accountability and independent oversight.

- **DRE Companies (Subproject Level):**
 - Complete the Stakeholder Engagement Checklist¹ during preparation and implementation of each subproject.
 - Maintain simple documentation (attendance lists, photos, meeting notes, proof of disclosure).
 - Submit the completed checklist and supporting documents to the National PIU.

- **National PIU (hosted by MOE):**
 - Overall Coordination
 - Collection and verification of checklists and documentation from DRE companies.
 - Consolidates data into quarterly national reports and updating the GMIS.
 - Employs E&S Specialists and CLOs to verify local compliance.
 - Manage and implement the Stakeholder Engagement Plan (SEP)
 - Dissemination of project information and implementation of effective GM.

- **The Senior Environmental management Specialist and Social and GBV Specialist at PIU**
 - Provide technical support in engaging and addressing environmental concerns of stakeholders.
 - Coordinate and implement the SEP and GM (social).
 - Oversee the implementation of the SEA/SH Prevention and Response Action Plan to be developed as part of the environmental and social management framework (ESMF).
 - Dissemination of project and GM information.
 - Facilitate and monitor implementation of the SEP.
 - Incorporate SEP guidelines in contractors' agreement which includes but not limited to confidentiality, grievance redress mechanism and a defined reporting system.
 - Organize and conduct national and district level training.
 - Develop manuals and modules for capacity building and awareness creation.
 - Facilitate and coordinate monitoring activities.
 - Ensure provisions for gender inclusion and GM under the SEP is implemented effectively.

¹ Proposed check list in annex 7

- Interface with stakeholders and respond to comments or questions about the project or consultation process.
 - Provide contact information if stakeholders have questions or comments about the project or consultation process.
 - Document any interactions with external stakeholders.
 - Maintain database, consultation and feedback records for SEP.
 - Coordinate public meetings, workshops, focus groups, etc.
 - Raise awareness of the SEP among project implementation unit, employees contracted firms and relevant external stakeholders.
 - Deliver information to stakeholders on complaint mechanism and procedures of the SEP.
 - Support SEA/SH case recording, management and referral (non-investigative role).
- **Fund Manager/Regional Coordination Unit (RCU):**
 - Reviews E&S checklists as part of the grant application process.
 - Ensures DRE companies meet stakeholder engagement requirements before financing.
 - Consolidates national reports into regional summaries.
 - Ensures harmonization of reporting formats across countries.
 - Submits semi-annual reports to the World Bank.
 - **Independent Verification Agent (IVA)/Third Party Monitoring:**
 - Conducts spot checks on selected subprojects to verify authenticity of documentation.
 - Ensures communities confirm that consultations and disclosure activities took place.
 - Assesses the accessibility and effectiveness of project GM.

7.3. Summary of how SEP will be monitored and reported upon (including indicators)

Reporting will be structured to flow upward from subprojects to national and regional levels, ensuring both micro-level accountability and program-wide oversight.

- **DRE Companies:** submit checklists and documentation to the PIU after consultations and before project commissioning.
- **National PIU:** produces monthly and quarterly reports consolidating company submissions, GM performances summaries, and stakeholder engagement activities and CLO field observations.
- **Fund Manager:** reports on compliance with stakeholder engagement requirements during grant review. prepares semi-annual consolidated reports covering all countries, including Sierra Leone, for submission to the World Bank.

- **IVA:** issues independent verification notes on whether subproject engagement obligations have been met.
- **RCU:** prepares semi-annual consolidated reports covering all countries, including Sierra-Leone, for submission to the World Bank.
- **Public Disclosure:** Annual summaries (number of consultations, grievances, inclusion of vulnerable groups) published via EDSA website, radio, and local government offices.

7.3.1. Adaptive Management

The system is designed to be flexible and adaptive, allowing adjustments based on results and lessons learned.

- Annual update of the SEP incorporating monitoring results and stakeholder feedback.
- Corrective measures where engagement gaps are identified (e.g., if DRE companies fail to involve women/youth adequately).
- Continuous strengthening of capacity for both PIU staff and private operators through training and technical support.

7.3.2. Reporting back to stakeholder groups

The Project Implementation Unit (PIU) will ensure systematic feedback to stakeholders to maintain transparency, accountability, and trust throughout project implementation. Feedback will be provided using accessible and culturally appropriate channels, especially at the community level. Quarterly updates will be shared through community meetings, local radio programs, county notice boards, and public disclosure via the EDSA website. Feedback loops will also be integrated into field missions conducted by Community Liaison Officers (CLOs), ensuring two-way communication with rural and remote communities.

In addition, the PIU will prepare **annual public summaries** that present **aggregated information** on stakeholder engagement activities, key issues raised by stakeholders, grievances received and resolved through the Grievance Mechanism (GM), and corrective actions implemented. These public summaries will **not include personal data** and will comply with confidentiality requirements, particularly for sensitive cases such as Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) or financial integrity complaints.

This reporting-back process will ensure that stakeholders are informed of how their concerns have been addressed and how their feedback has influenced project decisions. It strengthens stakeholder confidence and ensures compliance with the World Bank's Environmental and Social Standard ESS10 on information disclosure and ongoing stakeholder engagement.

7.3.3. Indicators

Monitoring indicators are used to track the implementation, effectiveness, and quality of stakeholder engagement activities at both program and subproject levels. These indicators support adaptive management by enabling the PIU, RCU, and other relevant entities to assess

whether engagement activities are conducted as planned, whether stakeholders are meaningfully reached, and whether feedback and grievances are effectively addressed, in line with ESS10 requirements.

