

REPUBLIC OF GHANA



MINISTRY OF EDUCATION

**SECONDARY EDUCATION TRANSFORMATION FOR ACCESS,
RELEVANCE AND RESULTS FOR JOBS (STARR-J) PROJECT**

(P514793)

**STAKEHOLDER ENGAGEMENT PLAN
(SEP)**

MARCH 2026

ABBREVIATIONS AND ACRONYMS

Abbreviation	Full Meaning
ADD	Attention Deficit Disorder
APTI	Association of Principals of Technical Institutes
CBOs	Community-Based Organizations
CEA	Complementary Education Agency
CENDLOS	Centre for National Distance Learning and Open Schooling
CHASS	Conference of Heads of Assisted Secondary Schools
CTVET	Commission for Technical and Vocational Education and Training
CSU	Client Service Unit
DAs	District Assemblies
DOVVSU	Domestic Violence and Victim Support Unit
EPA	Environmental Protection Agency
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FAQ	Frequently Asked Questions
FBOs	Faith-Based Organizations
GALOP	Ghana Accountability for Learning Outcomes Project
GBV	Gender-Based Violence
GETFund	Ghana Education Trust Fund
GES	Ghana Education Service
GLA	Ghana Library Authority
GM	Grievance Mechanism
GNECC	Ghana National Education Campaign Coalition
GNAPS	Ghana National Association of Private Schools
GNAT	Ghana National Association of Teachers
GRM	Grievance Redress Mechanism
LMP	Labour Management Procedures
MMDA	Metropolitan, Municipal and District Assemblies
MoE	Ministry of Education
NAGRAT	National Association of Graduate Teachers
NaCCA	National Council for Curriculum and Assessment
NaSIA	National Schools Inspectorate Authority
NNED	Northern Network for Education Development

Abbreviation	Full Meaning
NTC	National Teaching Council
OHS	Occupational Health and Safety
PAP	Project-Affected Person
PAs	Parent Associations
PC	Project Coordinator
PTT	Project Technical Team
RAP	Resettlement Action Plan
RF	Resettlement Framework
RP	Resettlement Plan
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SHS	Senior High School
STHS	Secondary Technical High School
STARR-J	Secondary Education Transformation for Access, Relevance and Results for Jobs
TVET	Technical and Vocational Education and Training
TVETS	Technical and Vocational Education and Training Service
WB	World Bank

GLOSSARY OF KEY TERMS

Consultation – A structured two-way process of engaging stakeholders to solicit their views, knowledge and advice, and to meaningfully consider and incorporate this input project decision-making, setting targets and defining strategies and interventions.

Engagement - An ongoing process of through which a project builds, maintains and strengthens constructive and sustainable relationships with stakeholders over the life of a project. Engagement forms part of a broader “stakeholder engagement” strategy that includes project affected parties, as well as other interested parties such as government entities, civil society, employees, suppliers, and partners.

Grievance Mechanism - A formal, project-level system through which project-affected parties and other stakeholders can submit concerns, complaints, or feedback, and through which such issues are received, recorded, assessed, and addressed in a timely, transparent, and appropriate manner. .

Stakeholders - Persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively; workers, local communities directly affected by the project and other stakeholders not directly affected by the project but that have an interest in it, e.g., local authorities, neighboring projects, and/or nongovernmental organizations, etc.

Stakeholder Engagement Plan - A project-specific instrument that sets out a systematic approach for identifying stakeholders and planning, implementing, and monitoring engagement activities throughout the project life cycle. The SEP defines how information disclosure, consultation, and other engagement activities will be carried out to manage, strengthen, and sustain effective stakeholder relationships, in line with ESS10 requirements. **Complainant**- An individual, group, or organization that submits a verbal or written complaint through a project-level or institutional grievance redress mechanism.

Grievance/Complaint -an expression of dissatisfaction that stems from real or perceived issues, typically referring to a specific source of concern and/or seeking a specific solution. For the purpose of this GRM, real and perceived impacts are treated equally and subject to the same due process. The term grievance and complaint are used interchangeably in this document.

Sexual exploitation- any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. In World Bank (WB) financed operations, sexual exploitation occurs when access to or benefit from Bank-financed goods, works, non-consulting services or consulting services is used to extract sexual gain.

Sexual abuse - actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

Sexual harassment- Any unwelcome sexual advances, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might be reasonably expected or perceived to cause offense or humiliation to another when such conduct interferes with work; is made a condition of employment; or creates an intimidating, hostile, or offensive work environment.

Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH): SEA occurs against a beneficiary or member of the community. SH occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff training can include specific instruction on the procedures for report each incidence.

Survivor - A survivor is a person who has experienced the SEA/SH in connection with the project, and whose case is addressed through the project GM.

EXECUTIVE SUMMARY

The World Bank will be supporting the Ministry of Education (MoE) of the Republic of Ghana in implementing the Secondary Education Transformation for Access, Relevance, and Results for Jobs (STARR-J) project. The project is financed through an IDA Credit of US\$300 million.

The objective of the project is to expand access, improve quality and relevance, and strengthen the systems of secondary education in Ghana. In practical terms, this means that more Ghanaian adolescents — particularly girls, students with disabilities, and young people in underserved communities — will have a place in a secondary school, that the quality of teaching and learning in those schools will improve, and that the institutions responsible for managing secondary education will be better equipped to plan, monitor, and deliver results.

What the Project Will Do

The project is organized into three main components:

Component 1 — Expanding Access to Secondary Education. This component addresses the shortage of secondary school places — particularly in northern Ghana — by constructing new schools in communities that currently have no nearby secondary school, completing partially built schools from the earlier E-Block program, rehabilitating and upgrading existing Community Day Secondary Schools (CDSS) in underserved urban and peri-urban areas, expanding and upgrading boarding facilities, and rehabilitating all ten special needs secondary schools across Ghana to ensure that students with disabilities can access quality secondary education.

Component 2 — Improving Quality and Relevance. This component focuses on making secondary education more useful and meaningful for students. It will support teacher training and development (including in the use of digital tools and artificial intelligence), improve school facilities such as science laboratories and workshops, strengthen STEM (Science, Technology, Engineering, and Mathematics) and TVET (Technical and Vocational Education and Training) programs, and develop digital skills for students. Particular attention will be paid to encouraging girls and students from disadvantaged backgrounds to participate in non-traditional subjects and vocational fields. A Re-entry Policy for pregnant girls and young mothers returning to school will also be supported under this component.

Component 3 — Strengthening Systems, Management, and Monitoring. This component will strengthen the capacity of the MoE and its key agencies to manage the secondary education sector sustainably. It will support improvements to teacher deployment systems, student assessment tools, data management and school information systems, labor market studies, and institutional systems for preventing and responding to Gender-Based Violence (GBV) and Sexual Harassment, Exploitation, and Abuse (SHEA).

Where the Project Will Work

Project activities will take place nationwide, across all 16 administrative regions of Ghana, in both urban and rural areas. However, new school construction and infrastructure expansion will prioritize regions with the greatest documented shortfall in secondary school places — namely the Savannah, North-East, Oti, and Upper West regions.

The specific locations of infrastructure subprojects — including new school construction sites, E-Block completion sites, and rehabilitation sites — are not fully known at this stage, because subproject sites are identified through a participatory process involving enrolment deficit analysis,

catchment area assessments, community engagement, and formal site selection criteria applied by MoE, GES and CTNET regional and district directorates. This process will be completed during project implementation, once financing is confirmed and the project's geographic targeting criteria have been applied. Subproject locations are expected to be progressively identified and confirmed beginning in the first year of project implementation, with the majority of sites confirmed before civil works contracts are awarded.

Purpose of Stakeholder Engagement Plan (SEP)

In line with the World Bank's Environmental and Social Standard 10 (ESS10) and national policy requirements, the SEP ensures that STARR-J is implemented through transparent, consistent, inclusive, and culturally appropriate engagement processes. The SEP outlines how the project will:

- Identify and engage stakeholders throughout the project life cycle.
- Ensure meaningful participation of affected persons, including vulnerable groups.
- Support inclusive decision-making across all 16 regions.
- Prevent, mitigate, or address concerns early, including those related to GBV/SEA/SH and Child Protection.

Stakeholder engagement is essential because the STARR-J is a nationwide education program touching active school environments, involving infrastructure works, service delivery, teacher deployment, learner safety, and the management of sensitive issues such as GBV/SEA/SH, child protection, and inclusion of vulnerable learners. Engagement ensures:

- Communities understand project benefits, timelines, and responsibilities.
- Parents, teachers, and students can provide feedback and report risks early.
- Workers, contractors, and school boards adhere to social and environmental standards.
- Vulnerable groups, including girls, students with disabilities, and displaced persons, are not left behind.

It also enables improved transparency, better design of learning environments, and shared ownership of project outcomes.

Implementation of SEP activities will be mainstreamed within the Ministry of Education, Ghana Education Service, CTNET, TVET Service, and collaborating agencies such as NaSIA, NTC, NaCCA, and the Ministry of Gender, Children and Social Protection (MGCSP). Clear institutional responsibilities and focal persons are identified to ensure accountability.

The SEP establishes indicators and processes for monitoring stakeholder engagement effectiveness. Stakeholders will be actively involved in monitoring activities, and regular reporting will ensure transparency and feedback loops to communities and partners.

Key Environmental and Social Risks

The STARR-J Project has been assessed as posing **Substantial environmental and social risk** due to its nationwide coverage and the scale and sensitivity of proposed interventions. Major risks include:

- **Construction-related risks:** Civil works at new and existing school sites may result in dust, noise, vibration, solid waste, and run-off affecting school communities and neighboring residents. Construction at active school sites risks disrupting teaching and learning,

particularly during national examinations. These risks will be managed by requiring contractors to prepare and implement site-specific Environmental and Social Management Plans (ESMPs) and by prohibiting disruptive works during examination periods.

- Occupational health and safety: Construction workers face risks of injury and accidents on site. All civil works contracts will require contractors to comply with occupational health and safety standards, provide appropriate personal protective equipment, and maintain safe and orderly work sites.
- Community health and safety: The presence of construction workers near school communities, including boarding school dormitories, creates risks to students — particularly female students — including risks of gender-based violence, sexual exploitation and abuse (SEA), and sexual harassment (SH). A dedicated GBV/SEA/SH Action Plan has been prepared and will be implemented before civil works commence at any school, including mandatory access control protocols, a zero-tolerance Code of Conduct in all civil works contracts, and confidential referral pathways to the Domestic Violence and Victim Support Unit (DOVVSU) and Ministry of Gender, Children, and Social Protection (MoGCSP).
- Land acquisition and involuntary resettlement: Construction of new schools and expansion of existing school boundaries may require additional land, which could result in displacement of residents, loss of livelihoods (including informal traders and market vendors near school gates), or disputes arising from customary land tenure arrangements, including unresolved legacy land disputes from the 2013–2015 E-Block program. A Resettlement Policy Framework (RPF) has been prepared, and site-specific Resettlement Action Plans (RAPs) will be prepared for each site where land acquisition or displacement is required, before any civil works commence at that site.
- Child labor: Construction supply chains and work sites carry risks of child labor. All civil works contracts will set a minimum working age of 18, with mandatory identity verification at the point of engagement, and regular unannounced inspections by the Project Technical Team (PTT) Environmental and Social Specialists.
- Digital safeguarding: Deployment of internet connectivity and digital devices to students under Component 2 carries risks of online harm to adolescent users. A Digital Safeguarding Framework will be developed before any digital infrastructure under Component 2 is deployed, setting out content filtering standards, online safety training for students, teacher supervision protocols, and a confidential mechanism for reporting online harm.
- Inclusion and accessibility: New and rehabilitated school infrastructure carries a risk of repeating the inaccessibility patterns of existing school buildings for students with disabilities. All new construction and significant rehabilitation will incorporate universal design standards — including ramps, accessible sanitation facilities, wide doorways, tactile guide paths, and assistive-technology-compatible ICT equipment — as mandatory engineering specifications. The National Schools Inspectorate Authority (NaSIA) will verify accessibility compliance before any building is commissioned.
- Chance finds of cultural heritage: Construction and ground disturbance at school sites — particularly at older schools with historical significance — may encounter previously unidentified cultural heritage assets. The Project ESMF includes Chance Finds Procedures requiring all works to stop immediately and the relevant authorities to be notified if cultural heritage is encountered during construction.

- Biodiversity and vegetation loss: Construction of new schools in rural areas may result in clearance of local vegetation and habitat modification. The project's site selection criteria will prioritize locations with minimal environmental sensitivity, and the Exclusion List prohibits construction in protected areas, critical habitats, and ecologically sensitive sites.

Summary of the Stakeholder Engagement Approach

Stakeholder Identification and Analysis

This SEP is a project-specific instrument that sets out a systematic approach for identifying stakeholders, planning, implementing, and monitoring engagement activities throughout the project life cycle. The SEP identifies and categorizes stakeholders into:

- **Affected parties:** MoE, GES, NaSIA, NaCCA, NTC, CTNET, schools, teachers, students, contractors, MMDAs, beneficiary communities, impacted landowners.
- **Other interested parties:** development partners, CSOs, NGOs, media, traditional authorities, disability organizations.
- **Vulnerable groups:** persons with disabilities, women/girls, children with special needs, orphans, displaced persons, and those without formal land documentation.

Engagement Methods

Engagement uses tailored tools such as community meetings, workshops, written materials, school-based forums, radio communication, sign-language interpretation, accessible venues, and targeted outreach for vulnerable populations.

