



PROMASS ENGINEERING SERVICES LIMITED

STAKEHOLDER ENGAGEMENT PLAN

For the Proposed 1 MW Solar Hybrid Interconnected Mini-grid Project under the Distributed Access through Renewable Energy Scale-up (DARES) Programme

Submission purpose: Project-level plan for inclusive stakeholder identification, consultation, information disclosure, grievance management and ongoing participation throughout development, construction, interconnection, operation, maintenance and decommissioning.

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Prepared by	Promass Engineering Services Limited
Approved by	Dr Sani Mohammed Bida, MD/CEO

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DOCUMENT APPROVAL AND CONTROL

Approval level	Details
Prepared by	Name: _____ Title: Community Liaison / E&S Officer Signature: _____ Date: _____
Reviewed by	Name: _____ Title: Project Manager / E&S Manager Signature: _____ Date: _____
Approved by	Dr Sani Mohammed Bida MD/CEO, Promass Engineering Services Limited Signature: _____ Date: _____

Revision history

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0.1	Draft	Initial three-page SEP for a 1 MW solar hybrid mini-grid project	09/09/2025	Promass Engineering Services Ltd
1.0	Submission	Expanded and amended for the DARES Interconnected Mini-grid Project, with lifecycle engagement, DisCo interface, inclusion, GRM and monitoring tools	29/07/2026	Promass Engineering Services Limited

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Recipient	Purpose	Format
REA / DARES Project Management Unit	Submission and oversight	Controlled PDF
Relevant Distribution Company	Interconnection coordination and stakeholder interface	Controlled PDF
Promass MD/CEO and Project Director	Approval and implementation oversight	Controlled copy
E&S Manager / Community Liaison Officer	Day-to-day implementation and records	Working controlled copy
EPC contractor and key subcontractors	Contractual compliance and site implementation	Relevant approved sections
Host community representatives / GRC	Disclosure and participation	Public summary and GRM information

MANAGEMENT COMMITMENT

Promass Engineering Services Limited commits to meaningful, inclusive, timely and culturally appropriate engagement with people and institutions affected by or interested in the proposed interconnected mini-grid. Engagement will begin early, continue throughout the project lifecycle, be proportionate to risk and impact, and be documented so that stakeholder views can influence decisions. The Company will provide accessible information, protect complainants from retaliation, address grievances promptly, and give particular attention to women, persons with disabilities, low-income households, elderly persons, youth, land users and other disadvantaged or vulnerable groups.

Management instruction: No land entry, material construction activity, interconnection outage, energisation, tariff or service change, or decommissioning activity shall proceed without the stakeholder actions and disclosures required by this SEP and the project ESMS.

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ABBREVIATIONS

Abbreviation	Meaning
BESS	Battery Energy Storage System
CLO	Community Liaison Officer
CSO	Civil Society Organisation
DARES	Distributed Access through Renewable Energy Scale-up
DisCo	Electricity Distribution Company
E&S	Environmental and Social
EHS	Environmental, Health and Safety
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
LGA	Local Government Area
LRP	Livelihood Restoration Plan

Abbreviation	Meaning
NERC	Nigerian Electricity Regulatory Commission
OHS	Occupational Health and Safety
PAP	Project-Affected Person
PCC	Point of Common Coupling
PPE	Personal Protective Equipment
PUE	Productive Use of Energy
PV	Photovoltaic
REA	Rural Electrification Agency
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
VLD	Voluntary Land Donation

1. INTRODUCTION

1.1 Background

The original Stakeholder Engagement Plan of Promass Engineering Services Limited was prepared for the development of a 1 MW solar hybrid mini-grid. It identified key regulatory references, affected and interested parties, vulnerable groups, engagement methods, an engagement timetable, responsibilities, a grievance mechanism and monitoring indicators. This revised plan retains those core elements and expands them into a project-level implementation document suitable for the proposed DARES interconnected mini-grid.

An interconnected mini-grid requires sustained engagement not only with the host community but also with the relevant Distribution Company, regulatory and environmental authorities, landowners and users, electricity customers, productive-use enterprises, contractors, emergency services and groups that may experience barriers to participation. The SEP therefore addresses community and institutional engagement from site development through interconnection, operation and eventual decommissioning.

1.2 Purpose

The purpose of this SEP is to establish a systematic process for identifying stakeholders, understanding their interests and concerns, disclosing relevant information, obtaining and documenting feedback, managing commitments, resolving grievances and reporting engagement performance. It is an operational component of the project ESMS and is mandatory for Promass personnel, contractors and subcontractors.

1.3 Objectives

- Ensure timely, transparent and understandable communication with all stakeholders.
- Enable affected people to influence project design, construction arrangements, interconnection planning, operations and decommissioning.
- Build trust, local ownership and constructive working relationships.
- Identify environmental and social risks, opportunities and conflict drivers early.
- Ensure women and disadvantaged or vulnerable groups can participate safely and meaningfully.
- Provide accessible grievance channels and prevent retaliation.
- Maintain a verifiable record of consultation, disclosure, issues, commitments and outcomes.
- Coordinate communication with REA/DARES, the relevant DisCo and other authorities.

1.4 Scope and applicability

This SEP applies to Promass Engineering Services Limited, its subsidiaries, consultants, EPC contractors, subcontractors, suppliers, security providers and any person acting on behalf of the project. It covers the project area of influence, including the generation and battery site, distribution network, interconnection facilities and PCC, access routes, temporary work areas, worker accommodation where applicable, affected land and livelihood areas, host communities and neighbouring settlements that could experience project impacts.

1.5 Relationship with other project instruments

Instrument	Relationship to this SEP
Environmental and Social Management System (ESMS)	Provides the governance, screening, risk management, monitoring and corrective-action framework within which engagement is implemented.
Environmental and Social Management Plan / ESIA	Identifies project impacts and mitigation measures that must be disclosed, consulted on and monitored with stakeholders.
Labour Management Procedures	Defines worker terms, labour risks and a separate worker grievance mechanism.
Code of Conduct	Establishes behaviour requirements for workers, including SEA/SH, GBV, child protection and community interaction.
ESHS Standards	Sets mandatory environmental, social, health and safety requirements to be communicated and monitored.
Land, RAP, LRP or VLD instruments	Provide project-specific processes for land access, compensation, livelihood restoration and voluntary donation where applicable.
Emergency Preparedness and Response Plan	Defines emergency communication and coordination with communities, DisCo and response agencies.

2. LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 Applicable national requirements

Promass shall maintain a legal and permit register and apply the stakeholder consultation and information-disclosure obligations of all applicable Nigerian federal, state and local requirements. The original SEP identified the Environmental Impact Assessment Act, NERC mini-grid requirements and REA programme requirements as core references. For this revision, those references are applied as follows:

Requirement	SEP application
Environmental Impact Assessment Act (CAP E12 LFN 2004)	Public participation and disclosure during environmental assessment and approval, proportionate to project classification and impacts.
Applicable NERC Mini-Grid Regulations, permits and approvals	Community and customer engagement, service and tariff communication, and coordination with the relevant DisCo for an interconnected system.
REA / DARES programme requirements	Evidence of inclusive consultation, disclosure, grievance management, E&S compliance and stakeholder records.
Applicable labour, land, safety, data protection and local government requirements	Worker consultation, land rights, community safety, confidential record handling and lawful public engagement.

2.2 International good practice

- World Bank Environmental and Social Framework, particularly ESS10 on Stakeholder Engagement and Information Disclosure, together with other relevant standards.
- IFC Performance Standard 1 on assessment and management of environmental and social risks and impacts, where applicable to lenders or investors.
- Principles of meaningful consultation, accessibility, non-discrimination, informed participation, confidentiality and non-retaliation.

2.3 Order of precedence

Where requirements differ, the project shall apply the more protective requirement unless doing so would conflict with Nigerian law. Any uncertainty shall be referred to the E&S Manager and Project Director and, where necessary, clarified with REA/DARES or the relevant authority before the affected activity proceeds.

