



**SECURITY RISK MITIGATION MEASURES FOR PAYMENT
OF PHASE III OF THE EMERGENCY CASH TRANSFER
(ECTIII)**

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1.0 Background

With the outbreak of the Covid-19, the Government of Sierra Leone instituted the Quick Action Economic Response Plan (QAERP). The World Bank and the GoSL through the Social Safety Nets Project (SSNP) provided US\$4m contingency fund for the National Commission for Social Action (NaCSA) to implement the first phase of the Emergency Cash Transfer (ECT I). The objective was to cushion the economic impact of 29,000 vulnerable groups in four regional headquarters including Western Area Urban.

Following the successful implementation of ECT 1, On 28th August 2020, WB approved third additional finance (AF3) of EUR 4.9 million (US\$ 5.5 million equivalent) financed by the European Commission through the Rapid Social Response-Adaptive and Dynamic Social Protection (RSR-ADSP). The intervention represented the second phase of the Emergency Cash Transfer (ECT II) to cover 39,000 traders in the informal sector and low paid workers in the service and tourism industry exclusively in the Western Area Urban. In May-June, 2021, NaCSA and stakeholders targeted, enrolled and paid 37,047 (Thirty-Seven Thousand and forty-Seven) beneficiaries.

After providing benefits for about 34,000 beneficiaries, the ECT II exercise was temporarily halted by an incident of stampede at one of the pay points that caused injuries to some beneficiaries¹. NaCSA management was required by the World Bank to follow-up on the incident and produce a report on the root cause including a safeguard corrective action plan. After receiving report on the incident and the Root Cause Analysis (RCA)², the World Bank requested NaCSA to provide further information on security measures that are in place prior to granting no objection for resumption of the exercise of dealing with the residual caseload of the ECT II beneficiaries.

Security mitigating measures for ECT II were established by NaCSA and whilst plans are on the way to resume payment exercise of the residual case of ECT II of 4,400 beneficiaries, Sierra Leone is once more exposed to another shock relating to impacts on food and fuel price increases triggered by the war in Ukraine. The Government is putting measures in place to cushion the effect on 35,000 beneficiaries (mostly the extreme poor) vulnerable to food insecurity in district towns through triggering of the Contingent Emergency Response Component (CERC) of the Productive Social Safety Net and Youth Employment (PSSNYE) Project. Funds from the CERC will be used to provide a one-time cash transfer for horizontal scale-up of the ECTs covering an

¹ On Tuesday, May 11, 2021, there was a stampede at the RCB Bank facility at Murray Town Junction, used as one of the pay points for the ECT II. Sarah Kargbo, a petty trader, was among others who were on a queue to receive the benefit. Sarah was pushed to the ground; she suffered bleeding and lost her three-month old pregnancy.

² Annex 1- Root Cause Analysis

additional 35,000 beneficiary households. The third phase of the ECTs (ECT III) will cover the 11 district towns that have not benefited from the ECT I and II.

Given that the ECT III occurs during an election season, NaCSA will be required to act decisively to minimize overlaps with election activities. As part of the security measures adopted as recommended by the Bank, the Commission will not conduct any targeting and payment activities within the 6-month period before the election, therefore targeting and payment will be completed before end of December 2022.

2.0 Stakeholder Engagement on Security Measures

As provided in the RCA, NaCSA engaged relevant stakeholders to ensure a beneficiary and vulnerable friendly environment during verification, targeting, enrolment and payment of the ECT II residual cases. NaCSA held meetings (see Annex 2 – minutes of meetings) with Sierra Leone Police (SLP), Republic of Sierra Leone Armed Forces (RSLAF), Ministry of Health and Sanitation (MoHS), Ministry of Social Welfare (MSW), Sierra Leone Red Cross Society (SLRCS), Anti-Corruption Commission (ACC), and Rokel Commercial Bank (RCB). The primary objective of the meetings was to develop a Security Management Plan (SMP) for implementation of the SSN Project and the possibility of involving the public security personnel in the ECT II and the forthcoming ECT III under the PSSNYE Project.

As achieved at the stakeholder planning meeting for the resumption of the ECT II, NaCSA will engage the public security institutions (SLP and RSLAF) to provide security cover for the targeting, enrolment and payment of 35,000 beneficiaries of the ECT III in the district towns. Also, the other stakeholders including ACC, SLRCS, MSW and MoHS will be engaged to provide health and safety measures, monitoring and oversight during the activities.

3.0 Engagement of Public Security for the PSSNYE Project

Documenting the role of the Public Security Personnel is crucial to their participation in the PSSNYE Project. The SLP and the RSLAF have completed a joint operational order that will serve the purpose of a terms of reference and code of conduct for security personnel participating in the PSSNYE activities. The roles and responsibilities (see Annex 3 – Roles and Responsibilities) of the stakeholders contained in the RCA presented and discussed at the meeting will provide useful guide of the stakeholder involvement in the proposed ECT III. Moreover, during the implementation, NaCSA and ACC will share existing Code of Conduct and Standard Procedures (Annex 4 – Code of Conduct) for Preventing Sexual Gender Based Violence. The Code outlines standard principles and guidelines for prevention and mitigation of

sexual exploitation and sexual harassment. The Code will protect beneficiaries and provide directives on the conduct of officials in dealing with beneficiaries of the PSSNYE Project. In the medium term, the Commission is working with the relevant institutions including the security forces to draft and finalize a Memorandum of Understanding (MoU) on participation in the PSSNYE project.

While developing the MoU or agreement, the following points are suggested as risk reduction measures at the stakeholder meetings:

- a) Joint stakeholder assessment of targeting and enrolment centres. NaCSA will allocate caseload per centre to reduce overcrowding and sequence the process to alleviate incidents of long queues at the payment points.
- b) NaCSA will share the list of centres with the security institutions at the regional level and other relevant stakeholders and publish names of beneficiaries per targeting centres; this will happen a day before commencement of targeting and enrolment.
- c) NaCSA will develop and share a comprehensive and inclusive public and media information on the ECT III using variety of communication mechanisms including PA System, radio discussions, megaphones, SMS and Phone-in-call. The Message dissemination will be done in various local languages (see Annex 5- Communication Strategy for ECT III).
- d) A standby ambulance and contact will be arranged by MoHS and/or SLRCS to respond to emergency situations. Prior to implementation of the ECT III, the SLRCS and MoHS will train the implementation team as first responders to health emergencies on first aid, health tips and provide first aid kits and safe havens to treat emergency situations that may arise at the pay points.
- e) SLP and the RSLAF will jointly ensure a peaceful queue management at centres.
- f) SLP and RSLAF customised the existing Operational Order (OO) to suit the ECT II exercise with emphasis that use of force will be avoided as best as possible but will apply minimal force only for preventive and defensive purposes in proportion to the nature and extent of the threat. The OO will be extended to cover the ECT III security.
- g) The RSLAF consented to make available facilities at the respective barracks earmarked for the points of payment for ECT II beneficiaries by RCB. As best as possible, during the ECT III, similar arrangements will be made at the at district towns, where there are military barracks.
- h) SLRCS to position trained emergency response personnel as first aid responders during emergencies in district towns.
- i) Based on the case load and the current liquidity management challenge confronting banks, the team will maintain the ECT II agreed daily beneficiary quota allocation across targeting and enrolment centres not exceeding 400, and payment centres not exceeding 200 in a day.
- j) Considering the current security situation, NaCSA will constitute a high-level oversight monitoring comprising representatives from all relevant institutions including SLP, RSLAF, SLRCS, MoHS, ACC, MSW during implementation of ECT III in the district towns.

- k) Payment Service Providers (PSPs) to ensure availability and apprise the stakeholder on a daily basis of level of preparedness and availability of sufficient cash before commencement of payment across all points of payment.
- l) MSW to provide psychosocial training and support to the implementation team at the pay points.

Provision and composition of the security personnel is an important step in engaging the service of public security cover for the PSSNYE Project. Before commencement of the exercises, SLP and the RSLAF will provide a list of personnel to be deployed to targeting, enrolment and payment centres. The security forces covering activities of the PSSNYE Project will comprise a significant number of female personnel with appropriate briefing in keeping peace and crowd control applying minimum force as and when necessary. The list should include all relevant information of the personnel including contact details, summary of assigned roles and responsibilities of the deployed personnel and contact of supervisors.