Information Disclosure

Information will be disclosed at national, regional, district, and school levels, including:

- Project scope, timelines, and activities
- Environmental and social risks
- Mitigation measures
- Rights and responsibilities of stakeholders (affected parties, other interested parties and vulnerable groups as identified above)
- GRM channels and protocols
- GBV/SEA/SH reporting pathways
- Construction schedules and impact mitigation plans

Summary of the Grievance Redress Mechanism (GRM)

To complement these engagement arrangements and ensure accountability in project implementation, STARR-J will implement a strengthened sector-wide Grievance Redress Mechanism (GRM), which includes:

- Multiple grievance intake channels (phone, SMS/WhatsApp, boxes, in-person, email).
- A centralized IT platform providing case ID assignment, routing, and tracking.
- Clear timelines for resolving cases.
- Reporting requirements and escalation rules.

- A dedicated, confidential pathway for GBV/SEA/SH and child protection cases, which bypass ordinary resolution structures and follow MoE/GES/CTVET protocols.

GRM information will be displayed at schools, district offices, and MMDA websites.

Engagement Conducted to Date

Stakeholder engagement began early in project identification, with consultations involving:

- MoE, GES, NaCCA, NaSIA, NTC, TVET Service
- Development partners (UNESCO, UNICEF, EU, GIZ, JICA, WUSC, Mastercard Foundation)
- Disability organizations
- CSOs/NGOs
- Regional and district education offices
- School representatives

Consultations covered project objectives, design, implementation arrangements, E&S risks, disability inclusion, GRM structures, and feedback into project preparation.

Planned Engagement Activities

A stakeholder engagement program also sets out details of the purpose, timing and methods of stakeholder engagement and the STARR-J strategy for information disclosure which incorporates the view of vulnerable groups and other stakeholders. The SEP ensures inclusive, transparent, and culturally sensitive engagement throughout the project lifecycle. It is prepared in line with Ghana's 1992 Constitution, the Right to Information Act (2019), the Environmental Protection (Environmental Assessment) Regulations, 2025 (LI 2504), and the World Bank's ESS10. Upcoming engagement activities across the project lifecycle will include:

During Project Preparation

- Disclosure of ESF instruments (SEP, ESMF, ESCP).
- National and regional consultations with education stakeholders.

During Implementation

- Community and school-level engagement on construction activities.
- Continuous sensitization on GBV, child protection, and grievance reporting.
- Engagement with vulnerable groups through targeted sessions.

During Monitoring and Evaluation

- Stakeholder feedback surveys and follow-up consultations.
- SEP implementation monitoring via the MoE-PTT.
- Public reporting through annual education sector forums.

Funding for the SEP implementation is included as part of project cost under Component 3 which would fund all technical assistance (TA) and communication strategies conducted at the headquarters, regional and district levels. A total indicative estimated budget (over 3 years) of **USD 2,299,000** will be needed to implement the SEP.

TABLE OF CONTENT

ABBREVIATIONS AND ACRONYMS	i
GLOSSARY OF KEY TERMS	iii
EXECUTIVE SUMMARY	v
TABLE OF CONTENT	Error! Bookmark not defined.
LIST OF TABLES.....	xi
LIST OF FIGURES.....	xi
1.0 INTRODUCTION AND PROJECT DESCRIPTION	1
1.1 Background	1
1.2 Project Description.....	2
1.2.1 Project Development Objective and Beneficiaries	2
1.2.2 Project Components	3
1.3 Purpose and Objectives of Stakeholder Engagement Plan.....	4
1.4 Guiding Principles and Methodology.....	5
1.4.1 Guiding Principles	5
1.4.2 Methodology.....	6
2.0 POLICIES, REGULATIONS AND OTHER REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT	7
2.1 National Laws and Regulatory Requirements.....	7
2.1.1 1992 Constitution	7
2.1.2 Right to Information Act, 2019 (Act 989).....	7
2.1.3 Local Governance Act, 2016 (Act 936).....	7
2.1.4 Land Use and Spatial Planning Act, 2016 (Act 925)	7
2.1.5 Persons with Disability Act, 2006 (Act 715)	8
2.1.6 Environmental Protection (Environmental Assessment) Regulation of 2025 – Legislative Instrument (LI) 2504	8
2.1.7 National Environmental Policy.....	9
2.1.8 National Gender Policy (2015).....	9
2.2 World Bank’s Environmental and Social Standard 10 (ESS10) – Stakeholder Engagement and Information Disclosure	9
3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS	11
3.1 Stakeholder Identification.....	11
3.2 Analysis and Prioritization of Stakeholders	11
4.0 STAKEHOLDER ENGAGEMENT PROGRAM	17
4.1 Methods of Stakeholder Engagement and Information Disclosure	17
4.2 Strategy for Consultations and Information Disclosure.....	19
4.3 Proposed Strategy to Incorporate the Views of Vulnerable People.....	22
4.4 Brief Summary of Previous Stakeholder Engagement Activities	23
5.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING SEP ACTIVITIES	26
5.1 Resources	26
5.2 Management Functions and Responsibilities	26
6.0 GRIEVANCE MECHANISM.....	28
6.1 Proposed Education Sector-wide GRM.....	28
6.2 Core Design Principles.....	29
6.3 Grievance Redress Structure and Resolution Pathways.....	29
6.3.1 Entry Points and Grievance Uptake	29
6.3.2 Sector-wide Integrated IT Platform (Central Hub).....	30
6.3.3 GBV/SEA/SH and Child Protection Referral Pathway	31

6.3.4 High-Level GRM Oversight Committee	32
6.4 Grievance Processing	33
6.5 Recommended Grievance Redress Time Frame.....	34
6.6 Grievance Documentation and Reporting.....	35
6.7 Handling GBV/SEA/SH Cases.....	35
6.7.1. Policies and Guidelines	36
6.7.2. Procedure and processes	36
6.7.3. Preventive Measures.....	38
7.0 MONITORING AND REPORTING	39
7.1 Monitoring and Reporting Indicators	39
7.2 Summary of how SEP will be monitored and reported	40
7.3 Involvement of stakeholders in monitoring activities	41
7.4 Reporting back to stakeholder groups	41
ANNEXES	42
Annex 1: Stakeholder Consultation Reporting Matrix.....	42
Annex 2: List of Attendees from Stakeholder Consultations Workshops.....	43
Annex 3: Pictures From Stakeholder Consultations with Association of Person with Disability	44
Annex 4: Indicative Budget for Implementation of SEP.....	45
Annex 5: Agreed Next Steps for Education Sector-Wide GRM.....	47
Annex 6: GRIEVANCE REGISTRATION AND REDRESS FORM	48
Annex 7: Grievance Acknowledgement Receipt.....	50
Annex 8: Sample Grievance Redress Mechanism (GRM) Logbook.....	51
Annex 9: Grievance Resolution Meeting Record Template.....	52
Annex 10: Grievance Closure Form.....	54
Annex 11: Grievance Referral Template	56

LIST OF TABLES

Table 1: List of Affected Stakeholders and Level of Impact.....	14
Table 2: List of other Interested Persons and Level of Impact; Vulnerable Groups	15
Table 3: Characterization of Vulnerable Groups.....	16
Table 4: Stakeholder Engagement Methods.....	17
Table 5 - Stakeholder Consultation Schedule	20
Table 6: Strategies for Engaging Vulnerable Groups	22
Table 7: Previous Stakeholder Engagement Activities.....	24
Table 8: Summary of key Institutions/Focal Persons and their Responsibilities	26
Table 9: Proposed GRM Time Frame	34
Table 10: Monitoring and Reporting on the SEP	39

LIST OF FIGURES

Figure 1: Ghana Education Sector GRM – Operating Model	32
Figure 2: Grievance Uptake Methods	33

1.0 INTRODUCTION AND PROJECT DESCRIPTION

This Stakeholder Engagement Plan (SEP) outlines the strategy and processes for systematic, transparent, and inclusive engagement with stakeholders throughout the STARR-J Project lifecycle. It ensures compliance with national regulations and international standards, particularly the World Bank ESS10.

1.1 Background

Ghana's education system operates within a well-defined institutional and policy framework. The system follows a 2-6-3-3-4 structure spanning kindergarten through tertiary education, with the first 11 years of basic education constitutionally mandated for all children. The Ministry of Education (MoE) provides overall policy direction for the sector, with the Ghana Technical and Vocational Education and Training Service (TVET Service) and Ghana Education Service (GES) leading implementation at the pre-tertiary level under the Education Strategic Plan (ESP 2018–2030). Over the past two decades, Ghana has made substantial progress in expanding access across all levels of education. Enrolment gains at the kindergarten and primary levels — with gross enrolment ratios (GER) rising to 124 percent and 111 percent respectively — reflect the success of sustained policy investment in foundational education. At the secondary level, the introduction of the Free Secondary and Technical Education Policy in 2017 was transformative, driving a 78 percent increase in enrolment from 800,000 students in 2017 to 1.43 million in 2025, and lifting the secondary GER from 55.9 percent to 70.1 percent by 2024. With the population of 15- to 17-year-olds projected to grow from 2.2 million in 2035 to 2.6 million by 2040, demand for secondary places will continue to rise, placing mounting pressure on infrastructure, staffing, and instructional quality.

Ghana introduced the double-track system as a transitional measure to manage the surge in secondary school enrolment that followed the introduction of the Free Senior High School (SHS) policy. Under this arrangement, students are divided into cohorts that attend school on alternating terms, allowing existing facilities and teachers to serve a significantly larger number of learners within a single academic year. At its peak in 2018, 58 percent of public secondary schools operated on a double-track schedule; by 2026, this share had declined to 39 percent, though these schools continue to enrol 68 percent of all public secondary students — an average of 2,678 students per school, compared to 891 in single-track institutions. While the system has been effective in expanding access under infrastructure constraints, it has come at a cost to learning quality. Students in double-track schools experience out-of-school periods of up to 12 weeks between tracks, substantially reducing classroom contact hours and disrupting instructional continuity. These extended gaps have also placed additional strain on teacher workload and student engagement, creating trade-offs that undermine the quality gains the broader secondary education expansion was intended to deliver.

Persistent infrastructure deficits and uneven geographic distribution further exacerbate access challenges for current and future demand, as well as quality disparities. Public secondary schools face a deficit of over 200,000 effective seats, contributing directly to overcrowding and the continued reliance on double-tracking. A 2022 National Schools Inspectorate Authority (NaSIA) assessment of 24 low-performing schools revealed that 88 percent lacked technical and vocational workshops and 58 percent lacked designated science laboratories, significantly limiting opportunities for practical instruction. Even where laboratories existed, many were poorly equipped or in disrepair. In addition, 13 districts lack a public secondary school

entirely, highlighting geographic inequities that constrain access for rural and underserved communities. These infrastructure gaps limit the system’s capacity to deliver STEM-oriented, inclusive, and competency-based learning at scale. Addressing these challenges requires a multi-pronged approach: rehabilitating and upgrading existing facilities, completing unencumbered infrastructure such as E-blocks,¹ and constructing new schools with standardized facilities where demand justifies investment. Infrastructure investments must be accompanied by comprehensive teacher deployment and training in the revised curriculum and practical skills instruction to ensure that expanded facilities translate into improved learning outcomes.

In addition to infrastructure gaps that affect the quality of education, gaps in digital and transferable skills further limit the employability prospects of secondary graduates. Only 22 percent of adolescent boys and 8 percent of girls possess relevant ICT skills, indicating substantial gender disparities in digital readiness. Each year, approximately 260,000 of the 400,000 secondary graduates enter the labor market without progressing to tertiary education, underscoring the central role of secondary education in workforce preparation.² A 2022 ACET study found that 61.5 percent of employers require secondary education as the minimum qualification; however, employers consistently report deficits in digital literacy, soft skills, and workplace problem-solving among graduates.³ These findings reinforce the need to strengthen foundational, applied, and digital competencies within both general and technical secondary programs.

1.2 Project Description

1.2.1 Project Development Objective and Beneficiaries

The Project Development Objective (PDO) *is to expand access to, and improve the quality and relevance of, secondary education in Ghana.*

Project activities will be implemented nationwide across all 16 regions of Ghana benefitting an estimated 2.3 million people during the implementation period. The program will reach all public senior secondary schools (SHS/STHS: 723, TVET: 233). Accordingly, approximately 2.2 million students, 100,000 teachers, and school principals are expected to benefit directly from project interventions during the implementation period. The main primary beneficiaries are students enrolled in public general secondary and technical and vocational education and training (TVET) institutions that receive project-financed investments. This includes students in newly constructed, expanded, or rehabilitated schools, as well as those benefiting from upgraded classrooms, laboratories, workshops, digital learning infrastructure, and improved teaching and learning materials. The project will prioritize students from underserved, including rural and peri-urban communities and districts with limited secondary school coverage. Gender and vulnerability considerations are central to project design.

Targeted measures will support girls, students from poor households, and students with special educational needs by reducing physical, financial, and social barriers to participation and learning. Interventions will promote gender-responsive school infrastructure, safer learning environments,

¹ E-blocks, short for Educational/Excellence Blocks, are standardized, multi-story classroom and facilities complexes comprising 24 classrooms, three laboratories (physics, chemistry and biology), constructed from 2017 by the GoG to rapidly expand capacity at secondary level.

² Tertiary education includes all post-secondary institutions as defined by the Ghana Tertiary Education Commission (GTEC).