3. PROJECT DESCRIPTION AND STAKEHOLDER CONTEXT

3.1 Project overview

The project is a proposed 1 MW solar hybrid interconnected mini-grid intended to provide reliable electricity within the selected host community while operating in coordination with the relevant Distribution Company. The final design, location, customer base, generation mix, battery capacity, distribution route, PCC, protection arrangement and operating agreement shall be entered in Annex A before submission and updated after design approval.

Component	Stakeholder relevance
Solar generation area	PV modules, mounting structures, cabling, combiner systems and associated civil works.
Battery energy storage	Battery racks or containers, battery management system, ventilation or thermal management, fire protection and restricted access.
Power conversion and control	Inverters, transformers, switchgear, protection relays, SCADA or monitoring systems and auxiliary equipment.
Distribution network	Poles, conductors or cables, transformers, service connections, meters and customer interface equipment.
Interconnection facilities	PCC, synchronisation, metering, protection, communications, isolation and operating interfaces with the DisCo.
Temporary facilities	Construction access, storage areas, worker facilities, parking, waste storage and temporary utility arrangements.

3.2 Project phases

Phase	Principal engagement needs
Development and feasibility	Site screening, resource and load studies, stakeholder mapping, land discussions, DisCo interface, environmental and social assessment.
Design and approvals	Engineering design, permit applications, tariff and service planning, disclosure of impacts and mitigation measures.
Pre-construction	Land access confirmation, contractor mobilisation, community notice, recruitment communication, baseline records and GRM activation.
Construction and installation	Civil works, equipment delivery, distribution works, traffic management, safety communication and ongoing consultation.
Testing, interconnection and energisation	Outage planning, protection tests, customer notice, emergency coordination, controlled energisation and handover.
Operation and maintenance	Service communication, complaints, outages, maintenance, tariff and customer information, community benefit monitoring and incident communication.
Decommissioning or major rehabilitation	Advance disclosure, asset removal, waste and battery management, land restoration, worker transition and grievance closure.

3.3 Key stakeholder issues anticipated

- Land ownership, land use, access routes and potential livelihood effects.
- Eligibility for connection, connection timing, metering, tariffs, payment channels, service standards and complaint handling.

- Interconnection responsibilities, outage windows, system protection, anti-islanding, emergency isolation and data exchange with the DisCo.
- Local employment expectations, contractor recruitment processes and prevention of favouritism or exploitation.
- Construction noise, dust, traffic, road access, vegetation clearance, waste, spill prevention and community safety.
- Battery and electrical hazards, fire risk, restricted areas, emergency response and public awareness.
- Impacts on women, children, persons with disabilities, low-income households, migrants, elderly people and other vulnerable groups.
- SEA/SH, GBV, worker conduct, security behaviour and safe reporting.
- Productive-use opportunities, affordability, business continuity and equitable distribution of benefits.

4. ENGAGEMENT PRINCIPLES AND APPROACH

Principle	Required application
Early and continuous	Engagement starts during screening and continues through closure; it is not limited to one-off public meetings.
Proportionate to risk	Frequency, depth and methods reflect the significance of impacts and stakeholder vulnerability.
Inclusive and accessible	Barriers relating to gender, disability, literacy, language, cost, distance, timing and social status are actively addressed.
Meaningful and two-way	Information is shared in time for stakeholders to consider it, ask questions and influence decisions.
Culturally appropriate	Methods respect local institutions and customs without compromising human rights or excluding less powerful groups.
Transparent	The project explains what is decided, what remains open, what cannot be changed and why.
Safe and non-retaliatory	Participation and complaints must not expose people to retaliation, stigma, violence or loss of benefits.
Documented and accountable	Issues, commitments, responsible persons, deadlines and outcomes are recorded and tracked.
Data-minimising	Only information necessary for legitimate engagement and grievance purposes is collected; sensitive data is protected.

4.1 Engagement cycle

Step	Action
1. Identify	Update stakeholder map and assess influence, impact, vulnerability and information needs.
2. Plan	Select method, language, timing, facilitator, venue, safeguards and desired decision or feedback.
3. Disclose	Provide accurate, understandable information sufficiently in advance.
4. Consult	Listen, clarify, record views and create safe opportunities for less powerful groups.
5. Respond	Explain decisions, commitments, reasons and next steps.
6. Track	Maintain issue, commitment and grievance registers.
7. Report and adapt	Measure performance, disclose progress and revise the SEP when risks or stakeholders change.

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

5.1 Stakeholder categories

Category	Definition
Project-affected parties	People or organisations directly or indirectly affected by land use, construction, distribution works, interconnection, service provision, tariffs, outages, safety risks or project benefits.
Other interested parties	Authorities, civil society, media, financiers, professional bodies, suppliers and others interested in project performance or oversight.
Disadvantaged or vulnerable groups	People who may be more severely affected or less able to access information, participate, secure benefits or use grievance channels.
Internal and contracted stakeholders	Employees, contractors, subcontractors, security personnel and workers whose conduct and performance affect community outcomes.

5.2 Identification process

1. Review project footprint, area of influence, land records, customer data, local institutions and E&S screening results.
2. Conduct key-informant interviews and community mapping with separate validation by women, youth and vulnerable groups.
3. Identify formal and informal decision-makers, people with limited voice, seasonal users, tenants, migrants and livelihood users.
4. Assess each stakeholder for level of impact, influence, interest, vulnerability, information needs and preferred engagement method.
5. Update the stakeholder register at least quarterly during construction, annually during operation, and whenever design, land, DisCo arrangements or community conditions change.

5.3 Stakeholder analysis matrix

Stakeholder	Impact / influence	Information needs	Methods	Lead	Frequency
REA / DARES PMU	High influence; oversight	Compliance evidence, milestones, E&S performance, grievances, incidents	Formal submissions, technical meetings, site visits	Project Director / E&S Manager	Monthly or as required
Relevant DisCo	High influence and operational interface	PCC design, protection, outages, energisation, safety, operating protocol, customer transition	Technical workshops, joint site visits, formal notices, operating meetings	Project Manager / Interconnection Engineer	At each design gate and before any outage or energisation
NERC and environmental authorities	High influence; regulatory	Permits, tariff/service arrangements, E&S approvals, compliance reports	Applications, formal letters, inspections, technical meetings	Project Director / Legal / E&S Manager	At permit milestones and as required
State and LGA authorities	Medium-high influence; local coordination	Development benefits, land, roads, security, emergency response, local services	Briefings, workshops, site visits	CLO / Project Manager	Quarterly and before disruptive works
Traditional and community leaders	High local influence	Project scope, land, recruitment, benefits, impacts, grievance process	Courtesy visits, community meetings, written summaries	CLO	Monthly during development/construction
Landowners and land users	High impact	Footprint, access, rights, compensation, livelihood restoration, schedule	One-to-one meetings, surveys, documented agreements	Land / Social Specialist	Before access and until all commitments close
Households and electricity customers	High impact and interest	Connection, tariffs, meters, service levels, safety, outages, complaints	Town halls, door-to-door outreach, SMS, radio, customer helpdesk	CLO / Commercial Manager	At design, pre-connection and throughout operation
Businesses, artisans and PUE users	High interest; economic impact	Load needs, reliability, tariffs, finance/connection, outage planning	Business forums, load surveys, clinics	PUE / Commercial Officer	Quarterly and before tariff/service changes
Farmers, herders and resource users	Potential land/livelihood impact	Access routes, crop/grazing effects, restoration, safety	Field meetings, transect walks, seasonal consultation	Social Specialist / CLO	Before land works and seasonally
Women and women-led groups	Potentially high vulnerability and benefit	Affordability, safety, employment, PUE, SEA/SH channels, meeting access	Women-only focus groups, home visits, trusted facilitators	Gender / Social Specialist	At least quarterly