Indicators are structured at two levels: **program-level indicators**, which capture overall stakeholder engagement performance across the DARES Program, and **subproject-level indicators**, which focus on engagement activities implemented by DRE operators at the local level. All grievances related data must be segregated by gender

Program-Level Indicators (PIU, RCU, Fund Manager, IVA)

- Number of stakeholder consultations conducted at national and regional levels;
- Percentage of women, youth, and vulnerable or disadvantaged groups participating in consultations;
- Percentage of planned stakeholder engagement activities implemented as scheduled;
- Number of grievances received and resolved, disaggregated by type and by sex;
- Percentage of grievances resolved within the timeframe defined in the Grievance Mechanism;
- Number of spot checks and verification missions conducted by the Independent Verification Agent (IVA);
- Number of financial or integrity-related grievances investigated by the Fiduciary Agent (as applicable);
- Number of SEP monitoring reports produced and disclosed (quarterly and annual);
- Number of corrective actions identified through monitoring and verification, and percentage of corrective actions effectively implemented.

Subproject-Level Indicators (DRE Operators, under PIU Oversight)

- Number of consultations conducted per subproject;
- Timeliness of disclosure of subproject information prior to construction or service rollout;
- Percentage of subprojects that submitted completed stakeholder engagement checklists and supporting documentation;
- Evidence of disclosure of tariffs and service conditions to users;
- Percentage of subprojects where vulnerable or disadvantaged groups were explicitly included in engagement activities;
- Percentage of subprojects with documented feedback matrices linking issues raised by stakeholders to responses or actions taken;
- Compliance rate with Grievance Mechanism awareness requirements (availability of hotline, contact information, and local entry points);
- Number of grievances received at subproject level and escalated to the PIU;

- Number of SEA/SH-related grievances managed in accordance with the Project referral and confidentiality procedures (reported in aggregated and non-identifiable form).

Monitoring data will be consolidated by the PIU through consultation logs, disclosure records, grievance databases, and verification reports. Results will be used to inform periodic SEP updates, strengthen implementation practices, and ensure continuous improvement of stakeholder engagement throughout the project lifecycle.

8. Budget for SEP Implementation

The SEP and GM budgets presented below are indicative estimates covering the full duration of the project. These figures will be reviewed and updated by the National PIU during project implementation.

Successful implementation of the SEP requires adequate financial resources. An indicative budget has been prepared to cover staffing, communication, consultations, and monitoring activities.

An indicative budget of approximately **USD [970,000]** has been allocated for SEP implementation in **Sierra Leone**, covering:

- Salaries of Social, GBV/SEA/SH, and Communications Specialists.
- Deployment of Community Liaison Officers (CLOs) / social mobilization teams.
- Organization of consultations and community meetings at national and district/community levels.
- Communication campaigns (radio, print, digital, and community notice boards).
- Training for PIU staff, developers/service providers, and local stakeholders, including SEA/SH awareness, Codes of Conduct, case reporting and referral pathways, and related procedures.
- Operation of the Grievance Mechanism (hotlines, GMIS/GM database, CLOs, and PIU focal points).
- Monitoring and reporting activities, including field missions and periodic stakeholder feedback collection.

The budget will be refined during appraisal and integrated into the national PIU's annual work plans.

The effective implementation of this Stakeholder Engagement Plan (SEP) requires adequate financial resources to support continuous, inclusive, and meaningful engagement with stakeholders throughout the project lifecycle. The SEP budget includes costs for stakeholder consultations at national and local levels, communication and public information disclosure, capacity building, grievance redress management, and field-based coordination and monitoring. The budget also integrates measures to ensure accessibility for disadvantaged and vulnerable groups and reflects the Project's commitment to transparency, accountability,

and responsiveness in stakeholder engagement, in line with World Bank Environmental and Social Standard ESS10.

Resources will be managed by the Sierra Leone Project Implementation Unit (PIU) hosted by the Ministry of Energy (MoE), under the policy oversight of the Ministry of Energy (MoE). The budget will be refined during project appraisal and incorporated into the annual work plans of the PIU. It will be reviewed periodically and adjusted as necessary to ensure effective delivery of stakeholder engagement activities.

Table 15 : SEP implementation budget

Budget Category	Unit	Unit Cost (USD)	Quantity / Duration	Total (USD)	Remarks
1. Staffing and Management					
Social Development Specialist (PIU)	annual	36,000	5 years	180,000	Full-time
GM Focal Point (PIU)	annual	28,000	5 years	140,000	Full-time
Communications & Outreach Officer	annual	24,000	5 years	120,000	GM & outreach
Community Liaison Officers (4 persons)	annual/person	6,000	4 × 5 years	120,000	County-based
Subtotal 1				560,000	
2. Stakeholder Consultations & Field Engagement					
Community consultations (logistics, transport, hall rental)	per mission	2,500	15 missions	37,500	Rural outreach
County-level stakeholder meetings	per event	3,000	10 events	30,000	Local coordination
National stakeholder workshop	per event	10,000	2	20,000	Launch + dissemination
Production of stakeholder materials	package	5,000	Annual × 5	25,000	Posters, forms, translations
Subtotal 2				112,500	
3. Communication & GM Disclosure					
Radio awareness campaigns	campaign	2,500	10 campaigns	25,000	Local radio
Information brochures + flyers	package	2,000	5 years	10,000	Continuous communication
GM notice boards, sticker & signage	package	3,000	2	6,000	GM visibility
Website disclosure (MOE page)	annual	2,000	5 years	10,000	GM updates
Subtotal 3				51,000	
4. Grievance Mechanism Operations					
GM hotline setup + phone operator	annual	5,000	5 years	25,000	Public access GM
SMS/WhatsApp GM platform	annual	2,000	5 years	10,000	Alternative access