³ ACET 2022 https://acetforafrica.org/wp-content/uploads/2022/10/YES_Ghana_country_report_Final_-1.pdf

and inclusive teaching practices, while encouraging girls' participation in STEM and TVET programs where gender gaps persist. Teachers, school leaders, and education personnel will benefit from improved learning environments, enhanced professional development, curriculum implementation support, and strengthened school management. Institutional beneficiaries include the Ministry of Education and its agencies at national, regional, and district levels, which will benefit from strengthened planning, monitoring, data systems, and service delivery capacity. Communities in project areas will also benefit from improved access to secondary education and local employment opportunities linked to school construction and rehabilitation.

1.2.2 Project Components

The project adopts a multi-pronged approach to invest in improving Ghana's secondary education access, quality and relevance. Project activities are organized under three interrelated components recognizing that access, quality, and systems strengthening are mutually reinforcing. In addition, the project incorporates multi-stakeholder processes and actively involves citizens and beneficiaries. It is also aligned with other relevant initiatives and projects financed by the World Bank, the GoG, and development partners.

Component 1: Increasing equitable access to senior secondary, technical and vocational education. This component will eliminate the double-track system and expand access to quality secondary, technical and vocational education infrastructure through strategic rehabilitation, upgrading, and new construction of school facilities nationwide. The subcomponent will integrate climate adaptation and mitigation strategies, contributing to more resilient educational facilities. An operations manual will be prepared that will contain guidance on climate resilience and the use of renewable energy as power sources. Schools will be constructed according to the manual and will incorporate both climate change adaptation measures such as rainwater harvesting systems to provide sustainable water sources during prolonged periods of drought and to prevent waterlogging and reduce the risk of waterborne diseases, disaster resiliency features to withstand extreme weather events, including elevated foundations, reinforced roofing, ventilation, and proper drainage system, as well as mitigation measures for such as energy-efficient designs, solar-powered lighting, and supporting green spaces and tree planting.

Component 2: Improving the quality and relevance of secondary education. This component strengthens the quality and *relevance* of secondary education in Ghana through investments in teaching, learning, and skills development across both general senior secondary and technical/vocational pathways.

Component 3: Strengthening systems for assessment, data and evidence-based decision-making. This component focuses on system-level activities essential for achieving quality secondary, technical and vocational education and access goals. It provides support for the conduct of student learning assessments and to strengthen the collection and use of data for planning, supervision, and monitoring of education outcomes and for decision-making. Together with other components, these efforts form key elements of a comprehensive approach to system-level improvements for student learning. Other activities to be supported include funding systems for addressing GBV issues in Ghana's secondary, technical and vocational schools, stronger school leadership for improved education outcomes.

1.3 Purpose and Objectives of Stakeholder Engagement Plan

The preparation of a Stakeholder Engagement Plan (SEP) for the Ghana Secondary Education Transformation for Access, Relevance and Results for Jobs (STARR-J) Project is essential to ensure that all individuals, groups, and institutions who may influence or be affected by the project are effectively identified, consulted, and engaged throughout the project cycle. The SEP provides a structured, inclusive, and transparent approach to stakeholder participation, and forms an integral part of the Environmental and Social Framework (ESF) instruments required for project appraisal and implementation. The key rationale for the SEP includes the following:

i. Compliance with Environmental and Social Standard (ESS10)

In line with the World Bank's ESS10, the Ministry of Education is required to establish and maintain a systematic process of stakeholder engagement beginning at project preparation and continuing through implementation. The SEP ensures full compliance with ESF requirements, including early disclosure of information, meaningful consultation, and accessible and functional grievance redress mechanisms.

ii. Promotion of Inclusive and Equitable Participatory Project Planning

The project will benefit a wide range of stakeholders—students, teachers, school administrators, district education offices, communities, and private sector partners. Beyond these, vulnerable and marginalized groups such as girls, rural learners, persons with disabilities, and low-income households have distinct needs. The SEP ensures that these diverse voices are meaningfully included, thereby strengthening the relevance, quality, and equity of project design and implementation arrangements. It also outlines targeted engagement strategies and tailored communication approaches aimed at addressing barriers to inclusion and ensuring equitable participation.

iii. Identification and Management of Environmental and Social Risks

The project may generate a range of social risks, including inequitable access to project benefits, labour management concerns, child protection risks, SEA/SH risks, exclusion of vulnerable learners, and community health and safety issues associated with construction activities. Effective stakeholder engagement is critical for early risk identification, understanding local contexts, and co-creating risk mitigation measures. The SEP provides the framework for continuous engagement and timely feedback that supports proactive risk management.

iv. Strengthening Transparency and Public Accountability

Given the national importance of secondary education and labour-market readiness, transparent communication and access to information are essential. The SEP promotes openness and builds public trust by clarifying project objectives, beneficiary criteria, implementation timelines, and roles of key institutions. It also creates a formalized platform through which stakeholders can raise concerns or request clarifications, thereby enhancing accountability.

v. Establishing a Robust Grievance Redress Mechanism (GRM)

A functional, accessible, and inclusive GRM is fundamental to responsive project management. The SEP outlines a comprehensive mechanism for receiving, assessing, and resolving grievances from students, parents, teachers, contractors, and community members. It also provides a confidential and survivor-centered pathway for handling SEA/SH, child labour, and child

protection cases. The GRM contributes to risk mitigation, early detection of implementation challenges, and resolution of disputes that may otherwise escalate.

vi. Facilitating Institutional Coordination and Harmonized Implementation

The project requires coordinated action across several institutions within the education sector and beyond. The SEP establishes clear channels of communication among national education agencies, regional and district education offices, school management structures, and external partners such as private sector employers supporting job-readiness initiatives. Effective stakeholder engagement at all levels promotes alignment, reduces implementation bottlenecks, and improves overall project performance.

vii. Supporting Continuous Learning, Adaptation, and Project Improvement

Stakeholder feedback is essential for iterative learning and adaptive management. The SEP provides processes for capturing, analyzing, and integrating stakeholder views into periodic project reviews and decision-making. This reinforces the relevance and responsiveness of interventions, especially in dynamic environments where education and labour market needs continue to evolve.

1.4 Guiding Principles and Methodology

The preparation and implementation of the Stakeholder Engagement Plan (SEP) are guided by internationally recognized principles and the requirements of ESS10. These principles ensure that engagement is transparent, inclusive, culturally appropriate, and responsive to stakeholder needs.

1.4.1 Guiding Principles

• Openness and Life-Cycle Engagement

Stakeholder engagement will occur throughout the entire project life cycle and will be conducted in a transparent, timely, and accessible manner. Consultations will be free from manipulation, interference, coercion, or intimidation.

• Informed Participation and Feedback

Relevant information will be shared proactively with all stakeholders in formats and languages appropriate to their needs. Mechanisms will be provided to enable stakeholders to ask questions, offer feedback, and raise concerns, with all inputs documented and addressed in a structured manner.

• Inclusiveness and Sensitivity

Stakeholder identification and mapping will ensure broad and equitable participation. Engagement activities will promote equal access to information and foster constructive relationships with all stakeholder groups. Special attention will be given to the needs of vulnerable individuals and groups, including women, students, elderly persons, persons with disabilities, displaced persons, people with underlying health conditions, and diverse ethnic groups.

• Gender Sensitivity and Equity

Consultations will be designed to ensure that women and men participate meaningfully and safely. Where appropriate, separate focus group discussions or targeted approaches will be used to ensure gender-specific concerns are heard and addressed.

1.4.2 Methodology

The development of the SEP followed a structured and participatory process that included:

- Identification and mapping of stakeholders through institutional analysis and project design reviews.
- Initial consultations with government agencies, education sector institutions, school representatives, community groups, and development partners.
- Definition and refinement of stakeholder engagement objectives.
- Development of the project's Grievance Redress Mechanism (GRM).
- Formulation of engagement methods, activities, roles, and the stakeholder engagement matrix.
- Establishment of timelines for engagement activities throughout the project cycle.
- Identification of resources, capacity needs, and institutional responsibilities for SEP implementation.
- Preparation of the SEP budget.
- Validation of SEP content with stakeholders.
- Finalization and public disclosure of the SEP.

2.0 POLICIES, REGULATIONS AND OTHER REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

The SEP is guided by applicable Ghanaian laws governing participation, decentralization, land acquisition, and environmental/social protection, and aligned with the World Bank Environmental and Social Framework (ESF), especially ESS10 on Stakeholder Engagement.

2.1 National Laws and Regulatory Requirements

2.1.1 1992 Constitution

The 1992 Constitution sets out the rights, freedom, duties and obligation of every citizen of Ghana. These are the constitutional rights of Ghanaians. Article 21(1) (f) of the 1992 Constitution of the Republic of Ghana elevates citizens right to information to a human rights status. This right will be properly enjoyed where the public is efficiently engaged in the processes and procedures of public institutions. There is no better way to respect this constitutional right than to design a mechanism that proactively engages project communities from the project planning phase and to actual implementation and completion.

2.1.2 Right to Information Act, 2019 (Act 989)

The Right to Information (RTI) Act, 2019 (Act 989), gives Ghanaians the right to access information in public institutions, thereby holding public officers accountable. The Act provides for the implementation of the constitutional right to information held by a public institution, subject to exemptions that are necessary and consistent with the protection of the public interest in democratic society, to foster a culture of transparency and accountability in public affairs and to provide for related matters. Thus, affected stakeholders, groups and persons interested in information related to the STARR-J project will have the right to apply for such information to be made available to them. The project shall be guided by the provisions of the law and will adopt transparent and disclosure systems that provide sufficient and relevant information for all interested entities.

2.1.3 Local Governance Act, 2016 (Act 936)

Sections 40 to 48 of the Local Governance Act, 2016 (Act 936) highlights the need for participatory governance at the local level. The sections mandate local authorities to create opportunities for residents and other stakeholders to access information and to participate effectively in the activities and decision making of the District Assembly and the sub-district structures of the District Assembly.

2.1.4 Land Use and Spatial Planning Act, 2016 (Act 925)

The STARR-J Project is subject to the provisions of Act 925, specifically Sections 174 through 178. Section 174, Public Consultation, outlines the procedure for public consultation conducted by a District Assembly for the purposes of land use and spatial planning initiatives. Section 175, Public Participation, obligates a person responsible for the preparation of a plan to ensure that stakeholders are consulted in accordance with the procedure prescribed in the Land Use and Spatial Planning Regulations, 2019 (LI 2384) accompanying Act 925. Section 176, Records, requires that the Land Use and Spatial Planning Authority (LUSPA), the Regional Coordinating Council (RCC) and each District Assembly keep written records of planning decisions together with supporting documents. Section 177, Public Records, establishes procedures to make records available to the

public through a public data room located in the Assemblies. Section 178, Power to Obtain Information, establishes the power of the Assemblies to obtain information in the performance of its planning function from an individual, group and/or entity.

2.1.5 Persons with Disability Act, 2006 (Act 715)

The Act protects persons with disabilities from discrimination and degrading treatment in employment and other aspects of social and economic life. It prohibits discrimination in hiring and employment, derogatory treatment, and placement of persons with disabilities in unsuitable work environments. The project must ensure inclusivity by accommodating persons with disabilities in employment, infrastructure design, and resettlement planning. Measures should be taken to provide equal opportunities and accessibility in project activities.

2.1.6 Environmental Protection (Environmental Assessment) Regulation of 2025 – Legislative Instrument (LI) 2504

LI 2504 requires public consultation and participation as an integral element of the environmental assessment process.

- The Regulations emphasize that stakeholders—particularly communities and individuals potentially affected by a project—must be involved in the assessment of environmental and social impacts.
- Stakeholder input should be sought to identify concerns and inform project design, mitigation measures, and decision-making.

Stakeholder engagement under LI 2504 is not a one-off event but a continuous process.

- Engagement should occur at key stages of environmental assessment, including project scoping, environmental impact statement (EIS) preparation, review, and decision stages.
- Early engagement helps identify environmental and social issues and integrate community concerns into project planning.

With respect to public access to information and documentation, the Regulations highlight transparency and accessibility:

- Project documentation relevant to environmental impacts and planned mitigation should be made available to stakeholders in a timely and understandable manner.
- Disclosure may include environmental reports or summaries that explain anticipated impacts, mitigation plans, and opportunities for public comment.

LI 2504 incorporates mechanisms such as public hearings and community consultations:

- Public hearings are organized to give affected members of the public an opportunity to express views and ask questions before decisions are finalized.
- Notices for consultations and hearings are typically disseminated in appropriate media and forums so that stakeholders—including local residents, interest groups, and civil society—are informed and able to participate.

The Regulations expect that engagement efforts are inclusive:

- Effective consultations should consider language, cultural contexts, and socio-economic differences to ensure all affected persons—especially vulnerable or marginalized groups—have meaningful opportunities to participate.

- This supports the identification of local concerns and priorities related to environmental and social impacts.

Stakeholder engagement under LI 2504 is directly linked to environmental permitting and impact assessment processes:

- Projects requiring an environmental permit must typically undergo an environmental assessment with mandated consultation components.
- The EPA (or its successor authority) reviews environmental submissions and may confirm that stakeholder engagement obligations have been met before issuing permits.

2.1.7 National Environmental Policy

The Strategic goal 4 of the National Environmental Policy, focuses on participation and coordination in environmental governance, charges the lead institutions in environmental governance to ensure active participation in all environmental matters.

2.1.8 National Gender Policy (2015)

The policy integrates gender equality into Ghana’s national development by improving social, legal, political, economic, and cultural conditions for all, particularly women, girls, children, persons with disabilities, and marginalized groups. It prioritizes gender mainstreaming, women’s empowerment, and social protection through five key commitments: women’s empowerment and livelihood, women’s rights and access to justice, women’s leadership and accountable governance, economic opportunities for women, and gender roles and relations. The project must ensure gender-sensitive planning and implementation, including equitable participation, women’s empowerment initiatives, and consideration of gender roles in decision-making. Measures should be in place to support women's access to resources, leadership roles, and economic opportunities.

