

**Horn of Africa (HoA) Groundwater for Resilience  
Intergovernmental Authority on Development (IGAD) Component (P174867)**

**Stakeholder Engagement Plan (SEP)**

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## **1. Introduction/Project Description**

### **1.1 IGAD Region Context**

The HoA -Groundwater for Resilience (HoA-GW4R) targets the Intergovernmental Authority on Development (IGAD) region. It is home to a rapidly growing population of over 251 million people. Most of the population is poor and relies on rainfed agriculture and for its livelihood, in a climate characterized by irregular and unpredictable short rainy seasons and recurrent droughts. In this regard, the IGAD region is not homogeneous in terms of hydro-climatology. Rainfall is concentrated in the Ethiopian highlands and along the south-western border of the region (southern Sudan, South-Sudan and Uganda), while the climate in the northern, eastern and south-eastern parts of the region is characterized by low rainfall and high potential evapotranspiration. A great part of the region is composed of arid and semi-arid lands (ASALs), in which around 30% of the total population is found.

Groundwater is the largest water resource in these areas, if not the only one available, having the greatest potential for providing water security and socio-economic benefits. Adding to this average low water availability, the region has been affected by longer dry periods since the second half of the 20th century until now, suffering several episodes of catastrophic and intense drought, and is now affected by increasing inter-annual variation in the length of the rainy season. The Great Horn of Africa region (shortened as “HoA”), already characterized by high climate variability, will suffer significant impacts as a result of climate changes. Average temperatures in the region will rise by up to 1.5°C in the next 20 years and up to 4.3°C by the 2080s. Changes in both rainfall and temperature are likely to have significant impacts on the water cycle and the water resources, drought frequency and intensity, erratic floods and untimely precipitation patterns which will affect the ground water recharge and others. Indeed, related to groundwater recharge, the trends point to more intense rains of increasingly shorter duration, which are less efficient for recharge. In addition to climate change, increasing population density in the region will put additional pressure on the region’s fragile natural resource base, pushing it in some cases beyond its regenerative capacity. Conflicts over land and water are likely to multiply, which may exacerbate insecurity and emigration.

### **1.2 Project Description**

The proposed Horn of Africa Groundwater for Resilience Program (P174867) is a long-term investment. This program was built from the lessons learnt and potential investment assessment of the HoA Groundwater Initiative (P169078). The objective of the IGAD activities under this phase is to build trust and relationships. The first phase of the Program involves a US\$ 381 million investment in three countries in the region namely: Ethiopia, Kenya and Somalia with a regional component under implementation by the IGAD.

The overall project PrDO is ‘To increase the sustainable use and management of groundwater by beneficiary groups in the Horn of Africa’. Program activities are linked to the ‘Four I’s (Infrastructure, Information, Institutions and Inclusion) that the program is seeking to address in order to enhance long term community resilience (i.e., gaps in groundwater infrastructure and inclusive community-level use,

groundwater institutions and information) and foster transboundary cooperation. Action in these areas will increase the access and use of groundwater at the community level; enhance the capacity of local, sub-national, national and regional entities to manage and use the resource sustainably; including the promotion of renewable energy and energy efficiency for pumping; increase mapping, monitoring and feasibility studies of the resource; and increase dialogue and coordination on transboundary water resources in the region.

The Project Development Objective of the IGAD component, which is the focus of this SEP, is to enhance the collaborative management and use of groundwater resources for climate resilience among targeted regional and national entities.

Components being managed by IGAD are:

- **Component 1: Strengthening Regional Capacity & Information for Groundwater Management (US\$2 M)**

Building on the achievements of earlier and ongoing projects (see above), IGAD's Water Unit will implement several institutional strengthening and information management activities that bring regional value added and complementarities with the activities carried out by the individual Member States, in particular on the topic of regional groundwater governance.

The overall objective of this component is to strengthen and enhance the capacity of Government Institutions in the IGAD Member States and the IGAD Water Unit that are mandated to promote groundwater management services to sustainably develop the region's groundwater resources and thus contribute to more resilient livelihoods.

- **Component 2: Promoting Regional Integration and Collaboration (US\$ 2.1 M)**

The aim of this component is to consolidate a sustainable institutional and policy framework for Trans-Boundary Aquifers. This will address the lack of institutional, legal and policy mechanisms in relation to trans-boundary aquifers by implementing management structures at **one and/or two trans-boundary aquifers in the IGAD region and** by promoting groundwater infrastructure management and development.

In general, the feasibility study is expected to generate a pathway for the joint monitoring, modeling, governance and eventually development of the shared aquifer. The development of a joint model for the aquifer will contribute to a common understanding of the dynamics and potential of the TB groundwater resource that will facilitate the dialogue among the riparian countries to develop a shared vision and support decision-making on the future development and management of the aquifer.

- **Component 3: Regional Program Coordination, Monitoring & Evaluation (US\$ 5.9 M)**

Third Party Monitoring (TPM) and remote supervision tools as essential elements for Program oversight. Given the complexity of the HoA region and the scope of the Program, M&E will be strengthened with the Geo-Enabling initiative for Monitoring and Supervision (GEMS), launched by the FCV Group to systematically enhance M&E as well as supervision through third-party monitoring (TPM) in FCV settings. The approach will leverage field-appropriate, low-cost and open-source technology for digital real-time data collection and analysis, using a customized digital M&E system to enhance the transparency and accountability of implementation across the project cycle. The TPM will implement GEMS' platforms for remote supervision, real-time risk and safeguards monitoring, and portfolio mapping for coordination across projects and partners, which is seen as key to ensure the effectiveness of the regional Program.

The Project will also support the administration and management in the Implementation of the Project, Coordination of the Project activities under each Component and providing fiduciary services.

It should be noted that each participating country (for Phase 1 Ethiopia, Kenya and Somalia) will prepare their own Stakeholder Engagement Plan (SEP) to ensure meaningful engagement on the components that they are undertaking. In addition, other environmental and social instruments will be prepared by the countries as needed.

## 2. Brief Summary of Previous Stakeholder Engagement Activities

The HoA Groundwater for Resilience Program is under the Horn of Africa Initiative, Pillar 3 Resilience. This initiative was launched by the Finance Ministers and the representatives of the five Horn of Africa countries— Djibouti, Somalia, Kenya, Ethiopia, and Eritrea. The five countries issued a joint communiqué on 18 October 2019 in which they stressed the importance of regional, coordinated and concerted action between the countries to face common challenges, which are hampering their economic growth and poverty eradication efforts. <https://hoainitiative.org/>

A mini virtual workshop for the Horn of Africa Groundwater for Resilience Program took place on Wednesday April 7<sup>th</sup> 2021. IGAD co-hosted with World Bank team and the participation of the country delegations from Djibouti, Ethiopia, Kenya, and Somalia.