Stakeholder	Impact / influence	Information needs	Methods	Lead	Frequency
Youth groups	High interest; potential conflict/employment expectations	Recruitment, skills, safety, conduct, business opportunities	Youth forums, noticeboards, digital channels	CLO / HR	Monthly during mobilisation/construction
Persons with disabilities and caregivers	High accessibility needs	Accessible information, physical access, connection/service needs, grievance support	Accessible small-group meetings, home visits, representative organisations	CLO / Social Specialist	Quarterly and before key decisions
Elderly, low-income or remote households	Potentially high vulnerability	Affordability, connection process, safety, access to complaint channels	Home visits, local-language briefings, assisted forms	CLO	Quarterly and as identified
Schools, clinics and public services	Critical service users	Connection priority, reliability, outage notice, emergency protocols	Institutional meetings and service continuity planning	Commercial / Technical Manager	Before connection and planned outages
Emergency services and health providers	Emergency response role	Fire, electrical injury, battery incidents, access, contacts, drills	Planning meetings, drills, site familiarisation	HSE Manager	Before construction, energisation and annually
Security providers and local security structures	Potential rights and safety impacts	Use of force, conduct, escalation, community interface	Briefings, training, incident review	Security Manager / E&S Manager	Before deployment and monthly
Contractors, suppliers and workers	High implementation influence	Code of conduct, OHS, labour terms, community behaviour, worker GRM	Induction, toolbox talks, contractor meetings	Project Manager / HSE / HR	Before work and ongoing
CSOs, NGOs, media and academia	Interested parties and potential monitors	Project benefits, impacts, disclosure, grievance performance	Roundtables, public reports, site visits where appropriate	E&S Manager / Communications	Bi-annually or as needed
Financiers, insurers and auditors	High influence where applicable	Risk controls, compliance, incidents, performance indicators	Reports, audits, management reviews	MD/CEO / Project Director	As agreed

6. ENGAGEMENT PROGRAMME BY PROJECT PHASE

6.1 Development and feasibility

Topic	Stakeholders	Purpose	Method	Timing	Lead	Record
Project introduction and stakeholder mapping	All affected communities; authorities; DisCo	Explain concept, clarify that design is preliminary, identify affected groups and preferred channels	Community entry meetings, key-informant interviews, participatory mapping	Before site selection is confirmed	CLO / E&S Manager	Meeting records and stakeholder register
Land and livelihood screening	Landowners, tenants, farmers, resource users, vulnerable households	Identify ownership, users, seasonal access and potential displacement; explain rights and options	Household interviews, transect walks, land meetings	Before any agreement or entry	Land / Social Specialist	Land records, impact inventory, consent/negotiation records
Load, customer and PUE assessment	Households, businesses, institutions, DisCo	Understand demand, affordability, service priorities and existing supply conditions	Surveys, business focus groups, institution interviews	Feasibility stage	Commercial / PUE Team	Survey database and consultation summary
E&S scoping	Affected parties, women, youth, vulnerable groups, authorities	Identify impacts, mitigation options, cumulative issues and local knowledge	Scoping meetings, separate focus groups, site walks	Before finalising ESIA/ESMP scope	E&S Manager	Scoping report and issues register

6.2 Design, approvals and pre-construction

Topic	Stakeholders	Purpose	Method	Timing	Lead	Record
Disclosure of design and impacts	Affected communities, land users, authorities	Present layout, routes, safety zones, impacts and mitigation; collect design feedback	Public meeting, maps, small-group sessions, disclosure boards	Before design freeze	Project Engineer / E&S Manager	Comments and response matrix
Interconnection planning	DisCo, REA/DARES, NERC as required, critical customers	Agree PCC, protection, outage and energisation communication	Technical workshops, joint inspections, formal submissions	At design gates	Interconnection Engineer	Minutes, approvals and action tracker

Topic	Stakeholders	Purpose	Method	Timing	Lead	Record
Land agreements and livelihood measures	Affected owners/users and representatives	Complete informed, documented and lawful agreements; confirm compensation or livelihood support where applicable	One-to-one negotiation and witnessed documentation	Before site possession	Land / Social Specialist	Signed agreements and payment/commitment records
Contractor mobilisation and recruitment disclosure	Community leaders, youth, women, contractors, workers	Explain recruitment method, eligibility, worker conduct, local procurement and GRM	Community briefing, noticeboard, contractor induction	Before recruitment and mobilisation	HR / CLO / Contractor	Recruitment notices, attendance, commitments
Construction schedule and community safety	Residents, businesses, schools, clinics, road users, emergency services	Notify work hours, traffic routes, access changes, hazards and emergency contacts	Door-to-door notice, radio/SMS, meetings, signage	At least 7 days before disruptive works	Construction Manager / HSE / CLO	Notice register and acknowledgement records

6.3 Construction and installation

Topic	Stakeholders	Purpose	Method	Timing	Lead	Record
Routine progress and impact review	Affected residents, businesses, leaders, vulnerable groups	Share progress, upcoming works, mitigation performance and complaints status	Monthly community forum, focus groups, site walk	Monthly and as needed	CLO / Site Manager	Minutes and issue tracker
Traffic and access management	Road users, transport operators, schools, emergency services	Coordinate deliveries, temporary closures, pedestrian access and emergency routes	Advance notices, marshals, route briefings	Before each major delivery or closure	Logistics / HSE / CLO	Traffic notice and incident log
Construction environmental issues	Neighbouring households, farmers, authorities	Address dust, noise, waste, drainage, vegetation and spills	Inspection feedback, complaint follow-up, joint site review	Weekly internal; monthly external	E&S Officer	Inspection and corrective-action records
Worker-community conduct	Workers, contractors, women/youth groups, leaders	Reinforce Code of Conduct, SEA/SH prevention and reporting channels	Induction, toolbox talks, community sensitisation	Before work and monthly	HR / GBV Focal Point / CLO	Training records and anonymised reports
Grievance feedback	Complainants, GRC, management	Acknowledge, investigate, resolve and communicate outcomes	Individual follow-up and GRC meetings	Continuous	Grievance Officer	Grievance log and closure evidence

6.4 Testing, interconnection and energisation

Topic	Stakeholders	Purpose	Method	Timing	Lead	Record
Planned outage and switching notice	DisCo, customers, critical facilities, community leaders	Provide date, time, duration, affected areas, safety instructions and escalation contacts	Formal DisCo notice, SMS, radio, door-to-door notice, public boards	Minimum notice agreed with DisCo; repeated 24 hours before	Interconnection Engineer / CLO	Approved outage plan and notice evidence
Public electrical safety campaign	Residents, children, schools, businesses, emergency services	Explain live equipment, clearances, tampering risks, emergency contacts and first response	School talks, demonstrations, posters, local-language radio	Before energisation and periodically	HSE / CLO	Campaign records and materials
Joint pre-energisation consultation	DisCo, REA/DARES, contractors, emergency services	Confirm protection, isolation, emergency, communication and public notice readiness	Technical meeting and joint inspection	Before energisation authorisation	Project Manager	Signed readiness checklist and minutes
Energisation communication	All customers and affected communities	Confirm energisation, service start, meter use, tariffs, complaint channels and prohibited actions	Public announcement, customer pack, helpdesk	On energisation date and first month	Commercial Manager / CLO	Customer information distribution record

6.5 Operation, maintenance and decommissioning

Topic	Stakeholders	Purpose	Method	Timing	Lead	Record
Service, tariff and customer engagement	Customers, businesses, public services, DisCo	Explain service standards, billing, tariff changes, connections, outages and energy efficiency	Customer helpdesk, SMS, meetings, public notices	Continuous; before any material change	Commercial Manager / CLO	Customer communication register
Planned maintenance and outage notice	Customers, DisCo, critical facilities	Minimise disruption and protect critical services	Formal notices, SMS, radio, direct calls to critical users	Before each planned outage	Operations Manager	Outage communication record
Annual community performance review	Affected parties, leaders, vulnerable groups, authorities	Review benefits, impacts, complaints, employment, safety and improvement actions	Community scorecard, survey, annual forum	Annually	E&S Manager	Annual engagement report
Incident and emergency communication	Affected people, DisCo, emergency services, authorities	Provide verified safety information and instructions without prejudicing investigation or confidentiality	Emergency alerts, direct coordination, public update	Immediately as required	Incident Commander / Communications	Incident communication log
Decommissioning or major rehabilitation	Landowners, customers, workers, authorities, waste handlers	Consult on service transition, asset removal, waste/battery management, land restoration and grievance closure	Formal plan disclosure, meetings, individual agreements	At least six months before planned closure where practicable	Project Director / E&S Manager	Decommissioning engagement plan and closure report

7. INFORMATION DISCLOSURE PLAN

7.1 Disclosure requirements

Information shall be accurate, consistent with approved project decisions, understandable to the intended audience and disclosed early enough for meaningful consideration. Technical material shall be summarised in plain language and, where needed, translated orally or in writing into locally understood languages. Personal data, commercially confidential information, security-sensitive information and survivor-identifying information shall not be publicly disclosed.