2.1.9 National Child and Family Welfare Policy (2015)

This policy sets out Ghana’s Child and Family Welfare System comprising of laws and policies, programmes, services, practices and structures designed to promote the wellbeing of children by ensuring safety and protection from harm. It aims to achieving permanency and strengthening families to care for their children successfully. The Policy understands that a child is an integral part of the family, as such, a child’s welfare cannot be separated from that of the family.

This Policy is concerned with both the ‘formal’ component of Child and Family Welfare system (i.e. those governed by laws, policies and regulations and delivered by state institutions) and the ‘informal’ (i.e. those that are based on community and traditional processes and resources).

2.2 World Bank’s Environmental and Social Standard 10 (ESS10) – Stakeholder Engagement and Information Disclosure

Stakeholder engagement and information disclosure are a key requirement of all World Bank-funded projects. The introductory paragraph of ESS 10 states “This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to a successful project design and implementation”.

ESS 10 stipulates the development and implementation of a stakeholder engagement plan to engage with stakeholders throughout the project life cycle, and early in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The ESS 10 also requires borrowers to engage in meaningful consultations with all stakeholders. The project is required to 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, and intimidation. In the case of the Secondary Education Transformation for Access, Relevance and Results for Jobs (STARR-J) Project, the wide geographical location of the sub-projects, the number of project districts, and the multiplicity of actors involved warrant the need to deepen stakeholder consultation throughout the project cycle.

3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

This section identifies key stakeholders who were/will be informed and consulted about the project, including individuals, groups, or communities. It also identifies and assesses the needs of some disadvantaged or vulnerable individuals or groups, who may have limitations in participating and/or in understanding the project information or in participating in the consultation process.

3.1 Stakeholder Identification

Stakeholders are defined as persons or groups who are directly or indirectly affected by a project as well as those who may have interest in a project and/or could influence its outcome, either positively or negatively.

For the purpose of effective and tailored engagement of the STARR-J Project, stakeholders can be divided into the following core categories:

(i) Affected parties - These are institutions or groups or individuals who are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project activities, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Affected parties include the key implementing and beneficiary institutions and entities, students and teachers at the beneficiary schools, neighbouring property owners, land users and host communities of beneficiary schools among other parties that may be subject to direct impacts from the Project.

(ii) Other interested parties - Other interested parties include project stakeholders other than those directly affected. These are institutions, groups, or individuals who may not experience direct impacts from the Project activities, but whose interests may be affected by the Project activities. Interested Parties could also influence the process of the Project's implementation in various ways.

(iii) Disadvantaged/vulnerable individuals or groups - The Project Affected Parties also include vulnerable groups or persons who may be disproportionately impacted or further disadvantaged by the Project activities as compared with any other groups due to their vulnerable status and may require special engagement efforts to ensure their equal representation in the consultation and decision-making processes under the Project. Identifiable vulnerable persons and groups under this Project include: persons with disabilities, children with special needs, women/girls, and orphans who may encounter difficulties in accessing information or other project benefits. Vulnerable groups to be affected by the project will be further confirmed and consulted through dedicated means, as appropriate.

3.2 Analysis and Prioritization of Stakeholders

The MoE-PTT and its project implementing agencies appreciate the crucial roles of these stakeholder groups, their interests, and how they might be directly or indirectly affected. The project's success and sustainability heavily rely on their support and cooperation. Therefore, the MoE-PTT and its project implementing agencies will prioritize these groups and develop suitable ways to engage with them regularly. The extent of engagement will depend on each group's influence and the impact the project has on them.

To help ascertain the engagement approaches that would work with these stakeholders, they are categorized into the following:

Development Partners: The project will leverage on extensive ongoing work supported by Development Partners (DP) and foundations complementing efforts in the education sector. These include the T-TEL, EU, UNESCO, GIZ, UNICEF, Solidaridad, World University Service of Canada (WUSC), MasterCard Foundation, British Council and JICA.

Policy Makers and Implementers: These are ministries, departments and agencies under the Government of Ghana that are responsible for policy formulation, implementation, monitoring, and evaluation, as well as supervision and coordination of relevant activities of the education sector and related matters. These include the following:

- a. Ministry of Education (MoE)
- b. Ministry of Finance (MoF)
- c. Ministry of Gender, Children and Social Protection (MGCSP)
- d. Ghana Education Service (GES)
- e. Commission for Technical and Vocational Education and Training (CTVET)
- f. Technical and Vocational Education and Training (TVET) Services
- g. Ghana Library Authority (GLA)
- h. National School Inspectorate Authority (NaSIA)
- i. National Teaching Council (NTC)
- j. National Council for Curriculum and Assessment (NaCCA)
- k. Complimentary Education Agency (CEA)
- l. Centre for National Distance Learning and Open Schooling (CENDLOS)
- m. Ministry of Local Government, Chieftaincy and Religious Affairs
- n. Ministry of Health
- o. Lands Commission

Beneficiary entities - These are institutions or groups or individuals who benefit or likely to benefit directly or indirectly, positively, by the Project activities. These need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Beneficiary parties include:

- a. Beneficiary schools
- b. Governing Boards and management of beneficiary schools
- c. Students and teachers at the beneficiary schools
- d. Regional directorates of education
- e. District directorates of education
- f. Regional Coordinating Councils
- g. Local Authorities/MMDAs

Disadvantaged/vulnerable individuals or groups - The Project Affected Parties also include vulnerable groups or persons who may be disproportionately impacted or further disadvantaged by the Project activities as compared with any other groups due to their vulnerable status. These may require special engagement efforts to ensure their equal representation in the consultation and decision-making processes under the Project. Identifiable vulnerable persons and groups under this Project include:

- a. Persons with disabilities
- b. Children with special needs
- c. Women/ girls
- d. Orphans

- e. Land users/ owners (without recognized interests or formal documentation)

These persons may encounter difficulties in accessing information, participating in engagements, or enjoying project benefits. Vulnerable groups to be affected by the project will be further confirmed and consulted through dedicated means, as appropriate

Opinion Leaders: These are entities and individual people with expertise or power who exert a significant amount of influence within their network and who can affect the opinions of connected individuals. They have an audience or following that trusts them as a source of information for their interests. This group of stakeholders could include the following:

- a. Town Development Committees
- b. Chiefs
- c. Assembly members
- d. CSOs, CBOs and NGOs (Ghana Federation of Disability Organisations, Ghana National Education Campaign Coalition (GNECC), Northern Network for Education Development (NNED))
- e. Subject matter experts

For the STARR-J project, Tables 1 and 2 present the various categories of stakeholders and their levels of impact⁴.

Table 3 below also identifies and assesses the needs of some disadvantaged or vulnerable individuals or groups to help determine suitable engagement strategies.

⁴ The Stakeholder list is a “living document” which will be updated regularly throughout the Project life as appropriate.

Table 1: List of Affected Stakeholders and Level of Impact

Stakeholder Category	Level of impact		
	High Impact	Medium Impact	Low Impact
Affected	<ul style="list-style-type: none"> • Ministry of Education (MoE) • Ghana Education Service (GES) • National Council for Curriculum and Accreditation (NACCA) • National School Inspectorate Authority (NaSIA) • National Teaching Council (NTC) • Commission for Technical and Vocational Education and Training (CTVET) • Technical and Vocational Education and Training (TVET) Services • Ghana Library Authority (GLA) • Centre for National Distance Learning and Open School (CENDLOS) • Complementary Education Agency (CEA) • Project Technical Implementation Teams (including safeguards) • MMDA Directorates of Education • MMDA Education Oversight Committee • Teachers/ Head teachers • National service teachers • Students • Contractors • Social Investors; • Service Providers • PAPs losing land/assets/livelihoods 	<ul style="list-style-type: none"> • Regional Directorates of Education • Parent Associations (PAs) • Communities and Community Leaders/ members - (peer groups women, children, vulnerable groups and persons etc.) • Sub-contractors 	<ul style="list-style-type: none"> • Artisans

Table 2: List of other Interested Persons and Level of Impact; Vulnerable Groups

Stakeholder Category	Level of Impact		
	High Impact	Medium Impact	Low Impact
Other Interested	<ul style="list-style-type: none"> • Special Education Division, GES • Development Partners • Office of the President (Cabinet) • Ministry of Finance • Land Valuation Division of the Lands Commission 	<ul style="list-style-type: none"> • Ministry of Gender, Children and Social Protection (MGCSP) • Environmental Protection Authority (EPA) • Ministry of Local Govt., Chieftaincy and Religious Affairs • Ministry of Jobs, Labour and Employment (MJLE) • Ghana National Association of Teachers (GNAT) • National Association of Graduate Teachers (NAGRAT) • Ghana National Association of Private Schools (GNAPS) • Conference of Heads of Assisted Secondary Schools (CHASS) • Association of Principals of Technical Institutes (APTI) • Parliament • Parliamentary Select Committee on Education • Ministry of Health (MoH) • Ghana Health Services (GHS) • Ghana Police Service (DOVVSU) • Ghana Judicial Service • Regional Coordinating Councils(RCCs) • Metropolitan, Municipal and District Assemblies (MMDAs) • Department of Social Welfare • Community Based Organisations (CBOs) • Academia • Ghana Police Service • Media • Ghana Federation of Disability Organisations • Ghana National Education Campaign Coalition (GNECC) • Northern Network for Education Development (NNED) 	<ul style="list-style-type: none"> • Ghana Education Trust Fund (GETFund) • Faith Based Organizations (FBOs)
Vulnerable	<ul style="list-style-type: none"> • Persons with Disabilities • Children with special needs • Women/ girls • Orphans • Displaced persons 		

Table 3: Characterization of Vulnerable Groups

Stakeholder group	Key Characteristics	Language needs	Preferred notification	Specific needs
Students with disabilities	Hearing impairment (Hearing loss) Visual impairment (Low vision or blindness) Physical impairment (Mobility disabilities)	Braille, audio, sign language	Written information	Accessible venues, sign-language translators/ interpreters
Teachers with disabilities	Hearing impairment (Hearing loss) Visual impairment (Low vision or blindness) Physical impairment (Mobility disabilities)	Braille, audio, sign language	Written information	Accessible venues, sign language translators/ interpreters
Children with special needs	Learning disabilities, such as Attention-Deficit Disorder (ADD), autism spectrum disorder, Hyperactivity Disorder, dyslexia, or dyscalculia Epilepsy	Additional person support	Through care givers	Special needs textbooks and materials Limited assistive devices may be required
Women and girls	Consultation times will have to align with the needs of women, girls. Women may have limitations about time of day or location for public consultation; they may need childcare for meetings or other additional support and resources to enable them to participate in consultations.	Local language as appropriate	Verbal, community announcement, focused group meetings etc	Gender sensitive Teaching and Learning Materials Meetings in close by locations within the communities
Orphans	limited voice low representation, lack of access to information	-	Focused group meetings	Reach out to orphanages to ensure that opportunities under the Project are available
Displaced persons, neighboring land users/owners without formal documentation or recognizable rights	They face heightened exposure to economic and social risks and often lack the legal, institutional, and economic capacity to protect their interests during land acquisition and project implementation.	Local language as appropriate	Verbal, written information, community announcement, focused group meetings etc.	Targeted engagement, inclusive consultation, and proactive mitigation measures

4.0 STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder consultation on the STARR-J is considered as key to successful design and implementation. It is an inclusive process that must be conducted throughout the project cycle.

4.1 Methods of Stakeholder Engagement and Information Disclosure

This section outlines the broader strategic approach that the project implementing agencies shall employ to constructively engage with all identified groups. To ensure adequate representation and participation of the different groups, the project will rely on different methods and techniques based on the assessment of the stakeholder needs and prioritization criteria. Some of the engagement methods are listed below in Table 4.

Table 4: Stakeholder Engagement Methods

Engagement Technique	Information to be shared	Target audience
Online Platform (MoE, and other implementing agencies website)	A dedicated webpage /existing websites of the Implementing Agencies will be used to ensure users find all the information about STARR-J. The platform will also be used to publish all the ESF instruments (ESCP, ESMF, RF, LMP, SEP, etc.). All public consultation events will be advertised through this platform.	All stakeholders and the general public
Information Centre and Information Boards with local communities and MMDAs	Advance announcements of commencement of major Project activities, project Grievance Redress Mechanism, advertisement for local artisans and labor etc.	Local communities within the project areas
Public Consultations /Virtual and in-person consultations	Project overview and objectives; project activities in their localities; potential environmental and social impacts; land acquisition, compensation and resettlement information; labour and employment information; community health, safety, and security measures; GBV/SEA/SH risk prevention measures; child labour and child protection measures; project grievance redress mechanism (GRM); rights and responsibilities of affected persons; roles of key institutions; and monitoring and reporting framework.	Project affected communities
Correspondence by phone/ email/ written letters	Distribute or share project information; Invite stakeholders to meetings; receive and provide feedback on enquires, complaints or grievances.	Government officials, NGOs, CSOs, CBOs, FBOs, Development Partners, social investors, service providers, parents and

		direct beneficiaries such as learners and teachers
Printed advertisement media	To disseminate and disclose project documents intended for general readers and audience (e.g., ESMF, RF, ESCP, SEP) Advertise project procurement documents	General public
Distribution of printed public materials: Project information leaflets, brochures, fact sheets	To convey general information on the Project and to provide regular updates on its progress	Local, regional and national stakeholders; General public
One-on-one interviews	To solicit views and opinions on project risks, impacts and mitigation measures	Vulnerable individuals, CSO/NGOs/FBOs, DPs etc. direct beneficiaries such as learners, teachers, project affected parties, other interested parties
Dedicated hotline	A designated and manned telephone line that can be used by the public to make complaints and grievances, obtain information, make enquiries, or provide feedback on the Project.	Project affected persons, and any other stakeholders and interested parties
Workshops	<ul style="list-style-type: none"> • Present project information to stakeholders; • Allow the group of stakeholders to provide their views and opinions; • Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies • Recording of responses. 	Government, NGOs, CSOs, FBOs, Social Investors, Service Providers
Focus group meetings	Facilitate discussion on Project's specific issues (e.g., SEA/SH, disability inclusion, etc.), that merit collective examination with various groups of stakeholders using Focus Group Meetings.	Vulnerable groups, groups of Project affected persons, and any other stakeholders and interested parties as necessary
Quality Assessment Surveys	To gather beneficiary opinions and views about project interventions. Engagement with CSOs to support citizen feedback surveys is being explored.	Project beneficiaries

4.2 Strategy for Consultations and Information Disclosure

Timing and advanced planning of engagement is one key element that ensures that consultations are relevant, information is readily accessible to the affected public, and that facilitates informed participation. It is envisaged that the rollout of stakeholder engagement will align to the project cycle, i.e., preparation and design phase, implementation phase, monitoring phase, completion and evaluation phase. STARR-J will provide information in a language that different groups of stakeholders can easily understand, and that consultation will be meaningful such that it will allow stakeholders the opportunity to express their views on project risks, impacts and mitigation measures while allowing the project team to consider and respond to them. All consultation activities will be documented and lessons from previous activities will inform subsequent activities.