Below is the summary of high-level messages from the above mini-workshop:

1. The **Groundwater for Resilience Program** was recognized as a useful and relevant umbrella to address the challenges and the opportunities of groundwater in the HoA region. There was overall agreement on the Program's development objective and on the need for a long-term, phased approach to build the climate resilience of vulnerable HoA communities, with a particular emphasis on borderland areas.
2. Participants highlighted the importance of understanding **resilience building as a long-term process**, as well as the importance of building trust among countries in the region. Capacity building, exchanges and study tours were mentioned among the mechanisms to foster trust.
3. The **role and contribution of IGAD** on the regional aspects of the Program was acknowledged, and useful suggestions were made by country delegations on potential regional activities and collective actions.
4. The need to strengthen **groundwater information, knowledge and data sharing** emerged as a strong need across the country presentations and was identified as a cornerstone for enhanced groundwater management and use in the region.
5. Presentations also highlighted the importance of **institutional strengthening** and groundwater policy formulation and delivery. Remarks highlighted the importance of identifying concrete actions and avoiding duplication of efforts.
6. Participants highlighted other issues to be considered in the design of robust project proposals as part of Phase I of the Program, including integrating clear linkages between the proposed actions and **climate change** (e.g., drought) preparedness and adaptation, **gender inclusion** and GBV risks, and **technology use and innovation** (e.g., solar).

A second virtual mini-workshop took place in June 30<sup>th</sup> 2021. The IGAD's proposed components were revised and finally validated by the country delegations from Djibouti, Ethiopia, Kenya, and Somalia and Project Steering Committee (PSC) Members for the HoA-GWI Project.

At this workshop, the IGAD Water Unit, within its role to coordinate all Water Projects/Programmes at the IGAD Secretariat, extended the invitation to the Technical Advisory Committee (TAC) which is a long standing Committee on water matters whose participants are senior representatives from the Member States who report to their respective Water Ministers.

The Technical Advisory Committee (TAC) meetings are held twice per year according to their standing regulations. However, there can be extraordinary TAC Meetings as need may arise.

The outputs of these workshops helped inform the design of the Project in particular the components that would be implemented by IGAD and early identification of potential environmental and social risks and impacts.

### **3. Stakeholder Identification and Analysis**

The identification of the key stakeholders, who will be informed and consulted about the project, including individuals, groups, or communities, is informed by the previous historical stakeholder information related to the similar projects implemented by the IGAD Water Unit and specifically on the HoA-Groundwater Initiative IGAD-World Bank project. Those key stakeholders are categorized as those that:

- Are affected or likely to be affected by the project (project-affected parties); and
- May have an interest in the project (other interested parties).

### 3.1. Affected Parties

The IGAD component aims to enhance groundwater management by strengthening **national** and **regional** institutional capacities and by expanding the HoA's information and knowledge base on regional groundwater resources.

Component 2 entails undertaking an aquifer feasibility study and ESIA on one or two aquifers in the region. Consequently, a wide range of stakeholders are involved in the Transboundary Aquifer (TBA) study. They can range from the Government, regulatory agencies, businesses, communities, civil society and NGOs.

Once the aquifer is identified, the consulting company in charge of undertaking the TBA study will produce a detailed stakeholder analysis report.

Otherwise, the overall project outputs/outcomes at the local level aren't directly related to IGAD's activities. Impacts on these groups as a result of IGAD activities will be minimal and thus stakeholder engagement will be focussed at a higher level.

At the national level, The HoA-GW4R project will benefit from the already existing Project Steering Committee (PSC) for the HoA-GWI Project with the same functions of approving the work plans and budget as well as providing inputs on behalf of the countries.

At the regional level, the IGAD Water Unit coordinates all Water Projects/Program by the IGAD Secretariat. While coordinating these activities IWU works closely with Technical Advisory Committee (TAC) which is a long standing Committee on water matters including senior representatives from the Member States. TAC members report to their respective Water Ministers.

In summary, for IGAD activities the key affected stakeholders at the national level are the national ministries (through their respective representatives) and national government agencies in charge of groundwater affairs as well as the Ministry of Finance as the lead ministry for the Horn of Africa Initiative. The IGAD Secretariat, as the host institution, is also a key affected stakeholder. The Coordination of the IGAD Water Unit with other IGAD departments and other IGAD agencies such as the IGAD Climate Prediction and Applications Center ICPAC, IGAD Center for Pastoral Areas and Livestock Development ICPALD, and Conflict Early Warning and Response Mechanism (CEWARN) will enhance the identification of water use (livestock, impact of climate change, investment on infrastructure for domestic water supply, conflict cross-border assessment) inputs during the identification of the transboundary (ies) aquifer(s) at the borderlands of Component 2.

### 3.2. Other Interested Parties

The Other Interested Parties (OIP) include individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the Project and/or who could affect the project and the process of its implementation in some way. Other interested parties include, among others, government institutions that may be involved in various ways in the project, as well as academia, civil society, international organizations, the media, etc.

#### a) IGAD host institution

The most important benefit of the host institution (IGAD) will be the coordination and linking of groundwater data and knowledge of the member states for better management of water resources on a regional scale. At the regional level, some of the foreseen outputs will lead increasing groundwater mapping, monitoring, feasibility studies and information shared through a regional platform.

#### b) National-level beneficiaries

- *National Focal Persons (PSC), TAC members, trainees and interns*

Under the Horn of Africa-Groundwater initiative, IGAD identified and supported National Focal Persons to act as an interface between the Institute and the IGAD Member States. Seven TAC members were also established. The TAC will continue as an activity in the proposed programme and will include further capacity building and support inputs. As the focal persons and TAC initiatives unfold, growing numbers of participants will be direct project beneficiaries. Further national-level direct beneficiaries will include country participants in conferences, workshops and training, and young professionals selected and or seconded to join the capacity building programme.

- *National institutions responsible for water management*

Institutional arrangements for water resource management are similar across most IGAD Member States. Typically, they include a nationally responsible ministry (ministries of water resources) and localised institutions such as directorates of water resources management (Uganda). In rural areas, in the majority of IGAD member countries, groundwater management is jointly managed by the regional authority and the local community. Subject to country-by-country differences in participation, national water management institutions will benefit from multi-faceted programme efforts to build capacity, especially around the growth and institutional consolidation of groundwater management in the broader water resource management domain.

- *Groundwater professionals working at the regional level*

As with groundwater professionals working at the national level, professionals working at the regional level benefit from the project, through access to information, tools and network connections. Consultants can benefit through the provision of services to regional research, information management, network facilitation and other IGAD-wide initiatives. This project also proposes the establishment of a Groundwater Information Center Network that will create a connection between groundwater professionals at the regional level.