Budget Category	Unit	Unit Cost (USD)	Quantity / Duration	Total (USD)	Remarks
GMIS (KoboToolbox setup + tablets + data)	package	8,000	1	8,000	Case management system
Training for GM handling (PIU + CLOs)	sessions	4,000	3	12,000	Case classification
SEA/SH confidential management support Implementation of SEA/SH prevention and mitigation activities (training, awareness raising, GBV case management)	package	40000	2	80,000	Survivor referral system
AML/CFT compliance tools & screening	package	8,000	1	8,000	Integrity protocol
Subtotal 4					143,000
5. Monitoring, Reporting & Documentation					
Field monitoring missions	mission	2,500	10	25,000	GM follow-up
Independent evaluation of SEP (midterm)	contract	10,000	2	20,000	Learning
PIU reporting and documentation costs	annual	3,000	5	15,000	GM database
Subtotal 5					60,000
6. Training & Capacity-Building					
Training for local authorities (traditional + local govt)	sessions	4,000	4	16,000	GM awareness
Training DRE developers on GM requirements	sessions	5,000	3	15,000	Compliance
Training CSOs for accountability monitoring	sessions	3,000	4	12,000	Inclusion
Subtotal 6					43,000

TOTAL ESTIMATED BUDGET 969,500 USD

9. Annex

9.1. Annex 1 : National regulation

This annex presents the national legal and institutional framework applicable to the Sierra-Leone DARES Project and referenced throughout the Stakeholder Engagement Plan (SEP). It compiles the key laws, regulations, and institutional mandates governing transparency, environmental and social management, energy sector governance, land administration, grievance handling, and anti-corruption in Sierra-Leone. The inclusion of these references ensures alignment of the SEP with national legislation and supports compliance with the World Bank Environmental and Social Framework (ESF), particularly ESS10 on Stakeholder Engagement and Information Disclosure.

No.	Reference (text)	Domain / Application	Relevance for the SEP / PIU (MOE)	Official link / source
1	Right to Access Information Act, 2013 (Act No. 2 of 2013)	Access to information / transparency	Establishes the legal obligation for proactive disclosure, response to information requests, and transparency in public decision-making. Directly relevant to ESS10 requirements on information disclosure and stakeholder access to project-related information.	PDF (Sierra Leone legal sources – SierraLII or official government portal) (Sierra Leone);
2	Environmental Protection Agency Act, 2022 (Act No. 15 of 2022), repealing the EPA Act, 2008	Environmental governance / compliance	Establishes the Environmental Protection Agency of Sierra Leone (EPA-SL) and provides the overarching legal framework for environmental regulation, ESIA requirements, permitting, monitoring, and public participation applicable to project investments.	SierraLII; FAOLEX; UNEP-LEAP (FAOLEX)
3	Environmental Protection Agency (Environmental Impact Assessment Licence) Regulations, 2010 (S.I. No. 14 of 2010)	ESIA / environmental licensing	Regulates the Environmental Impact Assessment (EIA) process, including consultation, disclosure, and approval procedures, relevant to ESS1 and ESS10. These regulations remain applicable as subsidiary legislation.	FAOLEX (PDF) : (PDF Drive) ; UNEP-LEAP (fiche) : (Sierra Leone) ; ECOLEX (fiche) : (Anti-Corruption Commission SL)

No.	Reference (text)	Domain / Application	Relevance for the SEP / PIU (MOE)	Official link / source
4	Electricity and Water Regulatory Commission Act, 2011 (Act No. 13 of 2011)	Energy and water regulation	Establishes the EWRC as the sector regulator, including licensing, tariff setting, service standards, and consumer protection. Highly relevant for mini-grids, EaaS models, and regulatory consultations under the Project.	ECOLEX; FAOLEX; FAOLEX
5	Public Procurement Act, 2016 (Act No. 1 of 2016)	Public procurement / transparency	Governs procurement procedures, transparency, and complaints mechanisms. Relevant for project governance, trust-building, and prevention of procurement-related grievances.	SierraLII; Anti-Corruption Commission SL ;
6	Anti-Corruption Act, 2008 (Act No. 12 of 2008)	Integrity / anti-corruption	Establishes the Anti-Corruption Commission (ACC) and the legal framework for corruption prevention, investigation, and prosecution. Relevant for integrity-related grievances and sensitive complaint handling.	PDF (source stable – sierra-leone.org) : (Sierra Leone) ; ACC (référence) : (Anti-Corruption Commission SL)
7	Anti-Corruption (Amendment) Act, 2019	Strengthened anti-corruption framework	Reinforces provisions of the 2008 Act, including asset declaration and sanctions. Relevant for transparency, accountability, and governance in public projects.	ILO NATLEX; ACC(Anti-Corruption Commission SL)
8	Anti-Money Laundering and Combating of Financing of Terrorism Act, 2012 (Act No. 2 of 2012)	AML / CFT	Establishes the AML/CFT framework applicable to financial flows, fiduciary controls, and due diligence mechanisms relevant to the Facility.	SierraLII; official government sources Sierra Leone
9	Anti-Money Laundering and Combating of Financing of Terrorism	AML / CFT (amendment)	Strengthens the 2012 AML/CFT framework. Relevant where project financing or grant mechanisms require enhanced due diligence.	SierraLII; official government sources