Views and comments from stakeholders during the consultation process shall be written. Written comments shall be received and filed. The MoE-PTT shall review all comments, either oral or written, and ensure that the comments are addressed and communicated to the stakeholders.

Given that the various phases of project implementation do not necessarily occur in a linear way, Table 5 below provides details on what, how, when, estimated coverage of information and responsibilities at each phase of the project.

Documentation of Consultations: All consultation activities will be thoroughly documented. This documentation will include information on all meetings held with all categories of project stakeholders, detailing: dates, locations, participant numbers, a summary of comments made, questions asked, concerns expressed by displaced persons and other stakeholders, and the official responses provided. This level of detail will ensure transparency and accountability. All engagement sessions shall be documented and reported in the format provided in Annex 1. Pictures and signed minutes of consultations must be included in project reporting.

Table 5 - Stakeholder Consultation Schedule

Project stage	List of information to be disclosed	Method proposed	Timetable: Location/dates	Target Stakeholders	Topic of consultation	Responsibility
Preparation or design phase	Project Appraisal Document (PAD) ESMF, RPF, ESCP, SEP	Newspaper publication	Once in 2 national dailies	National, Regional and district stakeholders	Project concepts, benefits, anticipated risks and impacts, and proposed mitigation measures	MOE, GES and Project Coordinating unit
		workshops	3 workshop – South, middle and Northern sectors	Regional, District and community level		MOE, GES and Project Coordinating unit
		website	MOE, GES WB, Min. of Local Gov. EPA,	International, National, Regional and district stakeholders		MOE, GES and Project Coordinating unit
		Community durbars and Consultation with affected parties	Community Information Centers	Community level	Mode of selection of subprojects, benefits, impacts	
		Distribution of printed and electronic documents in relevant institution	MOE, GES, DAs.	Community level		
			Community Information Centers	National, Regional and district stakeholders		

Implementation Phase	ESMP, RAP, Labor Management Procedure, Occupational Health and Safety Plan Emergency preparedness and response Project Monitoring and safeguard compliance report	Website, Distribution of electronic copy through email	MOE, GES, WB, Min. of Local Gov. EPA	International, National, Regional and district stakeholders	Subprojects benefits, impacts (Community health and Safety, Occupational health and Safety, Labor Management Procedures, Traffic Safety, Security, GRM, SEA/SH issues and mitigation)	MOE, GES and Project Management unit, Safeguard Team
Operational Phase	Annual Education Sector Performance report Environmental and Social Audit report Updates on project activities	Regional and District level offices of GES/CTVET/NaCCA, NaSIA, MOE/GES/CTVET/NaCCA, NaSIA, TVET, NCT national offices and websites Distribution of electronic copy through email	GES Regional and District offices	Regional and district stakeholders	Performance of the schools, GRM, maintenance of facilities, Security, SEA/SH education	MOE, GES, CTVET/NaCCA, NaSIA, TVET, NCT and Project Management unit
Completion Phase	Project completion report	Distribution of electronic copy through email; Website	GES Regional and District Offices	National, Regional and district stakeholders	Outcome of the project	MOE, GES and Project Management unit

4.3 Proposed Strategy to Incorporate the Views of Vulnerable People

The consultation activities will be based on the principle of inclusiveness, i.e., engaging all segments of the local society, including disabled persons and other vulnerable individuals as specified above. If necessary, logistical assistance would be provided to enable representatives from the remote areas, persons with limited physical abilities and those with insufficient financial and transportation means to attend public meetings scheduled by the Project. In cases where vulnerable status may lead to people’s reluctance or physical incapacity to participate in large-scale community meetings, the project will hold separate small group discussions with them at an easily accessible venue as a way for the Project to reach out to the groups who, under standard circumstances, may be insufficiently represented at general community gatherings.

Views and comments from the disadvantaged and vulnerable groups shall be prioritized. During consultations with these disadvantaged and vulnerable groups, the invitation shall be extended to advocacy groups such as religious and faith-based groups, CSOs, and NGOs to be present in the consultations and ensure that those views are addressed.

Appropriate media of communication such as Braille, sign languages, and local languages among others shall be employed to enhance the comprehension of the vulnerable groups. The strategy to be used in reaching out to and engaging the vulnerable is summarized in Table 6 below.

Table 6: Strategies for Engaging Vulnerable Groups

Purpose of Engagement	Vulnerable Group	Method of Engagement	Information to be shared	Frequency of Engagement
Solicit stakeholders’ input	Visually Challenged	1. A face-to-face meeting with identified groups, radio communication, community broadcast 2. Transcribing text into Braille versions as possible for dissemination of information	Description of project activities, and project objectives	As required (project planning and designing phase)
	Hearing-impaired	Face-to-face meeting with identified groups using sign language		
	Children with special needs	A face-to-face meeting with identified groups, radio communication, community broadcast		
	Women and girls			
	Orphans			
People living in remote areas				
Project’s timelines and requirements from stakeholders	Visually Challenged	Face-to-face meeting with identified groups, radio communication, community broadcast	Timelines/schedule of project and resources and	As required (project planning and designing phase)
	Hearing-impaired	Face-to-face meeting with identified groups using sign language		

	Children with special needs	Face-to-face meetings with identified groups, radio communication, community broadcast	collaboration required from parents, guidance and communities	
	Women and girls			
	Orphans			
	People living in remote areas			
Information on environmental and social risks and mitigations	Visually Challenged	Face-to-face meetings with identified groups, radio communication, community broadcast	Environmental and social risks of the project and updated risk register	Continuous (monthly)
	Hearing-impaired	A face-to-face meeting with identified groups using sign language		
	Children with special needs	A face-to-face meeting with identified groups, radio communication, community broadcast		
	Women and girls			
	Orphans			
	People living in remote areas			
Grievance's mechanism	Visually Challenged	A face-to-face meeting with identified groups, radio communication, community broadcast	Grievance Mechanism	Continuous (quarterly)
	Hearing-impaired	A face-to-face meeting with identified groups using sign language		
	Lifeline consumers	Face-to-face meetings with identified groups, radio communication, community broadcast		
	Slum-dwellers			
	Single Parents			
	People living in remote areas			

4.4 Brief Summary of Previous Stakeholder Engagement Activities

Stakeholder Engagement under the STARR-J began early during project identification to allow stakeholders' views and concerns to be considered in the project design, and to provide inputs to the project environmental and social assessment and mitigation planning. These engagement activities have sought to disseminate and disclose project-related information and to plan project implementation, monitoring, and evaluation arrangements. Engagements have included both formal and informal methods. Stakeholders involved span government institutions and Association of Persons with Disabilities. Table 7 presents a summary of stakeholder engagement undertaken as part of the preparations of the STARR-J. Please refer to Annex 2 through 3 for attendance lists and pictures from engagements held as part of the preparation of the project.

Table 7: Previous Stakeholder Engagement Activities

Stakeholder Group	Institutions	Interest	Method of engagement	Topic of consultations	Summary of key inputs
Government agencies	<ul style="list-style-type: none"> • Ministry of Education (MOE) • Ghana Education Service (GES) • National Council for Curriculum and Assessment (NaCCA) • National Schools Inspectorate Authority (NaSIA) • National Teaching Council (NTC) • Commission for Technical and Vocational Education and Training (CTVET) • Technical and Vocational Education and Training (TVET) Services • Ghana Library Authority (GLA) 	Project Implementing partners, technical implementing agencies, beneficiaries	<ul style="list-style-type: none"> • STARR-J Working Group Meetings • Workshops 	Project objective, scope, implementation arrangement, costing and budgeting, etc.	Refinement of project objectives, scope of activities, and implementation arrangements.
Development Partners	T-TEL, EU, UNESCO, GIZ, UNICEF, Solidaridad, World University Service of Canada (WUSC), MasterCard Foundation, British Council and JICA	Project design/ scale up partners	• Meetings	Project objective, scope, implementation arrangement, costing and budgeting, etc.	
CSOs/ NGOs	<ul style="list-style-type: none"> • Ghana Federation of Disability Organizations 	Disability inclusion and accessibility for new infrastructure	Workshop	Project scope and objectives, roles and responsibilities in implementation, Inclusion of Special	<ul style="list-style-type: none"> ▪ Need for conduct of accessibility audits on existing buildings, to inform the extent

Stakeholder Group	Institutions	Interest	Method of engagement	Topic of consultations	Summary of key inputs
				schools in project design	of retrofitting during refurbishment / renovation works. <ul style="list-style-type: none"> ▪ Engagement with heads of disability schools ▪ Provision for disability TLMs etc.

5.0 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING SEP ACTIVITIES

5.1 Resources

Funding for the SEP implementation is included as part of project cost under Component 3 which would fund all technical assistance (TA) and communication strategies conducted at the headquarters, regional and district levels. A total indicative estimated budget (over 3 years) of **USD 2,299,000** will be needed to implement the SEP. The detailed indicative cost estimate for implementation is provided in Annex 4.

5.2 Management Functions and Responsibilities

The project will be implemented through the MoE and existing national education sector institutions and systems, ensuring ownership, sustainability, and alignment with sector reforms. It will leverage the institutional experience, fiduciary systems, and coordination platforms established under GALOP and SEIP.

The MoE-PTT will liaise with the Project Oversight Committee (POC) which will have members of the heads of agencies and the MoE. The POC will have the responsibility for oversight of the project to ensure facilitated and effective implementation.

A Social Specialist, a GBV/SEA/SH Specialist and an Environmental Specialist will be procured to support the PTT in carrying out its duties. The Environment, GBV/SEA/SH and Social specialists within the PTT will directly facilitate implementation of the SEP, GBV risk management, gender and inclusion issues. The Project will also include the Regional Education Directorates, MMDA Education Directorates and School Governing Boards, who will ensure SEP implementation at the sub-national level.

Below is a summary of STARR-J’s management functions and responsibilities.

Table 8: Summary of key Institutions/Focal Persons and their Responsibilities

Institutions/Focal persons/Unit	Roles and Responsibilities
Project Oversight Committee	<ul style="list-style-type: none"> ▪ Oversight responsibility for entire implementation team
Project Technical Team	<ul style="list-style-type: none"> ▪ Day-to-day project administration and coordination, including stakeholder engagement.
MOE, GES, CTNET, TVET Service, NaSIA, NaCCA, NTC, CENDLOS, GhLA, CEA, and NSS	<ul style="list-style-type: none"> ▪ Implementation of stakeholder engagement plan as it relates to their specific project activities.
Environmental, GBV/SEA/SH and Social Specialists	<ul style="list-style-type: none"> ▪ Facilitate implementation of SEP ▪ Incorporate SEP guidelines in service providers and contractors’ agreement ▪ Organize and conduct national, regional and district level E&S training ▪ Develop manuals and modules for capacity building and awareness creation ▪ Facilitate monitoring and coordinate monitoring activities ▪ Strengthen and ensure effective implementation of GRM ▪ Liaise with relevant institutions on environmental and social issues

Service Provider (NGOs)		<ul style="list-style-type: none"> ▪ Adapt content of this SEP to operational context; ▪ Conduct necessary stakeholder engagement as necessary using site context appropriate engagement methods and in line with this SEP; ▪ Train and support staff to implement the SEP; ▪ Develop necessary IEC materials for training and awareness creation; ▪ Ensure operationalization of the Project GRM; ▪ Report on SEP and GRM implementation to MOE-PTT
Regional/MMDA Directorate	Education	<ul style="list-style-type: none"> ▪ Oversight responsibility at the regional/MMDA level ▪ Ensure effective implementation of the SEP at the regional/MMDA level ▪ Coordinate regional/MMDA level capacity building and training activities ▪ Carry out periodic and surprise inspection in schools ▪ Work to resolve conflicts at the regional/MMDA level
School Governing Boards and Management		<ul style="list-style-type: none"> ▪ Help the service providers/contractors identify context-specific stakeholders to engage ▪ Help co-ordinate and oversee activities as needed, including ensuring teachers and other staff participation in stakeholder engagement programmes etc. ▪ Management of STARR-J activities at the school level ▪ Ensure strict adherence to E&S guidelines are complied with by contractors ▪ Liaise between contractor and community/schools ▪ Create awareness on the project at the school and community level ▪ Liaise with other focal persons with regards to emerging issues
Contractor/Artisan		<ul style="list-style-type: none"> ▪ Follow and comply with all, E&S guidelines ▪ Keep records of all E&S issues on site

6.0 GRIEVANCE MECHANISM

The main objective of a Grievance Mechanism (GM) is to assist in resolving complaints and grievances in a timely, effective and efficient manner to satisfy all parties involved. The GM is an integral part of the SEP and helps to create avenues for receiving and responding to stakeholder concerns and complaints about issues related to the project. Specifically, it provides a transparent and credible process resulting in outcomes that are fair, effective and lasting. It also builds trust and cooperation as an integral component of broader stakeholder consultation that facilitates corrective actions.

The GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

The STARR-J will leverage on the impending Education Sector-Wide Grievance Redress Mechanism currently under formulation concurrently with the preparation of this project.

6.1 Proposed Education Sector-wide GRM

The proposed Ghana Education Sector Grievance Redress Mechanism (GRM) builds on the existing grievance mechanisms currently operated separately by education sector agencies, as well as the centralized grievance intake and records management system being deployed under the GALOP project. Rather than replacing these arrangements, the proposed sector-wide GRM establishes a governed GRM network with clear routing, escalation, and accountability rules. Existing institutional GRMs are retained as frontline uptake and resolution nodes, connected to a central IT platform, with overall oversight vested in a High-Level GRM Oversight Committee at the Ministry of Education (MoE).

The design is particularly critical for STARR-J, which is construction-intensive and multi-site, with anticipated grievances related to land, labor management, contractors, traffic management, and worker and community safety. In this context, sector-level visibility and oversight are non-negotiable, even where agencies retain intake and resolution functions. In addition, GBV/SEA/SH risks are elevated due to the presence of contractors in active secondary school environments, including boarding schools with adolescent students. Accordingly, agency GRMs are not permitted to manage GBV/SEA/SH cases internally. While such cases may be received at any entry point, they must be immediately referred to the designated GBV/SEA/SH referral pathway, in line with survivor-centred and confidential procedures. The GRM is also designed to comply with World Bank incident reporting requirements, including tighter timelines, and therefore provides for escalation mechanisms that can override agency discretion where required.

Overall, the sector-wide GRM provides accessible, transparent, timely, and fair processes for receiving, assessing, resolving, and monitoring complaints and concerns related to education sector activities and projects. The GRM enables students, parents, teachers, school staff, communities, contractors, and other stakeholders to:

- raise concerns or complaints related to education service delivery, school operations, infrastructure works, labor conditions, land issues, or project impacts;

- receive timely feedback and resolution; and
- escalate unresolved or complex grievances through clearly defined channels.

The GRM operates in line with ESS10 (Stakeholder Engagement and Information Disclosure) and integrates specialized procedures for GBV/SEA/SH and child protection cases.

6.2 Core Design Principles

The GRM is guided by the following principles:

- **Accessibility:** Multiple intake channels are available at school, community, institutional, project, and national levels.
- **Transparency:** Clear roles, responsibilities, and escalation pathways are defined.
- **Confidentiality and survivor-centred approach:** Particularly for GBV/SEA/SH and child protection cases.
- **Timeliness:** Grievances are addressed within defined timeframes appropriate to their nature and severity.
- **Accountability:** Oversight, reporting, and follow-up mechanisms are built into the system.
- **Integration:** Existing institutional GRMs are retained and connected to a central sector platform.

6.3 Grievance Redress Structure and Resolution Pathways

The Ghana Education Sector GRM offers a **multi-tiered, integrated system** that:

- Preserves existing local and institutional mechanisms;
- Connects them through a centralized IT platform;
- Provides clear resolution, referral, and escalation pathways;
- Ensures confidentiality and survivor-centred handling of sensitive cases; and
- Strengthens accountability and learning at the sector level.

6.3.1 Entry Points and Grievance Uptake

Leveraging the Ghana Education Sector-wide GRM, the STARR-J Project adopts a **four-tier Grievance Mechanism (GM)** that aligns with, and is fully integrated into, the existing GES and TVET Service grievance handling system. The four tiers are: **school/community**, **district**, **regional**, and **national** levels. A direct digital access via the integrated Ghana Education Sector-wide GRM is also available at all levels.

i) Tier 1: School/Community (Local Level)

At the school or community level, existing GES/TVET Service grievance structures (counsellors, tutors, school management teams, school governing boards, related committees and suggestion boxes or other locally appropriate mechanisms) serve as the first points of uptake.

- The **head of institution** or a **designated tutor** is responsible for receiving and recording complaints, facilitating resolution for routine, nonsensitive issues related to the school

operations and service delivery, and ensuring timely feedback to complainants (per timelines defined in Table 9).

- Cases that cannot be resolved at this level are escalated to the district level.

ii) Tier 2: MMDA Level

The MMDA Education Directorate, the **MMDA Education Oversight Committee (EOC)** and the **Client Service Units (CSUs)** of the MMDAs constitute the second tier.

- These actors receive and record complaints originating at the MMDA level or escalated from schools.
- They work to resolve routine, nonsensitive issues related to schools operations and service delivery grievances promptly and document outcomes.
- Unresolved cases are escalated to the regional level.

iii) Tier 3: Regional Level

The Regional Education Directorate and the Regional Coordinating Councils (RCCs) handle grievances lodged directly at this level or those that cannot be resolved at the MMDA level.

- The regional team reviews newly lodged and escalated cases, facilitates mediation or investigation, and works with relevant institutions to resolve routine, nonsensitive issues related to schools operations and service delivery.
- Cases unresolved at this level are referred to the national tier.

iv) Tier 4: National Level (MoE-PTT and Implementing Agencies)

The national level is the apex of the GM structure and comprises the **Ministry of Education's Project Technical Team (MoE-PTT)** and relevant implementing ministries, departments and agencies (MDAs) (e.g. GES, NaCCA, NTC, TVET/CTVET, NASIA, CEA, CENDLOS).

- These institutions address cases lodged directly to them and complex or unresolved grievances escalated from other levels and provide final determinations.
- Escalation to this level occurs only when all lower-level efforts have been exhausted.

v) Direct Digital Access via the Sector-wide IT Platform (Central Hub)

All stakeholders also have **direct access** to the sector GRM through a centralized **IT-based platform**, which includes:

- Hotline / call centre;
- WhatsApp numbers; and
- Web portal.

This ensures that complainants can bypass local or other levels of the GRM structures if needed and lodge grievances confidentially and independently.

6.3.2 Sector-wide Integrated IT Platform (Central Hub)

The **IT Platform (Central Hub)** will also function as the **central intake, registry, routing, and reporting hub** of the sector-wide GRM. All cases handled at all the levels will be **mandatorily logged or mirrored in the sector-wide IT Platform**, ensuring full visibility and traceability.

Its core functions include:

- Receiving grievances from all intake channels;
- Assigning a **single, unique case ID** for all project-related grievances;
- Categorising and tagging grievances (e.g. by project, institution, or type);
- Routing cases to the appropriate resolution pathway;
- Tracking case progress and status; and
- Generating consolidated data, analysis, and reports.

The IT Platform does **not replace existing resolution mechanisms**. Rather, it connects them into a single, coherent sector-wide system. Non-sensitive grievances will be routed to the **relevant institutional GRM nodes (as outlined in section 6.3.1 above)**, which may include:

- Schools;
- District and regional education offices; and
- Sector agencies (e.g. GES, NaCCA, NTC, TVET/CTVET, NASIA, CEA, CENDLOS etc.).

These levels/institutions are responsible for:

- Investigating and resolving grievances within their respective mandates;
- Communicating outcomes to complainants; and
- Adhering to agreed timeframes.

The **MoE-PTT Environmental and Social Safeguards Specialists** or another designated officer will be responsible for managing the central system, coordinating responses, ensuring timely escalation, and monitoring overall performance of the GM.

6.3.3 GBV/SEA/SH and Child Protection Referral Pathway

The GRM includes a **dedicated, parallel pathway** for handling **GBV/SEA/SH and child protection cases**, recognizing their sensitive nature.

Key features include:

- **Immediate referral** from the IT Platform or from institutional nodes once such cases are identified;
- **Survivor-centred, confidential, and ethical procedures;**
- **Dedicated intake channels;**
- **Restricted data access** and enhanced confidentiality controls;
- **Ring-fenced resources** for case management;
- **Suppressed public reporting**, with information shared strictly on a need-to-know basis.

These cases bypass standard resolution structures and are handled in line with approved GBV/SEA/SH protocols and service provider arrangements.

6.3.4 High-Level GRM Oversight Committee

A **High-Level GRM Oversight Committee**, housed at the Ministry of Education, will provide strategic oversight of the GRM.

Its responsibilities include:

- Setting sector GRM policies, standards, and Standard Operating Procedures (SOPs);
- Reviewing consolidated GRM reports generated through the IT Platform;
- Ensuring follow-up on systemic issues and recommendations;
- Examining complex appeals; and
- Addressing highly complex or unresolved cases escalated from lower levels.

The Oversight Committee **will not handle routine grievances**, but will ensure accountability, consistency, and system-wide learning.

The proposed sector-wide GM structure to be adopted for the STARR-J project is shown in Figure 1 below.

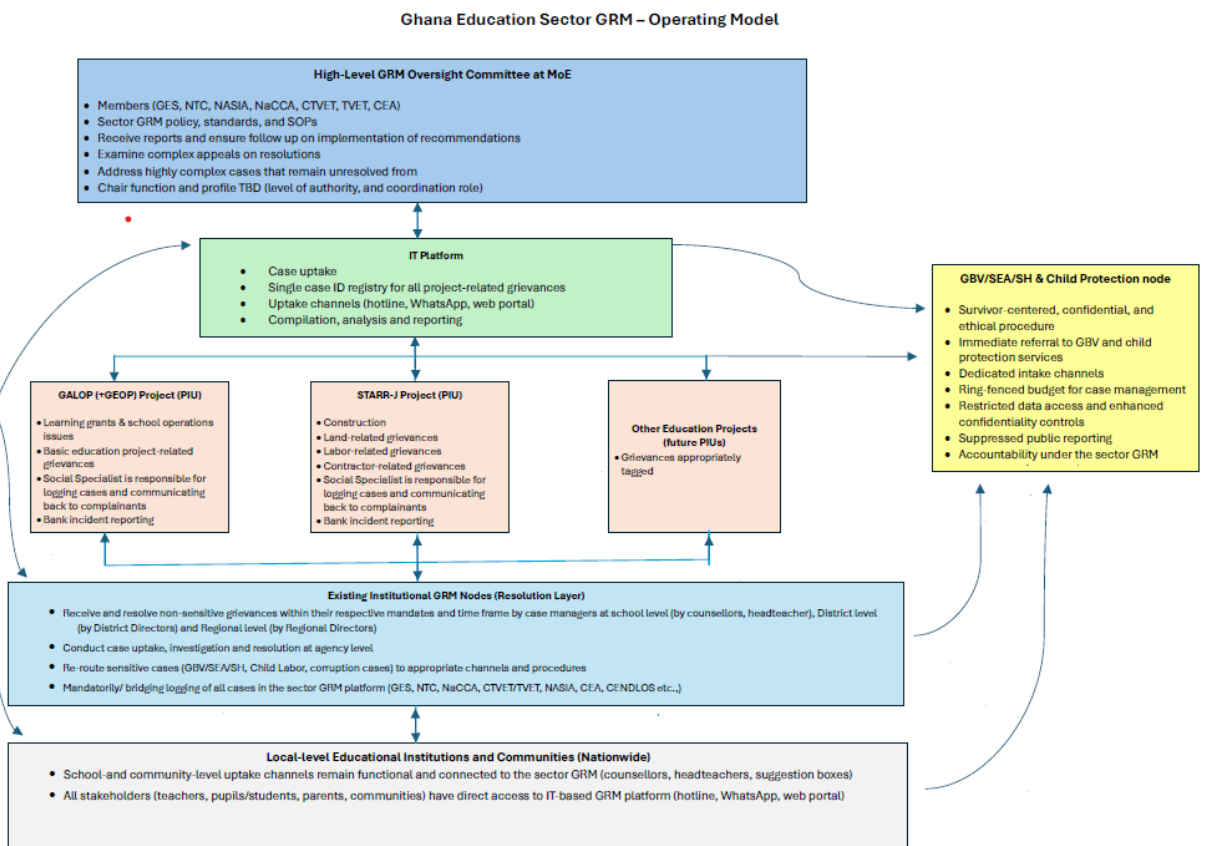


Figure 1: Ghana Education Sector GRM – Operating Model

The GM numbers and addresses have been disclosed and shall continuously be disclosed and displayed at the schools, district assemblies, district education offices, regional education offices,

and community centers. The GM numbers and addresses will also be publicised through community information centers, advertisement and jingles on radio and television. Figure 2 below depicts a poster containing the various means by which complainants can access the STARR-J GM.



Figure 2: Grievance Uptake Methods (to be updated subsequently by MoE)

6.4 Grievance Processing

The GM recommends five key steps in the processing and resolution of complaints and grievances as follows:

- Receive and register grievances or complaints; A sample grievance registration and redress form is attached in Annex 6.
- Acknowledge, assess and assign (Acknowledge receipt of grievance, outline how grievance will be processed, assess eligibility and assign responsibility); A sample grievance acknowledgement receipt is attached in Annex 7. A sample grievance logbook is included as Annex 8.
- Propose Response.