During the implementation of the ECT III, there will be a high-level oversight monitoring team including representatives of RSLAF, senior management staff of NaCSA, ACC, MoHS, MSW and SLRCS and SLP³. The high-level monitoring team assisted with social media engagement⁴ will be visiting the centres to assess the security performance and provide further instructions where necessary.

Monitor security performance on an ongoing basis. The high-level oversight monitoring team will oversee monitoring performance of the deployed security personnel. The team will include representatives of SLP and RSLAF management including the Local Unit Commanders (LUC) of Police in the district towns. Similar representation will also come from the MoHS, MSW and the SLRCS. The high-level monitoring team will conduct site visits to assess and guide the security operations at the centres.

Security personnel background screening will be undertaken prior to deployment for the ECT III exercise. NaCSA and stakeholders will further discuss and agree on how individuals assigned to the project will be properly vetted for ethical and other issues including allegations

³ Deputy Inspector General of Police and two Assistant Inspector General of Police have consented to join the oversight monitoring team.

⁴ The contacts of the senior management of both forces have been shared with the team at NaCSA. There is currently an established WhatsApp group that comprises of the Commissioner and deputy Commissioner of NaCSA, Deputy Inspector General of Police, two Assistants Inspector General of Police, the Deputy Chief of Defence of the RSLAF, the permanent Secretary of the Ministry of Health and Sanitation, the Secretary General and Director of Communication of the Sierra Leone Red Cross Society, the director of National Social Protection Secretariat and other middle level staff.

of past abuses, and inappropriate use of force. Records on other criminal activity and wrongdoing will be considered prior to allowing an individual to be assigned to participate in the project.

Maintaining crowd control involving peaceful and vulnerable population of the society will require assurance that the appropriate security personnel equipment is utilized. During the pre-deployment engagement with the security institutions, the Commission and other stakeholders will continue discussions to emphasize the point that there will be no use of firearms, ammunition or any lethal weapons. However, useful equipment including radio, telephone and vehicles will be used for efficient operations of the security.

Security use of force has been widely considered as paramount to the involvement of the public security personnel in the ECT III exercise and other PSSNYE activities. During meetings with the security force, the stakeholders underscored the point that the use of force will be strictly prohibited as the categories of people secured are the vulnerable and extremely poor. Discussion was also established around avoidance of threat, molestation and marginalization of beneficiaries. Most Importantly, the stakeholders have discussed and agreed that there will be minimal contact of security personnel with beneficiaries; NaCSA, ACC and other stakeholders will form the frontline staff to deal directly with beneficiaries. The security personnel will only be involved in instances necessary to maintain queue and crowd control. Further sensitization on the PSSNYE Project's principles will be delivered to security personnel on pre-deployment talks.

Security personnel training is considered of crucial importance to participation in the PSSNYE activities. NaCSA does not have a role in deciding on the appropriate training of security personnel for participation in the PSSNYE Project. However, it has been suggested that in the medium to long term, the security forces will position personnel trained with the relevant skills to manage and control crowd in a peaceful manner. It has been further emphasized at the meetings that health and safety of the beneficiaries will be well protected and the project grievance redress mechanism will be activated to limit the role and/or potential abuses of the security personnel in dealing with arising matters at the centres. Other stakeholders including SLRCS, MSW, MoHS and NaCSA staff will ensure personal health and safety of the beneficiaries is upheld during the ECT III exercise.

Allegations of misconduct is rife in past involvement of security personnel in the ECT exercise. NaCSA and stakeholders including the ACC are suspicious of the tendency of corrupt practices in the conduct of security forces during past ECT activities. According to observation, it is a situation occasioned by the ad hoc method of engagement of security personnel. However, with the current constructive engagement process employed by the Commission, it is very unlikely that there will be a recurrence. During the meetings, the security forces and the other personnel have been reminded about the presence and roles of the ACC with the mandate to

arrest, investigate and prosecute alleged corrupt practices. This measure is intended to serve as mitigation to security personnel and any other staff involved in PSSNYE Project.

4.0 Measures to Identify and Support Vulnerable and Marginalized People

In conducting the targeting, enrolment and payment of the 35,000 cases of ECT III in 11 district towns affected by the impacts of food and fuel price increases caused by the ongoing Ukraine war, NaCSA and stakeholders will adopt a three-stage targeting method consisting of: geographical targeting; categorical targeting of (i) female headed household, (ii) persons with disabilities, and (iii) elderly headed households in varying proportions as shown below; and proxy-means testing.

Table 1: Targeting, Enrolment (vulnerability type)

| District Name | Headquarter town | Beneficiary distribution | Households with a PwD | Female-headed households | Elderly-headed households |
|---------------|------------------|--------------------------|-----------------------|--------------------------|---------------------------|
| Kailahun | Kailahun | 3874 | 897 | 1900 | 1078 |
| Kono | Koidu | 5315 | 1066 | 2589 | 1660 |
| Falaba | Bendugu | 2169 | 250 | 1275 | 644 |
| Koinadugu | Kabala | 1956 | 343 | 1090 | 523 |
| Tonkolili | Magburaka | 3940 | 664 | 2272 | 1004 |
| Kambia | Kambia | 3043 | 552 | 1561 | 930 |
| Karene | Kamakwie | 3150 | 586 | 1610 | 955 |
| Bonthe | Bonthe | 1775 | 334 | 870 | 572 |
| Moyamba | Moyamba | 3779 | 773 | 2001 | 1006 |
| Pujehun | Pujehun | 4047 | 792 | 2183 | 1072 |
| W Area Rural | Waterloo | 1952 | 273 | 1241 | 439 |
| Total | | 35000 | 6528 | 18592 | 9881 |

Source: WB Technical Support

As these are the extreme poor of society, NaCSA will engage and sensitise stakeholders on objectives of prelisting marginalised and vulnerable people to benefit from the ECT III. NaCSA will deploy systems of community targeting of the PSSNYE by forming Community Identification Committees (CICs) in the district towns. The CICs will be engaged in sensitizing on the selection criteria. Other issues will include compliance with orders relating to crowd comportment and ensuring that the most vulnerable and marginalised are given priority.

During the training of targeting, enrolment and payment teams, emphasis will be placed on identification and support to vulnerable and marginalised potential beneficiaries. Prior to the implementation of the ECT III, the Commission, through the National Social Protection Secretariat (NSPS), will hold meetings with local authorities to discuss the selection criteria and emphasize the rules at the centres.

The Commission has identified Sign Language interpreters who would also be part of the IEC team to disseminate information to beneficiaries with hearing and speech impairments. Each of the interpreters will be assigned to a targeting and enrolment centre and payment point. There are also existing working and collaborative relationships between NaCSA and the National Commission for Persons with Disabilities (NCPD), Sierra Leone Union of Disabilities Issues (SLUDI) and other Disable Persons Organisations (DPOs) to participate in the ECT III. The representatives of these institutions will be part of the high-level monitoring team and will provide support needed to further identify and support vulnerable and marginalised persons especially persons with disabilities.

In the selection of centres, it will be ensured that the access is disabled friendly with wash facilities to adhere to the Covid-19 precautionary measures. There will be a joint assessment of the centres and points of payment to ensure that the centres are properly positioned to accommodate all categories of beneficiaries including persons with disabilities, pregnant and lactating women. The IEC team will further provide sensitisation messages on dealing with vulnerable and marginalised persons.

During implementation, the Commission will explore its established two-queueing system; one for the marginalised/vulnerable group (including pregnant/lactating women, aged, and persons with disabilities) and another for the rest of the beneficiaries. Additional information will be disseminated at various targeting and enrolment centres and points of payment. Also, some arrangements with nearby community stakeholders will be made to provide basic seating accommodation especially for the vulnerable groups.

5.0 Targeting, Enrolment and Payment Plan

NaCSA will hold meetings with the relevant stakeholders including Statistics Sierra Leone (Stats SL), SLP, RSLAF, SLRCS, ACC, PSPs, MoHS, and MSW to discuss implementation of the ECT III in the district towns.

While Stats SL will perform the traditional role of conducting the Proxy Means Test and NaCSA handle the enrolment of beneficiaries, ACC will be in charge of monitoring the process of prelisting beneficiaries by the CICs and other related activities. The process will assist in the strategy of sequencing beneficiaries according to date of targeting and enrolment or issuance of e-voucher to collect benefits at the pay points. A beneficiary will only show up at a payment point after being targeted, enrolled and issued an enrolment certificate and e-voucher/e-payment transfer; and this point is emphasized on the messaging during the communication campaign of the ECT III.