Information	Audience	Minimum content	Channel	Timing	Owner
Project overview and contact details	All stakeholders	Plain-language summary, location map, components, schedule, contacts and GRM	Community boards, meetings, website where available, project office	At project launch and when materially revised	CLO
E&S risks and mitigation measures	Affected parties and authorities	Non-technical summary of ESIA/ESMP/ESMS commitments	Public meeting, disclosure location, printed summary	Before construction and after material updates	E&S Manager
Land access and livelihood information	Affected owners and users	Rights, options, process, eligibility, valuation/assistance, grievance channels	Individual meetings and written notices	Before agreement or entry	Land / Social Specialist
Construction schedule and traffic impacts	Residents, road users, institutions	Work areas, hours, access restrictions, deliveries, safety and contacts	SMS, posters, radio, door-to-door notice	At least 7 days before disruptive work; updates as needed	Site Manager / CLO
Recruitment and procurement opportunities	Local community and businesses	Transparent criteria, application method, deadlines and prohibition of fees or favouritism	Noticeboards, meetings, radio/digital channels	Before each recruitment/procurement round	HR / Procurement / CLO
Interconnection and outage information	DisCo, customers, critical facilities	Outage timing, affected areas, safety, service restoration and escalation	Formal notice, SMS, radio, direct calls	In line with agreed outage protocol	Operations / CLO
Tariffs, metering and service conditions	Existing and prospective customers	Approved tariffs, fees, payment channels, customer rights and service standards	Customer pack, helpdesk, meetings, public boards	Before connection and before any change	Commercial Manager
Emergency and safety information	Communities, schools, emergency services	Electrical, battery and fire risks, restricted areas, emergency numbers	Signage, drills, school/community talks, leaflets	Before energisation and annually	HSE Manager

Information	Audience	Minimum content	Channel	Timing	Owner
Engagement and grievance performance	Communities, authorities, REA/DARES	Activities held, issues raised, commitments and anonymised grievance status	Quarterly summary and annual report	Quarterly / annually	E&S Manager

7.2 Disclosure quality control

- All public materials shall be approved by the responsible technical or managerial owner and reviewed by the E&S Manager for clarity and risk.
- Outage, tariff, safety and emergency messages shall be coordinated with the DisCo where relevant.
- Disclosed versions shall be dated and entered in the Disclosure Register in Annex M.
- Questions that cannot be answered immediately shall be logged, assigned and answered within the communicated timeframe.
- Rumours and misinformation shall be addressed using verified facts and the same channels through which they are circulating, without naming or stigmatising individuals.

8. ENGAGEMENT METHODS AND COMMUNICATION PROTOCOLS

Method	Best use	Minimum protocol
Community-wide meetings	Broad disclosure and collective discussion	Use neutral venue, local language, advance notice, microphones where needed, separate question channels and documented attendance.
Focus-group discussions	Detailed discussion with groups sharing particular interests or vulnerabilities	Use trained facilitator; ensure privacy and safe participation; limit group size; avoid dominant leaders controlling the session.
Key-informant interviews	Technical, institutional or culturally sensitive information	Use structured guide; validate information; document consent and confidentiality expectations.
Household or one-to-one meetings	Land, livelihoods, vulnerability, connection or grievance matters	Meet at convenient time and place; allow trusted companion; avoid coercion; provide written record of agreements.
Participatory mapping and transect walks	Land use, access, resource use, hazards and routes	Include different user groups; record seasonal patterns; validate maps with affected users.
Technical workshops	DisCo, regulators, engineers and authorities	Issue agenda and documents in advance; record decisions, owners and deadlines; confirm technical approvals formally.
Radio and public-address announcements	Wide local reach, including low-literacy audiences	Use local language, repeat key messages, provide contacts, avoid disclosure of personal information.
SMS, telephone and digital channels	Rapid notices and direct customer communication	Maintain consent and current contact lists; provide alternative channels for people without access.
Posters, fliers and noticeboards	Persistent local disclosure	Use clear visuals and large print; place at accessible locations; date materials and remove obsolete versions.
Surveys and community scorecards	Measure needs, satisfaction and outcomes	Use representative sampling, disaggregate data appropriately and disclose summary results.
Site visits and joint inspections	Verify impacts, mitigation and commitments	Apply safety rules; document observations; agree corrective actions and follow-up.

8.1 Meeting protocol

6. Provide reasonable advance notice stating purpose, date, time, venue, accessibility arrangements and contact person.
7. Avoid times that exclude women, farmers, shift workers, traders, worshippers or caregivers; provide separate sessions where needed.
8. Open with the purpose, what decisions are open to influence, expected conduct, confidentiality limits and available grievance channels.
9. Record attendance with informed consent and provide an option not to sign a public list.
10. Use neutral facilitation, prevent intimidation or political capture, and ensure women and less powerful participants can speak.

11. Summarise key issues, agreed actions, responsible persons and dates before closing.
12. Circulate or display a plain-language summary and track commitments to closure.

9. INCLUSION OF DISADVANTAGED AND VULNERABLE GROUPS

9.1 Identification

Vulnerability is context-specific and may arise from poverty, gender, age, disability, health, displacement, migration status, literacy, language, remote location, social marginalisation, dependence on affected land or resources, or limited access to electricity and digital communication. The project shall identify individuals and groups through confidential consultation, community mapping and E&S assessment without labelling or exposing them to stigma.

Barrier	Required accommodation
Mobility or physical access	Use accessible venues, ramps or ground-floor spaces; conduct home visits; provide seating and transport support where justified.
Hearing or visual impairment	Use sign support where available, large print, verbal explanation, high-contrast materials and trusted assistants chosen by the participant.
Low literacy or language differences	Use oral disclosure, visual aids, local languages, demonstrations and read-back of agreements.
Time and care responsibilities	Schedule around market, farming and care duties; offer shorter or repeated sessions; provide safe child-friendly arrangements where feasible.
Cost and distance	Hold meetings close to affected people, avoid participation fees and provide justified transport assistance without coercive incentives.
Fear, stigma or power imbalance	Use separate confidential sessions, trusted facilitators, anonymous questions and non-retaliation safeguards.
Digital exclusion	Do not rely solely on SMS, email, social media or websites; maintain in-person and paper channels.

9.2 Minimum inclusion actions

- Prepare and update a vulnerable-person engagement list with access controls; do not publish names.
- Consult women and vulnerable groups separately before major community decisions are finalised.
- Disaggregate participation and benefit data by sex, age and disability status where lawful, safe and useful.
- Provide assisted grievance submission and allow representatives chosen by the complainant.
- Test whether mitigation and project benefits are reaching vulnerable groups and implement corrective measures where gaps are found.

10. GENDER, SEA/SH AND CHILD SAFEGUARDING

10.1 Gender-responsive engagement

- Women shall be consulted directly and not only through male leaders or household heads.
- Female facilitators or focal points shall be used where this improves safety and participation.
- Engagement shall address affordability, energy use, PUE opportunities, safety, employment, land and care burdens that may affect women differently.
- Participation data and commitments shall be reviewed for unequal access or outcomes.

10.2 SEA/SH-safe engagement

Mandatory safeguard: SEA/SH allegations shall not be investigated or mediated through a general community meeting or ordinary GRC process. The GRM shall receive the minimum necessary information, obtain informed consent, protect confidentiality and refer the survivor through an approved survivor-centred pathway.

- All facilitators, interpreters, CLOs, contractors and security personnel shall sign and receive training on the project Code of Conduct.
- Public materials shall provide discreet reporting options and explain confidentiality and non-retaliation.
- No promise of employment, connection, benefit, payment or service may be exchanged for sexual activity or favour.
- Engagement events shall be held in safe locations and avoid placing participants at increased risk on the journey or after disclosure.
- Survivor-identifying information shall be stored separately with restricted access and shall not appear in routine grievance logs or public reports.

