Digitally Connected and Resilient Samoa Project (P-180807)

STAKEHOLDER ENGAGEMENT PLAN

1. Introduction

The Digitally Connected and Resilient Samoa Project aims to increase the use of resilient broadband internet in Samoa and improve the delivery of digitally enabled services.

The project has three components.

- **Component 1 - Investments in Digital Connectivity and Digital Government Infrastructure:**

  This component is designed to support the development of climate and disaster-resilient national digital connectivity infrastructure in both Upolu and Savai'I i) to maximize the benefits of digital connectivity for public institutions**,** businesses, and citizens of Samoa; and ii) introduce channels for national-level atmospheric hazards and other disasters early warning notification. It includes the following sub-components which will be managed by the Ministry of Communications & Information Technology (MCIT): i) National fiber network to improve service delivery into underserved areas; ii) Enhancement of the capacity and coverage of the Government's Intranet; iii) Upgrade and establishment of secure and resilient government data center and support the rollout of broadband pilot(s),

- **Component 2 - Strengthening Institutions and enhancing the enabling environment for digital transformation.**

  This component will support the development and strengthening of the policy, legal and regulatory enabling environment, and the institutional arrangements, needed to underpin the investments in digital government and the digital transformation, including strengthening of GoS cybersecurity initiatives. It includes the following sub-components: i) Transactional, legal and regulatory support for the Public Private Partnership (PPP); ii) Regulatory support, policy and legal framework for digital government and economy; and iii) Enhancement of cybersecurity.

- **Component 3 – Project Implementation Support**

  This component will finance technical and operational assistance for Project management and implementation. Specifically, it will finance the establishment of a Sector Coordination division within MCIT, which will be led by a Sector Coordinator supported by four project officers responsible for financial management, procurement, environmental and social management, and M&E. The Sector Coordination division will be assisted by experts from the Centralized Technical Services Support Unit (CTSSU), under MOF.

The Project will be implemented on the two main islands of Upolo and Savai'i.

1.1 Legal and Other Requirements

The Digital Samoa Project will be implemented in accordance with Government of Samoa (GoS) laws and policies; and the World Bank's Environment and Social Framework (ESF).

GoS requirements for stakeholder consultation relevant to the project are outlined in the Cabinet Handbook 2011, EIA Regulation 2007 and Code of Environmental Practice 3 – Consultation. World Bank requirements are outlined in Environmental and Social Standard 10 – Stakeholder Engagement and information Disclosure.

As per these requirements, implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

1.2   Objective of the Stakeholder Engagement Plan

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and communication throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach: Public communications for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.

- Informed participation and feedback: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.

- Inclusiveness and sensitivity: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the communication process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

2   Stakeholder Identification & Analysis and Methodology

Project stakeholders are identified as individuals or groups, government ministries and other entities that may be impacted by or have an interest in the proposed projects.

2.1   Affected Parties

Affected parties include persons, groups and other entities within the project Area of Influence (PAI) that are directly influenced by the Project and/or have been identified as most susceptible to change associated with the Project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation measures.

Table 1 Affected Parties Stakeholder Analysis

Stakeholder Group	Stakeholder
Target communities / end users	- Matai/village leaders - Village councils - Village woman's councils; - Project affected households

	• Local schools • Local health centres • Police outposts • Local post office
Government Ministries/Agencies / end users	All government ministries as end users Key ministries involved in ICT services including • Ministry of Education, Sports and Culture • Electric Power Corporation • Ministry of Natural Resources and Environment • Ministry of Health • Ministry of Finance • Ministry of Commerce, Industry and Labour • Office of the Attorney General • Ministry of Works, Transport and Infrastructure • Ministry of Women Community Social Development • Samoa Tourism Authority • Land Transport Authority
Business, utilities, service providers	Internet Service Providers (Digicel, Vodafone, CSL, Lesa, Bluewave) Television & Radio Broadcasters (Samoa Quality Broadcasting, TV 3, EFKS TV, Catholic Media, Youth for Christ, BETA Multimedia Investment Company Ltd [TV 5], NUS TV, SDCL), Power Corporation, SWA
Contractors	Civil works contractors and sub-contractors Fibre optic providers

2.2   Disadvantaged/Vulnerable Individuals or Groups

Disadvantaged/Vulnerable stakeholders include persons or groups who may be disproportionately impacted or whom the project poses significant impacts and disadvantage compared with any other groups due to their vulnerable status. These stakeholders require special engagement to ensure their equal representation in the communication and decision-making process associated with the Project.