At the stakeholder meetings, the team formation will be discussed with security, health and safety considerations. Guided by the separate roles and responsibilities of the various

stakeholders, the entire targeting, enrolment and payment exercise will span a period of 7 to 13 days based on the case load per district town as shown in the table below.

Table 2: Targeting, Enrolment and Payment Plan of ECT III Beneficiaries

| District Name | Headquarter town | Beneficiary | Bens/day/centre | No. of days | Bens/ Centre | bens/pay point | No. of Centres | No. of Pay Points |
|---------------|------------------|--------------|-----------------|-------------|--------------|----------------|----------------|-------------------|
| Kailahun | Kailahun | 3874 | 66 | 10 | 400 | 400 | 6 | 3 |
| Kono | Koidu | 5315 | 57 | 13 | 400 | 400 | 7 | 4 |
| Falaba | Bendugu | 2169 | 46 | 7 | 320 | 320 | 7 | 4 |
| Koinadugu | Kabala | 1956 | 48 | 8 | 240 | 240 | 5 | 3 |
| Tonkolili | Magburaka | 3940 | 65 | 10 | 400 | 400 | 6 | 3 |
| Kambia | Kambia | 3043 | 85 | 8 | 400 | 400 | 5 | 2 |
| Karene | Kamakwie | 3150 | 82 | 8 | 400 | 400 | 5 | 2 |
| Bonthe | Bonthe | 1775 | 48 | 7 | 240 | 240 | 5 | 3 |
| Moyamba | Moyamba | 3779 | 68 | 9 | 400 | 400 | 6 | 3 |
| Pujehun | Pujehun | 4047 | 64 | 10 | 400 | 400 | 6 | 3 |
| WA Rural | Waterloo | 1952 | 48 | 8 | 240 | 240 | 5 | 3 |
| Total | | 35000 | 61 | 9 | 349 | 349 | 63 | 31 |

During implementation, the following actions recommended on the RCA for the ECT II will be followed to rectify some of the failures that led to the incident of stampede at pay points:

- The team will establish a total of sixty-three (63) targeting and enrolment centres to cover 35,000 potential beneficiaries with an average of 61 beneficiaries processed per centre per day. In a day, not more than 85 beneficiaries will be prelisted at a centre. Each team will conduct proxy means tests on a minimum of 46 and maximum of 85 beneficiaries in a day depending on the case load per district town.
- Having been engaged for the past ECT payments, RCB has committed to improve on payment delivery time by establishing an average of 3 Points of Presence (PoP) per district, mostly located in military barracks. In other words, one PoP is aligned to serve two targeting and enrolment centres. On average, a PoP will service 122 beneficiaries in a day over an average period of 9 days. The PSP has assured the Commission that there will always be adequate cash and timely presence of staff to minimize crowds at the pay points.
- There will be varying number of teams per centre depending on the caseload. In all, there will be 63 teams equivalent to the number of centres; each comprising a NaCSA, Stats SL, ACC and PSP staff each to conduct targeting, enrolment and e-payment transfer. In addition, the PSP will deploy 31 points of presence to deliver payments.
- There will be 11 representatives from SLRCS, MSW, and MoHS each shared among the 11 district towns to participate in monitoring and oversight at the targeting centres and pay points.
- Understanding has been reached with the SLP and RSLAF for timely deployment of security personnel at centres during ECT III targeting, enrolment and payment exercises and use of

minimum force to deal with beneficiaries. Also, there has been understanding to continue assistance of military for housing the PoPs and/or increase security presence at the pay points.

- f) According to the understanding established with the security forces, there will be 40 public security personnel comprising equal number of police and military personnel; 20 police personnel to cover the targeting and enrolment centres during PSSNYE activities, while almost all the payment points will be located at the military barracks to be covered by the 20 military personnel.
- g) During the ECT II, NaCSA in agreement with the PSP relaxed the grace period for expiration of e-vouchers to help reduce the haste and rush to pay points. This concession will be extended to beneficiaries of ECT III. However, beneficiaries will be encouraged to cash e-payment transfers in not later than one-month period.

6.0 ANNEXES

Annex 1: Sierra Leone Social Safety Nets Project- Root Cause Analysis (RCA) And Safeguards Corrective Action Plan (CAP)

1.0 Background

On 28th August 2020, WB approved third additional finance (AF3) of EUR 4.9 million (US\$ 5.5 million equivalent) financed by the European Commission through the Rapid Social Response-Adaptive and Dynamic Social Protection (RSR-ADSP). The second phase of the Emergency Cash Transfer (ECTII) was implemented in Western Area Urban covering 39,000 beneficiaries in the informal sector comprising petty traders, low paid workers in the hospitality and tourism industry.

In October 2020, the stakeholders met to discuss and agree on implementation procedures and processes including registration of beneficiaries for e-payment delivery system, case management, data management, and setting up of points of presence (PoP) and crowd control procedures and processes. In May 2021, payment of 39,000 beneficiaries by the payment service provider (PSP) Rokel Commercial Bank (RCB) commenced after a very lengthy verification, targeting and enrolment process.

On day 4, of the implementation, Tuesday, May 11, 2021, at around 12:00 noon, there was a stampede at the RCB Bank facility at Murray Town Junction, used as one of the pay points. The RCB Bank facility was prepared to service an average of 110 beneficiaries in a day. Sarah Kargbo, 36 years and a petty trader, was among others who were in a queue to receive the ECT benefit of SLL1,309,000 (US\$135). Sarah was pushed to the ground; she suffered bleeding and lost her three-month old pregnancy. There were other beneficiaries involved in the stampede but according to the eye witness, no serious case of injuries was reported.

NaCSA was informed barely four months after the incident by a report of independent process evaluation team submitted to the World Bank. Management followed-up on the incident and produced the following report on the root cause of the incident including a safeguard corrective action plan.

1.1 Objective

The objective of the report is to provide analysis of the root-cause of a stampede which occurred during targeting, enrolment and payment of the ECT II leading to loss of three-month pregnancy of a beneficiary. The document will also propose a safeguard corrective action plan to prevent reoccurrence.

1.2 Methodology

On achieving the objective of the report, the project implementation team followed an effective method of engaging the relevant parties to gather firsthand and in some cases, reported information on the incident. The approach includes conducting a site visit and interviews. The team also examine the Emergency Response Manual (ERM) of the ECTII to determine its adequacy in dealing with health and safety issues.

2.0 Root Cause Analysis (investigation/findings)

When the ECT targeting and enrolment commenced, the PSP, RCB reported a case of shortage of cash to deliver payment to the caseload of 39,000 beneficiaries who were to receive one-off cash transfer of SLL1,309,000 (US\$135 equivalent). The issue of cash shortage was a national problem that affected every financial institution in Sierra Leone. The Central Bank got involved to help RCB (solve the cash shortage problem) but not much was done to adequately meet the demand for cash to cover the ECT payment. There were 13 centres targeting, enrolling and issuing e-vouchers, while RCB had only 6 PoPs for cashing e-vouchers. While the targeting, enrolment of beneficiaries and issuance of the e-vouchers went on smoothly, there was a mismatch between beneficiaries receiving the e-voucher and those who were able to cash the vouchers. At any point in time, there were more people who received the e-voucher than those who were able to cash it at the pay points. During the early period of the exercise, encashment level was placed at an average of only 30%.

As more people continue to receive the e-vouchers, there were build-ups of desperate crowd of people waiting at the pay points to be paid. There were reported cases of beneficiaries passing night at PoPs to get payment. Moreover, the ERM granted only 15 days' grace period for expiration of e-vouchers after issuance⁵. A beneficiary who fails to cash an e-voucher loses the chance of getting the benefit paid except after clearance by the Commissioner of NaCSA on the advice of the Grievance Redress Mechanism (GRM) team comprising NaCSA and Anti-Corruption Commission (ACC). This was communicated to the beneficiaries.

