



PEACE, PROSPERITY AND
REGIONAL INTEGRATION

Intergovernmental Authority on Development (IGAD)

Health Emergency Preparedness, Response and Resilience Project for Eastern and Southern Africa under Phase I of the Multiphase Programmatic Approach (P180127)

Negotiated

STAKEHOLDER ENGAGEMENT PLAN

August 2, 2023

1. Introduction/Project Description

1.1 IGAD Region Context

1. The Intergovernmental Authority on Development (IGAD) is one of the Regional Economic Communities (RECs) and a pillar of African Union (AU). IGAD encompasses eight (8) Member States, namely Djibouti, Eritrea, Ethiopia, Kenya, Somalia, South Sudan, Sudan and Uganda. The IGAD region stretches over 5.2 million Km² with an estimated population of 270 million inhabitants. The region hosts over 4.5 million refugee population, 12 million IDPs and a significant population of pastoralists and cross border mobile population.

2. Initially, the Intergovernmental Authority on Drought and Development (IGADD) was established in 1986 by Djibouti, Ethiopia, Kenya, Somalia, Sudan and Uganda to jointly address drought and mitigate its impact in the region. In 1996, the IGADD was transformed into Intergovernmental Authority on Development (IGAD) superseding the earlier and broadening its mandate to include development. More specifically, it was mandated to assist and complement member States' efforts to achieve peace, prosperity and regional integration and assist efforts of Member States to collectively combat drought and other natural and man-made disasters and their consequences through:

- Increased cooperation for food security and environmental protection.
- Promotion and maintenance of peace and security and addressing humanitarian affairs.
- Economic cooperation and integration as well as health social development.

3. Two countries were included which increased the number of the member states to 8 and two are; South Sudan and Eritrea The Authority comprises of the Assembly of Heads of states and Governments, a council of Ministers, a Committee of Ambassadors and Secretariat. The Secretariat operates through these policy organs and Sector Ministerial and Technical Committees while collaborating with various stakeholders and executing its mission.

4. The IGAD region is characterized with frequent disease outbreaks, natural disasters and conflicts often resulting in humanitarian crisis. The immense humanitarian crisis is often occasioned by large population of refugees and the Internally Displaced Persons (IDP's) in a number of the member states. The crises impact heavily on the already fragile health systems resulting to weakened health system affecting the entire chain of continuum of health care in the region. Constant movement of population, goods and services, labor, refugee and displaced persons across borders in the IGAD region predisposes the vulnerable cross border communities to acute public health events and transboundary diseases that collectively endanger the health of the population in the region and international borders. Ensuring necessary collective action for health at both national and regional level is vital in addressing the regional health security.

5. The burden of TB, HIV and Malaria is quite significant in the region. For instance, Ethiopia, Kenya and Uganda are among the 30 high burden TB countries and Somalia among one the 30 MDR burden countries globally. Similarly, Uganda, Kenya and Ethiopia are among the countries with high number of people living with HIV. Recent, assessment jointly done by IGAD, Roll Back Malaria and ALMA along with the National Malaria Control Programs of member states showed that all countries except Ethiopia are in the control phase. Generally, Malaria is endemic and Epidemic in many of the IGAD member states particularly, Sudan and South Sudan. However, all are expected to end malaria by 2030 which requires regional collaboration for malaria elimination and robust surveillance system. IGAD Secretariat has developed a regional HIV, TB and Malaria strategic plan 2018 to 2025 which is aimed to; strengthen cross border health collaboration for effective service delivery, support to improve HIV, TB and Malaria services in refugee settings, generate evidence to regional inform policy on HIV, TB and Malaria elimination and resource mobilization for cross border and refugee health programs

5. Since 2016, The IGAD Health Ministers recognized that communicable diseases place a high-level burden

on IGAD member states Health system and pronounced changes in the incidence of epidemic diseases have been observed in the region in parallel with the extreme weather conditions associated with the EL Nino cycle and the climate change. The Ministers recommended that IGAD Member States should have a robust preparedness plan and integrated outbreaks and epidemics surveillance system that will be applicable in all emergencies and crisis including the cross borders and remote hard to reach areas. Therefore, when the COVID-19 pandemic was declared early in 2020, IGAD developed a Regional Response Strategy on COVID-19 pandemic and was basis for the ongoing COVID-19 response project.