Within the Project, the vulnerable or disadvantaged groups take into consideration and are not limited to the following:

- Women
- Elderly
- Female-headed households
- Illiterate people
- People with disabilities
- Those who identify with diverse sexual orientation and gender identities and expression (SOGIE), including *fa'afafine.*
- Individual encountering inadequate digital services / people residing in areas with limited coverage
- Groups that are more vulnerable to exploitation and abuse on web

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

2.3   Other Interested Parties

Other Interested Parties include individual/groups/entities that may not experience direct impacts form the Project but who consider their interests as being affected by the project and/or who could affect the Project and the process of its implementation in any way. These include:

- Civil society (Samoa Umbrella for NGOs and relevant NGOs)

- Mainstream media
- Politicians
- Public
- Church

3   Stakeholder Engagement Program

3.1   Engagement during project preparation

Consultations undertaken with stakeholders during project preparation are summarised in Table 2.. Information on the Project was also disclosed on MCIT and OoTR websites.

Table 2   Consultations/Meetings held during the preparation stage of the project

Date	Type of meeting/ communication	Purpose/Message	Stakeholders
January –May 2024	Meetings	Meetings with key stakeholders to seek input into the design of the project.	Key Government Agencies
22 May 2024	Stakeholder Consultation workshop	Consultation with key project stakeholders to inform them about the project scope, implementation requirements as well as their roles and responsibilities in the overall implementation of the project to improve coordination. Information on E&S risk management was also shared.	WB, MOF, MCIT, OoTR, Key Government Agencies including PSC, EPC, MCIL, LTA, MNRE Service Providers including Vodafone, Digicel Community Representatives from Samatau and Solosolo

Feedback received during communications and taken into account by MCTI and OoTR includes:

Comment	Response
Voda thinks this may be a duplication work, and mentioned that they have a fiber connecting the majority of Upolu Island, but they believe Savaii may need more connectivity. The topic of who will manage and maintain the network was brought up, including the potential involvement of the private sector	Government thinks that this will improve the last mile issue since most of Government traffic will now be on a separate network. It will also improve the quality of service where Government priorities its digital transformation. Also, the areas targeted are under served and unserved areas. The Government is looking at more concrete solutions for data management and cybersecurity.

Comment	Response
Have similar projects been implemented in other parts of the Pacific? Concerns were raised about the government's workforce capacity for the project rollout.	Similar projects are being implemented in other Pacific countries. This is the first of its kind with WB financing in Samoa. MCIT is undergoing huge restructuring where there are new divisions to look after government networks and ICT development/projects.
Access to coverage issues for customers remains a concern, especially in areas with poor coverage by the current service provider. The mayor of Samatau expressed a desire for similar consultations in their village and increased participation from other villages nationwide.	The provision of the network for all Government services will promote the access of everyone to not just information and government services but also give the service providers a chance to improve their networks to homes and other parts of the country. Materials of the consultation will be uploaded to the https://mcit.gov.ws/digital-samoa/. Everyone/Anyone can access it anytime from anywhere.
The handling and management of lands involved in the project during implementation were also discussed.	The process is with MWTI at the PUMA Division. The project will use the same and as well as the coordination with the LTA.
What is the project timeline or progress? Especially in terms of rolling out the installation of equipment to when people can access and start using the service.	The project is currently in the preparation phase. The World Bank board meeting is intended to be held at the end of May which will discuss the Digital Samoa project, with further discussion towards the month of October. Therefore, the installations and such may begin most probably around early 2025, but these are yet to be finalised.