No.	Reference (text)	Domain / Application	Relevance for the SEP / PIU (MOE)	Official link / source
	(Amendment) Act, 2019			Sierra Leone
10	Anti-Money Laundering and Combating of Financing of Terrorism and Financing of Proliferation of Weapons of Mass Destruction Act, 2024 (Act No. 4 of 2024)	AML / CFT & PF	Updates the AML/CFT framework to include proliferation financing and WMD risks. Relevant for fiduciary controls and compliance under the Facility.	SierraLII Sierra Leone Legal Information Institute)
11	Cyber Security and Crime Act, 2021	Cybersecurity / data security	Establishes obligations related to cybersecurity and protection of digital systems and data. Relevant for GM information systems, stakeholder databases, access control, and confidentiality.	SierraLII Sierra Leone Legal Information Institute)
12	Customary Land Rights Act, 2022 (Act No. 20 of 2022)	Customary land tenure	Central to ESS5 compliance recognizes customary land rights, consent processes, and local governance of land transactions. Relevant for siting of mini-grids and productive-use infrastructure.	SierraLII; FAOLEX; UNEP-LEAP Sierra Leone Legal Information Institute) ; (FAOLEX)
13	Local Government Act, 2022	Local governance / decentralization	Defines the mandate and role of District Councils and local authorities. Relevant for local consultations, coordination, grievance mediation, and Phase 2-3 engagement.	Official Government of Sierra Leone publications Mof.gov.sl)
14	Employment Act, 2023	Labour / ESS2 / OHS	Provides the legal framework for labour rights, occupational health and safety, non-discrimination, and employment conditions. Relevant for	SierraLII Sierra Leone Legal Information Institute)

No.	Reference (text)	Domain / Application	Relevance for the SEP / PIU (MOE)	Official link / source
			contractors, DRE/EaaS providers, and worker grievance mechanisms.	
15	Child Rights Act, 2007 (Act No. 7 of 2007)	Child protection	Establishes the legal framework for child rights and protection. Relevant for engagement in schools and communities and prevention of child exploitation during project activities.	PDF (source stable – sierra-leone.org) : (Sierra Leone) ; Refworld (fiche) : (Refworld)
16	Sexual Offences Act, 2012	SEA/SH prevention and response	Core legal framework addressing sexual offences, reporting obligations, and victim protection. Relevant for SEA/SH-related grievance handling and referral pathways under the Project GM.	PDF (source stable – sierra-leone.org) : (Sierra Leone) ; Refworld (fiche) : (Refworld)
17	Right to Access Information and Data Protection Regulatory Commission Bill (under consultation, 2025)	Personal data protection (pending legislation)	Relevant as emerging legislation given PIU handling of personal data (beneficiaries, attendance lists, GM records). To be treated as pending legislation, complemented by internal confidentiality and data protection procedures.	Ministry of Information and Civic Education (MoICE) – official consultations moice.gov.sl
18	Electricity and Water Regulatory Commission (EWRC) – institutional mandate and implementing regulations	Sector regulation / implementation	EWRC is responsible for implementing the EWRC Act and conducting regulatory consultations (mini-grids, EaaS). Relevant for coordination, disclosure, and regulatory engagement.	EWRC official website ewrc.gov.sl

9.2. Annex 2. Template to capture minutes/records of consultation meetings

Stakeholder (Group or Individual with gender ratio)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
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9.3. Annex 3. Sample Table: Monitoring and Reporting on the SEP

Table X. Program-Level SEP Monitoring Indicators

(PIU, RCU, Fund Manager, IVA)

Indicator	Definition / Measurement	Data Source	Reporting Frequency	Responsible Entity
Number of stakeholder consultations conducted at national and regional levels	Total number of consultations organized at national and regional levels during reporting period	Consultation logs; meeting minutes; attendance sheets	Quarterly	National PIU
Percentage of women, youth, and vulnerable groups participating in consultations	% of total participants disaggregated by sex, age group, and vulnerable category	Attendance sheets (sex-disaggregated); Kobo records	Quarterly	National PIU
Percentage of planned stakeholder engagement activities implemented as scheduled	(Number of engagement activities conducted ÷ number planned) × 100	SEP workplan tracking	Quarterly	National PIU
Number of grievances received and resolved (disaggregated by type and sex)	Total grievances logged in GMIS; breakdown by category and complainant sex	GMIS database	Quarterly	PIU Focal Point
Percentage of grievances resolved within defined timeframe	(Grievances resolved within timeframe ÷ total grievances resolved) × 100	GMIS tracking system	Quarterly	PIU GM Focal Point
Number of spot checks and verification missions conducted by IVA	Total stakeholder engagement-related verification missions conducted	IVA reports	Semi-annual	IVA
Number of financial/integrity-related grievances investigated	Total integrity-related cases referred to Fiduciary Agent or relevant authority	Fiduciary reports; GMIS	Quarterly	Fiduciary Agent / PIU
Number of SEP monitoring reports produced and disclosed	Quarterly and annual SEP implementation reports produced and publicly disclosed	PIU reports; website publication records	Quarterly / Annual	PIU
Number of corrective actions identified and % implemented	Total corrective measures identified; % implemented within agreed timeframe	Monitoring matrix; follow-up reports	Quarterly	PIU / RCU