6. The ongoing COVID-19 pandemic continues to exert immense challenges in the IGAD region. The IGAD Secretariat responded timely to the pandemic by developing a regional COVID-19 response plan which helped to galvanize resources in collaboration with various partners, notably the European Union (EU), AfDB among others. Despite the various health interventions geared to mitigate the pandemic, the region continues to experience multiple challenges which stem from weak health system and infrastructure, weak surveillance system and limited cross border capacity on disease prevention and control. As occasioned by these challenges the region evidently has low pace of COVID-19 vaccine uptake where the vaccine coverage still stands below 30%. This is an indication of inadequate health systems to support vaccination programs in the member states and more so at the cross-border areas

7. Other emerging and re-emerging infectious and non-infectious diseases continues to pose significant threat to the region. Key among these are zoonotic diseases such as Ebola and Yellow Fever. In the same line, new vector for malaria (*Anopheles stephensi*) has emerged in Djibouti, Somalia and Ethiopia. IGAD has a longstanding partnership on building health systems especially in cross border areas and with a focus on vulnerable cross-border and mobile populations, such as refugees, migrants, IDPs, pastoralists/Nomads, youth, traders and seasonal workers, and their hosting communities with development partners such as EU, AfDB, World Bank, UN Agencies, WHO, Global Fund, USAID and many others. The engagement covers strengthening coordination and inter country collaboration; strengthening regional and cross border health system; strengthening community engagement; strengthening diseases surveillance, preparedness, and response to transboundary health threats. Today, IGAD is leading the coordination of the region's response to key health challenges at the intersection of climate change, mobility, conflicts, displacement, and fragility.

1.2 Project Description

8. **In this project, IGAD builds on existing capacity and lesson learned and aligns its interventions to the priority of this MPA.** In line with the overall MPA Program and building on previous IGAD's efforts, IGAD's interventions include activities designed to strengthen preparedness and resilience of the regional health system to prepare, detect, respond to and be resilient to the Health Emergencies through multisectoral engagement and partnerships with relevant stakeholders including the private sectors such as private sector companies working on pharmaceuticals manufacturing and medical supplies. To support the Health Emergency Preparedness, Response and Resilience Program for Eastern and Southern Africa, IGAD will ensure regional coordination and facilitation of specific interventions under the four program components as follows:

9. **Component One: Strengthening preparedness and resilience of regional systems to manage health emergencies (HE).** Within the MPA, IGAD will be implementing regional interventions and play key role leveraging IGAD's political convening power, existence of established member states coordination platforms, advocacy and policy dialogue, and knowledge sharing role on multi-sectorial issues/aspects pertaining to climate change, one health, cross-border collaboration, crisis management including Health emergencies induced by conflict resulting in humanitarian crisis among others. This component will also support to expand the Cross Border Health collaboration and strengthen the cross-border health service delivery to ensure continuity of services during the outbreaks and pandemics

10. Component Two: Strengthening the regional health emergency preparedness and response: Activities under this component will be supporting countries to structure their preparedness and response frameworks with Africa CDC, international standards such as IHR and the global health security agenda. The IGAD Centre for Emergency Preparedness and Response was initiated by the IGAD secretariat in 2019 with main objective to provide high level advocacy and coordination of preparedness and response to Public Health Events of Concern (PHEC) in the region. Through this initiative IGAD proposes to strengthen optimal operationalization of the Centre to support implementation and coordination of Emergency Preparedness and Response (EPR) in the region.