According to Sarah, the unfortunate incident occurred not necessarily out of recklessness of the security situation. There were two armed security guards from the Sierra Leone Police (SLP) force at the RCB facility at Murray Town junction. The stampede happened after a mad-rush of a crowd of people who were outside of the gate trying to access the pay point. The people outside the gate ceased advantage of the situation when the gate was open to allow access to a vehicle into the bank's premises. The pay point became chaotic and the queue where Sarah was waiting for payment got disorganized. The RCB official called-off the exercise and the desperate crowd got rowdier. Sarah was unfortunately pushed to the ground and many other people fell over on top of her. In the process she experienced some bleeding, she became unconscious and was rushed to the King Harman Road Government Hospital for treatment by other potential beneficiaries of the ECT. She lost her 3-month pregnancy. She was admitted for a day and discharged to continue treatment at home (see attached medical report). The incident was never reported to police.

⁵ To assist with reconciliation, the vouchers are redeemable for 15 days only, after which time the voucher is refunded to NaCSA. Beneficiaries are informed of this time limit when registering and via the communication campaign.

Following-up with Sarah Kargbo & Family

On Wednesday, 15th December 2021, at 10:30am, a team comprising NaCSA management including Dr Susan Robert, Senior Director, Programs Development, Regina Saffa, Director, Programs, Idris Turay, Director Social Protection Secretariat, Umaru Samai, IEC Officer, Hannah Buya-Kamara, WB long term Consultant, sitting in as an observer met with Sarah Kargbo at the NaCSA office of the Senior Director.

Sarah, age 36, is married and a mother of 2 kids. She disclosed that after the stampede, she was taken in an unconscious state to one of the King Harman Road Government Hospital where she was treated and informed that her 3-month pregnancy had gone. She informed the team that since she left the hospital, her condition has remained stable with no side effect after the treatment. She, however, could not tell the cost of her treatment as it was incurred by her husband.

When asked if she had any comment for the meeting; Sarah expressed appreciation for the benefit received on the Emergency Cash Transfer (ECT), a process she described as fair and objective. According to Sarah, she had already lost her business capital to the difficult times of the pandemic and receiving the support was a great relief. She is now in business after receiving the ECT.

The team decided to meet with the husband through a telephone call and this is what he had to say:

- a) That he was not present at the scene; he received a call at about 12:15 on the incident. He then rushed to the King Harman Road Government Hospital, where he met his wife in an unconscious state responding to treatment;
- b) She was treated and later discharged on the same day; and
- c) He incurred a medical bill of Four Hundred Thousand Leones (SLL 400,000)⁶.

On contacting the hospital, almost four-month after the incident, it was initially difficult to trace details relating to Sarah's case. However, with the consent and presence of the victim, the team's persistent effort paid off; NaCSA eventually secured the medical report of Sarah Kargbo. When questioned about the likely cost of such treatment, the hospital personnel (matron) replied that such case falls within the Free Medical Initiative for pregnant women and lactating mothers.

3.0 The Level of Security/Crowd Control Measures in Place

As part of its compliance with the insurance conditions for indemnity, the PSP is required to have at least two armed security guards from the Sierra Leone Police (SLP) force at the bank premises during business hours. The incident as already stated, happened at one of the RCB's branches. On the 11th May 2021, during day 4 of the ECT payment, RCB confirmed that there were two armed guards purposefully charged with security of the assets of the bank but not for crowd control. Hence, the incident that caused the stampede overwhelmed the capacity of the guards to manage the desperate crowd.

4.0 Sufficiency of the Measures to Minimize Risk

After the incident, the same day the stampede took place, action was immediately taken by the PSP to relocate the pay point to avoid a repeat of the incident. When Sarah returned after 5 days,

⁶ Equivalent of US\$40

the pay point had been moved to the Military Barracks at Murray Town, about 800 metres from the initial RCB Bank facility; she was paid at the Military Barracks pay point.

As a way to manage the crowd, RCB and NaCSA have decided to always increase the number of security guards at the pay points. The Deputy Commissioner of NaCSA paid a courtesy call on the Inspector General of the Sierra Leone Police to table a request for security presence at the targeting and enrolment centres throughout the ECT II exercise. The downside to this arrangement to ensuring increased number of security personnel at the targeting and enrolment centres is that the security personnel has not been dealing with crowd control involving the category of people (poor and vulnerable) receiving the ECT at payment points. Meanwhile, since it was experimented⁷, arrangement is in place for pay points to be relocated in military barracks where there was more space to accommodate hundreds of beneficiaries and had always remained orderly in the conduct of payment exercise throughout the remainder of the payment exercise.

In dealing with the overcrowding at the centres, five days after commencement of payment, the PSP and NaCSA decided to place beneficiaries in sequential order according to dates of issuance of the e-voucher to collect the benefit at the pay point. This approach drastically reduced the number of beneficiaries at the pay point. Beneficiaries who missed their dates are reported to the case management unit at the pay point for a rescheduled date.

5.0 Review of Health and Safety Procedures to Minimize the Risks of Future Accidents

At the pay point, the SSN project adheres to protocol that normally makes provision for vulnerable people to be given priority during payment exercise. This protocol is normally emphasized during the training of the implementation team. Unfortunately, the age of Sarah's pregnancy, which was only 3 months old was not visible enough to have caught the attention of the team. Otherwise, she would have definitely treated as one of those deserving help. Also, it was rather unfortunate that Sarah never disclosed her circumstance during the exercise.

Reviewing the Emergency Response Manual (ERM), it contained provision for health and safety measures limited to minimize the risk of spreading the contagion of the COVID virus. No provision is made to prevent potential incidents of crowd control at pay points. As the ECT was primarily designed around the systems developed for the SSN, it is reasonable to expect that the ERM would not have foreseen any risks of crowd control. Since the commencement of SSN payment in 2014, there has never been any incident of disorderly and riotous crowd behaviour at pay points. Moreover, during implementation of the SSN project provision is made for vulnerable people to be given priority during payment exercise.

With the incidents experienced at the pay points of the ECT II payment, there is need for a review of the ERM to incorporate health and safety measures relating to crowd control. In that regard,

⁷ There were unsubstantiated allegations of highhandedness in dealing with beneficiaries and in some cases extortion by security personnel demanding money from beneficiaries for preference to access payments. But the ACC is currently serving as major deterrent to the alleged negative behaviours of the security forces.

NaCSA and partners implementing ETC will collaborate with appropriate institutions including Sierra Leone Red Cross (SLRC), Sierra Leone Police (SLP) force, Sierra Leone Armed Force (SLAF) to deploy effective crowd control measures at pay points. The team will also work with Emergency Response unit at the nearby satellite clinics and Ministry of Social Welfare (MSW) to have health and safety sensitization and psychosocial services during ECT payment exercise.

6.0 Recommended Actions

During implementation of ECT, the following actions should be taken to rectify some of the failures that led to the incident of stampede at pay points:

- h) PSP to improve on payment delivery time by establishing more PoPs and ensuring that there is adequate cash and timely presence of staff at the pay point to minimize crowd at the pay points;
- i) Review ERM to relax grace period for expiration of e-vouchers⁸; if the Project continues with current PSP, this will help reduce the haste and rush to pay points and also encourage savings by the beneficiaries;
- j) Continue with strategy to sequence payments of beneficiaries according to date of targeting and enrolment or issuance of e-voucher to collect benefits at the pay points;
- k) Review ERM to capture health and safety risks relating to potential rowdy crowd situations at pay points;
- l) Pursue collaboration with the police for timely deployment and use of minimum force to deal with vulnerable people;
- m) Continue assistance of military for housing the PoPs and/or increase security presence at the pay points with special personnel trained on how to manage a crowd of vulnerable people;
- n) NaCSA will collaborate with professional health and safety institutions such as Sierra Leone Red Cross to train the implementation team as first responders to health emergencies at the pay points;
- o) NaCSA will engage with the Ministry of Health and Sanitation on training the implementation team on first aid, health tips and providing first aid kits and safe heavens to treat emergency situation that may arise at the pay points;
- p) NaCSA will collaborate with the Ministry of Social Welfare to provide psychosocial training and support to the implementation team at the pay points; and
- q) NaCSA management in consultation with the World Bank to consider a welfare package (reimbursement of medical fees) to the victim.

⁸ The question now arises about handling the reconciliation of payments; when is payment considered to be delivered has to be redefined. It is suggested that for reconciliation purpose, payment is considered delivered when e-voucher is issued to the “correct beneficiary” who will then take time to cash it in a window of period agreed with the PSP.