- Agreement on Response (See Annex 9 for Grievance Resolution Meeting Record template); and
- If agreement is reached, implement agreement and close grievance (see sample Grievance Closure form in Annex 10).
 - If agreement is not reached, review case; and
 - If no agreement is reached under the review process, then the case can be escalated to the next grievance redress level or the law courts or other administrative structures for resolution. See Annex 11 for Grievance Referral template.

All complaints, irrespective of the uptake point or method, shall be logged into the online Sector-wide IT Platform. Dedicated personnel at the Ministry of Education Client Services Units (CSUs) and PTT shall be designated to process complaints and grievances received and assign them to the appropriate competent entities for resolution. The personnel will be given orientation on how to receive complaints and grievances from PAPs and other stakeholders, document relayed information and pass on to the PTT Environmental and Social Specialists. In addition, officers at the intake point will also fill in a form (Grievance Register, Annex 6) as they interact on phone or other communication media with the complainants for record purposes and further processing. Upon receipt, logging and assignment of unique identifier, complaints will be directed to the appropriate units for resolution. Complainants who cannot communicate in English would have the liberty to use their local language as the uptake points would have access to interpreters for ease of communication. Complainants would also be assured of receiving feedback within the stipulated working days.

If a complainant is not satisfied after exhausting all the grievance structures of the project, s/he may appeal to the High-Level GRM Oversight Committee at Ministry of Education. The GM will provide an appeal process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed, and if the complainant is still unsatisfied, they should be advised of their right to legal recourse. The project-level process will not impede affected persons’ access to the legal system. At any time, the complainant may take the matter to the appropriate legal or Judicial system as per the laws of Ghana. The project-level process can only act within its appropriate level of authority, and where applicable, complaints will be referred to the relevant authority for redress.

6.5 Recommended Grievance Redress Time Frame

The table below presents the recommended time frames for addressing grievances or disputes related to the STARR-J Project. It is envisaged that disputes could be resolved at the school/community or district levels, however, the proposed Sector-Wide GRM will include a Frequently Asked Questions (FAQ) list with responses for all levels on the hierarchy to aid in the resolution of cases.

Table 9: Proposed GRM Time Frame

Step	Process	Time frame
1	Receive and register grievance	within 24 hours
2	Acknowledge receipt of grievance	within 24 hours
3	Assess grievance	Within 24 hours

4	Assign responsibility	Within 2 Days
5	Development of response	within 7 Days
6	Implementation of response if agreement is reached	within 7 Days
7	Close grievance	within 2 Days
8	Initiate grievance review process if no agreement is reached at the first instance	within 7 Days
9	Implement review recommendation and close	within 14 Days
10	Grievance taken to court by complainant	-

**These timelines apply across all tiers, unless escalated cases require extended investigation.*

6.6 Grievance Documentation and Reporting

Resolved and escalated grievances/cases would be documented daily (as tickets) into the centralized GRM system by the assigned grievance officers at the various uptake and resolution levels. The Environmental and Social Safeguards Specialists or a dedicated staff at the PTT would exercise oversight over the system and track the resolution of all grievances/cases.

Monthly case/ grievance reports will be generated from the system by the Environmental and Social Safeguards Specialists or a dedicated staff at the PTT and reported to the Project Coordinator to inform management decisions. Quarterly reports will also be generated and reported to the MoE as part of the Project’s Progress Reporting to the World Bank. Periodic reports will also be generated within a reasonable time frame for stakeholders upon request irrespective of the period (e.g. bi-annual, annual etc.).

On a quarterly basis, the Environmental and Social safeguards specialists at the MoE PTT will randomly survey complainants to follow-up on satisfactory resolution. A summary of implementation of the grievance mechanism will be provided to the public on a regular basis, after removing identifying information on individuals to protect their identities. In handling GRM matters, client confidentiality will be paramount.

6.7 Handling GBV/SEA/SH Cases

The STARR-J will harness and strengthen the existing MoE, GES and CTNET protocols for handling sexual exploitation and abuse (SEA) and sexual harassment (SH) for case management under the project. The systems for addressing sexual exploitative, abuse, and harassment in secondary schools under GES and CTNET are specialized and differ from general grievance/complaint systems in several ways:

- **Focus and Expertise:** Systems for sexual misconduct specifically focus on addressing sensitive issues related to learner safety and well-being, often involving personnel trained in child protection and trauma-informed approaches.
- **Confidentiality and Sensitivity:** Procedures for reporting and handling sexual misconduct cases prioritize confidentiality and sensitivity to the needs of victims/survivors, which may differ from the handling of other types of grievances.
- **Legal and Ethical Standards:** Addressing sexual misconduct cases requires adherence to specific legal and ethical standards related to child protection, privacy, and due process,

ensuring that investigations and responses comply with national laws and MoE, GES and CTVET guidelines.

The Sector-wide GRM will include a dedicated, parallel pathway for handling GBV/SEA/SH and child protection cases, recognizing their sensitive nature.

Key features will include:

- Immediate referral from the IT Platform or from institutional nodes once such cases are identified;
- Survivor-centred, confidential, and ethical procedures;
- Dedicated intake channels;
- Restricted data access and enhanced confidentiality controls;
- Ring-fenced resources for case management; and
- Suppressed public reporting, with information shared strictly on a need-to-know basis.

These cases shall bypass standard resolution structures and shall be handled in line with approved GBV/SEA/SH protocols and service provider arrangements.

6.7.1. Policies and Guidelines

The following policies and codes of conduct instituted by MoE, GES and CTVET to address cases of sexual exploitation, abuse, and harassment in the education sector, including secondary education shall be followed:

- *Child Protection Policy*: The MoE, GES and CTVET have implemented child protection policies to ensure the safety and well-being of learners. These policies include protocols for reporting and addressing cases of abuse and harassment. These policies shall be strengthened with survivor-centered, confidential, and ethical procedures.
- *Code of Conduct for Teachers*: There are strict codes of conduct for teachers and educational staff, which outline acceptable behaviour and the consequences of misconduct, including sexual exploitation and abuse.
- *Code of Conduct for Students*: There are strict codes of conduct for learners, which outline acceptable behaviour and the consequences of misconduct, including sexual exploitation and abuse.

In addition to the above, all project contracts shall include a requirement for code of conducts for contractors and their staff.

6.7.2. Procedure and processes

The processes and procedures will be underpinned by confidentiality for individuals reporting incidents and protection against retaliation. Anonymous reporting options shall be encouraged where feasible. Training and awareness programs for tutors, learners, and parents to educate them about sexual exploitation, abuse, and harassment and how to prevent and report such cases will also be a feature of the process.

The following processes and procedures will be followed to address SEA and SH cases under the STARR-J:

- *Reporting Mechanisms*
 - Mode of Reporting: Schools, district directorates and regional directorates shall establish clear reporting mechanisms for learners and staff to report cases of abuse. This will involve designating specific individuals (e.g., child protection officers, school counsellors and girls' education coordinator) who are trained to receive and handle such reports. Victims can report incidents to guidance and counselling units, trusted teachers, school administrators or directly to the IT Platform if anonymity is preferred.
 - Designated Officers: Each school shall have a designated officer or focal person responsible for handling SEA/SH reports. Once an abuse related complaint is reported at any uptake point, it shall be immediately referred to the designated individual at that level trained to handle such cases.
 - Immediate Safety: Ensure the immediate safety and well-being of the victim.
 - Documentation: Properly document the initial report with as much detail as possible, and log into the Sector-wide GRM IT Hub (maintaining as much confidentiality as necessary) and **report the incident to the World Bank within 24 hours.**
 - The designated officer or focal person shall ensure immediate referral from the IT Platform or from institutional nodes in line with approved GBV/SEA/SH protocols and service provider arrangements once such cases are identified, logged and unique identifier assigned.
 - Confidentiality: Maintain the confidentiality of the survivor and the alleged perpetrator throughout the process.
- *Investigation and Response*
 - Prompt Response: Trained personnel or designated investigators (led by the designated service provider) shall promptly investigate reported cases.
 - Forming an Investigation Team: Under the direction of the service provider, form an impartial investigation team, including school administrators, counsellors, and possibly external experts. **Note: Where a crime is suspected, the matter should be reported immediately to law enforcement for further investigation and action according to the laws of Ghana.**
 - Gathering Evidence: Collect evidence, including interviews with the survivor, alleged perpetrator, and any witnesses. Ensure that the investigation aligns with GES/TVET Service policies and legal requirements.
 - Supportive Measures: Implement interim measures to protect the safety and well-being of the victim(s) during the investigation, such as temporary reassignment of staff or adjustment of learner schedules.
 - Disciplinary Action: If allegations are substantiated, take appropriate disciplinary action against the perpetrator(s) in accordance with GES/TVET Service policies and legal requirements. This may include warnings, suspension, termination, or legal action depending on the severity of the offense.
 - Appeals Process: Ensure there is a clear process for appeals if either party is dissatisfied with the outcome.
- Support Services
 - Victim Support: Provide comprehensive support services to survivors, including access to counselling, psychological support, medical assistance, and advocacy support.

- Parental Involvement: Inform the victim’s parents or guardians and involve them in the support process.
- Community Engagement: Engage with the school community to raise awareness about sexual misconduct, promote a culture of respect and zero tolerance, and educate learners on recognizing and reporting inappropriate behaviours.
- Follow-Up
 - Monitoring the Situation: Follow up with the victim to ensure their ongoing safety and well-being.
 - Assessing Impact: Evaluate the impact of the incident and the measures taken to prevent recurrence.
 - Feedback Mechanism: Collect feedback from all parties involved to improve the process and policies.
- Collaboration and Partnership
 - External Support: Collaborate with external agencies, such as child protection organizations, law enforcement, and healthcare providers, to enhance support and response mechanisms.

6.7.3. Preventive Measures

To promote a culture of prevention of SEA/SH, the STARR-J will adopt the following measures:

- Training and Awareness: The project shall conduct regular training and awareness programs for teachers, students, and staff on SEA/SH issues.
- Policy Updates: The project shall facilitate the regular review and update of policies and procedures related to SEA/SH to ensure they are effective and comprehensive.
- Monitoring and Evaluation: The project shall support regular monitoring of the implementation of policies and procedures to ensure effectiveness in preventing and addressing SEA/SH and compliance. The project shall also support evaluation of the impact of interventions and make necessary adjustments to improve response systems based on feedback and outcomes.

7.0 MONITORING AND REPORTING

Monitoring and tracking of stakeholder engagement is important as it:

- ensures effective continuous engagement and follow-up.
- minimizes slippages and oversight of important engagements.

7.1 Monitoring and Reporting Indicators

Monitoring and reporting of this SEP will be guided by a set of indicators as indicated in Table 10 below.

Table 10: Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p>GM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agencies responded to and managed such grievances?</p>	<ul style="list-style-type: none"> • Are project-affected parties raising issues and grievances? • How quickly/ effectively are the grievances resolved? 	<ul style="list-style-type: none"> • Usage of GM and/or feedback mechanisms • Requests for information from relevant agencies. • Use of suggestion boxes placed in the schools and villages/project communities. • Number of grievances raised by stakeholders, disaggregated by gender and location, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	<p>Records from the implementing agencies and other relevant agencies</p>

<p>Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?</p>	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle? 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional media entries on the project results</p>
<p>Implementation effectiveness. Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

7.2 Summary of How SEP Will be Monitored and Reported

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance.

SEP reporting will include the following:

- (i) Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP)
- (ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Management Framework, or Resettlement Policy Framework; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-

associated reasons. Minutes of meetings summarizing the views of the attendees will also be annexed to the monitoring reports.

- (iii) Quantitative reporting based on the indicators included in the SEP. A set of indicators for monitoring and reporting is included in section 6.1 above.

The MoE-PTT will maintain a Stakeholder Engagement Log (See Annex 1 for template) that chronicles all stakeholder engagement undertaken or planned. The Engagement Log includes location and dates of meetings, workshops, and discussions, and a description of the project-affected parties and other stakeholders consulted. Monitoring reports presented to the STARR-J Management Team will include Stakeholder Engagement Logs as well as feedback from the GM. It may also include for instance, how the project implementation agencies responded to the concerns raised, how these responses were conveyed back to those consulted, details of outstanding issues and any planned follow up. There will be annual reporting of the SEP as part of the project monitoring report.

The PTT will also develop an evaluation form to assess the effectiveness of every formal engagement process. The questions will be designed as appropriate for the relevant audience.

7.3 Involvement of Stakeholders in Monitoring Activities

As indicated earlier, the PTT will have oversight over the SEP implementation. The Environmental and Social Specialists and officers in the PTT will monitor the Stakeholder Engagement Plan (SEP) in accordance with the requirements of the legal agreement, including the Environmental and Social Commitment Plan (ESCP). The team will monitor and document any commitments or actions agreed during consultations, including changes resulting from changes in the design of the project or the SEP.

The project will leverage MoE's existing relations with the umbrella group for NGOs engaged in education, the Ghana National Education Campaign Coalition (GNECC), to track citizen engagement and impact of the STARR-J. These discussions will be firmed up in collaboration with the MOE, GES, TVET Service, and the other implementing agencies.

7.4 Reporting Back to Stakeholder Groups

Reports to stakeholder groups will be done through various means. Key among them will be during the National Education Week which is held annually to report on the performance of the education sector in meeting goals and objectives set in the Education Strategic Plan. Other means will be through the Sector Working Group (SWG) meetings made up of education stakeholders at the national level. For sub-national level reporting, it is important to utilize the several fora for training, orientation, and information sharing which become available as the project is implemented. Additional electronic media such as emails and infographic sharing through social media will be used as and when necessary.