Table Y. Subproject-Level SEP Monitoring Indicators*(DRE Operators under PIU Oversight)*

Indicator	Definition / Measurement	Data Source	Reporting Frequency	Responsible Entity
Number of consultations conducted per subproject	Total number of community consultations organized per subproject	Subproject consultation records; checklist	Per subproject	DRE Operator
Timeliness of disclosure prior to construction/service rollout	Confirmation that key project information was disclosed before works or commissioning	Disclosure logs; subproject checklist	Per subproject	DRE Operator / PIU
Percentage of subprojects submitting completed stakeholder engagement checklists	$(\text{Subprojects submitting complete checklist} \div \text{total active subprojects}) \times 100$	PIU compliance tracking	Quarterly	PIU
Evidence of disclosure of tariffs and service conditions	Confirmation of documented tariff disclosure (meeting minutes, signed forms, public notice)	Disclosure records; IVA spot checks	Per subproject	DRE Operator
Percentage of subprojects including vulnerable groups in engagement	$(\text{Subprojects documenting targeted inclusion} \div \text{total subprojects}) \times 100$	Attendance sheets; consultation reports	Quarterly	PIU
Percentage of subprojects with documented feedback matrices	$(\text{Subprojects with issue-response matrix} \div \text{total subprojects}) \times 100$	Subproject reports; checklist	Quarterly	PIU
Compliance rate with GM awareness requirements	% of subprojects where hotline/contact details visibly available and communicated	Field verification; IVA spot checks	Quarterly	PIU / IVA
Number of grievances received at subproject level and escalated to PIU	Total grievances logged locally and referred upward	GMIS records	Quarterly	DRE Operator / PIU
Number of SEA/SH grievances managed per protocol (aggregated)	Number of SEA/SH cases referred and handled in line with referral and confidentiality procedures (no PII)	SEA/SH referral log (anonymized)	Quarterly	PIU SEA/SH Focal Point

9.4. Annex 4 : Minutes of the first phase consultation

Meeting Minutes

Date: 16 June 2025

Time: 09:06 AM (Sierra Leone Local Time)

Duration: 58 minutes 14 seconds

Attendees:

- INENSUS Team: Ferdous Rahman (Legal Expert), Flora Erbel (Energy Access Specialist), Andrea Cabañero (Energy Access Specialist)
- Sierra Leone Government: Emmanuel Mannah (Director General, Regulator - SLWERC), Cyril Grant (Executive Technical Advisor, Ministry of Energy)
- World Bank: Kagaba Paul Mukiibi (Senior Energy Specialist), Ibrahim Jalloh (Energy Specialist)

1. Introduction to the Project

INENSUS introduces R-DARES project's goal and core principles and presents its 2 main components (DRE and Eaas for public institutions).

2. Legal and Regulatory Clarifications: The consultation aimed to clarify gaps in regulatory analysis, particularly the regulation regarding Energy as a Service (EaaS) model.

3. Private Sector Involvement and Licensing

- Company-level licenses are required for companies deploying renewable energy systems, including mini-grids and solar home systems. These licenses apply within specific geographical regions.
- No separate electrical contractor licenses are needed unless work is outsourced (in which case the contractor must hold the applicable contractor license).

4. Regulatory Structure of EaaS:

- The Energy as a Service model involves private companies providing energy to public institutions under energy service agreements, not based on kWh sales.
- These systems are still subject to generation licensing as per the Electricity Act.

- There is a legal gap: The existing mini-grid and captive power plant regulations do not cover these new business models – they both exclude off-grid standalone systems.
- According to Mr. Grant and Mr. Mannah, at present all cases of EaaS (private company operating a solar plant for customers, such as mining and other industrial actors), go through a legal work-around and remain under the Captive Power Plant regulations. However, it is acknowledged this is not a long-term solution and it is time to resolve the legal gap of this business model.

4.1. Options for Legal Adjustments to regulate the EaaS business model

- Option 1: Develop a new, separate regulation for standalone solar systems and EaaS models. This is favored over adapting mini-grid regulations to avoid overly complicated changes to existing laws.
- Option 2 (proposed by Paul Kagaba): Modify the Captive power plant regulations to accommodate EaaS systems (but this requires careful consideration due to potential overlaps). Further, “captive power plants” refer to self-use, and this is a model that precisely what it does is sell power to a third-party (non-self-use).
- Option 3: amend Mini-grid Regulations to cover as well standalone solar systems.

4.2. Discussion on Business Models

- Energy as a Service (EaaS) involves selling access to energy rather than electricity itself, with fixed fees based on service availability and quality.
- The need for a clear regulatory framework to avoid ambiguity for lenders and investors in large-scale EaaS projects is highlighted by INENSUS.

5. Concessions and Licensing (DRE)

- Paul (WB): Concessions for mini-grids or EaaS models within a defined region can include a license to operate different types of technologies (mini-grids, solar home systems, etc.) and different business models (kWh-based/utility, EaaS, PayGo). Energy as a Service in a concession area should be managed by the license holder but requires clarity on how these new models are regulated within the concession framework. → to be discussed internally with R-DARES World Bank team.

6. Recommendations/Conclusions:

- Develop new regulations for EaaS business models, recognizing these as distinct from mini-grid and captive power plant models.