Table 3: Questions and Responses (People/Institutions) on the Stampede Incident

| Questions | Victim | Sierra Leone Police | Rokel Commercial Bank | Beneficiaries | WB Independent Process Monitor | Hospital Staff | Family members |
|---|---|---|--|--|--|--|---|
| Date of interview | 14 th December 2021 | 24 th December 2021 | 24 th December 2021 | 24 th December 2021 | 26 th December 2021 | 27 th December 2021 | 24 th December 2021 |
| Where you part of the Targeting, Enrolment and Payment of the Covid-19 Emergency Cash Transfer process? | Yes | Yes | Yes | Yes | Yes; I supervised the Independent Process Monitoring exercise | No. NaCSA has not been involving the health sector on targeting and payment processes. | No My wife was registered, verified, targeted and paid. |
| Which targeting center/pay point where you deployed/allocated/served? | Rokel Commercial Bank Murray Town Junction. | Rokel Commercial Bank Murray Town Junction pay point and other point of payment | Rokel Commercial Bank Murray Town Junction pay point and other point of payment | Ben 1: At Rokel Commercial Bank branch, Murray Town Junction pay point Ben 2: At Rokel Commercial Bank branch, Murray Town Junction pay point | I was roaming about the Western Area Urban | N/A | I was not part of the payment |
| Are you aware of any incidents of riotous conduct of crowd at pay points that led to a miscarriage? | Yes. I was directly involved. | No. No such incident was reported to the Sierra Leone Police and records show no report of similar cases. | No. The incident only came to our notice after the independent monitor's report was presented. | Ben 1: No. Upon collecting my benefits, I left immediately. But I was informed about events. Ben 2: Yes; I experienced the stampede incident at the RCB facility at Murray Town Road. I was one | I am not aware of the specific incident but I heard of several crowd action at various pay points. The incident in question was reported at a Focus Group Discussion conducted as part | N/A | Yes. I was called that my wife has collapsed in a stamped in the process of receiving the ECT benefits. I immediately rushed to the pay point and took my wife to the King-Harman |

| | | | | | | | |
|--|--|----------------------|----------------------|--|--|-----|--------------------------|
| | | | | of those who assisted in evacuating Sarah Kargbo after the incident. | of the independent process monitoring exercise. | | road satellite hospital. |
| Are you aware of any damage caused by the incident other than the miscarriage? | No. After the medication, I am doing well and there has been no other complication. | Not to our knowledge | Not to our knowledge | Ben 1: Not aware Ben 2: There were other people who fell to the ground but with minor injuries. | I heard about people fainting at some pay points; I witnessed a few cases. | N/A | Not to my knowledge |
| Can you tell what caused the incident? | An incoming vehicle entered the bank's compound, the crowd of beneficiaries rushed into the compound. It was in the process that I felt uncomfortable and unconscious. | Not to our knowledge | Not to our knowledge | Ben 1: Not aware Ben 2: A crowd of people entered the RCB facility in rush from outside through the gate. | It's all about the rush at pay points to collect the benefits. There were apparently fewer pay points and shortage of cash to meet the demand for payment. | N/A | Not actually |
| Did the victim receive First Aid care | Yes | Not to our | Not certain | Ben 1: I don't | I didn't get any prompt | N/A | Yes |

| | | | | | | | |
|---|--------------------------------------|-------------------------------|---|--|---|-----|---|
| response? | | knowledge | | know. Ben 2: No | information on the incident as a result couldn't comment on the treatment of the victim. | | |
| How do you think we can prevent such incident from recurring? | | Improve on security situation | Reduce the number of beneficiaries to be paid per day and give priority to vulnerable beneficiaries | Ben 1: Register beneficiaries in phases Ben 2: Speed up the payment process and have adequate cash at the pay points. | Have many pay points; process payment faster and make cash available. Most importantly, improve on the security presence at the pay points. | N/A | I was not there so I cannot tell |
| Did you receive any other complain of miscarriage emanating from the Emergency Cash Transfer? | N/A | No | No | Ben 1: No Ben 2: No | No. | N/A | No |
| Was any cost incurred in treating the victim? | I don't know but my husband can tell | | | Ben 1: No Ben 2: I don't know | I couldn't comment treatment as I only got to know about the incident well after it occurred. | N/A | Yes. I spent Four Hundred Thousand Leones (SLL 400,000) |
| Who took care of the medical bill? | My husband | N/A | N/A | Ben 1: No knowledge Ben 2: I don't know | Same as above | N/A | My husband |
| Was the victim referred for further medical care? | No | N/A | N/A | Ben 1: No knowledge Ben 2: I don't know | Same as above | N/A | Yes |
| What is the current status of the victim, (referred for treatment discharge) | I am doing well at the moment | | | Ben 1: No knowledge Ben 2: I don't know | Same as above | N/A | Not always too well |

Table 4: Safeguard Corrective Action Plan (SCAP) of ECT II

| Action to be taken | Timelines | Responsibilities | Monitoring Plan |
|---|---|-------------------------|--|
| Review ERM to relax grace period for cashing of e-vouchers, if the current PSP is used, to help reduce rush to the pay point and encourage savings by the beneficiaries. | 4 th February 2022 | NaCSA, NSPS, & WB | <ul style="list-style-type: none"> Revised version of ERM shared with the WB |
| PSP to improve on payment delivery by establishing more pay points and ensuring adequate cash and timely presence of staff at the pay point to minimize crowd at the pay points | 7 th February 2022 | NaCSA, NSPS, PSP, & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence, and crowd situation at the pay point. NaCSA management (contract manager) to communicate findings on a daily basis to the PSP top management |
| Continue with strategy to sequence beneficiaries according to date of targeting and enrolment or issuance of e-voucher to collect benefits at the pay points | 7 th February 2022 | NaCSA, NSPS, PSP, & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence, and crowd situation at the pay point and level of control. |
| Review ERM to capture health and safety risks relating to rowdy crowd situations at pay points; | 7 th February 2022 | NaCSA, NSPS & WB | <ul style="list-style-type: none"> Revised version of ERM shared with the WB |
| Pursue collaboration with the Sierra Leone Police (SLP) for timely deployment and use of minimum force to deal with vulnerable people; | Ongoing till 15 th February 2022 | NaCSA, PSP, SLP & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash position, staff presence (PSP, NaCSA, security personnel), and crowd situation at the pay point and level of control. |
| Seek assistance from the Sierra Leone Armed Force (SLAF) to continue housing the PoPs and/or increase security presence at the pay points with special disciplined personnel to manage crowd of vulnerable people | Ongoing till 15 th February 2022 | NaCSA, PSP, SLAF & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence (PSP, NaCSA, security personnel), and crowd situation at the pay point and level of control. |
| Collaborate with professional health and safety institutions such as Red Cross to train implementation team as first responders to health emergencies at the pay points | Ongoing till 15 th February 2022 | NaCSA, NSPS, SLRC & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence (with the requisite training), and crowd situation at the pay point |
| Engage with the Ministry of Health and Sanitation on health and safety training and providing first aid kits and safe heavens to | Ongoing till 15 th February 2022 | NaCSA, NSPS, MoHS & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of preparedness of the pay points to accommodate emergency cases |

| | | | |
|--|---|------------------------|---|
| treat emergency situation that may arise at pay points | | | |
| Collaborate with the Ministry of Social Welfare to provide psychosocial training and support to the implementation team at the pay points | Ongoing till 15 th February 2022 | NaCSA, NSPS, MSW & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, staff presence (with the requisite training), and crowd situation at the pay point |
| NaCSA management in consultation with the World Bank to consider a welfare package (reimbursement of medical fees) to the victim. Meanwhile, NaCSA has proposed a financial package of One Million Leones (SLL 1,000,000) on humanitarian grounds to be provided by NaCSA. | 20 th February 2022 | NaCSA, WB, MSW, ACC | <ul style="list-style-type: none"> ACC to follow-up and establish cost of medical care incurred by the victim; and MSW to conduct psychosocial assessment of the victim and advise NaCSA & WB |
| Prepare the security engagement plan/protocol or the security personnel management plan (SPMP) | 20 th February 2022 | WB, NaCSA | <ul style="list-style-type: none"> NaCSA to relate with Environment Social Safeguard team of the WB to secure and incorporate protocol in the SPMP |
| NaCSA and stakeholders to report incident or accident to the World Bank within 24-48 hours after learning of it. | As and when necessary | NaCSA, ACC & WB | <ul style="list-style-type: none"> The SPMP will include an action that NaCSA and ACC will report incident to WB within 24-48 hours after it's known. |

Annex 2: Minutes of Meetings on Security Measures

Multisectoral Approach to the Development of Security Management Plan (SMP)

Minutes of Meeting on Tuesday, 18th January, 2022:

NaCSA team held meetings with the following stakeholders:

- Sierra Leone Police
- Republic of Sierra Leone Armed Forces (RSLAF)
- Ministry of Health and Sanitation

The team also visited the Ministry of Social Welfare but the Minister and the Permanent Secretary were present and the secretaries promised to provide feedback after engaging the Ministry's authorities. An invite was extended to the Sierra Leone Red Cross Society to attend a meeting on Thursday 20th January, 2022.