11. Component Three: Program management: This component will support the implementation of other component in term of day-to-day operations and activities, support learning and documentation of best practices as well as provide tailored made combined technical support to MPA and non MPA participating countries.

Brief Summary of Previous Stakeholder Engagement Activities

12. Recently on 26th of April 2023, IGAD Health program organized a regional advocacy meeting for implementation of cross border health data sharing and protection policy framework. In this meeting IGAD invited directors of policy and planning of the IGAD countries. IGAD seized this opportunity and inform the member states about the incoming MPA project with the World Bank. IGAD shared with them the project development objectives, components and multi-phased modality. Member of the delegation from Ethiopia who is receiving the first phase reflected on the approach and linkages with their country components. The Ethiopian delegation as participating country in the MPA expressed the need to coordinate and have further discussion on challenges and opportunities. The meeting deliberated on the project and underscored the importance of the regional component and full engagement of non MPA participating countries in the regional component. Nonparticipating countries express strong desire to be part of this MPA in the next phases.

The outputs of the above engagements helped inform the design of the project in particular the components that would be implemented by IGAD. Further engagement of the countries stakeholders will be planned during the implementation of the project

Stakeholder Identification and Analysis

13. 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 IGAD. Those key stakeholders are categorized as those that:

- a. Are affected or likely to be affected by the project (project-affected parties); and
IGAD did not hold any consultations so far with NGOs and local communities. As this is a regional component, we will capitalize on the countries national consultations for the community level discussion
- b. May have an interest in the project (other interested parties).

3.1 Affected Parties

The main stakeholders likely to be directly affected by the project are the IGAD Member States and other stakeholders in East Southern Africa region, including Republic of Sao Tome Principe.

Table 1: Stakeholder group and assessment of engagement interest

Stakeholder Group	Engagement of Interest
<p>Ethiopian - Ministry of Health will be fully engaged and primary group</p> <p>Kenya - Minister of Health will be fully engaged and primary group</p> <p>Sao Tome and Principe - Ministry of Health</p> <p>East, central and Southern Africa Health Community (ECSA-HC)</p> <p>Other IGAD Member States Ministries of Health are also affected because they will be engaged with the development and validation of regional policies, frameworks and management of transboundary diseases emergency preparedness and response and engage in the upcoming phases of the project</p>	<p>Health emergency preparedness and response project will strengthen the health system resilience and multi-sectoral preparedness and response to health emergencies in IGAD region and Eastern and Southern Africa region</p>

3.2 Other Interested Parties

14. 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. IGAD secretariat and its different entities will play a big role in the implementation of the project activities. The Steering Committee Members of the project at regional level will play a key role in the overall coordination and information sharing, scaling up of best practices, synergy with on-going similar projects.

Table 2: Other interested parties and assessment of engagement interest

Stakeholder Group	Engagement of Interest
IGAD Secretariat and specialized institutions	The executing units for the region-level activities will include the IGAD related entities, Health and Social Development and IGAD specialized institutions (ICPAC, CEWARN, ICPALD) who will provide various support to IGAD Health Program in the implementation of the technical components of the Project.
Regional Advisory Committee (RAC)	The IGAD PIU will be overseen by a Regional Steering Committee (RAC) who is primary function is to provide policy and technical guidance to the implementation of the project.
International and regional partners such as Africa CDC/AUC WHO, AFENET, other UN Agencies, World Bank, USAID, EU, GF, NGOs, Research institutions among others	The partners have invaluable experience including knowledge, skills, and resources for the establishment of resilient health emergency preparedness and response systems in the region based on innovations. IGAD will work closely with them on identification of best practices that enhance the preparedness, detection and response to regional health emergencies.
Media	These have wide regional and global coverage that can be utilized for awareness creation and visibility. They will promote and popularize regional emergency response mechanisms as well as they will create

	awareness to policy makers to increase investment on outbreak response in the region.
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3.3 Disadvantage or Vulnerable Individuals or Groups

Vulnerable Groups which include IDPs, refugees, migrants, people on the move and other vulnerable groups in relation to the cross-border activities of this project. The regional component was not consulted with those vulnerable groups and the consultation is planned in the launching phase.