7. Future Meetings and Actions

- Regular weekly calls (same slot, one hour later – Monday 10 am Freetown time) will be held to ensure alignment and discuss developments in regulatory proposals.
- On-going electrification project for public institutions in SL.
- New EaaS regulations must be passed to the parliament for 90 days before it becoming law. Policy docs don't need parliamentary approval; so we first go through a policy document.

Meeting Minutes Summary**Date:** 24 June 2025**Title:** R-DARES – Sierra Leone Legal Framework Consultations**Attendees:**

- INENSUS Team: Ferdous Rahman (Legal Expert), Nico Peterschmidt (CEO), Andrea Cabañero (Energy Access Specialist)
- Sierra Leone Government: Emmanuel Mannah (Director General, Regulator - SLWERC), Cyril Grant (Executive Technical Advisor, Ministry of Energy)

EaaS Model and Solar Home Systems:

- The discussion addressed whether solar home systems (SHS) fall under the captive power regime, as they are typically smaller systems. It was clarified that SHS for households are under the "free regime" due to their smaller size.
- INENSUS to prepare a first draft of an EaaS policy, which is to serve as the basis for a future EaaS model regulation.

Private Sector Involvement and Ownership:

- The question of whether the private sector can own and operate assets under the Energy as a Service (EaaS) model was raised. Sierra Leone supports private sector ownership, with an openness to performance-based procurement models.
- The World Bank emphasizes the importance of private sector leadership in the R-DARES program, and this is in line with the government's approach to privatize electricity service provision.

National Electrification Plan:

- The National Electrification Plan for Sierra Leone exists but has not been fully validated or published online. It is expected to be finalized and validated within the next 60 days.

Procurement Laws:

- The discussion clarified that bilateral financing agreements, such as those from the World Bank, supersede national procurement laws. Regional procurement entities can thus operate under these agreements to streamline processes.

Government's Willingness to Pay for Ongoing Maintenance:

- There is government willingness to pay for ongoing maintenance of energy services, but the **ability to pay** is constrained due to limited funding for public institutions. The issue is not about the government's willingness to pay but about securing sustainable funding for O&M (operations and maintenance).
- It is discussed to explore ways to find additional revenue streams from these standalone systems to subsidize the consumption of the public institutions.

Local Content Requirements:

- Sierra Leone's local content law requires developers to seek exemptions for importing equipment, creating a potential barrier for international companies. However, waivers are generally granted for necessary imports, and while the law is a hindrance, it cannot be easily changed due to national policies.

Regulatory Amendments for Mini-Grid and Solar Home Systems:

- Discussions highlighted the need for new regulations that provide flexibility for mini-grids, mesh grids, and solar home systems. The idea is to create a technology-agnostic regulatory framework, where technologies such as mesh grids and solar home systems can be deployed within the same community as MGs based on their cost-effectiveness.

Minigrid Licensing:

- A basic mini-grid license allows operators to deploy systems within specified geographic areas but without the protections afforded by full mini-grid licenses. There was discussion about whether small systems (below 100 kW) could qualify for a full mini-grid license, with a suggestion to remove the 100 kW threshold to allow small systems to be eligible for full licenses if they meet the criteria for protected, larger-scale projects. This requires changing the definition – but as per Mr. Mannah, the latest text has already been revised.
- INENSUS to inquire to World Bank for support to retrieve the latest text.

Regulatory Stability and MIGA Guarantees:

- A proposed stabilization clause was discussed that can be added to the License Terms and Conditions, which would ensure that any changes in laws, tariffs, or regulations do not negatively affect the financial stability of mini-grid projects. This clause would help make projects more insurable under MIGA guarantees.

Meeting Minutes Summary**Date:** 30 June 2025**Title:** R-DARES – Sierra Leone Legal Framework Consultations**Duration:** 20 minutes**Attendees:**

- INENSUS Team: Ferdous Rahman (Legal Expert), Nico Peterschmidt (CEO), Andrea Cabañero (Energy Access Specialist)
- Sierra Leone Government: Cyril Grant (Executive Technical Advisor, Ministry of Energy)
- SE4All: Ngozi Beckley-Lines

Key discussed points:

- Ngozi (SE4All) points out that the MG Regulations are already passed and at printing stage – no further changes can be integrated. This is in contrast to former statements by Mr. Mannah (who is not in the call today) that the government is awaiting passing the regulations to ensure R-DARES regulatory change recommendations are included.
- Andrea (INENSUS) states that the submitted regulatory change recommendations on the 21st of May 2025 precede any consultations with the regulator and the ministry and thus are considered **a draft**. The final recommendations stem from the completion of the on-going stakeholder consultations.
- Mr. Mannah (SLEWRC) is not present in the call.
- Ngozi to share the final draft that is currently passed for INENSUS to revise ahead of next week's call (Monday 7th of July).

Meeting Minutes

Date: July 28, 2025

Subject: Legal Framework Consultations – Mini-Grid Regulation and Energy-as-a-Service (EaaS) in Sierra Leone

Facilitated by: Ferdous Rahman

Participants: Emmanuel Mannah (EWRC), Ibrahim Jalloh, Nico Peterschmidt, Abhishek Malhotra, Ferdous Rahman

Meeting Summary

The meeting was convened to discuss the evolving legal and regulatory framework in Sierra Leone related to mini-grid systems and the Energy-as-a-Service (EaaS) model, especially concerning public institutions. A central focus was on understanding the current status of the mini-grid regulations, identifying gaps for EaaS licensing, and exploring the potential to develop policy frameworks that facilitate private investment in energy infrastructure.