10.3 Child safeguarding

- Children shall not be used as substitutes for adult consultation on household or land decisions.
- Where children are consulted on matters affecting them, use age-appropriate methods, informed assent and appropriate caregiver or safeguarding arrangements.
- Photographs or personal information about children require lawful consent and a legitimate project purpose.
- Any concern that a child may be at risk shall be referred through the approved child-safeguarding procedure and applicable law.

11. LAND, LIVELIHOOD AND COMMUNITY AGREEMENT ENGAGEMENT

11.1 Core requirements

13. Identify all persons with formal, customary, seasonal, tenant, livelihood or access interests before site possession or route works.
14. Explain project requirements, alternatives, rights, valuation or support process, grievance channels and the right to seek advice.
15. Allow sufficient time for consideration; avoid pressure from leaders, family members, government representatives or project staff.
16. Document meetings, maps, inventories, agreements, payments and commitments in a language and format understood by affected persons.
17. Provide signed copies and monitor completion of compensation, restoration or other commitments before displacement or loss occurs.
18. Apply the project VLD guideline only where donation is demonstrably informed, voluntary, minor and free from coercion; otherwise use negotiated acquisition or applicable resettlement instruments.

11.2 Community agreements

Any community memorandum, benefit arrangement, access agreement or local-employment understanding shall clearly state parties, scope, commitments, limits, responsibilities, duration, review mechanism, grievance process and signatories. It shall not replace individual rights or lawful compensation. Draft agreements shall be disclosed and discussed with affected groups, including women and vulnerable people, before signature.

12. INTERCONNECTION AND DISTRIBUTION COMPANY ENGAGEMENT

12.1 Purpose

Interconnection creates shared operational, customer and safety responsibilities. Promass shall maintain a formal stakeholder interface with the relevant DisCo from feasibility through operation. Community communication on outages, energisation, safety, service boundaries and customer transition shall be technically accurate and coordinated with the DisCo.

Stage	Engagement subject	Stakeholders	Required record
Feasibility	Network data, existing customers, load, service boundaries, preliminary PCC and operational concept	DisCo technical and commercial teams; REA/DARES as required	Data-request register, meeting minutes and agreed assumptions
Design	PCC, protection philosophy, anti-islanding, metering, communications, earthing, switching and operating procedures	DisCo protection, planning, metering and operations teams	Design review records, comments tracker and approvals

Stage	Engagement subject	Stakeholders	Required record
Pre-construction	Work near existing network, access, outages, safety responsibilities and public notice protocol	DisCo operations, community leaders, critical users	Method statements, outage protocol and public communication plan
Testing and energisation	Test schedule, isolation, witnesses, protection settings, emergency contacts and energisation authority	DisCo, contractor, Promass, REA/DARES as applicable	Signed test records, readiness checklist and switching instruction
Operation	Planned and unplanned outages, dispatch/operating data, customer complaints, emergency isolation and service changes	DisCo operations and commercial teams; customers	Operating meeting minutes, outage logs and customer notices

12.2 Public communication controls

- Only authorised personnel may issue statements on DisCo network conditions, switching, outage duration or energisation.
- Notices shall distinguish planned work, emergency outages, mini-grid issues and upstream DisCo supply issues without assigning blame before facts are verified.
- Critical facilities shall receive direct notice and continuity planning support where practicable.
- All energisation notices shall include a clear warning that installed equipment may become live and must not be touched, climbed, opened or tampered with.

13. COMMUNITY HEALTH, SAFETY AND SECURITY ENGAGEMENT

Risk	Information to disclose	Method	Timing
Electrical hazards	Live conductors, poles, transformers, meters, earthing and tampering	Public safety talks, school outreach, warning signs, emergency number	Before energisation and annually
Battery and fire risk	Restricted access, smoke or odour, fire, damaged batteries and emergency evacuation	Community briefings, emergency drills, responder familiarisation	Before operation and annually
Construction traffic	Heavy vehicles, deliveries, reversing, road obstruction and pedestrian safety	Advance route notices, marshals, school coordination, signage	Before each major delivery and during active works
Excavations and work sites	Open trenches, falling objects, equipment and unauthorised access	Barriers, lighting, notices, daily inspection and community warning	Daily during relevant works
Security conduct	Access control, conflict, use of force and rights-respecting behaviour	Security induction, community contact protocol, incident reporting	Before deployment and monthly
Emergency response	Fire, electrical injury, spill, severe weather, flooding, structural failure or public accident	Emergency contact disclosure, drills, response-agency coordination	Before construction/energisation and at least annually

13.1 Incident communication

During an incident, the Incident Commander or authorised communications lead shall provide clear instructions focused on safety, access restrictions, emergency contacts and verified facts. Names, medical details, allegations, security-sensitive information and preliminary causes shall not be disclosed without authority. Affected stakeholders shall receive updates until the immediate risk is controlled and follow-up actions are communicated.

14. LABOUR AND WORKER ENGAGEMENT

Worker engagement is distinct from community engagement but must be coordinated because labour practices and worker conduct can directly affect communities. All workers shall receive information on employment terms, OHS, Code of Conduct, worker accommodation where relevant, non-discrimination, SEA/SH prohibition, community interaction, security, emergency procedures and the worker grievance mechanism.

Activity	Participants	Content	Frequency	Owner
Induction	All workers and subcontractors	Terms, OHS, E&S rules, Code of Conduct, community relations, GRMs	Before site access	HR / HSE / E&S
Toolbox talks	Task teams	Daily or task-specific hazards, community interfaces and lessons learned	Daily / before high-risk work	Supervisor / HSE
Worker consultation	Workers and representatives	Working conditions, welfare, accommodation, discrimination, safety and proposed changes	Monthly	HR / HSE
Contractor coordination	Contractor managers and focal points	ESHS performance, community issues, grievances, incidents and corrective actions	Weekly during construction	Project Manager / E&S
Worker GRM	All workers	Confidential complaints, appeals and non-retaliation	Continuous	HR / Worker GRM Officer

Separation of mechanisms: Worker grievances shall be recorded and resolved through the worker GRM. Community grievances shall not be referred to a worker supervisor unless necessary for corrective action and confidentiality can be protected.

15. GRIEVANCE REDRESS MECHANISM

15.1 Objectives and principles

The GRM provides a transparent, accessible and culturally appropriate channel for receiving and resolving concerns connected with the project. It complements, and does not restrict, access to courts, regulators, traditional mechanisms or other lawful remedies. Complainants may submit anonymous grievances and may use a representative of their choice.

- Accessibility through multiple channels and assistance for people who cannot read or travel.
- Prompt acknowledgement and proportionate investigation.
- Fairness, impartiality and opportunity to appeal.
- Confidentiality, data protection and non-retaliation.
- Survivor-centred handling of SEA/SH and child-safeguarding concerns.
- Documentation, trend analysis and corrective action.