Action Points

| Action | Delivery Timeframe | Responsible Persons/Institution |
|--|--------------------------------|--|
| Create a WhatsApp Group for to enhance communication with all relevant institutions. | As soon as possible | NaCSA |
| Share report of the previous payment, the ECT II Emergency Response Manual and all project relevant documents | Before next Meeting | NaCSA |
| Sierra Leone Police to form a committee and involve the relevant regional command. | As soon possible | SLP |
| Public education and media engagement on the processes and procedures of payment | Before payment | NaCSA and Partners |
| SLP to host another meeting with all stakeholders | 20 th January 2022 | NaCSA/SLP |
| Joint venue assessment | Before payment | NaCSA/RSLAF, SLP, SLRCS, MoHS, MSW |
| In working with the RSLAF, NaCSA must send in letter, filled security form, request to use military establishment. | Before payment | NaCSA |
| The Ministry of Health to attend the Meeting schedule for Thursday, 20 th January, 2022 | 20 th January, 2022 | MoHS |
| Commence discussions with the Secretary General of the Sierra Leone Red Cross Society. | 19 th January, 2022 | NaCSA |

Minutes of Meeting on Thursday 20th January 2022:

Background and Rationale

With the outbreak of the Covid-19 and as part of the contingency funding of the Social Safety Nets Project, the world Bank provided the sum of US\$4 million for the GoSL to provide emergency cash transfers (ECTs) to *Protect the wellbeing of households that are expected to be especially vulnerable to the impacts of COVID-19*. The ECT provided these targeted households with financial support to help them cope with the immediate negative impact on their wellbeing, smoothing consumption and supplementing lost or reduced income.

The transfer amount to each beneficiary was Le1,309,000 with coverage in the regional headquarter towns of Makeni, Portloko, Kenema, Bo and Freetown. Following the implementation of the first phase of the Emergency Cash Transfers (ECT I), the European Union through the World Bank provided the sum of US\$5.5 million to further provide support to thirty-nine thousand (39,000) petty traders, people in the informal sector in small and micro enterprises and low paid workers in the service industry. This intervention was termed as the ECT II with exclusive concentration in Freetown.

On Friday, 14th October 2020, the National Commission for Social Action (NaCSA) commenced the verification of 39,000 potential beneficiaries of the ECT II in all markets and street settlements across Freetown, including potential listed beneficiaries from the Ministry of Labor and Social Security (MLSS) and the Ministry of Tourism and Cultural Affairs (MoTCA).

In May-June, 2021, NaCSA and its partners targeted and enrolled 37, 047 beneficiaries. So far, Rokel Commercial Bank has paid 32,342 beneficiaries after a very lengthy verification, targeting and enrolment process.

On day 4 of the implementation, Tuesday, May 11, 2021, there was a stampede at the RCB Bank facility at Murray Town Junction, used as one of the pay points. Sarah Kargbo, a petty trader, was among others who were in a queue to receive the benefit. Sarah was pushed to the ground; she suffered bleeding and lost her three-month pregnancy. NaCSA was informed barely four months after the incident by a report of independent process evaluation team submitted to the World Bank. Management followed-up on the incident and produced a report on the root cause of the incident including a safeguard corrective action plan.

In response, the World Bank advised the Commission to develop a Security Management Plan (SMP) before the commencement of payment of remaining caseload of 4,400 beneficiaries. The development of SMP requires an intensive engagement with relevant Government Ministries, Departments and Agencies including RSLAF, SLP, MoHS, SLRCS etc.

Feed Back/Action Points

| | |
|--------------|--|
| SLP | <p>The Sierra Leone Police indicated that:</p> <ul style="list-style-type: none">• Having carefully looked at the outcome of previous meetings, it has been concluded that there was inadequate Security Personnel during the recent payment• The venue was also critical and there should be a close look at venue intended to be used during the next payment.• RCB and the ACC should be invited in the next meeting• Further work to be done on the media approach and strategy• The SLP will develop the Operational Order which will state terms of reference for individual institution and will be later shared with stakeholders• The AIG will communicate date of next meeting after giving the DIG of Police update of today's meeting |
| RSLAF | <ul style="list-style-type: none">• The Military expressed optimism and readiness to support NaCSA in the development of the SMP and during payment but there is for planning. |
| MoHS | <ul style="list-style-type: none">• The role is to provide health security and the ministry is ready to supports with First Aid Kits, Ambulances and Train Personnel |
| SLRCS | <ul style="list-style-type: none">• The SLRCS will provide expertise on handling health emergencies and training of personnel on such. |

Minutes of Meeting on 27th January, 2022

Following the Individual prayers, the minutes of the 20th January 2022 was read by Umaru Samai and Adopted by all attendees. The adoption was presented by AIG Sahr Senesie and seconded by Isata Blake.

The discussion points were on the risk reduction pathways which have been highlighted below:

Summary of Overall Suggested Risk Management Pathways

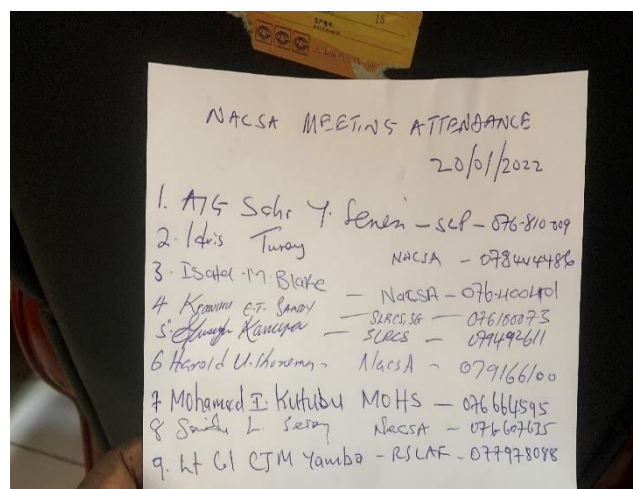
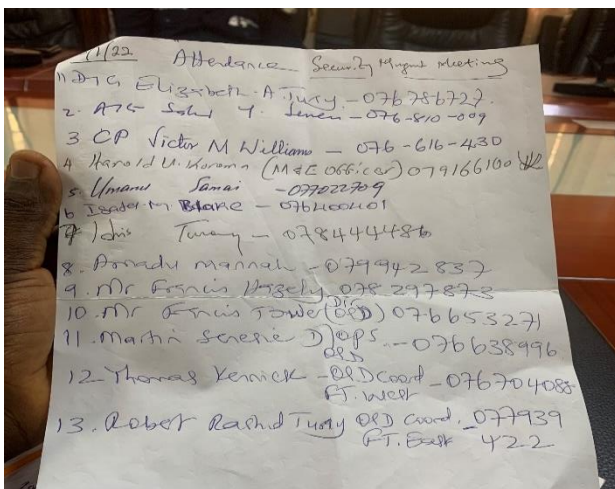
- a) Joint Institutional assessment of targeting and enrolment centres.
- b) Ensure a comprehensive and inclusive public and media relations using variety of communication mechanisms including PA System, Radio and Television discussions, megaphones, SMS and Phone-in-call. The Message dissemination should be done in various local languages.
- c) Publication of names of beneficiaries per centre. This should happen a day before commencement of targeting and enrolment.
- d) A standby ambulance for emergency.
- e) The Sierra Leone Police and the Republic of Sierra Leone Armed Forces will jointly ensure a fair queue management.

- f) The Sierra Leone Red Cross Society to position its trained emergency response personnel for first aid treatment.
- g) Daily targeting and enrolment quota allocation across all centres of least 50-100 beneficiaries per day.
- h) High-Level oversight monitoring with representatives from all relevant institutions including SLP, RSLAF, SLRC, MoHS, MSW.
- i) PSPs to ensure availability of cash before commencement of payment and that the cash should be available across all points of payment.
- j) The SLP to modify and adopt existing Operational Order before commencement of payment.