Table 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 Member States	Ministry of Health and other ministries related to health emergency and preparedness and response	Consists of high-level technical representatives whose knowledge and skills in health emergency preparedness, response and resilience	Official Language: English and French (Djibouti)	Translated letter, shared electronic documents (reports) via email and presented / discussed when needed at formal meeting	Public and virtual consultations meetings with translation
IGAD Secretariat and specialized institutions	IGAD health and Social Development programs IGAD Climate Prediction and Application Centre, CEWARN, IGAD Centre for Pastoral Areas and Livestock Development	Formulate and implement regional interventions, policies and strategies as well as multisectoral coordination	French and English	Translated letter, shared electronic documents (reports) via mail, phone call for follow up, leaflets/informative notes	Project roles and responsibilities, support in stakeholder engagements, information generation and dissemination. Regular formal and informal meetings

International and regional partners	UN Agencies, World Bank, AFDB, Africa CDC/AUC, USAID, EU, Global Fund, I&N NGOs, Research institutions	Knowledge generation and documentation	English	Email, telephone calls, meetings (in person or virtual)	Project progress, project preparation and implementation, other stakeholder engagements, joint control and management efforts, experience sharing Regular formal and informal meetings
Regional Steering Committee (RAC)	IGAD MSs (Ethiopia and Kenya and other IGAD countries), IGAD Secretariat, Sao Tome Principe and ECSA-HC	Organizations working regionally on health emergency preparedness, response and resilience with similar projects and also cover the same geographical areas	English and French	Email, telephone calls, meetings (in person or virtual)	Project progress, project preparation and implementation, other stakeholder engagements, joint control and management efforts, experience sharing Regular formal and informal meetings
Media	Radio and TV stations, international media, IGAD websites and social media pages	Wide regional and global coverage that can be utilised for awareness creation and visibility	English	Email, telephone calls, meetings (in person or virtual)	Alerts, press releases, project reports and events Periodic meetings with media channels

Stakeholder Engagement Program

4.1 Purpose and timing of stakeholder engagement program

15. The overall goal of this Stakeholder Engagement Plan is to ensure a systematic, consistent, comprehensive and coordinated approach to stakeholder participation and communication throughout the project cycle. The SEP outlines ways in which the project team will communicate with stakeholders and feedback mechanism to be utilized. The plan will guide timely engagement with key stakeholders as well as dissemination and increased access to relevant project information. The project will innovate ways for

consultations to be effective and meaningful to project and stakeholder needs even during any restrictions due to epidemics or pandemics. Strategies to be employed include virtual and physical meetings, researches, phone calls, and emails. It is important to note that most of the planned activities in the regional component are activities that includes stakeholder engagement and consultations. The coordination and policy dialogue role of the IGAD in its regional component depends on participation and interaction of the stakeholders of the project. So the appraisal document of the regional component is contributing to the overall SEP.

Implementation Phase

16. 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:** individual consultations with different stakeholders during the preparation phase will be sought. If resources allow, small workshop will be co-hosted by IGAD, and World Bank team will take place during the preparation phase. The workshops will engage the potential Steering Committee Members (IGAD Secretariat and its entities, World Bank, Ethiopia, Kenya, Sao Tome Principe, ECSA-HC). Moreover, the WB and IGAD team will have frequent meetings and consultation on the project implementation to ensure that all Stakeholders interest is addressed.
- b) **Implementation Phase:** At the official project launch meeting, the IGAD-PIU will invite the RAC to present the ToR of the regional component including the RAC and also the project plan and implementation arrangements. The interest of those key stakeholders is to help to steer the project from start to completion, approving the Work Plans and Budget as well as providing inputs. Participation in the launch meeting will be extended to IGAD representatives from other divisions and specialized institutions relevant to health emergency preparedness, response and resilience, other stakeholders like CSO, Development Partners, etc. The launch event will take place within 3 month of the project’s effectiveness date and after recruitment of the key staff in IGAD-PIU. Two Steering Committee meetings per year are foreseen for the project. In addition, to those planned meetings, any other meetings and workshops could be organized as needed.