ANNEXES

Annex 1: Stakeholder Consultation Reporting Matrix

Date of Consultation	Name of Organization/ Group	Number of Consultees			Summary of Issues Discussed	Summary of Conclusions Reached	Next Steps/Areas of Further Discussions
		Males	Females	Total			

Annex 2: List of Attendees from Stakeholder Consultations Workshops

(to be provided)

Annex 3: Pictures From Stakeholder Consultations with Association of Person with Disability

(to be provided)

Annex 4: Indicative Budget for Implementation of SEP

(Three-Year Implementation Period)

Activity	Description	Estimated Cost (USD)
Stakeholder Consultations and Public Meetings	National, regional, district and community consultations including workshops, town hall meetings, and focus group discussions with stakeholders and project-affected communities	450,000
Engagement with Vulnerable Groups	Targeted consultations with persons with disabilities, women, children with special needs, remote communities, and other vulnerable groups including accessibility support (sign language interpreters, accessible venues, transport support)	140,000
Communication and Information Disclosure	Development and dissemination of IEC materials, brochures, posters, stakeholder briefs, website updates, social media communication, and information boards at schools and MMDAs	250,000
Operation of Stakeholder Communication Platforms	Maintenance of project webpage, information portals, and communication channels (email, hotline, SMS/WhatsApp communication)	100,000
Capacity Building and Training	Training of MoE-PTT staff, implementing agencies, regional and district education directorates, school management, and service providers on stakeholder engagement, ESS10 requirements, and GRM implementation	250,000
Grievance Redress Mechanism (GRM) Implementation	Operation of grievance intake points, grievance logging, investigations, meetings for resolution, grievance communication and reporting	230,000
GRM Digital Platform and Data Management	Development/maintenance of centralized grievance database, software tools, reporting dashboards, and case tracking systems	160,000
Monitoring and Evaluation of SEP Implementation	Field monitoring missions, stakeholder engagement tracking, surveys, evaluation forms, stakeholder engagement log management, and reporting	140,000
Media and Public Awareness Campaigns	Radio programs, public announcements, community outreach campaigns, and national education communication events	120,000
Travel and Logistics for Engagement Activities	Travel costs, accommodation, transport, meeting logistics, refreshments, venue rental for stakeholder engagement across regions and districts	250,000
Contingency (10%)	Provision for unforeseen engagement activities or expanded consultation needs	209,000
Total Estimated Budget (3 Years) USD 2,299,000		

Proposed Annual Budget Distribution

Year	Estimated Cost (USD)	Key Activities
Year 1	1,100,000	Project launch consultations, disclosure of ESF instruments, GRM establishment, national and regional stakeholder workshops
Year 2	700,000	Continuous stakeholder consultations, community engagement, training, GRM operation, communication campaigns
Year 3	499,000	Monitoring, evaluation, follow-up consultations, stakeholder feedback sessions and reporting

Budget Notes:

- Costs are **indicative estimates** and will be refined during project implementation.
- SEP implementation funding is expected to be drawn from project resources under the technical assistance and communication components.
- Budget allocations support ESS10 requirements for continuous engagement throughout the project lifecycle.

Annex 5: Agreed Next Steps for Education Sector-Wide GRM

NO.	Activities	Responsible
1.	Define the profile of the case manager at the local level	MoE HR (GES), Guidance and Counselling Unit, Girls Education Unit, Special Education Unit, SHEP, PR, MoE, Cooperate Affairs (NaCCA), Diversity and Inclusion unit (TVET) Gender,
2.	Define the task of the Social Specialist at the PIUs	
3.	Develop the GBV specific GRM	
4.	Develop a standardized form for case recording (to be part of the manual	
5.	Define the level of authority and role (profile) of the Chair of the Committee	
6.	Determine/ define the roles of actors in the GRM at all levels (part of manual	
7.	Define nature of information access on the platform (read only, edit function, delete function? Resolution, case closure etc) of the different actors – to be part of the ToR of the IT consultant	
8.	Develop a periodic reporting form – for checking the integrity of the structure (which role and cases (no. of cases, no. resolved etc.,)	
9.	Define what constitutes a sensitive case (GBV, Child labor, bullying, abuse of power, corruption, etc.)	
10.	Prepare the GRM procedures manual (both GBV and non-sensitive cases	

Annex 6: Grievance Registration and Redress Form

GRIEVANCE REGISTRATION FORM (FORM A) – For Complainant

Name (Complainant):

.....

ID Number (PAPs ID number):

.....

Contact Information (house number/ mobile phone)

Nature of Grievance or Complaint:

Details of Grievance.....

.....

.....

.....

Name (Receiver):.....Signature

Date.....

Name (Filer):.....Signature.....

Date.....

Relationship to Complainant (if different from Complainant):

GRIEVANCE AND RESOLUTION FORM (FORM B) – For RECEIVING ENTITY

Name (Complainant):

.....

ID Number (PAPs ID number):

.....

Contact Information (house number/ mobile phone)

Nature of Grievance or Complaint:

Details of Grievance:

.....

.....

.....

.....

Name (Receiver):.....Signature.....

Date:.....

Name (Filer):.....Signature.....

Date:.....

Relationship to Complainant (if different from Complainant):

.....

Review/Resolution Level 1 (School) Level 2 (MMDA) Level 3 (Region)

Level 4 (MoE)

Date of Conciliation Session:

Was Filer/Complainant Present? Yes No

Was field verification of complaint conducted? Yes No

Findings of field investigation.....

.....

Summary of Conciliation Session Discussion.....

Issues.....

Was agreement reached on the issues? Yes No

If agreement was reached, detail the agreement.....

.....

.....

If agreement was not reached, specify the points of disagreement:.....

.....

Signed (Conciliator):.....Signed (Filer/Complainant):

Signed:

(Independent Observer e.g. Assembly Member/Opinion Leader)

Date:

Implementation of Agreement

Date of implementation:

.....

Feedback from Filer/Complainant: Satisfied Not Satisfied

.....

If satisfied, sign off & date:.....

(Filer/Complainant) (Conciliator)

If not satisfied, recommendation/way forward:.....

.....

.....

(Signature & date of Filer/Complainant) (Signature & date of Conciliator)

Annex 7: Grievance Acknowledgement Receipt

1. Receipt Information

- Acknowledgement Receipt No.: _____
- **Date of Receipt:** ____ / ____ / ____
- **Time of Receipt:** _____
- **Mode of Submission:** Verbal Written Phone Call SMS/WhatsApp Email Other: _____

2. Complainant Details (Complete only with the complainant's consent)

- **Name:** _____
- **Address/Community:** _____
- **Contact Information (Phone/Email):** _____
- **Preferred Contact Method:** _____

3. Grievance Summary (Provide a brief, neutral description of the concern)

4. Receiving Officer Details

- Name of Officer Receiving Grievance: _____
- **Designation/Unit:** _____
- **Signature:** _____ **Date:** ____ / ____ / ____

5. Acknowledgement Statement to Complainant

Your grievance has been received by the STARR-J Project team. It will be reviewed in accordance with the Grievance Redress Mechanism (GRM) procedures outlined in the Stakeholder Engagement Plan (SEP).

You will receive an update on the status of your grievance within ____ **days**, and a resolution will be sought within ____ **days**, depending on the complexity of the issue.

6. Signature of Complainant (Optional)

- **Name:** _____
- **Signature:** _____ **Date:** ____ / ____ / ____

Annex 8: Sample Grievance Redress Mechanism (GRM) Logbook

Log No.	Date Received	Complainant Name / Contact	Community / Location	Grievance Channel Used	Grievance Summary	Category	Severity Level	Acknowledgement Date	Assigned Officer	Initial Assessment Outcome	Action Taken / Resolution Steps	Date Resolved	Resolution Outcome	Feedback Provided?
001/2026	10/02/2026	Kwame A., 024xxxxxxx	Kofikrom	In-person	Contractor machinery blocking footpath	Community Safety	Medium	10/02/2026	CLO	Requires corrective action	Machinery relocated; signs installed	12/02/2026	Resolved	Yes
002/2026	11/02/2026	Anonymous	Asamankese	Grievance Box	Noise from chainsaw at night	Environment	High	11/02/2026	Safeguards Officer	Non-compliance identified	Night work suspended; monitoring initiated	13/02/2026	Resolved	N/A

Annex 9: Grievance Resolution Meeting Record Template

1. Meeting Details

- Meeting Reference Number: _____
- Date of Meeting: ____ / ____ / _____
- Time: _____
- Venue: _____

2. Grievance Information

- Grievance ID: _____
- Date Grievance Was Received: ____ / ____ / _____
- Complainant Name (if provided): _____
- Community/Location: _____
- Brief Summary of Grievance: _____

3. Participants

Name Role / Representation Contact Information Signature

(Include GRM Committee members, complainant or representative, community leaders, Project field staff, contractors, and observers as applicable.)

4. Summary of Discussions

(Provide a factual, concise record of key points raised by all parties.)

5. Agreed Actions / Resolution Measures

Action Item	Responsible Person/Institution	Timeline / Deadline	Remarks

6. Outstanding Issues (If Any)

(Identify issues requiring escalation or additional follow-up.)

7. Final Outcome of Meeting

- Resolution Status:

Resolved Partially Resolved Not Resolved (Escalated)

- Details / Justification:

8. Confirmation by Complainant (Optional)

I confirm that the issues discussed and the actions agreed represent my concerns.

- **Name:** _____
- **Signature:** _____
- **Date:** ____ / ____ / ____
- **Comments:**

(If complainant declines to sign or is unavailable, explain briefly.)

9. GRM Committee Validation

- **Name of Chairperson/GRM Officer:** _____
- **Signature:** _____
- **Date:** ____ / ____ / ____
- **Name of Secretary/Record Officer:** _____
- **Signature:** _____
- **Date:** ____ / ____ / ____

10. Attachments (If Applicable)

- Attendance sheets
- Evidence or photos
- Copies of letters, reports, or investigation notes
- Any other supporting documents

Annex 10: Grievance Closure Form

1. Grievance Identification

- **Grievance ID Number:** _____
- Date Grievance Was Received: ____ / ____ / _____
- **Complainant Name (if provided):** _____
- **Community/Location:** _____
- **Contact Information:** _____

2. Summary of Grievance

(Provide a concise description of the issue raised)

3. Resolution Actions Taken

- Investigation Completed on: ____ / ____ / _____
- Summary of Findings:

- Corrective/Remedial Actions Implemented:

- **Responsible Person/Unit:** _____
- Date Corrective Action Completed: ____ / ____ / _____

4. Outcome of Grievance Handling

- Final Status of Grievance:

Resolved Partially Resolved Unresolved but Closed

Referred to Higher Authority/External Mechanism

- Explanation/Justification:

5. Complainant Confirmation (Optional)

The complainant has been informed of the outcome and confirms acceptance of the resolution.

- **Complainant Name:** _____
- **Signature:** _____
- **Date:** ____ / ____ / _____
- Comments (if any):

(If the complainant cannot be reached or declines to sign, state reason here.)

6. Closure Authorization

- Name of GRM Officer/Responsible Staff: _____
- **Designation:** _____
- **Signature:** _____
- **Date:** ____ / ____ / _____
- Official Stamp/Seal (if applicable)

7. Additional Notes (if applicable)

Annex 11: Grievance Referral Template

1. Referral Information

Item

Details

Referral Reference No.:

Date of Referral:

Referring GRM Committee / Office:

Name of Officer Completing Referral:

Position / Role:

Contact Information:

2. Complainant Information

(Complete only with consent; maintain anonymity for SEA/SH or sensitive cases)

Item

Details

Name (or Anonymous Code):

Gender / Age (if disclosed):

Community / Location:

Contact (optional):

3. Grievance Details

Item

Details

Date Grievance Was Received:

Mode of Submission: (In-person Phone Written
Grievance Box Other)

Grievance Category: (Environmental Social Health
& Safety Labour Child Labour SEA/SH Other)

Summary of Grievance:

(Brief, factual description)

Confidential Case? (Yes No)

Requires Immediate Attention? (Yes No)

4. Reason for Referral

Item

Details

Justification for Referral:

(Why the case cannot be resolved at the GRM Committee level)

Type of Specialist Support
Required:

Child Protection SEA/SH Service Provider Law
Enforcement Social Welfare Health Facility Labour Officer
 Other

5. Receiving Institution / Service Provider

Item

Details

Name of Institution / Agency:

Contact Person:

Position / Unit:

Telephone / Email:

Item

Details

Address / Location:

6. Actions Undertaken Prior to Referral

Item

Details

Initial Assessment Conducted? (Yes
 No)

Immediate Safety Measures Taken:

Information Provided to Complainant:

Consent for Referral Obtained? (Yes
 No) *Required for all non-criminal cases*

For SEA/SH Cases:

Referral must follow survivor-centred protocol; do not record personal details without consent.

7. Documents Attached

- Initial Grievance Form
- Assessment Notes
- Consent Form (if applicable)
- Any supporting evidence
- Incident Report (for emergencies)
- Other (specify): _____

8. Handover Confirmation

Item

Details

Date and Time of Transfer:

Method of Transfer: (In-person Email Phone Other)

Receiving Officer Name & Signature:

Referring Officer Name & Signature:

9. Follow-Up Tracking (by GRM Committee)

Item

Details

Feedback Received from Receiving Agency:

Date Feedback Was Received:

Outcome / Status:

Case Closed? (Yes No)

Closure Date:

