



DIGITAL TRANSFORMATION & INCLUSIVE CONNECTIVITY PROJECT

STAKEHOLDER ENGAGEMENT PLAN

LECC STAKEHOLDER ENGAGEMENT PLAN

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Terms and Definitions

Term	Definition
Contractor	Service Providers(s) appointed by the Consultant for the construction of the Project, or portion of the Project.
Emergency:	Any unplanned event that can cause death, serious injury, significant environmental damage, or reputational harm.
Emergency Control Centre (ECC)	A pre-designated location (e.g., LEC Communications Headquarters) equipped with communication tools, maps, and emergency contact lists.
Environment	The aggregate of surroundings within which people exist. The environment is made up of: the soil, water and atmosphere; fauna and flora; any part, combination or interrelationships among these; and all the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.
Environmental Impact	The effect of an activity on the environment, whether desirable or undesirable. Undesirable or negative environmental impacts will result in damage to / or pollution of, the environment that could be immediate or delayed
Environmental Management Plan	A detailed plan of action prepared to organise and coordinate environmental mitigation, rehabilitation and monitoring so that positive impacts are enhanced, and negative impacts and damage to the environment are avoided, minimised or rectified where required.
Incident Commander (IC)	The designated individual on-site who assumes overall responsibility for managing the emergency response
Incidents	<p>An event or occurrence occurring at work or arising out of or in connection with the activities of persons at work, or in connection with the use of plant or machinery, in which, or in consequence of which:</p> <ul style="list-style-type: none"> Any person dies, becomes unconscious, suffers the loss of a limb or part of a limb or is otherwise injured or becomes ill to such a degree that he is likely either to die or to suffer a permanent physical defect or likely to be unable for a period of at least 14 days either to work or to continue with the activity for which he was employed or is usually employed; A major incident occurred; or The health or safety of any person was endangered and where: <ul style="list-style-type: none"> A dangerous substance was spilled. The uncontrolled release of any substance under pressure took place. Machinery or any part thereof fractured or failed resulting in flying, falling or uncontrolled moving objects, or machinery ran out of control.
Stakeholder	Communities, NGOs, service providers and governmental agencies whose departments govern, or will be affected by the proposed project planning, construction and implementation. This also includes customers of the proposed infrastructure

Acronym & Abbreviations

Abbreviation	Meaning
ADSS	All Dielectric Self-Supporting fibre
AfDB	African Development Bank
CSR	Corporate Social Responsibility
D.A	District Administrator
D.C.S	District Council Secretary
DOE	Department of Energy
DTIC-P	Digital Transformation and Inclusive Connectivity Project
ETL	Econet Telecommunications Lesotho
GRM	Grievance Redress Mechanism
GBV	Gender Based Violence
LEC	Lesotho Electricity Company
LECC	LEC Communications
MCC	Maseru City Council
MoHA	Ministry of Home Affairs
NGO	Non-Governmental Organisations
NOC	Network Operations Centre
PAP	Project affected Persons
PoP	Point of Presence
PPP	Public Participation Process
RoD	Record of Decision
RD	Roads Directorate
SEP	Stakeholder Engagement Plan
TIP	Trafficking in Persons
VCL	Vodacom Lesotho
WASCo	Water & Sewage Company

Table of Contents

1	<i>Executive Summary</i>	7
2	<i>Introduction</i>	13
2.1	Purpose	14
2.2	Project Overview.....	14
2.3	Objectives	15
3	<i>Scope</i>	15
4	<i>Regulation and Institutional Framework</i>	17
4.1	National Policies.....	17
4.1.1	Environmental Act (2008)	17
4.1.2	Communications Act (2012).....	17
4.1.3	National Strategic Development Plan II 2018 (NSDP II 2018)	18
4.1.4	Lesotho Communications Policy (2008)	18
4.2	International Standards	18
4.3	Institutional Roles	19
5	<i>Project Description</i>	21
5.1	Scope	21
5.2	Project Timeline and Phases	25
5.3	Potential Environmental and Social Risks of the Project.....	25
6	<i>Stakeholder Identification and Analysis</i>	28
6.1	Stakeholder Identification.....	28
6.2	Categorization of stakeholders.....	28
6.3	Stakeholder Profiling	29
6.4	Stakeholder Analysis	29
7	<i>Previous Engagement Activities</i>	33
8	<i>Stakeholder Engagement Methods and Tools</i>	38
8.1	Engagement Methods	38
8.2	Information Disclosure	38
8.3	Workshops and Technical Session.....	39
8.4	Monitoring and Feedback Tools	39
9	<i>Stakeholder Engagement Program</i>	43
10	<i>Grievance Redress Mechanism</i>	45
11	<i>Monitoring and Evaluation</i>	48
12	<i>Implementation Resources and Budget</i>	50
12.1	Human Resource Requirements.....	50
12.2	Budget.....	52

13	Conclusion.....	53
	Annexes.....	54
	Annex 1 – Evidence of Stakeholder Consultations	54
	Annex 2 – Stakeholder List and Contact Details	55
	Annex 3 – Sample Consultation Tools	57
	Annex 4 - GRM Form Templates	61

List of Tables

Table 1	Table showing the scope of the DTIC-P infrastructure per district.....	21
Table 2 :	Table showing Summary of the Project Timelines and associated milestones	25
Table 3:	Table showing Environmental and Social Impacts of the Project	26
Table 4:	Table showing Categorization of Stakeholders Identified for DTIC-P	28
Table 6:	Summary of Stakeholder Engagement Findings	34
Table 7:	Summary of Community Consultations Findings.....	35
Table 8:	Engagement Methods	38
Table 9	Table showing SEP KPI	41
Table 10	Plan for engaging different Stakeholders	44
Table 11:	Outline of the Grievance Redress Process	46
Table 12:	Estimated cost of the SEP implementation	52

1 Executive Summary

The Digital Transformation and Inclusive Connectivity Project (DTIC-P) is designed to foster competition within the telecommunications sector by building an open-access communications network spanning all districts of Lesotho. The project aims to break down existing financial, technical, and temporal barriers to entry into Lesotho's communications industry thus enabling even small network services providers to participate in the country's communications industry actively and equally. The increased competition in the market will help to reduce data costs to end users and increase residential fixed-line connectivity and provide affordable access to broadband services for small to medium enterprises (SMEs).

The DTIC-P is situated in all major urban centres of Lesotho. These areas are strategically selected as they host higher population and have potential to enable service delivery to a diverse client. That include businesses of varying sizes and neighbouring urban and peri-urban residential areas. The project aims to establish eighteen (18) points-of-presence (POPs) to facilitate interconnection and local-level distribution, primarily functioning as district edge service distribution points.

The LEC Communications (LECC) has formulated the Stakeholder Engagement Plan (SEP) to guarantee effective communication and inclusive participation among all pertinent stakeholders throughout the planning and execution stages of the Digital Transformation and Inclusive Connectivity Project. This plan constitutes a comprehensive framework intended to promote collaboration among LEC, local communities, governmental bodies, non-governmental organizations (NGOs), and other service providers.

The SEP outlines methods for communication, consultation, and feedback, emphasizing transparency, inclusivity, and responsiveness. It includes strategies for identifying stakeholders, determining engagement methods, scheduling activities, and incorporating feedback into project decisions. Roles and responsibilities, resources required, and measures for monitoring and evaluating engagement effectiveness are also defined.

Objectives

The primary objectives of the DTIC-P, SEP are:

- a) **Foster Inclusive Participation:** Ensure continuous engagement of all stakeholder groups, including marginalized and vulnerable populations, through community meetings in local languages.
- b) **Build Trust and Transparency:** Encourage open communication and provide timely information to stakeholders, maintaining credibility.
- c) **Enhance Project Design and Implementation:** Incorporate stakeholder feedback to improve project outcomes and relevance.
- d) **Mitigate Risks and Address Concerns:** Establish a grievance redress mechanism for timely resolution of complaints and concerns.
- e) **Promote Ownership and Sustainability:** Encourage stakeholder ownership for long-term project benefits through stakeholder committees.

- f) **Facilitate Collaboration and Partnerships:** Leverage resources and expertise through collaboration with various stakeholders.
- g) **Ensure Compliance and Accountability:** Adhere to local and international regulations through regular audits and compliance checks.

Key Legislation

In Lesotho, public consultation is mandated by the Environmental Act, 2008. The Act defines the ground rules for environmental management, including the requirements for EIAs and environmental audits (Sections 19 to 27). In addition, the SEP is aligned to the Department of Environment's requirements, specifically Record of Decision (RoD) condition 2, which requires consulting with local authorities and communities prior to commencing project activities.

The African Development Bank's (AfDB) Operational Safeguards (OS), particularly OS1, OS2, OS3, OS4, OS 6, OS 10 also emphasize stakeholder consultation and participation throughout the project lifecycle.

Potential Environmental and Social Risks and Impacts

The DTIC-P activities namely, Site preparation and deployment will include digging holes, trenching, planting of poles, and pulling of fibre optic cable, presents environmental and social impacts. Key potential risks include localized loss of vegetation, soil degradation, groundwater pollution, localized soil impacts, and public health and safety concerns. The potential social risks also include potential sexual exploitation, conflicts over resource use, disruption of traffic flow, local job creation and local economic growth. Thus, on-going stakeholder engagement is essential for managing these risks, while ensuring community acceptance and project success.

Stakeholder Identification and Analysis

The process of identifying stakeholders for the DTIC-P involved adoption of local protocols, preliminary research, mapping, and profiling to ensure inclusivity of all key stakeholder. The initial stakeholder identification process was initiated during the project appraisal phase and continued throughout the ESIA and feasibility phase. The stakeholders are continuously registered within the Stakeholder Register. Then the Stakeholders are categorized into government bodies, directly affected community members, private sector entities, NGOs, academic institutions, donors, media, and civil society groups.

The profiling helps DCIT-P, understand stakeholders' perspectives and expectations for effective engagement. The influence, perspective and expectations of the Stakeholders shall change during the different phases of the project. To this end the DCIT-P Stakeholders Register is a live document and shall be maintained throughout. This Stakeholder registry will be periodically updated to incorporate new stakeholders and remove those who have exited the project.

Stakeholder Engagement Strategies

DCIT-P will employ various strategies for different situations and to engage different stakeholders.

- a) **Information Dissemination.** Regular and transparent dissemination of project information through various channels, including community meetings, newsletters, social media, local radio broadcasts, and press releases. Communication materials will be developed in a gender-sensitive manner and translated into Sesotho.
- b) **Stakeholder Consultations** Regular consultations with various stakeholder groups, including local communities, government agencies, NGOs, and private sector entities will be conducted. Specifically for beneficiary and affected communities, separate community meetings (Pitso) will be held for men and women. Effort will be made to ensure that women feel comfortable voicing their opinions and concerns. These discussions will be scheduled at convenient times and locations for women in line with local practices.
- c) **Capacity Building and Training** Tailored training programs will be held for communities, technical units and any relevant project facilitators to ensure the use of the appropriate culturally sensitive communication and effectively use participatory skills in engagements with community stakeholders.
- d) **Participatory Monitoring and Evaluation** Involving stakeholders in the monitoring and evaluation (M&E) processes through community-based monitoring, participatory assessments, and feedback sessions. The M&E framework will include gender-disaggregated data to track the participation and benefits of men and women.
- e) **Grievance Redress Mechanism** Establishing a formal grievance mechanism that is accessible and responsive to women and vulnerable groups. This includes setting up confidential reporting channels for Sexual Exploitation Abuse and Harassment (SEAH) and ensuring female staff are available to handle complaints. Awareness campaigns will inform women and vulnerable about their rights and the available grievance mechanisms.

The SEP outlines various tools to share project information with their variety of stakeholders. These include the following as listed below:

- a) **Community gatherings** - Public consultations (Lipitso, local council meetings, village chiefs' forums) for sharing project updates, recruiting local labour, and addressing community concerns.
- b) **Formal Meetings** - Structured consultations with government authorities, regulators, and donors (e.g., quarterly or biannual reporting, compliance discussions).
- c) **Joint site visits** - On-site inspections with donors, development partners, and local government to review project progress and verify funded activities.
- d) **Coordination workshops** - multi-stakeholder workshops with utilities, contractors, and NGOs to align on E&S standards, OHS requirements, and project coordination.
- e) **Technical meetings** - Targeted sessions with specialists and institutions on issues like the Grievance Redress Mechanism (GRM), environmental safeguards, and technical design.
- f) **Press releases** - Official statements issued to media outlets to communicate major milestones, incidents, or corporate updates.

- g) **Media briefings** - Interactive sessions with journalists to provide updates, clarify incidents, and strengthen LECC's public image.
- h) **Radio and Newspaper spreads** - Information disclosure to communities via national and local radio, and print adverts for awareness campaigns, service disruptions, or other activities.
- i) **Social Media campaigns** - Real-time updates on Facebook/Twitter covering service disruptions, safety messages, project milestones, and customer notices.
- j) **Awareness campaigns** - Public education on issues like energy efficiency, safe electricity use, GRM processes, and digital inclusion through community events and outreach.

Monitoring and Evaluation Framework

The Monitoring and Evaluation (M&E) Framework for the Digital Transformation and Inclusive Connectivity Project (DTIC-P) provides a structured system for tracking, measuring, and improving the effectiveness of stakeholder engagement and project outcomes. It ensures accountability, transparency, and inclusivity throughout project implementation, while aligning with the Lesotho Environmental Act (2008) and the African Development Bank's Operational Safeguards (OS1, OS2, OS3, OS4, OS6, OS10).

Objectives of the Framework

- Foster inclusive participation by monitoring engagement of women, youth, and vulnerable groups.
- Build trust and transparency by tracking access to timely information and stakeholder satisfaction.
- Enhance project design and implementation by integrating stakeholder feedback into decisions.
- Mitigate risks and address concerns by ensuring the grievance redress mechanism is effective and accessible.
- Promote ownership and sustainability by supporting functional stakeholder committees.
- Facilitate partnerships with government, NGOs, and the private sector.
- Ensure compliance and accountability through audits and regular reporting.

Key Indicators

The framework uses both quantitative and qualitative indicators, including:

- Number of consultations and participation rates (disaggregated by gender).
- Timeliness and accessibility of project information.
- Number of grievances lodged and resolved within 30 days.
- Percentage of decisions influenced by stakeholder feedback.
- Training sessions held and skills gained by communities.
- Functionality of stakeholder committees and partnerships established.

Data Collection Methods

- Attendance registers and stakeholder logs.
- Surveys, focus group discussions, and key informant interviews.
- Grievance redress records and SEAH reporting channels.

- Community-based monitoring reports.
- Media and communications tracking.

Roles and Responsibilities

- Project Management Unit (PMU): Overall oversight and reporting.
- M&E Officer: Data collection, analysis, and report preparation.
- Community Liaison Officers: Field-level monitoring and grievance handling.
- Stakeholder Committees: Validation of findings and participatory monitoring.

Results Matrix

A Results Matrix outlines for each objective: indicators to measure success, baselines (current status at project start), targets (expected outcomes, e.g., 40% participation of women, 90% grievance resolution), means of verification (surveys, reports, registers, etc.), and frequency of data collection (monthly, quarterly, annually).

Reporting and Feedback

Results will be compiled into quarterly and annual reports, which will be shared with the AfDB, the government, and community stakeholders. Feedback sessions will validate the findings and inform the adaptation of engagement strategies.

Learning and Adaptation

The framework emphasizes continuous improvement, allowing lessons learned from monitoring to be applied across project phases. This ensures that the project remains responsive, inclusive, and sustainable.

Stakeholder Engagement Implementation Arrangements and Budget

The Stakeholder Engagement Plan (SEP) for the Digital Transformation and Inclusive Connectivity Project (DTIC-P) aims to involve various stakeholders throughout the project implementation through a structured approach. The implementation will be managed by a dedicated Environmental and Social Safeguards team. That shall be coordinated by LEC-C PIU on behalf of LEC and the Ministry of Energy as the project custodians.

The PIU shall have a dedicated team that will ensure that the SEP is implemented adequately and appropriately. Roles and responsibilities within the SEP are clearly defined to ensure successful implementation. The DTIC-P Manager will oversee SEP implementation, ensure the establishment of an inclusive Stakeholder Engagement team, coordinate training schedules and budgets with the M&E Officer, and conduct quality control.

PIU Environmental and Social Safeguards Specialist will approve the SEP, integrate technical aspects, receive quarterly reports, and contribute to work plan development. ESSS will oversee SEP implementation and monitoring at the district level, liaise with community leaders, contractors' Community Liaison officers and collaborate with national M&E officers. Community Leaders will mobilize community members, bridge the gap between the SEP team and the communities, and help set realistic goals to address community interests and concerns in the SEP.

The SEP is applicable throughout the three distinct phases of project implementation: planning, engagement, and feedback. During the planning phase, the SEP will identify and map stakeholders, assess their interests, and develop tailored engagement strategies. In the engagement phase, the team will organize various activities such as meetings, workshops, and public consultations, ensuring inclusive representation across genders and stakeholder groups. The feedback phase will involve synthesizing stakeholder input, disseminating information back to the communities, and incorporating feedback into project design and implementation. This SEP approach will foster transparency, accountability, and trust among stakeholders.

Capacity Gap Analysis and Training Needs

To ensure effective stakeholder engagement, the SEP will address existing capacity gaps among stakeholders, focusing on communication, technical knowledge, project management, and data collection. Key training needs include: Grievance handling and management, Sexual Exploitation Abuse & Harassment, Communication and facilitation skills. Technical training on project components, with gender-sensitive programs. Project management skills for local officials and community leaders. Data collection and analysis training, ensuring gender-responsive approaches.

2 Introduction

LEC Communications (PTY) Ltd Stakeholder Engagement is anchored on Lesotho legislative framework.

Section 36 of Lesotho's Constitution makes provision for the protection of the natural environment and states that *“Lesotho shall adopt policies designed to protect and enhance the natural and cultural environment of Lesotho for the benefit of both present and future generations and shall endeavour to assure all citizens a sound and safe environment adequate for their health and well-being”*.

The need for Public Participation and access to information to all project affected persons and interested parties is an integral part of the greater Environmental Impact Assessment process within Lesotho. The need emanates from the Environment Act Sections 28 (5) as well as Section 30 (1.a) and (1b). These legal provisions provide guidance on the duty to inform all interested and affected parties as well as key stakeholders about the project as well as its anticipated impacts on the community and the environment.

This SEP is also aligned with AfDB's Operational Safeguard 10 (**OS10: Stakeholder Engagement and Information Disclosure**). That provides for the needs for systematic and inclusive stakeholder engagement process throughout the Environmental and Social Impact Assessment (ESIA) cycle.

LEC Communications (PTY) Ltd aims to ensure that the highest standards of Environmental and Social performance, that are reasonably practicable to attain, are achieved in all our activities.

LEC Communications (PTY) Ltd also aims to uphold the highest standards of environmental sustainability while ensuring that the communities in which we operate are not negatively affected by our operations. This includes fostering inclusive development that benefits all, regardless of gender.

This **LEC Communications (PTY) Ltd, Stakeholder Engagement plan** aims to provide a framework through which LECC shall maintain value adding relations with their stakeholders. Central to this process shall be the core values of LECC that are *Ethical Leadership and Accountability, Customer Centricity, End-user Centricity, and Budget Prudence*.

Stakeholder identification and mapping are essential elements of this plan, ensuring the inclusion of a diverse array of perspectives, particularly those of individuals directly affected by the project. Engagement strategies encompass a variety of approaches, including information disclosure, workshops, and technical sessions, all aimed at informing stakeholders and integrating their feedback into the development process. Furthermore, the SEP delineates a structured methodology for monitoring and reporting, providing a transparent framework for assessing the efficacy of engagement initiatives.

Additionally, it incorporates a comprehensive cost analysis to ensure that resources are allocated judiciously in support of stakeholder endeavours.

The Stakeholder Engagement Plan aims to establish a participatory environment that not only complies with regulatory requirements but also fosters trust and enhances relationships with stakeholders, thereby contributing to the successful execution of the project and the sustainable development of the involved communities.

2.1 Purpose

The purpose of the SEP is to ensure inclusive, transparent and effective engagement throughout the project lifecycle. The SEP shall also provide guidance during all project stages from project planning, construction preparation, implementation, monitoring/ decommissioning .

This SEP is developed in partial fulfilment of the **Department of Environment - RoD condition 2** – The Local authorities and communities will be consulted before commencement of the project works.

2.2 Project Overview

The Digital Transformation and Inclusive Connectivity Project (DTIC-P) aims to strengthen Lesotho's digital economy by expanding broadband access, building digital skills, and fostering innovation to create jobs, boost competitiveness, and ensure no community is left behind.

The project focuses on three key components:

- **Climate-Smart Digital Infrastructure for Inclusive Connectivity** – Expanding high-capacity, energy-efficient fibre-optic networks to urban, peri-urban, and rural areas, connecting schools, government institutions, businesses, unserved and underserved communities.
- **Digital Skills, Entrepreneurship, and Business Transformation** – Training at least 20,000 people, including youth, women, and public servants, in market-relevant ICT skills, while supporting small businesses and startups with incubation, financing, and digital tools to compete in the modern economy.
- **Institutional Strengthening and Digital Policy Reform** – Updating outdated laws, introducing pro-innovation policies such as the Start-up Act and electronic transactions legislation, and building the capacity of key public institutions to regulate and manage the digital sector effectively.

Expected Results:

- *Broadband access is expanded, and connectivity costs for low-income users are reduced:* Fiber-optic networks will reach unserved and underserved urban and rural areas, increasing coverage and lowering prices through improved efficiency and competition, making high-speed internet affordable for households, schools, and small businesses.

- *Smaller Private Sector ISPs are supported to operate beyond Maseru, improving competition:* Open-access Points of Presence (PoPs) and infrastructure sharing will allow emerging ISPs to expand into rural districts, diversify service providers, and drive price reductions.
- *Trained youth, including many women, are placed in digital jobs, entrepreneurship, or further studies:* At least 20,000 people, 40% women, will gain market-relevant digital skills, leading to placements in jobs, startups, or further education, with direct links to employers and business networks.
- *Digital jobs are created through support for entrepreneurship and MSME digitization:* Up to 500 MSMEs and startups will be supported to digitize operations, access markets, and generate new employment opportunities.

Digital policies and laws are adopted by the cabinet, with strong stakeholder satisfaction: Key legislation—covering the Start-up Act, national physical addressing system, and electronic transactions—will be enacted after broad-based stakeholder consultations, establishing a secure, inclusive, and enabling digital environment.

2.3 Objectives

The objectives of the SEP are the following:

- Foster Inclusive Participation:** Ensure continuous engagement of all stakeholder groups, including marginalized and vulnerable populations, through community meetings in local languages.
- Build Trust and Transparency:** Encourage open communication and provide timely information to stakeholders, maintaining credibility.
- Enhance Project Design and Implementation:** Incorporate stakeholder feedback to improve project outcomes and relevance.
- Mitigate Risks and Address Concerns:** Establish a grievance redress mechanism for timely resolution of complaints and concerns.
- Promote Ownership and Sustainability:** Encourage stakeholder ownership for long-term project benefits through stakeholder committees.
- Facilitate Collaboration and Partnerships:** Leverage resources and expertise through collaboration with various stakeholders.
- Ensure Compliance and Accountability:** Adhere to local and international regulations through regular audits and compliance checks.

3 Scope

The SEP shall be applicable during the all-project stages from Preparation, Implementation and Monitoring/Decommissioning of Digital Transformation and Inclusive Connectivity Project (DTIC-P).

The implementation of this policy is aligned to the following LECC policies and guiding documents:

- LECC (LEMOFI) ESIA & ESMP, 2025 (now called Digital Transformation and Inclusive Connectivity Project)

- b) LECC Social Media Policy
- c) LECC Environment and Social Policy
- d) LECC Network Operating Centre (NOC) - operational rules
- e) LECC Emergency Response Policy

4 Regulation and Institutional Framework

4.1 National Policies

4.1.1 Environmental Act (2008)

The Environmental Act (2008) of Lesotho views the management of the environment as a collective responsibility and therefore requires that all interested parties and stakeholders be consulted. Thus, public consultation is a key legal requirement in the conduct of ESIA's and project briefs in Lesotho. The main purpose is to ensure that as many people as possible who are concerned with or affected by a proposed development are consulted, and their views are recorded. Further, it is important to ensure that, wherever possible, these views are considered in the final design and operation procedures of the project. In detail the Act promotes inclusive decision-making through:

- **Public Participation in Environmental Impact Assessments (EIAs):** Before approving projects with potential environmental impacts, the Act mandates that affected communities and stakeholders be consulted. This includes public hearings and opportunities to submit comments.
- **Access to Environmental Information:** The Director of Environment is required to make relevant environmental information available to the public, especially during project planning and assessment phases.
- **Environmental Councils and Committees:** Local and national bodies established under the Act are expected to engage with stakeholders, including civil society, traditional leaders, and community representatives, to ensure that environmental decisions reflect diverse perspectives.

Transparency and information disclosure of information is embedded in several provisions:

- **Mandatory Disclosure of EIA Reports:** Developers must submit EIA reports to the Director, who is then responsible for making them accessible to the public.
- **Environmental Audits and Monitoring Reports:** These must be documented and shared with relevant authorities and stakeholders, ensuring accountability and ongoing oversight.
- **Right to Environmental Information:** Citizens have the right to request and receive information about environmental conditions, risks, and government actions related to environmental protection.

4.1.2 Communications Act (2012)

The Communications Act of 2012 establishes the regulatory framework for the telecommunications, broadcasting, and postal sectors in Lesotho. LECC's operations and planned programmes are therefore designed to align with the Act and the oversight of the Lesotho Communications Authority (LCA). In implementing its projects, LECC will maintain structured engagement with the LCA, including active participation in public consultations, compliance reporting, and coordination on matters such as interconnection, infrastructure sharing, and universal access. Stakeholder engagement will prioritise inclusivity, with targeted outreach to low-income, disabled, and rural communities to meet the Act's accessibility obligations. LECC will also commit to

publishing clear service standards, grievance redress mechanisms, and privacy safeguards in line with LCA regulations on Quality of Service (QoS), dispute resolution, and consumer data protection. In addition, LECC will foster transparent cooperation with other licensees while ensuring strict adherence to the Act's prohibitions on anti-competitive and unfair practices.

4.1.3 National Strategic Development Plan II 2018 (NSDP II 2018)

The proposed project is in direct alignment with the **National Strategic Development Plan II 2018 (NSDP II 2018)**, Intermediate Outcome 3.4, Objectives 1 and 4.

Objective 1 aims to improve ICT access and use by promoting the sharing of strategic ICT infrastructure, attracting more market players, expanding LEC's optic fibre network to promote competition in retail internet access services, and improving penetration, price and quality performance of the Fixed Broadband Market (FBB).

Objective 4 on the other hand aims to improve uptake within the digital economy by stimulating demand to drive broadband up-take, promoting ICT literacy through e-learning and awareness programmes, and establishing data centres or hubs to attract data locally and internationally. Through the establishment of a country-wide fibre optic network and associated Points of Presence (POPs) throughout Lesotho, the project will enable the Government of Lesotho and its partners to implement the necessary programmes to improve uptake in the digital economy.

4.1.4 Lesotho Communications Policy (2008)

The above national objectives are further underpinned by the **Lesotho Communications Policy 2008** which aims to expand ICT infrastructure to unserved and underserved communities and individuals, improve competition within the ICT sector, and to provide additional options for non-subscribers to access telecommunications services. A core goal of the proposed project is to decrease telecommunications costs by increasing competition amongst retail service providers and by promoting the sharing of strategic infrastructure.

4.2 International Standards

African Development Bank Integrated Safeguards System (2023)

The proposed project is being developed with the support of the African Development Bank. Therefore, all environmental and social assessments carried out under this assignment are in accordance with relevant Environmental and Social Operational Safeguards (OS).

The Digital Transformation and Inclusive Connectivity Project (DTIC-P) has been assigned a **Category 2** by the African Development Bank in line with the guidelines within the Bank's ESAP. The following E&S OSs are triggered: **OS 1:** Assessment and Management of Environmental and Social Risks and Impacts, **OS 2:** Labour and Working Conditions, **OS 3:** Resources Efficiency and Pollution Prevention and Management, **OS 4:** Community Health, Safety, and Security, **OS 6:** Habitat and Biodiversity Conservation,

and Sustainable Management of Living Natural Resources , **OS10: Stakeholder Engagement and Information Disclosure** .

OS10: Stakeholder Engagement and Information Disclosure - DTIC-P recognizes that meaningful stakeholder engagement is essential for responsible infrastructure development. In alignment with AfDB's Operational Safeguard 10, the project has adopted a systematic and inclusive stakeholder engagement process throughout the Environmental and Social Impact Assessment (ESIA) cycle.

4.3 Institutional Roles

Ministry of Energy (MOE) Project owner and responsible for overall coordination and policy guidance for the project. They provide Policy guidance for LEC as the holding company for LEC-C.

Ministry of Environment and Forestry (MOEF) – Through the Department of Environment (DOE) is responsible for coordination, monitoring and supervision of environmental management activities. It coordinates the issuance, renewal and monitoring of ESIA guidelines and regulations. They mandate developers to engage stakeholders prior to issue and renewal of ESIA's and issue Environmental Licence or Record of Decision (ROD).

Ministry of Health (MOH) They are responsible for Health standards and Hygiene. They also coordinate Health care services across all districts. They are the part of the emergency response team. They provide out reach for all communicable diseases within the country.

Lesotho Communication Authority (LCA) On behalf of the Minister of Information, Communications Science, technology and Innovation are charged as the Regulator of Telecommunications services within Lesotho. LECC operations are licensed by LCA. As part of their licensing requirement the operators and services providers of communication services must engage with the various stakeholders including communities they work or operate within.

Lesotho Electricity Company (LEC) This is the holding company for LECC. They are also the Custodian of the powerlines, poles and servitudes which may be used in the DTIC-P.

LEC Communications (LECC) This is the DTIC-P's Executing Agency on behalf of the Ministry of Energy. The company will host and manage the Project Implementing Unit (PIU).

District Administrator (DA) They are present in all 10 districts of Lesotho. Administrative decentralisation and integration at the district level is coordinated by the District Administrator who represents the interests of Central Government in the District. They coordinate and disseminate information to all government officials operating and situated within their district.

District Council Secretary (DCS) They are present in all districts. They are mandated with coordinating and monitoring all developments projects within the district. They coordinate and disseminate information to all local community councils within their district.

Community Councils (CC) These are directly responsible to the respective District Council Secretary within their respective district. The Community councils and associated councillors are responsible for community organization and mobilization at village level.

Chiefs/ Marena These are traditional leaders. They are area chiefs responsible for a number of smaller villages. They function through a hierarchy where Principal Chief is most senior and they are supported by Area chiefs then Headmen look after smaller communities. Marena are responsible for community organization and mobilization at village level.

5 Project Description

5.1 Scope

The DTIC-P project focuses on expanding and modernizing the fibre optic network infrastructure across Lesotho's ten districts. The core objective is to extend high-speed broadband connectivity to underserved areas, fostering economic growth, improving access to e-governance services, and enhancing digital inclusion.

The purpose of this project is to foster competition within the telecommunications sector by building an open-access communications network spanning all districts of Lesotho. This will break down existing financial, technical, and temporal barriers to entry into Lesotho's communications industry thus enabling even small network services providers to participate in the country's communications industry actively and equally. The increased competition in the market will help to reduce data costs to end users and increase residential fixed-line connectivity and provide affordable access to broadband services for small to medium enterprises (SMEs).

The project aims to establish eighteen (18) points-of-presence (POPs) to facilitate interconnection and local-level distribution, primarily functioning as district edge service distribution points. Additionally, the project will focus on constructing area distribution networks to facilitate service delivery to a diverse range of entities including businesses of varying sizes and adjacent residential areas. It is further expected to provide area distribution networks that are capable to provide services to businesses (small to large) and neighbouring homes. The number of connections provisioned for would be approximately 4500.

Table 1 Table showing the scope of the DTIC-P infrastructure per district.

Activity	Description
1. Construction of ring and distribution networks (Highway – Central – IEMS)	Number of PoPs: One Estimated Ring Aerial Cable length: 6.859km Estimated Ring Trenched Cable length: 3.06km Estimated Distribution Aerial Cable length: 6.192km Estimated Distribution Trenched Cable length: 1.053km Use of LEC's 11kV lines: Yes SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 26 Poles SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 210 Poles Manhole: 0
2. Construction of ring and distribution networks (Parliament-MSU Mall)	Number of PoPs: One Estimated Ring Aerial Cable length: 9.159km Estimated Ring Trenched Cable length: N/A Estimated Distribution Aerial Cable length: 7.761km Estimated Distribution Trenched Cable length: N/A Use of LEC's 11kV lines: Yes SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 7 Poles SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 11 Poles

LECC STAKEHOLDER ENGAGEMENT PLAN

Activity	Description
	Manhole: 0
3. Construction of ring and distribution networks (Old Europa - Downtown)	Number of PoPs: One Estimated Ring Aerial Cable length: 5.080km Estimated Ring Trenched Cable length: 1.459km Estimated Distribution Aerial Cable length: 11.102km Estimated Distribution Trenched Cable length: 1.705km Use of LEC's 11kV lines: Yes SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 10 Poles SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 50 Poles Manhole: 2
4. Construction of ring and distribution networks (A2-Lekhloaneng Matala)	Number of PoPs: One Estimated Ring Aerial Cable length: 7.258km Estimated Ring Trenched Cable length: N/A Estimated Distribution Aerial Cable length: 12.032km Estimated Distribution Trenched Cable length: N/A Use of LEC's 11kV lines: Yes SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 10 Poles SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 61 Poles Manhole: 0
5. Construction of ring and distribution networks (Thetsane-Tikoe)	Number of PoPs: Two Estimated Ring Aerial Cable length: 12.160km Estimated Ring Trenched Cable length: N/A Estimated Distribution Aerial Cable length: 13.112km Estimated Distribution Trenched Cable length: N/A Use of LEC's 11kV lines: Yes SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 51 Poles SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 87 Poles Manhole: 0
6. Construction of ring and distribution networks (Maseru Industrial)	Number of PoPs: One Estimated Ring Aerial Cable length: 12.234km Estimated Ring Trenched Cable length: N/A Estimated Distribution Aerial Cable length: 13.389km Estimated Distribution Trenched Cable length: N/A Use of LEC's 11kV lines: Yes SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 8 Poles SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 10 Poles Manhole: 0
7. Construction of ring and distribution networks (Teyateyaneng)	Number of PoPs: Two Estimated Ring Aerial Cable length: 9.749km Estimated Ring Trenched Cable length: N/A

LECC STAKEHOLDER ENGAGEMENT PLAN

Activity	Description
	<p>Estimated Distribution Aerial Cable length: 11.138km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 10 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 89 Poles</p> <p>Manhole: 0</p>
8. Construction of ring and distribution networks (Mafeteng)	<p>Number of PoPs: Two</p> <p>Estimated Ring Aerial Cable length: 9.056km</p> <p>Estimated Ring Trenched Cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 31.434km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 11 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 10 Poles</p> <p>Manhole: 0</p>
9. Construction of ring and distribution networks (Maputsoe)	<p>Number of PoPs: One</p> <p>Estimated Ring Aerial Cable length: 12.144km</p> <p>Estimated Ring Trenched Cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 17.977km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 0 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 0 Poles</p> <p>Manhole: 0</p>
10. Construction of ring and distribution networks (Hlotse)	<p>Number of PoPs: One</p> <p>Estimated Ring Aerial Cable length: 11.682km</p> <p>Estimated Ring Trenched Cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 10.336km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 10 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 46 Poles</p> <p>Manhole: 0</p>
11. Construction of ring and distribution networks (Butha Buthe)	<p>Number of PoPs: One</p> <p>Estimated Ring Aerial Cable length: 7.480km</p> <p>Estimated Ring Trenched Cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 16.463km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 46 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 115 Poles</p> <p>Manhole: 0</p>

LECC STAKEHOLDER ENGAGEMENT PLAN

Activity	Description
12. Construction of ring and distribution networks (Mohale's Hoek)	<p>Number of PoPs: One</p> <p>Estimated Ring Aerial Cable length: 7.699km</p> <p>Estimated Ring Trenched Cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 12.025km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 0 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 4 Poles</p> <p>Manhole: 0</p>
13. Construction of ring and distribution networks (Lower & Upper Moyeni)	<p>Number of PoPs: One</p> <p>Estimated Ring Aerial Cable length: 7.449km</p> <p>Estimated Ring Trenched Cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 6.203km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 0 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 4 Poles</p> <p>Manhole: 0</p>
14. Construction of ring and distribution networks (Mokhotlong)	<p>Number of PoPs: One</p> <p>Estimated Ring Aerial Cable length: 7.225km</p> <p>Estimated Ring Trenched Cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 9.70km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 20 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 284 Poles</p> <p>Manhole: 0</p>
15. Construction of ring and distribution networks (Thaba Tseka)	<p>Number of PoPs: One</p> <p>Estimated Ring Aerial Cable length: 6.758km</p> <p>Estimated Ring Trenched Cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 7.983km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 10 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 47 Poles</p> <p>Manhole: 0</p>
16. Construction of ring and distribution networks (Qacha's Nek)	<p>Number of PoPs: One</p> <p>Estimated ring aerial cable length: 6.842km</p> <p>Estimated ring trenched cable length: N/A</p> <p>Estimated Distribution Aerial Cable length: 12.512km</p> <p>Estimated Distribution Trenched Cable length: N/A</p> <p>Use of LEC's 11kV lines: Yes</p> <p>SABS Poles of Length 9 meters (Treated – creosole and 140mm – 160 mm or greater): 0 Poles</p> <p>SABS Poles of Length 7 meters (Treated – creosole and 140mm – 160 mm or greater): 8 Poles</p>

LECC STAKEHOLDER ENGAGEMENT PLAN

Activity	Description
	Manhole: 0

5.2 Project Timeline and Phases

The anticipated project timelines for the project are presented in summary in the *Table 2* below.

Table 2 : Table showing Summary of the Project Timelines and associated milestones

Milestone No.	Sequence of Major Outputs	Completed Date
1	Project charter completed.	31-May-24
2	Project management Office Established.	27-Jun-24
3	LECC Warehouse Constructed.	23-Jul-24
4	Ring and Distribution Contractor Selected and Appointed for Projects.	30-Sep-24
5	Point of Presence Contractor Selected and Appointed for Projects.	23-Sep-24
6	Recruitment of General Project Staff Complete	20-Sep-24
7	Construction of Ring and Distribution Networks (Highway-Central-IEMS)	12-Mar-25
8	Construction of Ring and Distribution Networks (TY)	19-Mar-25
9	Construction of Ring and Distribution Networks (Maputsoe)	10-Apr-25
10	Construction of Ring and Distribution Networks (Maseru Industrial)	14-Jan-25
11	Construction of Ring and Distribution Networks (Mafeteng)	26-Feb-25
12	Construction of Ring and Distribution Networks (Parliament-MSU Mall)	26-Mar-25
13	Construction of Ring and Distribution Networks (A2-Lekhloaneng Matala)	25-Jun-25
14	Construction of Ring and Distribution Networks (Hlotse)	1-Oct-25
15	Construction of Ring and Distribution Networks (Butha-Buthe)	4-Sep-25
16	Construction of Ring and Distribution Networks (Mohale's Hoek)	1-Oct-25
17	Construction of Ring and Distribution Networks (Mokhotlong)	17-Sep-25
18	Construction of Ring and Distribution Networks (Thaba Tseka)	9-Oct-25
19	Construction of Ring and Distribution Networks (Thetsane)	27-Nov-25
20	Construction of Ring and Distribution Networks (Old Europa - Downtown)	17-Jul-26
21	Construction of Ring and Distribution Networks (Tikoe)	4-Sep-26
22	Construction of Ring and Distribution Networks (Quthing (Lower & Upper Moyeni)	27-Aug-26
23	Construction of Ring and Distribution Networks (Qacha's Nek)	9-Sep-26
24	Point of Presence (POP) Roll Out Completion	22-Apr-26
25	Overall Snag Rectification	15-Dec-26
26	Project Closure	31-Mar-27

5.3 Potential Environmental and Social Risks of the Project

The DTIC-P activities namely, Site preparation and deployment will include digging holes, trenching, planting of poles, and pulling of fibre optic cable. These will pose localised environmental and social impacts across all project sites.

The ESIA (2025) highlighted the following as Environmental and Social Risks of the project. The major risks associated with the implementation of the project include but are not limited to the following:

- Conflicts with community or land owners over land access for infrastructure
- Damage to existing infrastructure services like water, roads
- Digital divide concerns
- e-waste and environmental considerations.

Table 3 below presents a summary of all the identified environmental and social impacts of the project. While also highlighting the phases of the project the specific impacts are most likely to occur.

Table 3: Table showing Environmental and Social Impacts of the Project

Impacts	Phases of the Project	
	Construction	Operation
Acceleration of erosion	√	
Alteration of local topography	√	
Alteration of soil profile	√	
Blockage of drainage pattern	√	
Blockage of roads	√	
Change in land use	√	
Change in water quality	√	√
Contamination of groundwater	√	√
Contamination of surface water	√	√
Contamination of soil	√	√
Damage to communication cables	√	
Exposure to heat and light	√	
Impairment of air	√	√
Improved telecommunication		√
Improved livelihood	√	√
Increased demand for social infrastructure	√	√
Increased surface water turbidity	√	
Increase in incidence of STIs and HIV	√	
Increase in income	√	√
Increase in price of locally sources material	√	
Increase in social vices	√	√
Increase in opportunity for business and employment	√	√
The influx of migrant workers and camp-followers	√	√
Land utilised for temporary camps	√	

LECC STAKEHOLDER ENGAGEMENT PLAN

Impacts	Phases of the Project	
	Construction	Operation
Legal issues	√	√
Loss of land	√	√
Loss of employment/income	√	
Noise and vibration nuisance	√	
Road accidents	√	√
Worksite accidents	√	√

6 Stakeholder Identification and Analysis

The stakeholder identification process for the project is aligned to local Lesotho cultural protocols and practices. This was further refined with research and consultation with key informants. The section below provides a brief an overview of the process that was followed to identify all key stakeholders of this project.

6.1 Stakeholder Identification

The first step in the stakeholders' engagements was sensitisation of the key Local Leadership structures: the Principal Chief and the District Administrators respectively. The initial consultations began in December 2025 to February 2025. Through this exercise, the ESIA Consultant in consultation with these local leadership structures identified other key stakeholders that could potentially be affected by the project, had an interest and or held potential influence related to the project implementation. Additional stakeholders were identified through preliminary site reconnaissance. Where potentially affected and or interested stakeholders could be identified for each specific project site. All these stakeholders were noted and recorded within the ESIA stakeholder register.

6.2 Categorization of stakeholders

The identified stakeholders were then categorized based on their role, function and influence in relation to their mandate. The stakeholders were categorized into the following key groupings: Government agencies, potentially affected project beneficiaries, private sector, donors,

Table 4: Table showing Categorization of Stakeholders Identified for DTIC-P

Category	Stakeholder	Stakeholder's Level
Government Agencies	Ministry of Energy Ministry of Information, Communications, Science, Technology and Innovation Ministry of Forestry and Environment Ministry of Education Lesotho Communications Authority Ministry of Trade Ministry of Local Government Local councils Lesotho Communications Authority	National
Affected stakeholders and project beneficiaries	Community members Schools Hospitals SMEs Large Enterprises	National and Community
Private sector	Businesses involved in provision, and maintenance of broadband: Econet Telecom Lesotho, Vodacom Lesotho, Comnet Lesotho, Jenny Lesotho, Leo, other LCA licensees. IP Transit and Transport Providers: BBI, Open Serve, Hurricane Electric, etc. Industry Associations: Lesotho Internet Exchange Point	National and International

LECC STAKEHOLDER ENGAGEMENT PLAN

Donors and International Partners	AfDB	International funder
Media (inclusive of social media platforms)	Local and national media outlets for disseminating information and raising awareness: Public Eye Newspaper, Lesotho Times Newspaper, LEC Communications Website, LEC and LECC Social Media Platforms	National
Civil Society and NGOs	Community-based organizations and advocacy groups: Transformation Resources Centre, World Vision. SkillsShare Lesotho, Lesotho Council of NGOs,	National
Academia & Research Institutions	Universities, think tanks, independent experts: Primary, Secondary, and Highschools within project affected areas, National University of Lesotho, Botho University, Limkokwing University of Creative Technology, Leretholi Polytechnic, Lesotho College of Education, Council of Higher Education	National

6.3 Stakeholder Profiling

Once stakeholders were categorized, a detailed profiling exercise was conducted. This involved gathering specific information about each stakeholder, such as their objectives, level of influence, resources, and potential contribution to the project. Profiling helped in understanding the stakeholders' perspectives and expectations, which was and continues to be essential for effective engagement. This process is on going and will continue as the project progresses. Preliminary stakeholder profiling for the project is provided in the tables below.

6.4 Stakeholder Analysis

The power/interest matrix was be used to categorise stakeholders. This involved assessing the influence and interest of each stakeholder group as explained below and illustrated by the power/interest matrix (Figure 4-1) and results in Table 4-1.

High Power, High Interest: These are key stakeholders who have significant influence over the project and are highly interested in its outcomes. They require close engagement and active management.

High Power, Low Interest: Stakeholders in this category have significant influence but are less interested in the project. They need to be kept satisfied but not necessarily involved in every detail.

Low Power, High Interest: These stakeholders are highly interested in the project but have less influence. They need to be kept informed and involved in specific aspects of the project that directly affect them.

Low Power, Low Interest: These stakeholders have limited influence and interest. They require minimal effort but should be monitored to ensure they do not become more influential or interested over time.

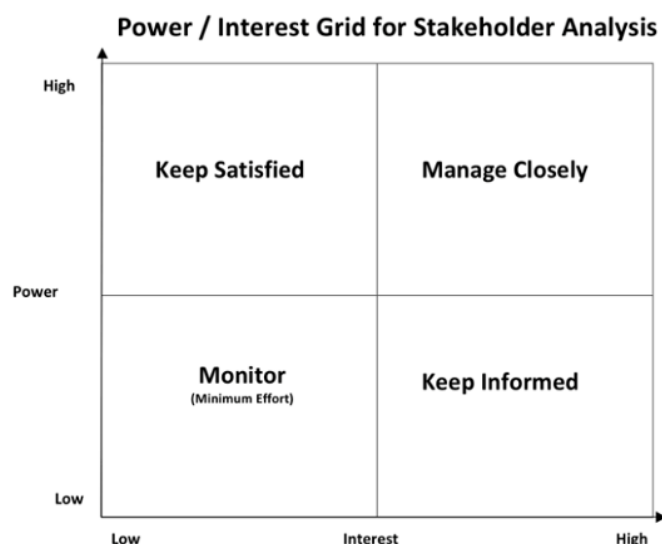


Figure 1: Stakeholder power-interest matrix

Stakeholder	Interest/ Concern	Influence	Interest	Action
Government Agencies				
Ministry of Information, Communication and Technology	Custodian of Information and technology in Lesotho Regulatory oversight, permits, alignment with national plans	High	High	Manage
Ministry of Environment	Will grant authorisation of project to go ahead Will monitor and audit the project compliance to environmental regulations	High	High	Collaborate
Lesotho Communications Authority	<ul style="list-style-type: none"> Sector regulator for telecommunications, broadcasting, and postal services under the Communications Act (2012). Grants and oversees licenses, enforces compliance with Quality of Service (QoS), consumer protection, and data privacy regulations. Facilitates public consultations, oversees interconnection and infrastructure sharing, and administers the Universal Service Fund (USF). 	Very High	High	Manage

LECC STAKEHOLDER ENGAGEMENT PLAN

	<ul style="list-style-type: none"> Ensures fair competition and prohibits anti-competitive practices. 			
Ministry of Trade	Provides trading licenses for operators and services providers	High	High	Manage
Utility companies <ul style="list-style-type: none"> LEC and Wasco 	<ul style="list-style-type: none"> Shared infrastructure corridors Potential service beneficiaries or impacted during construction Implement construction and connection activities 	Low	High	Manage
Affected communities and project beneficiaries				
Local Community councils	<ul style="list-style-type: none"> Their perspectives and feedback can provide valuable in identifying local context, potential risks, and the broader social and environmental impacts. This group will also be report reflecting gender and vulnerability disaggregated 	Medium	Medium	Monitor
Community members (beneficiaries)	<ul style="list-style-type: none"> Local communities will be negatively impacted by project activities during implementation, for example dust, noise and increased number of people at a given time. The community will benefit positively from having access to the internet. Local communities will be useful agents in collection of data that will be vital in monitoring and as such they will plan 	High	High	Keep informed
Vulnerable and disadvantaged groups	<ul style="list-style-type: none"> These include physically disabled people, households, households below the poverty line. This group will provide information regarding social economic status of residents in the project area. 	Low	Medium	Keep informed
Educational and Training Institutions	<ul style="list-style-type: none"> Skills impartment Collaborative training 	Low	Low	Keep informed
Hospitals	<ul style="list-style-type: none"> Collaborative training 	Medium	High	Manage

LECC STAKEHOLDER ENGAGEMENT PLAN

	<ul style="list-style-type: none"> HSE emergency respondents 			
Private sector-Service Providers	<ul style="list-style-type: none"> Carryout digging, connecting, and testing of the fibreglass. Supervision of works. Project Beneficiaries: Supply materials required for trenches, the fibre optic cable and other components needed for the project Form collaborations for skills transfer 	Medium	High	Implementation
Private Sector- Sector players	<ul style="list-style-type: none"> Econet, Voda Com , MTN, StarLink 	High	High	Manage
Donors and Partners				
Donors AfDB	Project performance, financial management, social & environmental outcomes	High	High	Manage
Media				
Media and Communication channels <ul style="list-style-type: none"> These include newspapers, magazines, televisions, radio and electronic media. 	<ul style="list-style-type: none"> They will be used to communicate about DTIC-P activities Media would be a useful link to reach out to stakeholders especially during disclosure of findings of studies Media can be a channel where stakeholders communicate their interest, complaints and grievance. (Given the terrain of Lesotho, the media will play an integral role in disseminating information to the rural areas and peri urban, where there are no billboards.) 	Medium	High	Collaborate
Civil Society/NGOs				
Community-based organizations and advocacy groups <ul style="list-style-type: none"> 	<ul style="list-style-type: none"> To advocate and mobilize the local community and other project stakeholders for implementation of mitigation measures of the project impacts and other related grievances. To partner in sharing lessons, resources for implementation and for upscaling. 	Medium	Medium	Collaborate

7 Previous Engagement Activities

Stakeholder consultations and Public Consultations were undertaken as part of the Environmental Impact Assessment for this project. These were carried out between 16th December 2024 to 20th February 2025. This involved: introductory letters and meetings with key informants within the respective districts.

Introductory Letters were provided by the Principal Secretary, Ministry of Energy for use during stakeholders' engagements for sensitise of the local authorities. This included the briefing of the District Administration Offices, District Council Offices, Principal Chief's offices and Area Chiefs on the proposed project. Consultation mechanisms included: telephone discussions and office meetings. Also, community gatherings were held in Maseru, Mokhotlong, Thaba Tseka, Mafeteng, Mohale's Hoek, Leribe and Butha Buthe.

The public consultation covered a range of study components. However, the key objectives of the consultation process were to:

- Inform stakeholders of the project.
- Ascertain issues of concern, according to those consulted, regarding the proposed project (including their suggestions on how to mitigate potential negative impacts).
- Identify potential negative and positive impacts, which may result from the proposed project.
- Identify sites of cultural and historical significance to the local community; and
- Identify requirements/expectations from government departments/ministries regarding the implementation of the project.

Public Disclosure of the ESIA and ESMP was also done on the 18th July 2024. This was done in partial fulfillment of Section 26 of the Lesotho Environment Act 2008. That mandates the submission and public review of the ESIA before approval is granted by the Department of Environment.

In general, the following observation and recommendations were made by the communities:

- Communities expressed their skepticism about the proposed project given that experience has taught them that engagements are done but implementation of projects never happens or take too long to happen. Hence, many previous consultations of previous similar projects which never took off.
- Communities requested that they be given regular feedback about the project.
- On property that will be affected by the project, communities wanted to know whether they will be compensated. Communities were skeptical about compensations, making reference to a previous project which did not compensate them for loss and damage of some of their properties.