In case of any stakeholder consultations meeting/workshops, either virtual or face-face, the IGAD-PIU will strive to provide relevant information to stakeholders with enough advance notice (15-30 business days) so that the stakeholders have enough time to prepare and to provide meaningful feedback. The PIU 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 30 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 who are the IGAD Focal points.

4.1. Proposed strategy for information disclosure

17. The electronic copies of the disclosure materials will be placed on the IGAD and World Bank websites to allow easy access for all stakeholders. The IGAD Centre of Health Emergency Preparedness, Response and Resilience will create its own link within IGAD website where also information can be shared. Also, IGAD will ensure the use of public information sharing methods and media engagement (Radio, TV, Channels, newspapers will be ensure) to disclose information to the general public, and will pay particular attention to the special accessibility needs of members of vulnerable groups, including persons who are illiterate or with disabilities, where needed. The IGAD websites have an on-line feedback feature that will enable readers to leave their comments in relation to the information shared. The disclosure materials will also be shared with the targeted stakeholders through email, and during project related meetings. In addition to disclosure of the

various project materials (ESCP, SEP, PAD), formal channels will be put in place to register and document comments and suggestions from the public. These grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns in relation to the Project.

Table 3: Information disclosure plan

Project stage	List of information to be disclosed	Communication channels	Target stakeholders	Timetable: location/date	Responsibilities
Preparation Phase	Project Concept note ESF documentation that is required for disclosure by the WB -SEP with GRM -ESCP	Email, intranet, website, meetings	PIU and implementing entities/divisions of IGAD	In person or virtual up to one month after project effectiveness	IGAD/PIU
Project Launch	-Project information/ Appraisal document -key activities, work plan - Implementation modalities -Key elements of ESCP and SEP	Shared via Email with an official invitation letter Media coverage for the launch event	PIU and implementing entities/divisions of IGAD and other stakeholders listed above	20 working days before the meeting, all stakeholders will be informed and shared with them the key documents by email as 100% target.	IGAD-PIU
During implementation	Progress Reports on: -Activities -M&E framework -TDA studies -ESIA assessment	Via email and during the SC meetings	PIU and implementing entities/divisions of IGAD and other stakeholders listed above	Throughout the implementation period	IGAD-PIU

4.2. Proposed strategy for consultation

18. For the stakeholder consultation, as described in below table, the foreseen strategies will be through email, virtual and/or face-to-face workshops and meetings. 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 and formulation phase	PSC and IGAD entities	IGAD-PIU
Project Launch	Project 1 st year work plan with budget SEP including GM and ESCP Project Design	Virtual and / or Face-to-face consultations meetings, documents shared via emails	Within 3 months after the project's effectiveness date	PIU, other IGAD entities and PSC	IGAD-PIU
During implementation	-Progress reports -Policy issues at Higher level -SEP including GM, ESCP etc. if revisions needed	Workshops/meetings, email for dissemination of documents	-Biannual meetings -As need arise	-MS, SC, IGAD entities	IGAD-PIU

4.3. Proposed strategy to incorporate the views of vulnerable groups

19. The views of vulnerable or disadvantaged groups (VDG) will be sought during the project formulation process. In depth analysis is required in order to fully understand who are the VDG and what are their issues related to this project. Mapping of stakeholders will be carried out in the preparation phase before embark on the implementation of the project which will be in 4th quarter report and 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, during implementation, PIU will emphasise the above views in all Terms of Reference (ToRs) for consultancy services for policy assessments at national level, policy and strategy development reports at the regional level.