15.2 Submission channels

Channel	Arrangement
In person	Project office, CLO, Grievance Officer or authorised community focal point
Telephone / SMS / messaging	Project grievance number: [insert before submission]
Email	Project grievance email: [insert before submission]
Suggestion or grievance box	Secure boxes at agreed accessible locations, opened by authorised persons
Written letter or form	Using Annex H or any other written format
Anonymous report	Any channel without identifying details; anonymous reports will be assessed to the extent possible

15.3 Standard grievance process and timelines

Step	Required action	Target timeline
1. Receive and make safe	Record minimum necessary information; address urgent safety risk immediately; do not force disclosure.	Same day
2. Acknowledge	Provide reference number, contact person, process and expected timeline.	Within 5 working days
3. Screen and classify	Identify subject, severity, confidentiality, SEA/SH or child-safeguarding pathway, responsible team and conflicts of interest.	Within 2 working days of receipt
4. Investigate / assess	Gather facts, consult relevant parties, review records and identify corrective options.	Target within 15 working days
5. Propose and agree resolution	Explain findings and remedy; obtain complainant feedback; record commitments and deadlines.	Within the 15-working-day target or provide written extension
6. Implement and verify	Complete agreed actions and verify effectiveness with the complainant where possible.	As agreed, with progress updates
7. Close	Issue closure communication, record acceptance or reason for disagreement and archive securely.	After verification
8. Appeal	Refer to the next management level, GRC or independent third party not involved in the original decision.	Request normally within 10 working days of decision

15.4 Grievance classification

Class	Examples	Owner	Response
Level 1 - routine	Information request, minor nuisance, customer issue or readily correctable concern	CLO / relevant department	Target resolution within 15 working days
Level 2 - significant	Repeated nuisance, land/livelihood issue, contractor conduct, service dispute, moderate safety or community conflict	Grievance Officer / E&S Manager / Project Manager	Investigation and management action plan
Level 3 - severe or urgent	Fatality or serious injury, major environmental incident, violence, credible threat, forced eviction, serious rights allegation, major security incident	Project Director / E&S Manager / Incident Commander; notify authorities/REA/DARES as required	Immediate escalation and incident procedure
Sensitive - SEA/SH or child safeguarding	Any allegation or concern involving sexual exploitation, abuse, harassment or child risk	Trained focal point using survivor-centred pathway	Immediate safety and referral; no ordinary investigation or public mediation

15.5 Grievance Redress Committee

A project GRC may support fair resolution of non-sensitive community grievances. Membership shall be balanced and may include Promass, community representatives, women, youth, vulnerable-group representation and local authorities as appropriate. Members shall sign confidentiality and conflict-of-interest commitments. The GRC shall not handle SEA/SH survivor details, child-protection cases requiring specialist response, or matters where a member has a conflict.

15.6 SEA/SH and child-safeguarding pathway

19. Receive only the minimum information necessary: nature of concern, whether immediate safety or medical support is needed, and preferred safe contact method.
20. Do not seek proof, confront the alleged perpetrator, disclose identities, or require the survivor to repeat the account to multiple people.
21. Explain available services and obtain informed consent before referral or information sharing, subject to applicable child-protection and mandatory-reporting requirements.
22. Record the case in the general log only as a non-identifying sensitive case code and status.
23. Report aggregate, non-identifying data only.

15.7 Records and confidentiality

The Grievance Officer shall maintain the log in Annex I. Access shall be limited according to role. Sensitive attachments and personal data shall be stored separately from routine logs. Records shall show actions and decisions without exposing complainants. Retention and disposal shall follow applicable law and the project data-management procedure.

16. ROLES AND RESPONSIBILITIES

Role	Responsibilities
MD/CEO	Approve the SEP, provide resources, review major stakeholder risks and severe grievances, ensure accountability.
Project Director / Project Manager	Integrate SEP actions into schedule and contracts; coordinate technical, commercial and construction teams; approve major commitments.
E&S Manager	Own the SEP; supervise risk-based engagement, disclosure, inclusion, monitoring, reporting and corrective action; interface with REA/DARES.
Community Liaison Officer	Maintain daily community contact, stakeholder register, notices, consultations, issue tracker and accessible GRM channels.
Grievance Officer	Register, acknowledge, classify, coordinate investigation, communicate outcomes, maintain confidentiality and prepare trend reports.
Gender / GBV Focal Point	Support gender-responsive engagement and confidential survivor-centred referral; maintain service mapping and training.
Land / Social Specialist	Manage land and livelihood consultation, affected-person records, agreements, compensation or restoration commitments.
Interconnection Engineer	Lead DisCo technical engagement, outage and energisation communication inputs, and interconnection records.
Commercial / PUE Manager	Lead customer, tariff, metering, service and productive-use engagement.
HSE Manager	Lead community safety, emergency-service engagement, public safety campaigns and incident communication support.
HR Manager	Lead recruitment disclosure, worker engagement, worker GRM and contractor labour compliance.
Contractor and subcontractors	Implement approved site engagement instructions, provide focal points, report issues promptly and make no unauthorised commitments.
Independent monitor / auditor where appointed	Review SEP implementation, records, inclusion and grievance performance and recommend corrective action.

16.1 Authority to make commitments

Only authorised persons may commit the project to compensation, employment, procurement, connection priority, tariff, schedule changes, community benefits or other obligations. Facilitators shall clearly state when they are collecting feedback rather than making a commitment. All authorised commitments shall be entered in the Stakeholder Issue and Commitment Tracker in Annex G.

17. RESOURCES AND BUDGET

Promass shall provide sufficient personnel, transport, communication tools, venues, accessibility support, translation, disclosure materials, grievance administration, specialist referral arrangements, monitoring and independent review for effective SEP implementation. The final budget shall be project-specific, approved before mobilisation and updated annually.

Budget line	Coverage	Phase	Amount (NGN)
Community entry and consultation meetings	Venue, seating, sound, facilitation, local-language support, notices and documentation	Development / construction	[Insert approved amount]

Budget line	Coverage	Phase	Amount (NGN)
Vulnerable-group inclusion	Accessible venues, home visits, transport support, sign or other communication support	All phases	[Insert approved amount]
Information disclosure	Printing, posters, noticeboards, radio, SMS, customer packs and website updates	All phases	[Insert approved amount]
CLO and grievance operations	Personnel, phone, data, travel, secure boxes, forms and case management	All phases	[Insert approved amount]
SEA/SH prevention and referral	Training, confidential channels, service-provider mapping and emergency referral support	All phases	[Insert approved amount]
DisCo and technical stakeholder meetings	Workshops, joint inspections, outage/energisation communication	Design to operation	[Insert approved amount]
Monitoring and independent review	Surveys, scorecards, audits, reporting and corrective actions	Construction / operation	[Insert approved amount]
Contingency	Unplanned consultations, conflict prevention and urgent communication	All phases	[Insert approved amount]

17.1 Procurement and financial control

- Engagement spending shall be approved, documented and auditable.
- Payments or allowances shall not be used to buy agreement, silence criticism or influence grievances.
- Where transport or participation support is provided, criteria shall be transparent and applied consistently.
- Community representatives shall not collect project funds on behalf of individuals unless formally authorised with appropriate controls.

18. MONITORING, EVALUATION AND REPORTING

18.1 Monitoring indicators

Indicator area	Measure	Frequency
Engagement delivery	Number and type of engagements completed against plan; timeliness of notices	Monthly
Participation	Attendance by stakeholder category, sex, age and disability where safe and lawful; percentage of women and vulnerable-group participation	Monthly / quarterly
Influence on decisions	Number of design, mitigation or operational changes arising from stakeholder input; reasons where suggestions were not adopted	Quarterly
Disclosure	Percentage of required disclosures issued on time; languages and accessible formats used	Monthly
Commitments	Open, overdue and closed stakeholder commitments; average closure time	Monthly
Grievances	Number by type and source; acknowledgement time; resolution time; closure and appeal rates; repeated issues	Monthly / quarterly
SEA/SH and sensitive cases	Aggregate non-identifying number received, referred and pending; no survivor details in routine reports	As required / quarterly aggregate
Community satisfaction	Survey or scorecard rating, trust, understanding of project and GRM awareness	Bi-annually / annually
Contractor performance	Engagement breaches, unauthorised commitments, Code of Conduct issues and corrective actions	Weekly / monthly
DisCo interface	Technical meetings, unresolved actions, outage notices and joint readiness milestones	At each interconnection milestone

18.2 Reporting schedule

Report	Recipient	Minimum content
Weekly site stakeholder note	CLO to Site Manager and E&S Manager	Upcoming works, issues, complaints, commitments and risks
Monthly SEP report	E&S Manager to Project Management	Activities, participation, disclosure, grievances, commitments, contractor performance and corrective actions
Quarterly external summary	Promass to REA/DARES and disclosed locally as appropriate	Progress, key issues, anonymised grievance data, E&S interface and next-quarter programme
Incident / urgent report	Project Director to relevant authorities, REA/DARES and DisCo as required	Verified facts, immediate response, stakeholder communication and follow-up
Annual SEP effectiveness review	Management and external stakeholders as appropriate	Trends, stakeholder satisfaction, vulnerable-group outcomes, lessons and revised plan

18.3 Records

- Stakeholder register and analysis.
- Notices, disclosed materials and distribution evidence.
- Meeting agendas, attendance, minutes and photographs where consented.
- Issue and commitment tracker.
- Grievance forms, log, correspondence and closure evidence.
- Survey and scorecard results.
- Training and contractor records.
- Reports, audits and corrective-action plans.