Update on the new SL WRC Act 2025 and the Solar Mini Grid Regulation 2025:

- The SLEWRC Act has been passed. The copy will be shared with INENSUS and the WB after the Act is printed in Gazette.
- The mini-grid regulation has been submitted to Parliament and is currently under review.
- Supporting documents such as license templates were not initially submitted, but Parliament has requested to review these documents for greater transparency. EWRC's strategy is to keep these documents outside of the regulatory text to preserve flexibility in their future revision.

Amendment of License agreement

- Participants discussed concerns regarding Parliament making decisions based on license templates, which may later be amended.
- The question of whether EWRC will have power to amend the license agreement can be answered clearly after the parliament passes the regulation.
- EWRC clarified that templates are considered dynamic documents, and it is hoped that Parliament will not embed them in formal legislation. If successful, EWRC would retain authority to revise them without returning to Parliament for each change.
- EWRC agrees to add the stabilization clause in the license agreement after the new regulation is passed.

System size under 100kW

- Another key topic was the treatment of basic licenses. According to the regulation, systems under 100kW are categorized as basic and intended for local providers. Portfolio licensing is currently available only for systems over 100kW per site.
- Concerns were raised about limiting access to portfolio licensing for investors deploying multiple smaller systems. Mr. Mannah reiterated that EWRC aims to incentivize site-level scalability and avoid historical underperformance of small, under-scaled systems.
- A related concern involved potential regulatory loopholes, where local partners might front for foreign investors to avoid the full licensing process. EWRC responded that monitoring systems are in place, and communities often raise concerns when systems scale up beyond agreed capacity, prompting reevaluation of licenses.

Legal vacuum for EaaS business model

- The discussion then shifted to the lack of a licensing framework for standalone EaaS systems targeting public institutions. Mr. Mannah acknowledged the regulatory vacuum and confirmed that EWRC's board has authority to develop licensing templates without requiring parliamentary approval, provided a policy is in place.
- This policy must originate from and be approved by the Ministry of Energy.
- It was agreed that the next step would be the drafting of a concise set of bullet points outlining the EaaS licensing needs and policy framework.
- These would be shared with Mr. Mannah, who would initiate internal discussions with the Ministry of Energy.
- Participants recommended avoiding public presentation in open stakeholder meetings, suggesting instead a closed-door session with the Ministry's leadership to maintain strategic control and clarity.

Next Steps

- Ferdous and team to prepare bullet points summarizing the EaaS policy and licensing requirements.
- Mr. Mannah to review and present the summary to the Ministry of Energy leadership.
- A closed-door meeting with the Ministry of Energy to be organized for detailed discussion.
- Await final print version of the Energy Act for stakeholder circulation.

Meeting Report: R-DARES Legal Framework Consultation – Sierra Leone**Date:** 4 August 2025**Time:** 10:26 AM (GMT)**Participants:**

Emmanuel Mannah (DG SLEWRC),

Sharmila Bellur (World Bank),

Onyinyechukwu Anene-Nzelu (World Bank)

Jakob Schmidt-Reindahl (INENSUS),

Ferdous Rahman (INENSUS),

Key Discussion Points:**1. Solar Mini-Grid Regulation:**

- The regulation has not yet been passed by Parliament.
- Current delays are due to political developments; approval is still pending.

2. Amendments to License Agreements:

- No clarity on whether EWRC will have authority to amend license agreements independently; this will be known only once the regulation is passed.

3. Electricity Act 2025:

- The Act has been passed but is pending the President's signature.
- Printed copies are not yet available.

4. Energy Access Services (EAS) Policy:

- Draft bullet points were shared by Ferdous Rahman to support early discussions.
- The policy draft itself will be shared once leadership at the Ministry gives the green light.
- Emmanuel Mannah confirmed that the leadership (Chairman Conde and key Ministry representatives) is currently out of the country.
- Discussion on policy content will proceed after their return tentatively in two weeks.

- Mr. Mannah suggested forming a local technical team supported by the World Bank to work closely with the consultants.

5. Licensing Threshold:

- Discussion confirmed that for systems below 100 kWh, no license would be required for EAS providers. Clarification was made that this refers to *kilowatt-hour*, not *kilowatt* capacity.

6. Local Content Regulation:

- No specific percentage is mandated for the energy sector in the Local Content Law.
- In practice, local content mainly refers to employing local labor and sourcing basic equipment locally, though this is often limited by local availability.

Next Steps:

- Postpone the regular meeting scheduled for **11 August 2025**.
- Schedule the next consultation meeting for **18 August 2025**, by which time it is hoped that the ministry leadership will be available for internal discussions.
- Mr. Mannah to share the bullet points with Chairman and update the team accordingly.

Meeting Minutes**Consultation on Legal Framework – Sierra Leone (R-DARES Programme)****Date:** 8 September 2025**Time:** 10:02 am**Platform:** Online meeting**Participants**

- Emmanuel Mannah (EWRC, Sierra Leone), Abhishek Malhotra (World Bank), Sharmila Bellur (World Bank), Ferdous Rahman (INENSUS), Flora Erbel (INENSUS), Andrea Cabañero (INENSUS)

Key Discussion Points**1. Mini-grid Regulation in Parliament**

- Mini-grid regulation has been laid in Parliament for 21 working days (process expected to conclude by end of September 2025).
- Licence terms and conditions are a separate doc to the 2025 Minigrid Regulations (Addendum); it is to be confirmed at the end of September if it could be adapted without parliamentary approval.