3.2   Engagement during project implementation

Engagement will occur at multiple stages of project implementation and will involve a number of different tools and techniques depending on the intended audience. As required, the project team will undertake engagement and disclose information in Samoan and in a format appropriate to the target audience.

3.2.1   Stakeholder Consultation

The stakeholder consultation plan is outlined below. This plan was developed during preparation to outline how engagement will be implemented for the different the project activities.

Table 3   Outline of stakeholder communication during different project stages.

Project stage / Activity	Topic of communication / message	Method used	Target stakeholders	Responsibilities
Overarching				
Ongoing throughout design and implementation of all Project activities	Project design and project progress	Correspondence by email and formal meetings	Government Ministries	MCIT/OOTR
Ongoing throughout Project Implementation	Environmental, Social and Health and Safety requirements, Worker GRM	Internal government communication channels; Formal and on-the-job training;	MCIT and OOTR project staff	MCIT/OOTR
At key milestones or as needed during Project Implementation	Project update	MCIT website and Facebook page, OOTR website, press release as required, email. 2AP/TV9	NGOs, traditional media, participants of social media	MCIT/OOTR
Component 1: Investments in Digital Connectivity and Digital Government Infrastructure				
Connectivity/infrastructure design and rollout - Last mile fibre network - Enhancement of government network connections and technology	Information on project Identification of target areas Design options and design documentation E&S impacts and management measures; GRM Lands access requirements affected assets and compensation process Identification of sensitive receptors	Consultation meetings and workshops Radio, TV, Posters, Flyers, Facebook Page	Target Government agencies Target communities and households (including vulnerable and disadvantaged groups) Affected landholders (i.e. state, customary, freehold) Utility owners and service providers Works contractors Interested parties including other	MCIT
	Progress updates; Environmental and Social management measures, GRM	Consultation meetings and workshops Radio, TV, Posters, Flyers, Facebook Page		MCIT

Project stage / Activity	Topic of communication / message	Method used	Target stakeholders	Responsibilities
		Grievance mechanism	government agencies and general public	
SamCERT	Cyber security	Invitations and stakeholder consultations TV9/ SamCERT Facebook	Government Agencies Private Sector Non-Government Organization	SamCERT
Broadband Pilots Design and Rollout	Information on project and pilot Identification of target areas and input into design / implementation	Consultations, formal meetings, emails.	Government Agencies, Telecom Service Providers	MCIT, OOTR
Design and upgrade of government data centre	Information on project and data centre input into design / implementation	Consultations, Emails, TV, Formal Meetings	Cloud Service Providers, Infrastructure Service Providers, MCIT, OOTR	MCIT, OOTR, MOF
Component 2: Strengthening institutions for enabling environment for digital transformation				
Transactional, legal and regulatory support for the Public Private Partnership	Information on PPP options, transactions	Consultations and meetings	Government ministries; telecom service providers / private sector	MCIT/OOTR
	Regulatory reforms for PPP	Inter-agency meetings and public consultations – refer. Cabinet Handbook 2011	Government ministries; general public	MCIT/OOTR
Regulatory support and capacity building for the digital economy	Information on training and procurement activities	Meetings	MCIT and OOTR staff	MCIT/OOTR
	Information on policy and legislative reviews	Inter-agency meetings and public consultations – refer. Cabinet Handbook 2011	Government ministries; general public	MCIT/OOTR

3.2.2   Information disclosure

The Project will utilize various methods to disseminate information, including public notices and press releases on television and radio programs, posting press releases on our website and official social media accounts, distributing pamphlets and brochures, among other channels. Both Samoan and English languages will be employed in the dissemination process.

3.2.3   Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

4   Grievance Mechanism

The Grievance Mechanism (GM) is a platform to receive and address complaints issued by affected persons or community members who have been impacted by any specific project activities. MCIT and OoTR encourage the submission of feedback and grievances and do not tolerate reprisals and retaliation against project stakeholders who share their views about the project.