- c) Other Ministries and Governments agency involved in water resources planning and investment: Ministry of Finance, Environment, Gender, etc.
- d) CSOs, academic national institutions and local cross border government agencies at the shared aquifer site: they will be involved during the TBA study through a detailed stakeholder analysis
- e) International Financing Institutions and Partners: The World Bank (ongoing projects), European Bank for Reconstruction and Development (EBRD), the Africa Development Bank as the main financial institutions supporting the long term investment plan of the Horn of Africa Initiative

### 3.3. Disadvantaged / vulnerable individuals or groups

Disadvantaged/vulnerable individuals and groups are also those who may not have a voice to express their concerns or understand the impacts of the Project and are sometimes excluded from engagement. It is expected that vulnerable households will benefit from the proposed country project interventions due to improved access to water and sanitation services and by increasing their quality of life. These groups will have priority in accessing water supply services. The IGAD Water Unit will closely monitor the consultation processes by the participating countries during the activities under the Component 2 to ensure that the views of vulnerable groups are included.

There is the potential for exclusion of disadvantaged and vulnerable groups (e.g., ESS7 communities,

women, persons living with disabilities, youth) from decision making structures due to cultural norms or existing tensions, with associated elite capture. Internally Displaced People and refugees who are present in the countries due to conflict are also at risk of exclusion. The involvement of communities in the identification and management of subprojects will help mitigate the risks, by promoting community buy-in and resilience.

It is acknowledged that there are relatively limited opportunities for women and the youth to participate in the water sector, and particularly the groundwater sector. Therefore, the IWU will ensure during the implementation of the project, particularly during the designation by the member states of training participants, that consideration is given to representation of women and young professionals. This has been tested during the HoA-GWI and member states supported this, specifically for the national tailored training activity.

### 3.4. Summary of project stakeholder needs

| Community                        | Stakeholder group   | Key characteristics                                      | Language needs  | Preferred notification means (e-mail, phone, radio, letter)  | Specific needs (accessibility, large print, childcare, daytime meetings)  |
|----------------------------------|---|--|---|--|---|
| IGAD Secretariat-IGAD Water Unit | Ministry of Foreign Affairs Focal points, Water and Finance Ministers | Country delegations (representatives from the Ministers) | Official Languages: French and English                          | Translated letter, shared electronic documents (reports) via email and presented / discussed when needed at formal meeting | Public and virtual consultations meetings with translation  |
| National                         | Technical Advisory Committee (TAC) and National Focal Points          | 7 TAC and 7 NFP from the PSC                             | French and English  | Translated letter, shared electronic documents (reports) via mail, phone call for follow up, Leaflets/informative notes    | Public and virtual consultations meetings / workshops with translation  |
| Other interested parties         | project beneficiaries (OIP) and local cross border affected           | OIP and Local cross border authorities                   | French, English and local cross border language at the TDA site | Electronic and printed knowledge products generation & dissemination, via mail or shared as hard copies, phone call        | Beneficiary survey completed by local snapshots and Focus Group (TBA study), in-depth interviews with relevant stakeholders, training/workshop events |

## 4. Stakeholder Engagement Program

#### 4.1. Purpose and timing of stakeholder engagement program

Stakeholder engagement is an inclusive process that must be conducted throughout the project cycle. The key stakeholder's engagement activities to take place during the project preparation stage through implementation and closure are:

- a) **Preparation Phase:** Two mini workshops co-hosted by IGAD and World Bank team took place virtually in April and June 2021. Country delegations represented by the PSC of the ongoing HoA-GWI, the TAC members and the national representatives for the specific HoA-GW4R (note: for some countries it is the same as the TAC, some others have a different focal point) made national presentations and ensured that the IGAD's proposed activities are contributing to the additional efforts of member state. This is the vision of IGAD.
- b) **Implementation Phase:** At the official project launch meeting, the IWU will invite the existing PSC of the ongoing HoA-GWI who will remain also the PSC for the HoA-GW4R and the TAC member. The interest of those key stakeholders is to help to steer the project through from start to completion, approving the Work Plans and Budget as well as providing inputs on behalf of the countries. Participation in the launch meeting will be extended to IGAD representatives from other divisions and specialized institutions. The launch event will take place within 3 month of the project's effectiveness date. Two Steering Committee meetings per year, either virtual or face-to-face, are foreseen for the project and one for TAC members. In addition, to those planned meetings, any other TAC and/or PSC could be organized as needed.

In case of any stakeholder consultations meeting/workshops, either virtual or face-face, the IWU will strive to provide relevant information to stakeholders with enough advance notice (10-15 business days) so that the stakeholders have enough time to prepare and to provide meaningful feedback. The IWU will gather written and oral comments, review them and report back to stakeholders on how those comments were incorporated, and if not, provide the rationale for reasons for why they were not within 10-15 working days from the stakeholder consultation event. The timeframe for notice for a ministerial event will be 3 months in advance with official letters sent via email through the Ministry of Foreign Affairs IGAD Focal points.

During the TBA study of Component 2, IWU will monitor it closely so that within two months after the signed contract of the consulting company, it provides a detailed stakeholder analysis report. It will include local stakeholders cross border of the identified shared aquifers, vulnerable groups and any OIP consultation processes.

Additional activities can be included following consultations with project beneficiaries, stakeholders and contractors if these are deemed useful and necessary.

#### 4.2. Proposed strategy for information disclosure

The table below provides a preliminary summary of the suggested information to be disclosed based on the project design and topics that might be of interest to stakeholders. The table, like the entire document, is an evolving tool and can be updated at any point during project preparation and implementation.

In the line with WB ESS10, the information will be disclosed in IGAD official languages (English and French) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs.



In the context of COVID-19 pandemics face-to-face meetings will be replaced with on-line/virtual means (or adjusted to conform with COVID-19 safety protocols). The Information Disclosure Plan will be updated in concordance with the general situation in the country

Table: Information disclosure plan

| Project stage                            | List of information to be disclosed  | Methods proposed                                    | Timetable: Locations/ dates   | Target stakeholders   | Percentage reached  | Responsibilities |
|--|--|---|---|---|---|------------------|
| Preparation Phase                        | Project Concept note<br><br>ESF documentation that is required for disclosure by the WB<br><br>-SEP with GRM<br>-ESCP      | Official letter via Email                           | 30 <sup>th</sup> June 2021<br><br>As soon as each individual deliverable is completed | 7 IGAD TAC & 7 PSC  | 100%  | IGAD/IWU         |
| Project Launch                           | -Project information document<br>-key activities, work plan<br>-Implementation modalities<br>-Key elements of ESCP and SEP | shared via Email with an official invitation letter | Launch of workshop within 3 months after the effectiveness date                       | TAC, PSC, IGAD Secretariat with relevant other divisions and specialized institutions, and international partners | 15 days before the meeting, all stakeholders will be informed and shared with them the key documents by email as 100% target. | IGAD/IWU         |
| During implementation (after the launch) | Progress Reports on:<br>-Activities<br>-M&E framework<br>-TDA studies<br>-ESIA assessment                                  | Via email   | Biannual PSC meetings<br>Venue will be based on a rotation member states approach     | 7 PSC members   | 100 %<br>Electronic reports   | IGAD/IWU         |

#### 4.3. Proposed strategy for consultation

For the stakeholder consultation, as described in below table, the foreseen strategies at the regional level will be through email, virtual and/or face-to-face workshops and meetings. During the TBA study, all stakeholders will be consulted through a beneficiary survey completed by local snapshots and Focus Groups (TBA study), in-depth interviews with relevant stakeholders and phone calls.