4.4. Timelines

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

c) **Preparation Phase:**

IGAD SEP will be finalized before the 30th of May 2023. The stakeholders will have each time to provide comments and feedback. Then IGAD will have to synthesise all received comments and send them back.

d) **Implementation Phase: The launch event where all concerned stakeholders can be invited and disclose the project details for them as a quick off event for the project implementation will** take place within 3 months after the project's effectiveness date. By that time all the PIU staff will be in place.

During the implementation, there will be a regular biannual meeting with the project steering committee. In addition, key stakeholders will be consulted on a regular basis throughout the life cycle of the project. 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.

4.6 Review of Comments

20. All written comments on reports will be sent by email to the concerned stakeholders either with track changes or in form of text message/note. After receiving all stakeholders' comments within 10 working days week after the shared date, the PIU will review and send them back within 15 working days. The disclosure will be for the concerned stakeholders who are basically the member of RAC, including non MPA participating countries, who will benefit from the IGAD regional component. **IGAD will ensure that feedback from the stakeholders is incorporated into the SEP, and IGAD will inform stakeholders regarding where and how in the SEP their feedback was taken into consideration.**

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

Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

21. During the preparation phase, IGAD Environment specialist with the Technical Support from the World Bank will develop the documents with the 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.

22. During project implementation the IGAD Environment Specialist will continue supporting the PIU and provide support to the Project and that he will be responsible for ensuring implementation of the SEP and GM throughout project implementation. **The focal person will be supported by the staff of the PIU and if need arise a consultant will be hired to support the implementation of this plan. However, most of the IGAD regional component is basically consultations and activities will be supported by the grant and a total amount of US\$350,000 is allocated to support those consultations and engagement of various stakeholders.**

For more information about the implementation of the SEP, please contact the below persons who **are**

responsible for management and oversight of the SEP.

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5.2. Management functions and responsibilities

23. **At the regional level**, the proper implementation of the SEP will be under the direct responsibility of the IGAD health program and subsequently the PIU Coordinator. The PIU will be embedded in IGAD Health Program and specifically will be in the IGAD Centre of health emergency preparedness, response and resilience and assisted by the entire IGAD Communication team. The IGAD Communication team is composed of 5 professional staff with complementary background communication skills in addition to two health communication staff. They will mainly support project information production and dissemination (preparation of webinars/video and GRM PR-materials).

24. **The PIU will be in charge of communication and engagement with key stakeholders.** The key stakeholders include the MPA participating countries and their Ministries of Health. Some of the non key stakeholders will be the relevant sectors including Ministries of Animal resources, Environment and climate related sector as well as some continental and regional organizations such AU, WHO. The team from IGAD health program, who is engaged in the preparatory steps for this project (this role will be done by PIU during implementation), 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.