19. ADAPTIVE MANAGEMENT AND SEP REVIEW

The SEP is a living document. The E&S Manager shall review it at least quarterly during construction and annually during operation, and immediately when there is a material change in design, location, land footprint, DisCo arrangement, tariff/service model, stakeholder profile, risk classification, grievance trend, incident or legal/programme requirement. Material changes shall be approved and disclosed to affected stakeholders.

Trigger	Required response
Design or route change	Re-map affected parties, update land and safety engagement, disclose revised impacts before implementation.
New or intensified grievance trend	Investigate root causes, hold targeted consultation, revise mitigation and communication.
Low participation by women or vulnerable groups	Change timing, venue, facilitator and channels; conduct separate outreach.
Interconnection or outage plan change	Coordinate with DisCo and reissue customer and critical-facility notices.
Serious incident	Implement incident communication, consult affected parties and incorporate lessons into SEP and ESMS.
Community conflict or misinformation	Use trusted, neutral channels, verify facts, increase direct engagement and avoid politicisation.

20. IMPLEMENTATION SCHEDULE

Action	Timing	Owner	Evidence
Appoint CLO, Grievance Officer and focal points	Before project submission / mobilisation	Project Director	Appointment letters and contact directory

Action	Timing	Owner	Evidence
Complete Annex A project details and Annex B stakeholder register	Before submission and updated before mobilisation	E&S Manager	Approved annexes
Activate public and worker GRM channels	Before land entry or recruitment	Grievance Officer / HR	Notices, boxes, phone/email and logs
Conduct initial community entry, vulnerable-group and land consultations	Before site and route confirmation	CLO / Social Specialist	Minutes, maps, issues register
Disclose E&S instruments and construction arrangements	Before construction	E&S Manager / Site Manager	Disclosure register and attendance
Implement monthly construction engagement programme	Throughout construction	CLO / Contractor	Monthly reports
Complete DisCo interconnection engagement and public notice plan	Before testing / energisation	Interconnection Engineer / CLO	Approved plans and records
Conduct pre-energisation safety campaign	Before energisation	HSE Manager / CLO	Campaign and readiness records
Conduct quarterly SEP performance review	Quarterly	E&S Manager	Review minutes and corrective actions
Conduct annual community performance review	Annually during operation	E&S Manager / Commercial Manager	Annual report and revised plan

MANAGEMENT ADOPTION

This Stakeholder Engagement Plan is adopted as a mandatory project document. All Promass employees, consultants, contractors and subcontractors shall comply with the requirements applicable to their roles. Project management shall ensure that the plan is adequately resourced, integrated into contracts and schedules, monitored and updated.

Approval level	Details
Prepared by	Name: _____ Title: Community Liaison / E&S Officer Signature: _____ Date: _____
Reviewed by	Name: _____ Title: Project Manager / E&S Manager Signature: _____ Date: _____
Approved by	Dr Sani Mohammed Bida MD/CEO, Promass Engineering Services Limited Signature: _____ Date: _____

ANNEX A - PROJECT-SPECIFIC INFORMATION SHEET

Item	Project detail
Project name	Proposed 1 MW Solar Hybrid Interconnected Mini-grid Project
DARES component / financing window	_____
REA reference number	_____
Host community / communities	_____
Ward / LGA / State	_____
GPS coordinates and site area	_____
Distribution Company	_____

Item	Project detail
Point of Common Coupling	_____
PV capacity	_____
Battery capacity and chemistry	_____
Expected customer connections	_____
Distribution network length	_____
Land status and acquisition method	_____
Construction start / duration	_____
Target energisation date	_____
Project Manager	Name / phone / email: _____
E&S Manager	Name / phone / email: _____
Community Liaison Officer	Name / phone / email: _____
Grievance contact	Phone / email / office: _____
Emergency contact	Phone and response agency: _____

ANNEX B - DETAILED STAKEHOLDER REGISTER

ID	Stakeholder / contact	Category	Location	Impact / interest	Influence	Vulnerability / access needs	Preferred method	Frequency	Relationship owner	Last contact	Next action
ST-01											
ST-02											
ST-03											
ST-04											
ST-05											
ST-06											
ST-07											
ST-08											
ST-09											
ST-10											
ST-11											
ST-12											
ST-13											
ST-14											
ST-15											

ANNEX C - STAKEHOLDER ENGAGEMENT ACTIVITY PLAN

Activity ID	Topic / decision	Stakeholders	Objective	Information to disclose	Method / language	Date / venue	Facilitator	Safeguards / accessibility	Expected output	Status
EA-01										

Activity ID	Topic / decision	Stakeholders	Objective	Information to disclose	Method / language	Date / venue	Facilitator	Safeguards / accessibility	Expected output	Status
EA-02										
EA-03										
EA-04										
EA-05										
EA-06										
EA-07										
EA-08										
EA-09										
EA-10										
EA-11										
EA-12										

ANNEX D - CONSULTATION NOTICE TEMPLATE

Notice item	Information
Project	Proposed DARES Interconnected Mini-grid Project
Purpose of engagement	_____
Stakeholders invited	_____
Date and time	_____
Venue / access directions	_____
Language(s)	_____
Accessibility support available	_____
Documents available in advance	_____
Contact for questions or accommodation	_____
Grievance channels	_____

Plain-language notice text:

ANNEX E - CONSULTATION MINUTES TEMPLATE

Record item	Details
Engagement title / ID	
Date, time and venue	
Stakeholders represented	
Facilitator and note-taker	
Purpose and decisions open to influence	
Information disclosed / documents referenced	
Accessibility and safeguarding arrangements	
Summary of discussion	
Issues and questions raised	
Responses provided	
Commitments, owner and deadline	
Unresolved matters / escalation	
Feedback on meeting process	
Next engagement / communication	
Attachments	Attendance register, photos with consent, maps, presentations, notices

ANNEX F - ATTENDANCE REGISTER

S/N	Name or identifier	Stakeholder group / organisation	Sex (optional)	Age band (optional)	Disability/access support (optional)	Community / location	Telephone/email (optional)	Signature / consent	Comments
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									

S/N	Name or identifier	Stakeholder group / organisation	Sex (optional)	Age band (optional)	Disability/access support (optional)	Community / location	Telephone/email (optional)	Signature / consent	Comments
14									
15									
16									
17									
18									
19									
20									

Privacy notice: Collect only information needed for the engagement purpose. Explain how contact details will be used and provide an option not to disclose optional information.

ANNEX G - STAKEHOLDER ISSUE AND COMMITMENT TRACKER

ID	Date	Stakeholder	Issue / request	Project response / commitment	Decision authority	Owner	Due date	Status	Evidence of completion	Stakeholder feedback	Closure date
IC-01											
IC-02											
IC-03											
IC-04											
IC-05											
IC-06											
IC-07											
IC-08											
IC-09											
IC-10											
IC-11											
IC-12											
IC-13											
IC-14											

ANNEX H - COMMUNITY GRIEVANCE FORM

Field	Details
Grievance reference	To be assigned by project
Date received	
Submission channel	In person / phone / SMS / email / box / letter / representative / anonymous
Complainant name	Optional; anonymous grievances accepted

Field	Details
Safe contact method and time	
Representative, if any	
Community / location	
Description of concern	
Date and place of event	
Immediate safety risk or urgent support needed	
Outcome requested by complainant	
Consent to share information for resolution	Yes / No / Limited - specify
Preferred language / accessibility support	
Received by	Name, role and signature

Sensitive complaints: For SEA/SH or child-safeguarding concerns, do not use this form to record detailed allegations or names. Contact the trained focal point and follow the confidential referral pathway.