At the national level, each member states will propose a strategy for consultation and continue to conduct

stakeholder engagement in accordance with their project specific SEP and provide information to stakeholders throughout the life cycle of the project. Once consultations have taken place, stakeholders will want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored.

*Table: Proposed strategy for stakeholder consultations*

| Project stage                            | Topic of consultation  | Method used   | Timetable: Location and dates  | Target stakeholders   | Responsibilities                                     |
|--|--|---|--|---|--|
| Preparation Phase                        | Project design’s activities, SEP including GM, ESCP  | Virtual consultations meetings, documents shared via emails   | During the preparation phase, at the SC of the ongoing project, stakeholders will be informed and updated  | 7 IGAD TAC & 7 PSC  | IGAD/IWU   |
| Project Launch                           | Project 1 <sup>st</sup> year work plan with budget<br><br>SEP including GM and ESCP<br><br>Project Design  | Virtual and / or Face-to-face consultations meetings, documents shared via emails   | Within 3 months after the project’s effectiveness date   | TAC, PSC, IGAD Secretariat with relevant other divisions and specialized institutions, and international partners | IGAD/IWU   |
| During implementation (after the launch) | -Progress reports<br>-Policy issues at Higher level<br>-SEP including GM, ESCP if revised needed<br><br>-Component 2, during the TBA through a Transboundary Diagnostic Analysis (TDA) | Workshops/meetings, email for dissemination of documents<br><br>- Beneficiary survey completed by local snapshots and Focus Group (TDA study), in-depth interviews with relevant stakeholders | -Biannual meetings<br>-As needed rise<br><br>-During the first two month after the date of inception meeting for the consultancy service for TDA study | -7 PSC members<br>-7 TAC<br><br>-Local cross border authority & vulnerable or disadvantaged groups, OIP           | IGAD/IWU<br><br>Consulting company for the TBA study |

#### 4.4. Proposed strategy to incorporate the view of vulnerable groups

The views of vulnerable or disadvantaged groups (VDG) will be sought during the TDA consultation process by the Consulting service company. The TDA is based on a substantial regional analysis that is required in order to fully understand the context of transboundary issues. During the regional analysis of the TBA study, the views of VDG will be reflected in the Stakeholder Analysis Report. Also their interests will be reflected in any policy and/or strategy document developed during the implementation of the project.

In conclusion, IWU will emphasise the above views in all Terms of Reference either for individual or

firm consultancy services for policy assessments at national level, policy and strategy development reports at the regional level, aquifer feasibility and ESIA of TBA study.

#### 4.5. Timelines

The information on timelines for project phases and key decisions that was described above are:

c) **Preparation Phase:**

IGAD Project Concept Note, SEP, ESCP finalized at the 30<sup>th</sup> November 2021. The concern stakeholders will have each time one week (7 days) to give comments and feedbacks. Then IWU will have to synthesise all received comments for one week and send them back. Final WB Board approval in May 2022. The expected effectiveness date of the project is June 2022.

d) **Implementation Phase:** The launch event will take place within 3 months after the project's effectiveness date.

During the implementation, it is foreseen to have a regular biannual meeting with the project steering committee. In addition, when needs rise, key stakeholders will be consulted in due time. All comments received during the consultation meetings/workshops will be finalised and shared to all participants at the events in a format of action items.

Finally, the duration of the project is for 4 years.

#### 4.6 Review of Comments

All written comments on reports will be sent by email to the stakeholders either with track changes or in form of text message/note. After receiving all stakeholders' comments within one week after the shared date, the IWU will review and send them back within 7 working days.

All oral comments during consultation meetings will be taken into account as an action item. This will be cleared by the IWU at the last day of the mentioned organized event.

### 5. Resources and Responsibilities for implementing stakeholder engagement activities

#### 5.1. Resources

During the Preparation phase, an independent Environment and Social Safeguard specialist has been hired. His main deliverables are to provide and review the SEP, and ESCP documents. The rest of consultations process between partners, member states and IGAD are only in a form of virtual meetings and via email.

All project's activities involving stakeholders consultations process have adequate budget.

For more information about the implementation of the SEP, please contact the below persons (individual names may change):

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#### 5.2. Management functions and responsibilities

**At the regional level**, the proper implementation of the SEP will be under the direct responsibility of the

IGAD task team leader. In order to assist him, it is foreseen that an Environment and Social Safeguard Specialist consultant will be recruited for a specific period and consulted when needed. After agreement on the number of days needed to undertake assignments officially communicated by the IWU implementing entity, he will be paid after the deliverable. His main tasks will be revision of the SEP and ESMF, revision of the consultancy service either for individual or firm undertaking some field assessments. Finally, during the consultation workshops with key stakeholders with a planned agenda referring to SEP and ESMF reports update, he will make a presentation.

In addition to the above mentioned assignments for the consultant, the IWU implementation unit will be assisted by the Program Manager of NRM&RE and the entire IGAD Communication team. In addition, as needed due the urgency of a situation, as for the current SEP draft, IGAD has the capacity to mobilize and undertake the task. The IGAD Communication team is composed of 5 professional staff with complementary background communication skills. They will mainly support project information production and dissemination (preparation of webinars/video and GRM PR-materials).

The IWU implementation unit will be in charge of communication and engagement with key stakeholders. Based on the lessons learnt from the ongoing HoA-GWI project regarding the engagement and follow up of stakeholders, the current project officer and assistant will continue supporting the project. They will be in charge of the document records, facilitation of logistical support to all consultation events, technical support (Google teams, WEBEX, Zoom...) for conducting online public consultations, meetings with communities, and other interested parties, assisting consultant(s) access to field trips in the IGAD Member States and any other duties related to stakeholder engagement. The project will support those two officers. For the records, the foreseen database expert under the project for ICAPC continuous support will develop, as part of one the deliverable, an Access database allowing recording all soft products.

All the above project staff resources are planned under Component 2 and Component 3.