6. Grievance Mechanism

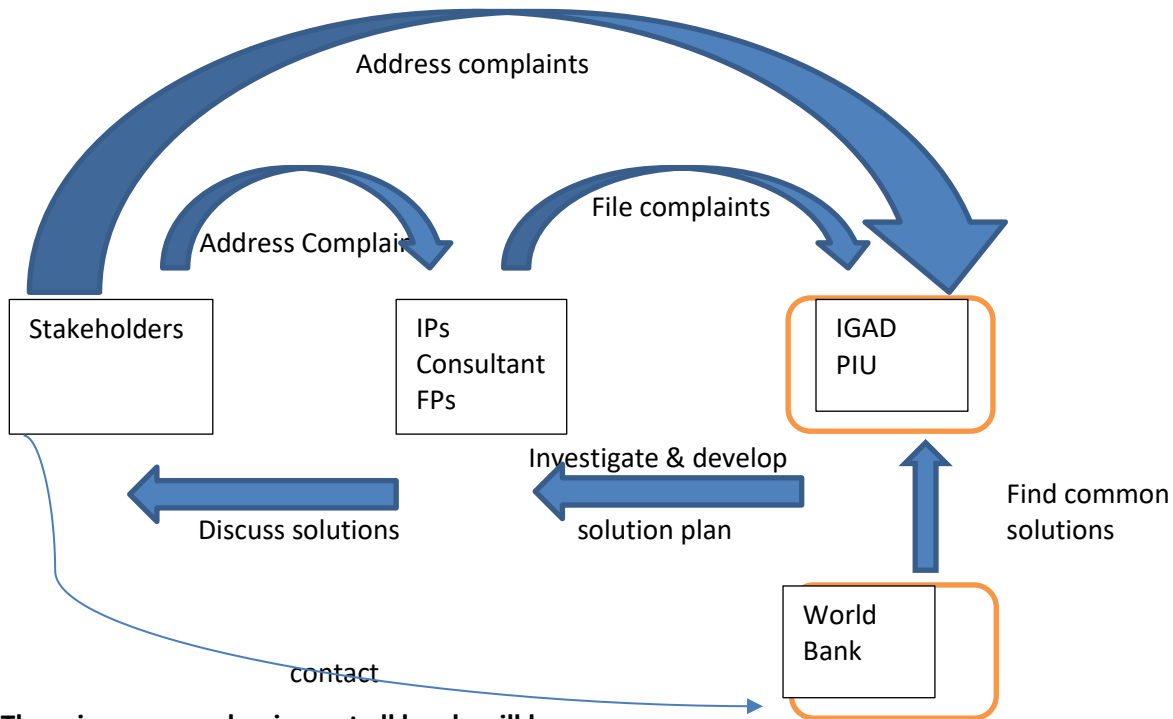
25. The purpose of the feedback, complaint and grievance redress mechanism (GRM) is to allow all project users and other stakeholders to communicate on adverse impacts of the project, potential damages, injuries or routine project activities and to effectively address any complaints, concerns or suggestions 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.

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

27. For the IGAD GM, the PIU manages the Project GRM process and facilitates the resolution of any complaints that may arise as described and designed in the below Figure 1. The PIU, in particular its Project Coordinator, ensures that it can be reached for complaints (e.g., hotline, mobile number, electronic address). When no local solution can be found through implementing partners or the focal persons of the project on the ground, the PIU is informed and investigates complaints in more detail and develops a solution proposal. Another layer of handling the grievances is to be communicated with the senior management of IGAD Secretariat in the health and social development division or even directly to the Executive Secretary Office. IGAD is public international intergovernmental organization and can easily be reached through its website

(www.igad.int), emails, telephones and the social media platforms. In exceptional cases, when the complainant deems it necessary, the World Bank 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>

Figure 1: GRM Processes



The grievance mechanisms at all levels will 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 as well as other interested parties. The Human Resource Unit (hrunit@igad.int) is responsible to address grievances.
- **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.

28. **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 (see Annex 1), and the IGAD Sexual Harassment Policy 2018 (Annex 2). The IGAD Whistleblower Policy (Annex 3) 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

29. 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 with the strong support of the IGAD Secretariat Monitoring & Evaluation team. In addition, MEL expert will develop M&E system/plan 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 RAC, 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, PIU will send the report to the main stakeholders' via email. It will request them to provide their comments within 10 working days. PIU will then submit the revised report within 15 working days;
- Training, communication and knowledge materials will be sent electronically to the participants by the PIU within 7 days after completion of the event;

These reports will rely on the same sources of communication that were used earlier in 4.2 section.

Stakeholders will be provided with updates on the availability of the grievance mechanism during quarterly stakeholder meetings and other meetings, meetings such as RAC biannual meetings.

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 recognizes 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 employees 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 institutionalize 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 behavior 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 favors.

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 recognizes 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

Whistleblowing 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 favors related to their association with IGAD;
- Undue favoritism 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 organization'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 minimize 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, ostracizing, 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