- Communities suggested that for local unskilled labour, similar approaches for local development projects such as Water and Soil Conservation, should be followed whereby people register at the local chief's offices and recruitment is done on a first come first serve basis. They complained about Councillors who they said have the tendency of recruiting their friends and relatives.
- On the recruitment of skilled labour too communities said that first preference should be given to people of the area where construction is taking place. They claimed that they too are skilled.
- Inclusiveness in recruitment was raised. Villagers where construction is taking place, should be the ones engaged to work there. When the construction moves to the next village, villagers concerned would be ones to work in such considered.
- The local authorities mentioned that projects of this nature are really beneficial when they take place and they believe they are going to improve on service provision as communication is now easier using online platforms. Therefore, all most all the government office still do not have reliable access to internet hence definitely this project once implemented will contribute significantly to service delivery. They are going to support it.

Table 5: Summary of Stakeholder Engagement Findings

Stakeholder groups	Key Concerns	Communication Methods
Project Communities	<ul style="list-style-type: none"> - The government must subsidise access to internet for the households and schools as now education is through internet. - Recruitment of Casual Labourers - Sub-standard workmanship. - Destruction of already existing Powerlines - Management of Borrow Pits - Compensation of affected Properties - Grievance Redress Mechanism 	- Public Gatherings
Local Authorities	<ul style="list-style-type: none"> - Compensation of affected properties - Engagement of local labour - Grievance Redress Mechanism 	- Meetings

LECC STAKEHOLDER ENGAGEMENT PLAN

Stakeholder groups	Key Concerns	Communication Methods
	<ul style="list-style-type: none"> - Continuous stakeholders' engagement throughout the project implementation - Free internet for government offices e.g. Courts, hospitals, offices of chiefs, community councils etc. 	
Government Departments	- Policy guidance	- Meetings

Table 6: Summary of Community Consultations Findings

Area	Questions/Concerns	Answers
Ntlholohetsane - Mokhotlong	1. How is general labour recruitment going to be handled?	1. The general labourers are going to be recruited using the already existing engagement methods that the Community of Ntlholohetsane and local structures are using to recruit general labourers.
	2. How are the grievances going to be handled?	2. LECC will disclose the GRM to follow before commencement of the Project. However, all the grievances will be recorded by the Project Team and will be handled by relevant parties.
	3. Are the affected properties going to be compensated?	3. All affected properties will be registered and valuated and compensation will be issued by the LECC.
Qalakheng - Mophale's Hoek	1. The community was very happy to hear about the project and they said they are going to support the project since internet is going to help them have reliable WhatsApp.	Noted
	2. General labour recruitment	2. The community suggested that all general Labourers recruitment be done through the office of the Chief and the Councillor to avoid political influence.

LECC STAKEHOLDER ENGAGEMENT PLAN

Thabong – Thaba Tseka	1. How is casual labour recruitment going to be handled?	1. There are already existing employment methods that the community use to hire casual labourers for other projects, those methods will be followed.
	2. Will the contractor impart any skills to some members of the community to attend to any requirements of the works once he leaves site.	2. Given the scope of work, this is going to be a huge project that will require expertise and manpower for the project to completed on time. Therefore, skills transfer will be done by the Contractor
Ha Tlai-Tali - Leribe	1.How are the disputes going to be handled between the Contractor and the Community?	1. LECC will disclose the GRM before commencement of the project. Again, the disputes are going to be handled by the Client and the Engineer.
	2. How is casual labour recruitment going to be handled?	2. There are already existing employment methods that the community use to hire casual labourers for other projects, those methods will be followed.
Ha Belo – Botha Bothe	1. Will there be blasting?	1. Blasting is not anticipated.
	2. Access to internet will improve communication hence, we welcome the project, and we will support it.	Noted
Ha Maama - Roma	1. Community pleaded that the contractor should give first preference to the elderly for camp establishment to enable them to make a living out of leasing their sites.	Noted
	2. Community complained that the government has a tendency of making promises that it is not willing to fulfil and takes too long to implement. As a result they don't believe that this project will see light of the day.	2. The project has secured funding already from the AfDB hence it will be implemented once the studies have been completed.
	3.Will the general labourers qualify for severance at the end of the project?	3. The Labourers will be paid as per the Labour Act 2024 and its guidelines.
Majoe -a-litšoene - Maseru	1. What will happen to individual properties if	1. All damaged properties will be repaired by the contractor.

LECC STAKEHOLDER ENGAGEMENT PLAN

		damaged by the Contractor?	
		2. How is casual labour recruitment going to be handled?	2. There are already existing employment methods that the community use to hire casual labourers for other projects, those methods will be followed.
		3. Site management and clean-up efforts should be done by the contractor during the construction phase. The project should not pollute the project area.	3.The Construction Supervision Engineer will ensure that the Contractors do not pollute the Environment where pollution is caused the Contractor will rehabilitate to the satisfaction of the Construction Supervision Engineer.
Matheneng Mafeteng	-	1. Who will be staying at the proposed labour camps?	1. Probably skilled labourers from outside the project area.
		2. The project seems to cover a huge area will there be more than one contractor?	2. the modalities of project implementation are not yet in place hence that can be clarified at a later stage.
		3.What is going to happen if the Contractor leaves the project site without paying casual labourers?	3. There is money that is called retention that the Client holds for a period of a year after construction. This money will not be released until all social and environmental issues have been addressed.

8 Stakeholder Engagement Methods and Tools

8.1 Engagement Methods

LECC shall use the following strategies/ techniques to communicate their messaging to different stakeholders as shown in the table below:

Table 7: Engagement Methods

Engagement Method	Application of Method
Community gatherings	Public consultations (Lipitso, local council meetings, village chiefs' forums) for sharing project updates, recruiting local labour, and addressing community concerns.
Formal Meetings	Structured consultations with government authorities, regulators, and donors (e.g., quarterly or biannual reporting, compliance discussions).
Joint site visits	On-site inspections with donors, development partners, and local government to review project progress and verify funded activities.
Coordination workshops	Multi-stakeholder or inter-agency workshops with utilities, contractors, and NGOs to align on E&S standards, OHS requirements, and project coordination.
Technical meetings	Targeted sessions with specialists and institutions on issues like the Grievance Redress Mechanism (GRM), environmental safeguards, and technical design.
Press releases	Official statements issued to media outlets to communicate major milestones, incidents, or corporate updates.
Media briefings	Interactive sessions with journalists to provide updates, clarify incidents, and strengthen LECC's public image.
Radio and Newspaper spreads	Information disclosure to communities via national and local radio, and print adverts for awareness campaigns, service disruptions, or CSR activities.
Social Media campaigns	Real-time updates on Facebook/Twitter covering service disruptions, safety messages, project milestones, and customer notices.
Awareness campaigns	Public education on issues like energy efficiency, safe electricity use, GRM processes, and digital inclusion through community events and outreach.

8.2 Information Disclosure

LECC makes use of a number of methods and channels for information disclosure. These include print and digital media to implement the SEP. Where feasible community and local stakeholder meetings (Pitso) shall be held.

Digital media

Social media channels (Facebook, Twitter) shall also be used for real-time updates on planned service disruptions and service restorations and project related incident reporting.

Print Media

Print media shall be used to communicate major milestones (construction start, contractor appointment and possible communication and CSR achievements). LECC shall also make use of press releases to communicate incidents. The following modes of print media shall be used: project signboards, posters, SHE signage, flyers and posters and Quarterly progress reports.

Pitso's (community meetings)

Within more rural settings the communication shall include pitso (community meetings). Local Community Council sittings and/ or Marena Lekhotla shall be used as key strategic avenues for information disclosure. During these sessions the appointed contractors shall be introduced to the stakeholders including the communities they are to work within. The messaging shall include the following key information:

- The name and contact telephone number of the Contractor's representative who can respond to concerns of affected parties including GRM.
- Proposed program for local labour Recruitment and local resources procurement

During construction phase the Contractor must notify local residents about new or changed construction activities that may affect access to their properties or otherwise significantly disrupt residents or occupiers use of their premises. Unless the work is of an urgent nature and for safety reasons, notification of residents must be at least 5 working days before commencing the work and must advise of the following:

- The nature of the work.
- Why it is necessary.
- The expected duration.
- Changes to arrangements for traffic or property access.

8.3 Workshops and Technical Session

Targeted engagements with institutions and technical stakeholders shall be used to communicate with key stakeholders. This shall include detailed stakeholder information sharing sessions and training on GRM. To ensure that all stakeholders are informed on this structured process for receiving and responding to concerns from communities and or other project affected persons.

8.4 Monitoring and Feedback Tools

Monitoring and Evaluation Framework

This Monitoring and Evaluation (M&E) Framework provides a structured approach for tracking, assessing, and improving the effectiveness of stakeholder engagement in the Digital Transformation and Inclusive Connectivity Project (DTIC-P). It ensures transparency, inclusivity, and responsiveness, while supporting compliance with Lesotho's Environmental Act (2008) and the African Development Bank's Operational Safeguards.

The M&E Framework aims to:

- Track the effectiveness of stakeholder engagement activities.
- Measure the inclusivity of participation, particularly for marginalized and vulnerable groups.
- Assess stakeholder satisfaction and trust levels.
- Monitor the timely resolution of grievances.
- Evaluate the integration of stakeholder feedback into project design and implementation.
- Support compliance with national legislation and AfDB safeguards.