OIP and VDG engagement activities will be the responsibility of the consultant(s). The IWU implementation unit will monitor stakeholder engagement activities being implemented and in the TORs and final report(s).

**At the national level**, PSC and TAC are in charge informing properly their respective country decisions makers. They continue to conduct stakeholder engagement in accordance with their project specific SEP and provide information to stakeholders throughout the life cycle of the project. Once consultations have taken place, stakeholders will want to know which of their suggestions have been taken on board, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored.

## 6. Grievance Mechanism

The purpose of the feedback, complaint and grievance redress mechanism (GRM) is to allow all project users and stakeholders to communicate on adverse impacts of the projects, potential damages, injuries or routine project activities and to effectively address any complaints, concerns or suggestions related to the project implementation, especially with regard to the environmental and social safeguards. Therefore, the mechanism will ensure the continuous improvement of the programme.

**. The project-level grievance redress mechanism (GRM) will be central to risks mitigation efforts and will help manage grievances from communities or by parties who feel that are or will be adversely**

**affected by the program.** The project-level GRM should serve as an avenue for communities to channel their concerns. Each participated countries will establish an accessible, effective and efficient GRM with the capacity to receive and respond timely to grievances in the local languages.

For the IGAD GM, the IWU manages the Project GRM process and facilitates the resolution of any complaints that may arise as described and designed in the below Figure. The IWU, in particular its Project Task team leader, ensures that it can be reached for complaints (e.g., hotline, mobile number, electronic address). When no local solution can be found, the IWU is informed and investigates complaints in more detail and develops a solution proposal. In exceptional cases, when the complainant deems it necessary, the WB can be contacted directly. Please refer to the following website to make a complaint directly to WB: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

The Figure below shows the Project complaint/grievance mechanism.



**The grievance mechanisms at all levels needs to be:**

- scaled to address the risks and impacts on affected communities,
- culturally appropriate,
- clear and accessible for any individual or group at no cost (vulnerable groups),
- transparent and including regular reporting, and
- prevent retribution and not impede access to other remedies.

**Important design principles include:**

- **Accessibility:** the grievance mechanism should be directed to and disclosed to all people affected, in particular to: construction workers and suppliers (Contractors and subcontractors) as well as community members.
- **Acknowledgement:** the receipt of a complaint should be acknowledged within a short time frame (e.g., 5 days) after submission.
- **Timely and appropriate response:** the response should be proportionate to the risk.
- **Record: the complaint should be recorded including information on:** 1) name and contact details (unless requesting anonymity), 2) date of contact, 3) issue(s) raised, 4) proposed

response, and 5) status (recorded, active closed).

- **Confidentiality:** If a complainant wishes to remain anonymous this will be accepted. No personal data will be made public. Details of the grievance will only be provided to those directly involved in the examination process.
- **Data management:** Personal data contained in the Complaints Register will be kept only as long as necessary to investigate the Complaint and implement a resolution. Personal data will then be either deleted or modified and transferred to an archive for a reasonable period.

**For the Project workers** (project implementation staff, consultants and firms hired under the Project), in addition to the above grievance mechanism, will sign the IGAD Code of Conduct 2018, and the IGAD Sexual Harassment Policy 2018. The IGAD Whistleblower Policy will be available to the workers to report grievances relating to accountability and integrity. Project workers are invited to report concerns relating to fraud, theft, use of inside information, bribes, gifts (etc.), inappropriate disclosure of confidential information, conflicts of interest and illegal acts.

## 7. Monitoring and Reporting

### 7.1. Involvement of stakeholders in monitoring activities

The IGAD project's theory of change developed during the preparation stage is useful for monitoring and evaluation. It helps identify better Key Evaluation Questions, key indicators for monitoring, gaps in available data, priorities for additional data collection, and a structure for data analysis and reporting.

With the clearly identified key indicators in the log frame of the project, the collection of the data for monitoring them will not require significant additional resources. Monitoring will be the responsibility of the paid project staff, specifically the officers doing data tracking and collection, with the strong support of the IGAD Secretariat Monitoring & Evaluation team. In addition, the project's database expert (Component 1) will develop a user-friendly M&E system within 90 days of the start of his duty.

The stakeholders will be involved monitoring the activities during the biannual meetings through presenting the progress report.

### 7.2. Reporting back to stakeholder groups

The results of stakeholder engagement activities will be reported back to both affected stakeholders and broader stakeholders as described below:

- At the biannual meetings with the PSC, discussions on the comments and recommendations will be presented as action items and shared on the last day of the event;
- For the comments on the consultant(s) report, IWU will send the report to the main stakeholders' via email. It will request them to provide their comments within one week. IWU will then submit the revised report within 7 working days;
- Training, communication and knowledge materials will be sent electronically to the participants by the IWU within 7 days after completion of the event;
- IOP and VDG reports on survey assessments, focus groups, in-depth interviews of key players at the cross border identified site during the TBA feasibility and EISA study will be shared via email as soon as they are available.

These reports will rely on the same sources of communication that were used earlier in the current SEP document.

Stakeholders will be reminded of the availability of the grievance mechanism during the biannual meeting.

### **ANNEX 1: IGAD Code of conduct 2018**

Statement by the Executive Secretary

Recognizing that local laws and cultures differ considerably from one country to another this code of conduct is based on International/Regional Intergovernmental Organizations legal standards. This code of Conduct is applicable to all employees as defined in the IGAD Service Regulation, and provides guidance in terms of behavior and conduct in all circumstances. In accepting appointment; you undertake to discharge your duties and to regulate your conduct in line with the requirements of this Code. This Code is, of course, broadly stated and therefore, is not intended to be a complete listing of detailed instructions for every conceivable situation. Rather, it is intended to help you develop a working knowledge of the Rules and Regulations that affect your job as well as maintaining a conducive work environment.

#### **1. Purpose**

This code of conduct seeks to capture and encompass the spirit of cooperation and collegial respect under which a working environment will be sustained.

Employees will be expected to:

- a) Treat all people fairly and with respect and dignity.
- b) Observe all local and international laws and be sensitive to local customs.
- c) Ensure that my professional conduct and behavior does not bring IGAD into disrepute.
- d) IGAD engages with governments, public interest groups, Regional Economic Communities and a broad range of other similar bodies around the world. In doing so, we must ensure we comply with all laid down guidelines.
- e) The Authority recognizes each employee's right to participate as an individual in social and political activities. However, these activities must be kept separate from the workplace.
- f) IGAD disassociates itself from any political or religious activity that incites extremism or undermines our commitment to cultural diversity and equal opportunity.

#### **2. Conflict of Interest**

This involves a conflict between the public duty and private interests of an employee in which the employee's private interests would improperly influence the performance of their official duties and responsibilities.