2. EaaS Policy Development

- Positive consultations held with the Chairman of EWRC and the Deputy Minister of Energy, both supportive of developing the Energy-as-a-service (EaaS) policy.
- Government requests local involvement: suggestion to engage a Sierra Leonean energy specialist or lawyer to support consultations and ground-level work.
- Policy approval requires Cabinet approval only (not Parliament). Timeline appears compatible with R-DARES rollout in early 2026.

3. Role of Consultants and World Bank

- Proposal for Inensus to draft the first version of the EaaS policy, to be refined with EWRC, the World Bank, and possibly a local law firm.
- Drafting to begin in early October 2025 after current deliverables are finalized.

4. Technical Standards

- Current 2025 mini-grid regulations only set standards for voltage drop and distribution losses for mini-grids.
- No standards yet for mesh-grids or standalone solar systems.
- Agreement that R-DARES programme-level technical standards could be adopted and referenced in licence agreements (not necessarily in regulations).

5. Exclusivity of Mini-grid Licenses

- Clarified that exclusivity applies to mini-grid operators for the duration of their licence, not just for site reservation during the 18-month development phase.
- Andrea raised concern that regulatory text could be interpreted differently; consensus reached that licence agreements could be adapted to explicitly anchor exclusivity.

6. Electricity and Regulatory Acts

- New EWRC Act (Regulatory Act) passed by Parliament, awaiting presidential signature.
- Final document will only be shared after official signing.

7. Parallel EaaS Component Discussions

- World Bank country office (education and health teams) is scheduling meetings with Health and Education Ministries (week of 22 September 2025) to advance discussions on the EAS component of R-DARES.
- Importance of involving a local law firm to capture and ground all conversations noted.

8. Licence Agreement Flexibility

- Licence terms and conditions are considered addendums, decoupled from regulations.
- They can be adapted on a case-by-case basis by EWRC in collaboration with licensees, without requiring Parliament or Presidential approval.

- This flexibility will help incorporate technical standards and exclusivity clauses.

Agreements & Next Steps

- Await outcome of Parliament's 21-day review of mini-grid regulations (end of September 2025).
- Inensus to prepare first draft of EaaS policy in October 2025.
- EWRC to consider engaging a local law firm/energy specialist to support EaaS policy consultations and documentation.
- R-DARES team to share draft technical standards for review.
- Future licence agreements to explicitly state exclusivity and reference relevant technical standards.
- Next consultation session to be scheduled for late September or early October 2025, after regulatory updates.

10. Other Annexes

10.1. Annex 5. Stakeholder Mapping Matrix

Stakeholder Group	Interest	Influence	Key Concerns/Expectations	Engagement Approach	Responsible Entity
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10.2. Annex 6. Consultation Log (KoboToolbox Form)

Digital form fields:

- date,
- location,
- type,
- participants (
- sex/age/vulnerability),
- topics,
- feedback,
- actions,
- evidence (minutes/photos/audio).

Data centralized in PIU Kobo account.

10.3. Annex 7. Subproject Stakeholder Engagement Checklist (can be on KoboToolbox Form)

Required of all DRE companies prior to commissioning; includes evidence of consultation, disclosure (tariffs/GM), inclusion of vulnerable groups, and submission to PIU.

(Structured by Consultation Phases)

SECTION A – Subproject Identification

- Subproject Name:
- Location:DRE/EaaS Operator:
- CLO Responsible:
- Date of Commissioning / Service Rollout:

SECTION B – Phase 1: Initial Consultation (Pre-Construction)

Date of Consultation: ___

Purpose Confirmed:

- Inform community about proposed activities
- Present site/location
- Present implementation timeline
- Present expected benefits
- Explain potential impacts

Documentation Attached:

- Attendance list (sex-disaggregated)
- Photos
- Minutes
- Issues raised recorded

Participation Data:

- Total Participants: __
- Women: __
- Youth: __
- Vulnerable Groups: __

SECTION C – Phase 2: Follow-Up Consultation (Commitments & Mitigation)

Date of Consultation: __

Purpose Confirmed:

- Discuss mitigation measures
- Present safety measures
- Explain tariff structure
- Clarify service conditions
- Address concerns from Phase 1

Documentation Attached:

- Attendance list
- Feedback matrix attached
- Responses to concerns documented

Was this consultation conducted before commissioning?

 Yes No

SECTION D – Disclosure Compliance

Date of Public Disclosure: __

- Tariffs publicly disclosed
- Service conditions explained
- Safety messages communicated
- GM contact details shared
- Hotline publicly displayed

Format used:

- Public meeting
- Printed material
- Radio
- Door-to-door

SECTION E – Grievance Mechanism Operationalization

- Local GM entry point identified
- Complaint box installed (if applicable)
- CLO trained on GM procedures
- GM awareness explained during consultation

Grievance Data (Preparation Phase):

- Number received: __
- Number resolved locally: __
- Number escalated to PIU: __
- Number of SEA/SH cases (aggregated only): __

SECTION F – Compliance and Verification

Were both required consultations conducted?

 Yes No

Was engagement completed prior to commissioning?

 Yes No

Has feedback been formally documented?

 Yes No

Signature of DRE Representative:

Signature of CLO:

Date:

PIU Verification:

Complete

Incomplete (Corrective action required)

10.4. Annex 8. Grievance Mechanism Forms and Registry Templates

Complaint ID	Date Received	Source/Channel	Category	Responsible Entity	Status	Resolution Provided	Complainant Satisfied?	Date Closed
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