From L-R: CP Victor MW Williams, AIG Sahr Senesie, DIG Elizabeth Turay, SDS Isata Blake, DNSPS Idris Turay and M & E Harold Koroma.

Pc: POIEC Umaru Samai





GRM-ACC Patrick Monrovia and Lt. Col. CJM Yamba

Annex 3: Roles and Responsibilities of Partners

| Responsible Agency | Responsibilities |
|---------------------------|--|
| NaCSA, NSPS | <ul style="list-style-type: none"> • PSP to improve on payment delivery by establishing more payments and ensuring adequate cash and timely presence of staff at the pay point to minimize crowd at the pay points |
| NaCSA M&E | <ul style="list-style-type: none"> • NaCSA M&E team to monitor and provide daily update on level of PSP preparedness, cash position, staff presence (PSP, NaCSA, security personnel), and crowd situation at the pay point and level of control. • NaCSA M&E team and NaCSA management (contract manager) to communicate findings on a daily basis to the PSP top management |
| ACC | <ul style="list-style-type: none"> • ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence, and crowd situation at the pay point. • To conduct verification of all potential beneficiaries through their phone numbers and IDs. |
| SLP | <ul style="list-style-type: none"> • SLP to provide timely deployment and use of minimum force to deal with vulnerable people |
| RSLAF | <ul style="list-style-type: none"> • RSLAF to continue housing the PoPs and/or increase security presence at the pay points with special disciplined personnel to manage crowd of vulnerable people. |
| SLRCS | <ul style="list-style-type: none"> • SLRCS to provide trained personnel to serve as first responder to health emergencies at verification/enrolment centres and pay point respectively. |
| MoHS | <ul style="list-style-type: none"> • MoHS to provide first aid kits, safe heavens and nursing aid to respond to emergency situations that may arise at verification/enrolment centres or pay points. • To also provide ambulance services for the transportation of victim in case of an emergency |
| MSW | <ul style="list-style-type: none"> • The Ministry of Social Welfare to give out Psychosocial experts who will provide psychosocial support to the implementation teams at verification/enrolment centres and pay points |

Annex 4: Code of Conduct to be Signed by All Project Staff

ESHS, GB V Codes of Conduct and Action Plan Individual Code of Conduct Implementing ESHS and Standards Preventing Gender Based Violence

I..... acknowledge that adhering to environmental, social, health and safety (ESHS) standards and preventing Gender Based Violence (GBV) is important.

The National Commission for Social Action (NaCSA) and Stats SL, consider that failure to follow ESHS and GBV standards, be it at the office and surroundings or the surrounding communities- constitute acts of gross misconduct and therefore grounds for sanctions, penalties or potential termination of engagement. Prosecution by the Police of those who commit GBV may be pursued if appropriate.

I agree that while working on the project I will:

1. Consent to Police background check and /or Anti-Corruption Commission (ACC) probe.
2. Attend and actively partake in discussions and/or workshops related to ESHS, and GBV as requested by the Commission.
3. Will exercise care, caution, implement health safety measures and utilize WASH materials at all times when at the office and field or engaged in project related activities.
4. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
5. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
6. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
7. Not sexually exploit or abuse project beneficiaries and members of the surrounding communities.
8. Not engage in sexual harassment of work personnel and staff -for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature is prohibited, e.g. looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.
9. Not engage in sexual favors -for instance, making promises of favorable treatment (e.g. promotion), threats of unfavorable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts or other forms of humiliating, degrading or exploitative behavior.

10. Not use prostitution in any form at any time.

11. Not participate in sexual contact or activity with children under the age of 18-including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

ESHS/GBV Codes of Conduct and Action Plan

12. Unless there is the full consent by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.

13. Consider reporting through the GRM or directly to NaCSA Management or Stats SL or ACC any suspected or actual GBV by a fellow worker, whether engaged by the Commissions or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

14. Wherever possible, ensure that another adult is present when working in the proximity of children.

15. Not invite unaccompanied children unrelated to my family into my place of lodging.

16. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also "Use of children's images for work related purposes" below).

17. Refrain from physical punishment or discipline of children.

18. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.

19. Comply with all relevant local legislation, including labor laws in relation to child labor.

20. Take appropriate caution when photographing or filming children (See Annex 2 for details).

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

21. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.

22 Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.

23. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.

24. Ensure images are honest representations of the context and the facts.

25. Ensure file labels do not reveal identifying information about a child when sending images electronically.

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning. 2. Formal warning. 3. Additional Training. 4. Loss of up to half of my stipend. 5. Termination of engagement to participate in the targeting exercise 6. Report to the Police/ACC if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the health and safety management advice. That I will avoid actions or behaviors that could be construed as GBV. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, GBV issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing engagement.

Signature:

Printed Name:

Title:

Date:.....

Annex 5: Communication Strategy for ECT III

Objectives of the Communication Strategy⁹

- To establish a systematic approach to stakeholder engagement that will build and maintain a constructive relationship with all stakeholders
- To raise public awareness of the implementation of the ECT Program
- Provide accurate and timely information about the ECT program
- Manage expectations through sensitisation of beneficiaries and various stakeholders
- Ensure and promote transparency and accountability of the process and address issues relating to rumours, fears, and misconceptions about the program
- Facilitate communication among NaCSA, beneficiaries, communities, other government MDAs, donors, and other stakeholders
- Promote visibility of the programme
- Provide for the communication needs of persons with disabilities as best as possible by coordinating with NCPD and other agencies working with PWDs, e.g., SLUDI

The objectives would be achieved using a broad range of communication channels, providing beneficiaries with relevant program information and integrated information for all partners and stakeholders.

Target Groups of Communication Strategy

Potential Beneficiaries

- NaCSA will engage relevant local authorities including City and Local Councils to disseminate information about the program to this group of beneficiaries.

Partner Institutions

- Communication will also be tailored based on requirements and policies of relevant partner institutions. In the past, partner institutions and groups have comprised the World Bank, European Union, United Nations Children's Fund, Line Ministries, Departments, and Agencies, including the National Commission for Persons with Disabilities (NCPD), Sierra Leone Union on Disability Issues (SLUDI), Integrated Project Administration Unit, Payment Service Provider, Sierra Leone Association of Journalists (SLAJ), Women in the Media (WIMSAL), Reporters Union, Civil Society Organisations, City Councils, Anti-corruption Commission, Statistics Sierra Leone and Community Structures.

General Public

- This will include members of the targeted communities as well as national interest.

⁹ Some of the objectives listed are from the IEC section of the PSSNYE PIM

Proposed Communication Channels

Direct Engagement with Potential Beneficiaries

- Lessons learned during the implementation of the ECT I led to the formation of the PR Committee in Western Area Urban, which included representatives (mostly chairpersons) of trade associations and the Traders' Council. Engagement with the chairpersons of the various market associations through the targeting process effectively disseminated information among traders and markets as they have direct contact with potential beneficiaries. As the ECT III will vulnerable members of the community, the NaCSA field offices led by the DCs will form communication teams including the local/district councils, DPOs/NCPD/SLUDI, MSW and community stakeholders to disseminate uniform and standardized messages received from the IEC at NaCSA head quarter.

Mass Media

- NaCSA will extensively utilize mass media including radio, public address systems, television, and newspapers to disseminate messages. Discussion programs will be organized on radio and television stations covering the targeted areas to inform and educate beneficiaries and the general public about the program.
- Television discussions will include sign language interpreters to cater to the needs of the hearing impaired.

Press/News Releases

- NaCSA will issue press/news releases to update stakeholders and the general public with program background and information and developments relating to the program.

Posters, leaflets, and brochures:

- Pictorial posters to illustrate the key aspects of the program and processes will be produced. The posters will be used in the discussions and the broader communication campaign. The posters will also be displayed at sites of registration, enrolment, payment, and other strategic locations within targeted areas, such as local council offices and NaCSA district offices.
- Posters with messages on COVID-19 preventive measures will also be displayed at these sites. The team should also consider procurement timelines in producing posters.

Social Media:

Information will also be shared on various social media networks such as Facebook, Twitter, YouTube, etc., to inform people and solicit feedback and suggestions.