##### **2.1 Gifts, Meals and Entertainment**

An employee will not accept gifts, meals, entertainment or any remuneration from governments, beneficiaries, donors, suppliers and other persons, which have been offered with the intention to influence an outcome.

#### **3. Health, Safety and Security**

The Authority shall provide a safe, secure and healthy working environment for all employees. As far as possible, it shall safeguard health and safety in all its premises. Employees shall make good use of IGAD facilities.

All employees are expected to adopt a proactive, co-operative attitude towards the health, safety and security of all IGAD staff and suppliers, and others working at or visiting IGAD premises. All our operations must be conducted in compliance with applicable health and safety laws and regulations, Authority standards and best practice in workplace health, safety and security.

- a) Each employee should be aware of applicable IGAD safety and health programmes, as well as, regulations. IGAD staff should be appropriately trained for their respective roles, in order to conduct their activities in a safe, healthy and responsible manner.
- b) We will act to mitigate risks which arise from deliberate or accidental breaches in our physical security or threats to our people.

- c) Promptly report accidents, incidents, near misses, non-compliance with regulations or anything else posing a risk to health, safety and security, as may be applicable.
- d) Understand the hazards associated with our own job and those associated with our colleagues' jobs.
- e) Manage the risks responsibly and ensure any required health and safety training has been completed.
- f) Integrate health, safety and security consideration into our day-to-day working activities.
- g) Make sure we know what to do in case an emergency occurs at our place of work.
- h) Challenge unsafe behavior by others in a timely manner to demonstrate that unsafe behavior is unacceptable.

#### 4. Substance Abuse

IGAD is committed to promoting the wellbeing of its staff by creating a safe and healthy work environment. Additionally, the authority recognises the negative impact that alcohol and drugs may have on the individual's ability to work safely and correctly. IGAD aims to ensure a working environment free from inappropriate use of substances where employees are unable to carry out their duties in a safe and efficient manner.

Any misbehavior witnessed as a result of intoxication shall be deemed unacceptable and will be handled as a disciplinary issue.

#### 5. Physical Violence

In keeping with the laws of the land and staff regulations, physical violence of any nature by one member of staff against another is strictly prohibited. Differences between staff are expected to be resolved amicably with the respect that each deserves.

#### 6. Use of Authority Resources

IGAD employees are expected to make responsible use of the information and resources to which they have. For the purposes of this section, resource & assets, shall be defined by the Financial Rules and Regulations.

Employees:

- a) Should not use Authority assets for their personal benefit or the benefit of anyone other than the Authority, unless allowed contractually.
- b) Are expected to make sensible use of facilities including the occasional personal phone call or e-mail from your workplace. Excessive personal calls or e-mail is a misuse of assets.
- c) Should use responsibly any digital communication channels that allow individuals to create and share content and post comments
- d) Should not use the Organization's resources to visit third party websites and gambling websites. This is strictly prohibited.
- e) Should not operate the Authority's assets unless authorized.

Misuse or theft of Authority assets whether by:

- a) Unauthorized removal or;
- b) Unauthorized information sharing or;
- c) Embezzlement or intentional misreporting of time or expenses may result in disciplinary measures being taken.

The Authority treats workplace theft of assets belonging to other employees the same way it treats theft of Authority assets.

#### 7. Authority Information

##### 7.1 Use of Information

For the purposes of this section, non-public information is any information which may not yet be disclosed to the public. Safeguard the Authority's non-public information is a responsibility of every IGAD employee.

##### 7.2 Confidential Information

- a) Do not disclose non-public information to anyone outside the Authority, including to family and friends, except when disclosure is required by law. Even then, take appropriate steps, such as execution of a



confidentiality agreement, to prevent misuse of the information.

- b) Do not disclose non-public information to others inside the Authority unless they have authority from the Executive Secretary.
- c) Only authorized employee’s can issue external communications on behalf of the Authority.
- d) Employees are obligated to protect the Authority’s non-public information at all times, including outside of the workplace and working hours, and even after employment ends.
- e) Refer to IGAD Service Regulation, Financial Rules and Regulation, IT Policy and any other additional regulations for guidance and tips on safeguarding information.

7.3 Information Security

All employees using the IGAD digital systems must ensure that these resources are used appropriately and used in line with the IGAD IT Policy.

7.4 Record Management & Data Privacy

Accurate and complete record keeping is everyone’s responsibility. Employees who handle the records must:

- a) Act in accordance with applicable law;
- b) Act in accordance with any relevant contractual obligations;
- c) Exercise confidentiality and prevent unauthorized disclosure.

8 Non-Discrimination, Intimidation & Undue Influence

8.1 Non-Discrimination

All persons working or affiliated to IGAD, shall not practice any form of discrimination, instead, they shall be entitled to equal treatment irrespective of political inclination, gender, color of skin, religion, culture, education, social status, ethnic affiliation or nationality.

- a) In all aspects of employment, IGAD will treat individuals justly, solely according to their abilities to meet the requirements and standards of their job.
- b) IGAD recognizes the diverse skills and contributions of the workforce and will ensure that individuals are equitably remunerated for their contributions to the Authority.
- c) Physical, sexual, racial, psychological, verbal, or any other form of harassment or abuse will not be tolerated, any staff who engages in such conduct will be liable to disciplinary action.

8.2 Intimidation & Undue Influence

IGAD staff members either by their position or any other factor of influence shall not coerce, induce, intimidate or unduly influence any member staff or third parties with an intention of influencing their decision.

9. Sexual Harassment

IGAD will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. (Refer to Sexual Harassment policy)

10. Implementation of this policy

IGAD will ensure that this policy is widely disseminated to all relevant persons.

All new employees must be sensitized on the content of this policy as part of their induction into the company. It is the responsibility of every employee to comply ensures that they are aware of the policy.

11. Staff commitment

I have read carefully and understand the IGAD Code of Conduct and hereby agree to abide by its requirements and commit to upholding the standards of conduct required to support IGAD’s aims, values and beliefs.

Name .....

Signature.....

Date.....

## ANNEX 2: IGAD Sexual harassment policy 2018

### 1. The Policy Statement

The Intergovernmental Authority on Development (IGAD) is committed to providing a safe environment for all its employees free from any form of discrimination. IGAD will operate a zero tolerance policy to any form of sexual harassment in the workplace, treat all incidents seriously and undertake prompt investigation of all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action. This could culminate in dismissal from employment. All complaints of sexual harassment will be treated with respect and in confidence. Furthermore, all employees who bring forward legitimate sexual harassment cases will be free of any and all reprisal or retaliation.

### 2. Purpose of the Policy

To define and institutionalise IGAD's response to sexual harassment and document the process, which is to be followed, should any grievances arise.