ANNEX I - GRIEVANCE LOG

Ref	Date	Channel	Complainant code / anonymous	Location	Category / level	Summary	Owner	Acknowledged	Action / resolution	Due date	Status	Appeal	Closed	Satisfaction / remarks
GR-001														
GR-002														
GR-003														
GR-004														
GR-005														
GR-006														
GR-007														
GR-008														
GR-009														
GR-010														
GR-011														
GR-012														
GR-013														
GR-014														

ANNEX J - MONTHLY SEP MONITORING REPORT TEMPLATE

Report item	Details
Reporting period	

Report item	Details
Prepared by / date	
Project phase and major activities	
Engagements planned / completed / deferred	
Stakeholder groups reached	
Participation data and inclusion measures	
Key issues and project responses	
Design or management changes from stakeholder input	
Open and overdue commitments	
Grievances received, resolved and pending	
Sensitive cases - aggregate non-identifying status only	
Contractor stakeholder-performance issues	
DisCo / authority engagement and pending actions	
Risks, corrective actions and required management decisions	
Next-period engagement plan	

ANNEX K - VULNERABILITY AND ACCESSIBILITY CHECKLIST

Check	Response	Action / owner / date
Have women and vulnerable groups been identified through more than one source?	Yes / No / N/A	
Could meeting timing exclude caregivers, traders, farmers, worshippers or shift workers?	Yes / No / N/A	
Is the venue physically accessible and safe?	Yes / No / N/A	
Are local-language, low-literacy and visual materials available?	Yes / No / N/A	
Is sign, hearing, visual or mobility support required?	Yes / No / N/A	
Are separate or confidential sessions needed?	Yes / No / N/A	
Could participation create stigma, retaliation or household/community conflict?	Yes / No / N/A	
Are transport or home visits needed to avoid exclusion?	Yes / No / N/A	
Are digital channels being supplemented by non-digital options?	Yes / No / N/A	
Has the group been told about the GRM and assisted submission?	Yes / No / N/A	
Have proposed accommodations been agreed with participants?	Yes / No / N/A	
Has effectiveness of inclusion measures been reviewed after the event?	Yes / No / N/A	

ANNEX L - SEA/SH SAFE REFERRAL PATHWAY (NON-IDENTIFYING)

Step	Required action
1. Listen and make safe	Receive calmly; do not ask unnecessary questions; assess immediate safety or urgent medical need.
2. Explain options	Explain confidentiality, limits, available services and the right to choose.
3. Obtain informed consent	Share information or refer only with consent, subject to applicable child-protection requirements.
4. Refer safely	Use the approved service-provider directory; arrange safe contact or transport where authorised.
5. Record minimally	Use a case code, date, broad category, referral status and no identifying details in the general log.
6. Follow up safely	Only through the survivor-approved method; do not pressure participation in investigation or legal action.
7. Manage alleged perpetrator risk	Use confidential management and safeguarding processes without exposing the survivor.

Service	Project-specific referral detail
Trained project focal point	Name / phone: _____
Medical service	Provider / location / 24-hour contact: _____
Psychosocial support	Provider / contact: _____
Legal support	Provider / contact: _____
Child protection service	Provider / contact: _____
Police / emergency service where chosen or legally required	Contact: _____

ANNEX M - INFORMATION DISCLOSURE REGISTER

ID	Document / message	Version / date	Audience	Language / format	Disclosure channel / location	Date disclosed	Owner	Questions received	Update / withdrawal date	Evidence
DI-01										
DI-02										
DI-03										
DI-04										
DI-05										
DI-06										
DI-07										
DI-08										
DI-09										
DI-10										
DI-11										
DI-12										

ANNEX N - COMMUNITY MEETING CODE OF PRACTICE

24. Participation is voluntary; no person shall be threatened, penalised or promised a benefit for a particular view.
25. Everyone shall be treated with dignity; abusive, discriminatory, sexual or intimidating language is prohibited.
26. Facilitators shall explain the purpose, decision scope, confidentiality and grievance channels.
27. Political campaigning, party slogans and unauthorised fundraising are not permitted during project meetings.
28. No participant shall photograph or record another person without consent.
29. Personal cases, SEA/SH allegations and child-safeguarding concerns shall be moved to a confidential channel.
30. Leaders and project staff shall not dominate discussion; women, youth and vulnerable participants shall have safe opportunities to speak.
31. Actions and commitments shall be read back, assigned and tracked.

ANNEX O - ENGAGEMENT BUDGET TEMPLATE

Budget code	Activity / line item	Unit	Quantity	Unit cost (NGN)	Total (NGN)	Phase / month	Responsible person	Approval status	Actual expenditure	Variance / remarks
SEP-01										
SEP-02										
SEP-03										
SEP-04										
SEP-05										
SEP-06										
SEP-07										
SEP-08										
SEP-09										
SEP-10										
SEP-11										
SEP-12										
SEP-13										
SEP-14										
SEP-15										

ANNEX P - TERMS OF REFERENCE: COMMUNITY LIAISON OFFICER

Purpose of role

To maintain trusted, accessible and documented relationships between the project and stakeholders and to support implementation of the SEP, ESMS, ESMP and GRM.

Minimum duties

- Maintain stakeholder, disclosure, engagement, issue and commitment registers.
- Plan and facilitate inclusive consultations in coordination with technical and E&S teams.
- Provide accurate advance notices and respond to routine questions.
- Receive grievances, provide acknowledgements and transfer cases securely to the Grievance Officer.
- Identify vulnerable people and arrange agreed accessibility support without exposing personal information.

- Monitor contractor-community interactions and report unauthorised commitments or misconduct.
- Support DisCo, safety, outage and energisation communication.
- Prepare weekly notes and monthly SEP reports and maintain auditable evidence.
- Escalate conflict, safety, SEA/SH, child-safeguarding and severe grievances immediately through approved channels.

Minimum qualifications and conduct

Relevant community-development, social-science, communications or E&S experience; fluency in relevant local language(s); strong documentation and conflict-sensitive facilitation skills; ability to maintain confidentiality; no unresolved conflict of interest in the project area; and signed compliance with the project Code of Conduct.

ANNEX Q - CONTACT AND ESCALATION DIRECTORY

Function	Project-specific contact
Promass Project Director	Name / phone / email: _____
E&S Manager	Name / phone / email: _____
Community Liaison Officer	Name / phone / email: _____
Grievance Officer	Name / phone / email: _____
Gender / GBV Focal Point	Name / safe contact: _____
HSE Manager / emergency lead	Name / phone: _____
Interconnection Engineer	Name / phone / email: _____
Relevant DisCo control / emergency contact	Office / phone: _____
REA / DARES contact	Name / role / contact: _____
LGA / community focal point	Name / role / contact: _____
Fire / medical / police / emergency services	Contact and location: _____
Approved waste / battery emergency contact	Provider / phone: _____

ANNEX R - SEP IMPLEMENTATION CHECKLIST AND MANAGEMENT SIGN-OFF

Implementation requirement	Status	Evidence / corrective action
Project details and stakeholder register completed	Yes / No	
CLO, Grievance Officer and specialist focal points appointed	Yes / No	
Public and worker GRM channels activated and disclosed	Yes / No	
Vulnerable-group and gender engagement completed	Yes / No	
Land and livelihood consultations documented	Yes / No / N/A	

Implementation requirement	Status	Evidence / corrective action
E&S instruments disclosed	Yes / No	
Contractor SEP and Code of Conduct obligations included in contracts	Yes / No	
Construction and traffic notices issued	Yes / No / N/A	
DisCo engagement records and outage communication protocol approved	Yes / No / N/A	
Pre-energisation safety campaign completed	Yes / No / N/A	
SEP budget approved	Yes / No	
Monthly monitoring and quarterly review system active	Yes / No	

Management certification: I confirm that the project-specific information and arrangements required by this SEP have been completed or are subject to an approved, time-bound corrective action plan before the relevant activity proceeds.

Approval level	Details
Prepared by	Name: _____ Title: Community Liaison / E&S Officer Signature: _____ Date: _____
Reviewed by	Name: _____ Title: Project Manager / E&S Manager Signature: _____ Date: _____
Approved by	Dr Sani Mohammed Bida MD/CEO, Promass Engineering Services Limited Signature: _____ Date: _____