Messages of Communication

- Explain to beneficiaries in straightforward terms the scope and limitations of the program:
 - Program objectives
 - Eligibility criteria of the program
 - Targeting and payment procedures (including COVID-19 preventive measures during implementation), payment points, rights and obligations of beneficiaries
 - Messages for potential beneficiaries and the general public to be aware of the unauthorized registration and not paying to be registered

- Tenure of the Program
- The benefits package
- How and where to gain access to the program
- Where to report grievances (GRM)
- Labeling of the cash transfers for their intended use and expectations from the beneficiaries
- Cash transfer amount and frequency to mitigate uncertainty and facilitate optimal use
- The difference between the ECT III and the SSN Project, ECT I and III (objectives, scope, cash transfer amount, eligibility, duration, etc.)

Responsibilities of NaCSA

The scope of work for NaCSA on IEC activities encompasses the following six key tasks in the implementation of ECT III¹⁰:

- **Sensitisation:** Ensure overall visibility of the ECT program and promote awareness about its activities; sensitize beneficiaries and stakeholders and raise public awareness about the program. The messages should also clearly explain the targeting processes to prevent unauthorized registration.
- **Clarification:** Explain to beneficiaries in straightforward terms the scope and limitations of the program, targeting/eligibility criteria, implementation procedure, roles and responsibilities of actors (NaCSA, Stat SL, Payment Service Provider, ACC, etc.), and other facts about the program that are outlined in this manual. It is imperative that the messages developed explain the difference between ECT III and SSN Project activities, ECT I and III to avoid confusion among beneficiaries and the public.
- **Identification:** Coordinate outreach interventions with local councils, and other stakeholders.
- **Dissemination:** In collaboration with local councils, and other partners, including disability organizations, provide accurate and timely information on all activities of the program using the appropriate channel of communication.
- **Documentation:** Gather information, publications, and other materials about the program from various sources and maintain a record within the NaCSA Directorate office of the PSSNYE Project. Reports of the communication campaign should be produced to document challenges and results.

Table 7. Information Audience and Communication Activities Matrix

| Audience | Activities | Information |
|----------------------|---|---|
| Beneficiaries | <ul style="list-style-type: none"> - Produce promos and radio jingles to be aired on community media outlets - Produce and display user-friendly banners, posters, and other graphics - Collaborate with identified communities and disability organizations in disseminating relevant program information | <ul style="list-style-type: none"> - Program information on program objective, payment calendar (including when delays occur), tenure of program, cash transfer amount, payment points protocols, the intended use of the cash transfers, rights, and obligations, |

¹⁰ Source: PSSNYE Communication Strategy

| | | |
|---------------------------------|--|---|
| | | - GRM, registration procedures, and information on registration locations |
| Policy Makers and Donors | <ul style="list-style-type: none"> - Develop success stories and testimonies of beneficiaries. - Sharing information with the Government, NGOs/CBOs, and other development partners/donors | <ul style="list-style-type: none"> - Justify programme relevance - Success stories and testimonies of beneficiaries on how the programme benefits or impacts their lives |
| General Public | <ul style="list-style-type: none"> - Conduct spot interviews/vox pop to sample public opinion as an impact assessment etc. - Share information on the various social media networks such as Facebook, you tube, etc. to share programme information and solicit feedback in the form of comments and suggestions - Write articles for publication in newspapers and the secretariat website | <ul style="list-style-type: none"> - Create public awareness of the programme - Providing information about the program objectives as well as responding to questions and enquiries |
| Media | <ul style="list-style-type: none"> - News reporting - Hosting of radio and television programs - Public address systems | - Increase general visibility by establishing effective collaboration with media organizations |

Timing

Preparation for the Implementation the of the ECT III

The preparation stage will include:

- NaCSA is organizing consultative sessions with representatives of potential beneficiary groups, Local Councils, disability organizations, and targeted communities to develop a strategy that will be used to provide information to potential beneficiaries and the general public about the ECT III. PR teams led by NaCSA District Coordinators involving the local councils will disseminate messages to the potential beneficiaries.
- Raising the national level of information about the ECT III and providing accessibility of information for potential beneficiaries.
- Posters and banners to be displayed in strategic locations will also be prepared and produced.

Implementation of the ECT III

Tasks in the implementation stage will include:

- Inform beneficiaries that have been selected for the cash transfers
- Key messages of the program should be coordinated and shared with the public and implementing partners
- Provide relevant program information and procedures to the beneficiaries
- Information on the general roles and responsibilities of implementing partners and communities
- provide regular information to all stakeholders using the appropriate channels
- Inform society about results and progress during implementation

Evaluation of the Communication Strategy and Processes Used in the ECT Program

Tasks in the evaluation stage will include:

- Evaluating beneficiary and society level of information about the implementation process
- Evaluating the communication process between implementing partners
- Communication of results of the implementation of the program to all stakeholders and the public.

Annex 6: Safeguard Corrective Action Plan (SCAP) of Residual Caseload of ECT II

| Action to be taken | Responsibilities | Monitoring Plan |
|---|-------------------------|--|
| Review ERM to relax grace period for cashing of e-vouchers, if the current PSP is used, to help reduce rush to the pay point and encourage savings by the beneficiaries. | NaCSA, NSPS, & WB | <ul style="list-style-type: none"> Revised version of ERM shared with the WB |
| PSP to improve on payment delivery by establishing more pay points and ensuring adequate cash and timely presence of staff at the pay point to minimize crowd at the pay points | NaCSA, NSPS, PSP, & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence, and crowd situation at the pay point. NaCSA management (contract manager) to communicate findings on a daily basis to the PSP top management |
| Continue with strategy to sequence beneficiaries according to date of targeting and enrolment or issuance of e-voucher to collect benefits at the pay points | NaCSA, NSPS, PSP, & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence, and crowd situation at the pay point and level of control. |
| Review ERM to capture health and safety risks relating to rowdy crowd situations at pay points; | NaCSA, NSPS & WB | <ul style="list-style-type: none"> Revised version of ERM shared with the WB |
| Pursue collaboration with the Sierra Leone Police (SLP) for timely deployment and use of minimum force when dealing beneficiaries; | NaCSA, PSP, SLP & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash position, staff presence (PSP, NaCSA, security personnel), and crowd situation at the pay point and level of control. |
| Seek assistance from the Sierra Leone Armed Force (SLAF) to continue housing the PoPs and/or increase security presence at the pay points with | NaCSA, PSP, SLAF & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence (PSP, NaCSA, security personnel), and crowd |

| | | |
|---|-------------------------|---|
| special disciplined personnel to manage crowd of vulnerable people | | situation at the pay point and level of control. |
| Collaborate with professional health and safety institutions such as Sierra Leone Red Cross Society to train implementation team as first responders to health emergencies at the pay points | NaCSA, NSPS, SLRC & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, cash, staff presence (with the requisite training), and crowd situation at the pay point |
| Engage with the Ministry of Health and Sanitation on health and safety training and providing first aid kits and safe heavens to treat emergency situation that may arise at pay points | NaCSA, NSPS, MoHS & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of preparedness of the pay points to accommodate emergency cases |
| Collaborate with the Ministry of Social Welfare to provide psychosocial training and support to the implementation team at the pay points | NaCSA, NSPS, MSW & ACC | <ul style="list-style-type: none"> NaCSA M&E team and ACC to monitor and provide daily update on level of PSP preparedness, staff presence (with the requisite training), and crowd situation at the pay point |
| NaCSA management in consultation with the World Bank to consider a welfare package (reimbursement of medical fees) to the stampede victim. Meanwhile, NaCSA has proposed a financial package of One Million Leones (SLL 1,000,000) on humanitarian grounds to be provided by NaCSA. | NaCSA, WB, MSW, ACC | <ul style="list-style-type: none"> ACC to follow-up and establish cost of medical care incurred by the victim; and MSW to conduct psychosocial assessment of the victim and advise NaCSA & WB |
| Prepare the security engagement plan/protocol or the security personnel management plan (SPMP) | WB, NaCSA | <ul style="list-style-type: none"> NaCSA to relate with Environment Social Safeguard team of the WB to secure and incorporate protocol in the SPMP |
| NaCSA and stakeholders to report incident or accident to the World Bank within 24-48 hours after learning of it. | NaCSA, ACC & WB | <ul style="list-style-type: none"> The SMP will include an action that NaCSA and ACC will report incident to WB within 24-48 hours after it's known. |