MCIT and OoTR as the implementing agencies will be the complaints administrators in charge of managing and monitoring the GRM for each of their respective components.

IA focal points are provided below:

MCIT

Lefaoalii Unutoa Auelua-Fonoti

Chief Executive Officer

Phone: 26117

Email: u.auelua-fonoti@mcit.gov.ws

OoTR

Lematua Gisa Fuatai Purcell

Regulator

Phone: 30282

Email:

Regulator@regulator.gov.ws

Complaints and grievances can be submitted in the form of a phone call, letter, email, or in person. All complaints and grievances will be recorded on complaint forms by the IA. The IAs will liaise with APs whenever necessary regarding the issues/requests and ensure they are resolved in a timely manner. Depending on the severity of the issue, the resolution period may vary. IAs will maintain a GM log. Information on grievances will be reported in project progress reports.

Project contractors will also be required to implement the project GM. Contractors will be required to nominate focal points, liaise with IAs on the receipt and resolution of grievances, and record and report on these matters.

Table 4   Project Grievance Process

Step	Description of Process	Time Frame	Responsibility
Grievance lodgement channels	Grievances can be submitted via the following project specific GM channels: • Telephone • E-mail • Letter to Grievance focal points • In person MCIT and OoTR have existing feedback lodgement channels that will also be utilised – refer https://mcit.gov.ws/ and https://regulator.gov.ws	n/a	Grievance focal points MCIT and OoTR feedback channel custodians
Sorting, processing	Any complaint received is forwarded to the nominated focal point. Focal points record, log and categorise complaints. Highly sensitive grievances involving allegations of sexual exploitation and abuse and sexual harassment will be immediately sent to the SEA/SH focal point without copying others.	Upon receipt of complaint	Project workers; grievance focal points; MCIT and OoTR feedback channel custodians
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant	Within 2 days of receipt	Grievance focal points
Verification, investigation, action	Investigation of the complaint is conducted. A proposed resolution is formulated by and communicated to the complainant.	Within 10 working days of receipt	Grievance focal points and relevant managers/technical staff
Monitoring and evaluation	Data on complaints are collected and reported	Semi-annually	Grievance focal points
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected	Within 5 working days of proposed resolution	Grievance focal points

Escalation

Complainants can request the grievance be escalated if they are not satisfied with the process or the proposed resolution. This would involve escalation from contractor to IA or from IA to the project steering committee.

4.1.1   SEA/SH related grievances

The Project's GRM will also use the following process for handling cases of SEA/SH. This process will be further operationalized during project implementation.

5   Resources and Responsibilities for SEP implementation

5.1   Responsibilities

The MCIT and OOTR as implementing agencies for the Project will be responsible for carrying out stakeholder engagement activities, including working closely with key stakeholders/ministries, international organizations, NGOs, local communities/entities and the media.

The Sector Coordination Division will be resourced to effectively support stakeholder engagement. MOF's CTSSU E&S Specialist will also provide technical support.

Civil Works Contractors will be responsible for undertaking stakeholder engagement related to site preparation and construction of the specific physical works.

The IAs will periodically revise and update this SEP as necessary in the course of project implementation to ensure that information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and affective in relation to the project context and specific phases of the development. The IAs will also be responsible for updating, monitoring and managing their internal project GRM logging system and ensure that the WB is kept informed and updated.

All this information and any public engagement activities undertaken by the Project will be documented and reported in project progress reports. Information will also be provided to stakeholders on MCIT and OoTR's websites and in public annual reports.

5.2   Budget for SEP Implementation

An indicative budget of US$150,000 for the implementation of the SEP will be included in the Project budget and will cover costs for the following:

- Communication consultant
- Travel costs of staff
- Communication campaigns and materials (i.e. printed media; online media)
- Trainings (i.e. Key messaging; GM implementation; SEA/SH response)
- Grievance mechanism establishment and operation (i.e. tollfree hotline etc)

Annex 1: Consultation Records