### 3. Sexual Harassment

Sexual harassment under this policy constitutes any unwelcome verbal, non-verbal or physical conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated; and interferes with work, productivity or wellbeing of others. It includes situations where a person is asked to engage in sexual activity as a condition for employment, promotion or benefit from a service or opportunity. Sexual harassment can involve one or more incidents.

Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

#### 3.1 Physical conduct

- a) Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching;
- b) Physical violence, including sexual assault;
- c) The use of job-related threats or rewards to solicit sexual favours.

#### 3.2 Verbal conduct

- a) Comments on a worker's appearance, age, private life, etc.
- b) Sexual comments, stories and jokes
- c) Sexual advances
- d) Repeated and unwanted social invitations for dates or physical intimacy
- e) Insults based on the sex of the worker
- f) Condescending or paternalistic remarks, sending sexually explicit messages (by phone or by email or any other means)

#### 3.3 Non-verbal conduct

- a) Display of sexually explicit or suggestive material
- b) Sexually-suggestive gestures
- c) Whistling
- d) Leering

Both female and male employees, service providers, applicants, partners and clients of IGAD may be exposed to sexual harassment.

### 4. Scope of application of the Policy

IGAD recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and subordinate. Anyone, including employees of IGAD, suppliers, casual workers, contractors or visitors engaging in any acts of sexual harassment shall be reprimanded in accordance with this Policy. All forms of sexual harassment are prohibited under this Policy whether occurring within IGAD's premises or outside, including but not limited to: social events, official mission trips, training and other stakeholder workshops, meetings or conferences convened by IGAD.

## 5. Complaints procedures

Anyone who is subject to sexual harassment should, as soon as possible, inform the alleged harasser that the conduct is unwanted and unwelcome. He/she should then file a complaint with the human resources officer or any director or other senior member of management that he/she is most comfortable with. Where the victim is unable to directly inform the alleged harasser due to any reasonable cause, he/she may file a complaint with the Human Resources Office or any director or other senior member of Management that he/she is most comfortable with.

When a complaint is received the following action should be taken:

- i) Statement of fact recording the dates, times and facts of the incident(s)
- ii) Ascertain the views of the Complainant as to what outcome he/she wants.
- iii) Ensure that the Complainant understands the Organization's procedures for dealing with the complaint.
- iv) Discuss and agree on the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the Complainant from pursuing a formal complaint if he/she is not satisfied with the outcome.
- v) Keep a confidential record of all discussions.
- vi) Respect the choice of the Complainant.
- vii) Ensure that the Complainant knows that they can lodge the complaint outside IGAD through the relevant processes and applicable national law(s).

Throughout the complaints procedure, a Complainant is entitled to be helped by a skilled counsellor. IGAD will identify and train a number of counsellors to enable them assist victims of sexual harassment.

### 5.1 Informal complaints mechanism

If the Complainant wishes to deal with the matter informally, particularly for offenses that are not classified as serious or criminal, the designated/appropriate manager shall:

- i) Give an opportunity to the alleged harasser to respond to the complaint;
- ii) Ensure that the alleged harasser understands the complaints mechanism;
- iii) Facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant; or if an amicable settlement cannot be reached refer the matter to another party (senior manager within IGAD), with the consent of both complainant and accused;
- iv) Ensure that a confidential record of proceedings is kept. All officials involved in the investigations/ case management must be bound by the duty to maintain confidentiality and impartiality during the hearing or after conclusion of the case;
- v) Follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped;
- vi) Ensure that the above measures are taken expeditiously and within a period not exceeding 14 days from the date of filing the complaint.

### 5.2 Formal complaints mechanism

If the Complainant wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the Complainant, the formal complaint mechanism should be used to resolve the matter.

The designated/appropriate person who initially received the complaint will refer the matter to the Executive Secretary to instigate a formal investigation. The Executive Secretary may deal with the matter, refer the matter to an internal or external investigator or refer it to a committee.

The person carrying out the investigation will:

- i) Interview the Complainant and the alleged harasser separately;
- ii) Interview other relevant third parties separately;
- iii) Ascertain whether or not the incident(s) of sexual harassment took place;
- iv) Produce a report detailing the investigations, findings and any recommendations;
- v) If the harassment took place, decide what the appropriate remedy the Complainant is, in consultation with the Complainant (i.e.- an apology, a change of working arrangements, a promotion if the Complainant

was demoted as a result of the harassment, training the harasser, discipline, suspension, dismissal or possible prosecution under applicable national penal laws for offences such as rape;

vi) Follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the Complainant is satisfied with the outcome;

vii) Keep a record of all actions taken;

viii) Ensure that all records concerning the matter are kept in trust and strict confidence. Such information shall be used only for the purposes required in fulfilling the purpose of this policy and as such shall not be used for any other purpose, or disclosed to any third party without approval;

ix) Ensure that the process is done as quickly as possible and in any event within 21 working days of the complaint being made.

#### 6. Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person made false and malicious allegations thereof, under the terms of this policy liable to any, but not limited to, the following sanctions:

a) Verbal or written warning;

b) Transfer;

c) Demotion;

d) Suspension;

e) Dismissal;

f) Prosecution under national penal laws for serious offences such as rape.

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial.

Where, after proper investigations, there is evidence to support allegations of severe sexual assaults such as rape or attempted rape, such offences shall upon consultation with IGAD Legal Counsel, be referred to national authorities for criminal prosecution.

#### 7. Appeals Process

Both the complainant and the accused may seek a review of any alleged failure to implement the procedures and principles of this policy fairly and reasonably. The subject may request a review of disciplinary action taken pursuant to this policy; the appeal must be in writing and submitted to the Human Resource Office within a reasonable time frame, not exceeding 30 days after the date of the disciplinary action, with clearly outlined grounds for the appeal.

#### 8. Freedom from Reprisal

A person who brings a complaint in good faith should not be subjected to retaliation, and adverse action taken against a complainant that appears to stem from the registering of a complaint will be thoroughly investigated in accordance to the IGAD Whistle-blowing Policy Section 7 (Prevention of recriminations, victimization or harassment).

#### 9. Implementation of this policy

IGAD will ensure that this policy is widely disseminated to all relevant persons.

All new employees must be sensitized on the content of this policy as part of their induction into the Organization. It is the responsibility of every employee be aware of the policy and comply.

Every IGAD Employee shall be required to read this Policy and sign a declaration affirming to have understood his/her rights, duties and responsibilities therein. The signed declaration shall form part of the employee's personal file.

#### 10. Declaration

I \_\_\_\_\_ do hereby affirm that I have read and fully understood my rights, duties and responsibilities under the IGAD Sexual Harassment Policy.

Position: \_\_\_\_\_

Duty Station/Section: \_\_\_\_\_

Signed \_\_\_\_\_  
Date \_\_\_\_\_

### Annex 3: The IGAD Whistleblower Policy

#### 1. INTRODUCTION

Employees of organizations are often the first to realize that there may be something wrong with their organization, or that an employee or member of management or another affiliated person or organization has been involved with wrongdoing detrimental to IGAD's interests. However, they may decide not to express their concerns because they feel that speaking up would be disloyal to their colleagues or to the organization. They may also fear harassment or victimization. In these circumstances, they may feel it would be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

IGAD's Whistle-Blowing Policy is intended to encourage and enable staff members to raise serious concerns within IGAD, rather than overlooking a problem or seeking a resolution for the problem outside IGAD, and to make it clear that IGAD will take necessary steps to protect them from victimization, subsequent discrimination or disadvantage.

This Policy is also intended as a clear statement that if any wrongdoing within IGAD or by any of its management or staff or by any of its projects or grant recipients is identified and reported to IGAD, this wrongdoing will be dealt with expeditiously and will be thoroughly investigated and remedied. IGAD will also examine how to prevent such wrongdoing in the future.

This Policy applies to all of the Secretariat's and project staff, including staff at Specialized Offices. It is also intended to provide a method for other stakeholders (suppliers, grant or aid recipients, project affiliates, etc.) to voice their concerns. The Internal Auditor is responsible for recommending any changes to this Policy.

#### 2. DEFINITIONS FOR THIS POLICY

##### 2.1. Whistle-Blowing

Whistle-blowing can be described as giving information about potential illegal and/or unethical practices, i.e. wrongdoing.

##### 2.2. Wrongdoing

Wrongdoing involves behaviour that can result in financial harm or bring discredit to IGAD. It includes but is not limited to:

- An unlawful act, whether civil or criminal in the applicable Member State or country where the act occurred;
- Acceptance or offering of bribes or favours related to their association with IGAD;
- Undue favouritism or discrimination with respect to national, religious, tribal, or other ethnic groups in hiring, procurement, provision of service or any other form;
- Conflict of interest;
- Breach of or failure to implement or comply with any published IGAD policy;
- Knowingly breaching IGAD's regulations;
- Serious unprofessional conduct;
- Questionable or fraudulent accounting or other practices;
- Misuse of assets;
- Knowingly making a misstatement;
- Dangerous practice likely to cause physical harm/damage to any person/property;

- Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to IGAD or a project;
- Abuse of power or authority for any unauthorized or ulterior purpose;
- Sexual harassment;
- Providing false information on official documents or reports;
- Risking the organisation's resources;
- Consistently overriding controls

### 3. BASIC POLICY

Any IGAD or project staff/supplier/conference attendee/consultant/recipient/affiliated person or organization that makes a disclosure or raises a concern under this Policy will be protected if he/she:

- a) Discloses the information in good faith;
- b) Believes it to be substantially true;
- c) Does not act maliciously or make false allegations; and
- d) Does not seek any personal or financial gain.

### 4. PROCEDURE

Anyone with a complaint or concern about IGAD should try to contact Internal Audit, their own supervisor or director or the Human Resources Officer. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of malpractice. Therefore contact directly with the Executive Secretary, Audit Committee Member or any member of the Council or of the Committee of Ambassadors may also be warranted. Contact details for the Heads of Internal Audit, Human Resources and designated Audit Committee member are listed at the end of this Policy.

### 5. IGAD'S RESPONSE

IGAD will respond positively to any concerns, although whistle-blowers must remember that checking the concerns is not the same as either accepting or rejecting them. Where appropriate, the matters raised may:

- a) Be investigated by management, the Internal Auditor, or through a disciplinary process;
- b) Be referred to forensic accountants, the police or other authorities or investigators.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

### 6. TIME SCALE

Within 15 calendar days of a concern being raised, the person contacted or a representative thereof will write to the whistle-blower:

- (i) acknowledging that the concern has been received;
- (ii) indicating how IGAD proposes to deal with the matter;
- (iii) explaining whether any initial enquiries have been made;
- (iv) explaining whether further investigations will take place and if not, why not; and
- (v) giving an estimate of how long it will take to provide a final response.

Concerns will be investigated as quickly as possible. The seriousness and complexity of any complaint may have an impact on the time taken to investigate a matter.

The amount of contact between the persons considering the issues and the whistle-blower will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, IGAD will seek further information from the whistle-blower.

IGAD will take steps to minimise any difficulties which the whistle-blower may experience as a result of raising a concern. IGAD accepts that the whistle-blower needs to be assured that the matter has been properly addressed. Thus, subject to legal constraints, IGAD will inform the whistle-blower of the outcomes of any investigation.

#### 7. PREVENTION OF RECRIMINATIONS, VICTIMISATION OR HARASSMENT

IGAD will not tolerate an attempt on the part of anyone to apply any sanction, detriment or punishment to any persons who have reported to IGAD a genuine concern that they may have concerning an apparent wrongdoing. Retaliation against staff who report concerns in good faith is against IGAD's policy and IGAD will take all reasonable measures to protect all legitimate whistleblowers from any retaliation, ostracising, discrimination or subsequent disadvantage.

If, having made a report of suspicious conduct, the whistle-blower subsequently believes that he/she has been subjected to retaliation or mistreatment of any kind, he/she should immediately report it to his/her Director, Internal Audit, the Human Resources Officer, or Committee of Ambassadors or Audit Committee member. Reports of retaliation will be investigated promptly, in a manner intended to protect confidentiality, consistent with a full and fair investigation. The party conducting the investigation will notify the whistle-blower of the results of such investigation. Any staff member who is found to have engaged in retaliation to or mistreatment of a whistle-blower will be subject to discipline.

#### 8. CONFIDENTIALITY AND ANONYMITY

IGAD will respect the confidentiality of any whistle-blowing complaint received by IGAD when the complainant requests confidentiality. However, it must be appreciated that it will be easier to follow up and to verify complaints if the complainant is prepared to give his or her name. In addition, confidentiality cannot be maintained if such confidentiality is incompatible with a fair investigation or if disclosure of the identity of the complainant is required by law. If anonymity is requested, the person may request anonymity of the Internal Auditor, Executive Secretary or Council Member, or he/she may send an anonymous message to the Internal Auditor.

#### 9. FALSE AND MALICIOUS ALLEGATIONS

IGAD will regard the making of any deliberately false or malicious allegations by any employee of IGAD as a serious disciplinary offence, which may result in disciplinary action.

#### 10. STATUS OF THIS POLICY

This Policy should be in accordance with all other Policies and the Service Regulations. In the event of a conflict, this Whistle-Blowing Policy shall prevail. Under the direction of the Audit Committee, the Internal Auditor is responsible for preparing updates as needed of this Policy to be submitted to the Council of Ministers for approval.

#### 11. CONTACTS

Position Name Email/Telephone

Internal Auditor

Human Resources Officer

Designated member of Audit Committee