Key Indicators

- a. Indicators will be both quantitative and qualitative to capture the breadth of engagement activities and will include: Information Dissemination
 - Number of information sessions, newsletters, and media broadcasts delivered.
 - Percentage of communication materials translated into Sesotho and gender-sensitive formats.
- b. Stakeholder Consultations
 - Number of consultations conducted with communities, government, NGOs, and the private sector.
 - Level of women's and vulnerable groups' participation in meetings (%).
- c. Capacity Building and Training:
 - Number of training sessions held for communities and technical units.
 - Percentage of participants reporting increased skills and knowledge.
- d. Participatory Monitoring & Evaluation:
 - Proportion of monitoring activities with community participation.
 - Inclusion of gender-disaggregated data in reports.
- e. Grievance Redress Mechanism:
 - Number of grievances received and resolved within set timelines.
 - Proportion of SEAH-related grievances handled by female staff.
- f. Trust and Transparency:
 - Percentage of stakeholders reporting timely access to information.
 - Level of stakeholder satisfaction with engagement processes.

Data Collection Methods

Data will be collected using a combination of methods:

- Meeting attendance records and stakeholder registers.
- Pre- and post-engagement surveys (disaggregated by gender and age).
- Focus group discussions and key informant interviews.
- Community-based monitoring reports.
- Grievance redress system records.
- Media and communication tracking logs.
- LECC shall make use of Toll-free hotline, suggestion boxes at local chiefs' offices,
- Online feedback form and surveys during construction

- To ensure inclusion of communities with limited access to print or digital media: community surveys and or pitso's can be held during and after completion of the construction activities.

Roles and Responsibilities

The Lesotho Electricity Company Communications (LECC) will lead the M&E activities. Specific responsibilities include:

- Project Management Unit (PMU): Overall oversight and reporting.
- M&E Officer: Data collection, analysis, and report preparation.
- Community Liaison Officers: Field-level engagement and grievance tracking.
- Stakeholder Committees: Participation in participatory monitoring and validation of findings.

Reporting and Feedback

M&E results will be compiled into quarterly and annual reports shared with AfDB, government authorities, and community stakeholders. Feedback sessions will be held to validate findings and co-develop corrective actions.

Learning and Adaptation

The M&E process will be iterative, allowing continuous adaptation of strategies. Lessons learned will be integrated into subsequent project phases to enhance inclusivity, trust, and sustainability.

Monitoring and Evaluation Results Matrix

The following Results Matrix outlines the objectives, indicators, baselines, targets, means of verification, and frequency of data collection for the DTIC-P Stakeholder Engagement Plan.

Table 8 Table showing SEP KPI

Objective	Indicator	Baseline	Target	Means of Verification	Frequency
Foster Inclusive Participation	Percentage of women and vulnerable groups attending community meetings	Baseline to be established during first quarter	At least 40% participation from women and vulnerable groups	Attendance registers, gender-disaggregated data	Quarterly
Build Trust and Transparency	Percentage of stakeholders reporting timely access to information	Baseline survey at project start	80% satisfaction rate	Stakeholder surveys, feedback forms	Bi-annual
Enhance Project Design and Implementation	Number of project decisions incorporating stakeholder feedback	0 at project initiation	At least 70% of decisions informed by feedback	Meeting minutes, decision records	Quarterly

LECC STAKEHOLDER ENGAGEMENT PLAN

Mitigate Risks and Address Concerns	Percentage of grievances resolved within 30 days	0 at start	90% resolution rate	Grievance logs, resolution reports	Monthly
Promote Ownership and Sustainability	Number of active stakeholder committees formed and functional	0 committees at start	At least 10 committees functional	Committee reports, activity logs	Semi-annual
Facilitate Collaboration and Partnerships	Number of joint initiatives with NGOs/private sector	0 at start	Minimum of 5 collaborative initiatives	Partnership agreements, reports	Annual
Ensure Compliance and Accountability	Number of compliance audits conducted	0 at start	At least 2 audits annually	Audit reports	Annual

9 Stakeholder Engagement Program

This section highlights how the LECC shall communicate with the different stakeholders When should we communicate and with which stakeholders. The communication can be done withing the following phases as listed below:

Planning - Initial consultations and disclosure, Government, local leaders, community reps

Pre-construction - Permits, awareness raising, All stakeholder groups

Construction -Ongoing updates, issue resolution, Affected communities, contractors

Post-construction – this is commonly referred to rehabilitation phase. This assisted operations of infrastructure and handover of completed sections. As well as rehabilitation and reinstatement of project affected land parcels and or infrastructure.

Operational - Service activation, this will include connection and service provision to end-users.

The Table 9 presents the Stakeholder engagement program for the project. It serves as a structured instrument for the planning, monitoring, and assessment of communication and engagement activities with stakeholders. The matrix encompasses all principal stakeholder groups identified within the Stakeholder Engagement Plan (SEP).

LECC STAKEHOLDER ENGAGEMENT PLAN

Table 9 Plan for engaging different Stakeholders

Stakeholder Group	Objective of Engagement	Message/Information to Share	Communication Channel/Method	Frequency/Timing	Responsible Person	Feedback Mechanism
Local Communities & Landowners	Inform & consult on project impacts and opportunities	Construction timelines, access disruptions, job opportunities, grievance process	Community meetings (Pitso), radio, flyers	Quarterly / Before key activities	Community Liaison Officer	Suggestion box, hotline, WhatsApp
Government Authorities (Ministry of ICT, DOE, Local Councils)	Ensure compliance & alignment with policies	Permits, ESIA results, progress reports	Formal meetings, written reports	Quarterly / As required	Project Manager	Written feedback, official letters
Development Partners & Donors	Provide accountability & progress updates	Financial & technical reports, project milestones	Progress reports, joint site visits	Monthly / Project milestones	Safeguards Specialist	Email feedback, review meetings
Service Providers & Contractors	Ensure compliance with safety and E&S standards	Contractual obligations, OHS requirements, procurement policies	Coordination meetings, site briefings	Pre-construction workshops / Biannual Supplier Day	Procurement & E&S Teams	Performance reviews, direct feedback
Utility Companies (WASCo, LEC, ETL, VCL)	Coordinate shared infrastructure & avoid service disruption	Infrastructure sharing agreements, construction schedules	Coordination workshops, technical meetings	Quarterly / As needed	Technical Manager	Meeting minutes, follow-up actions
Civil Society/NGOs	Ensure inclusivity & represent community interests	Project impacts, mitigation measures, social inclusion policies	Quarterly forums, workshops	Quarterly	Community Liaison Officer	Forum discussions, written submissions
Media	Ensure transparency & public awareness	Milestones, CSR initiatives, incidents	Press releases, media briefings, radio	As needed	Communications Team	Press coverage, journalist feedback
Customers (Residential & Commercial)	Build trust & awareness	Connection dates, tariffs, billing, safety campaigns	Call centres, SMS, social media, awareness campaigns	Ongoing	Customer Service Team	Surveys, hotline, customer service reports

10 Grievance Redress Mechanism

A grievance mechanism is presented in the ESIA and as an Annex of the ESMP. It is established as a formal mechanism that allows stakeholders to report issues, concerns, or complaints. The Digital Transformation and Inclusive Connectivity Project GRM is grounded in several national laws that uphold transparency, community participation, and the right to redress:

- Environment Act (2008): Requires that affected parties have the right to raise concerns and receive responses regarding environmental impacts.
- Land Act (2010): Supports community participation in land use decisions and access to dispute resolution mechanisms, especially where land is temporarily disturbed.
- Labour Code Order (1992): Provides a legal basis for resolving workplace disputes and protecting workers' rights, particularly during construction activities.
- Local Government Act (1997): Empowers local councils to mediate and resolve community grievances in development contexts.

These frameworks collectively ensure that the GRM reflects local governance structures and cultural norms around dispute resolution.

Objectives of the Grievance Redress mechanism

- a) To be responsive to the needs of the beneficiaries by providing a channel for feedback and resolving grievances and disputes at the various levels (local, district) in the project area.
- b) To provide an opportunity to the aggrieved party and the project implementers to resolve disputes in a short time before they escalate to big problems.
- c) To collect information that can be used to improve project performance and mitigate project risks.
- d) To facilitate effective communication between the project and the affected parties.
- e) To enhance the project's legitimacy among stakeholders by promoting transparency and accountability and deterring fraud and corruption.
- f) To provide a platform to ensure compliance with the provisions of the laws, regulations, and cultural and traditional rules in the project areas.

Complainants: Communities and individuals, business and institutions who believe that they are adversely affected by DTIC project. complainants shall include both property owners and care takers of said properties that are located within the project food print.

Channels: complainants may submit grievances through the following channels: LECC Website, LECC Toll Free Hotline, Phone Calls, Email, Letter, Fax, Suggestion box, WhatsApp, Community liaison officers/ local community Traditional leaders and or Local leaders like Councilors, District Administrator and or District Council Secretary. Grievances can also be recorded during public/ community/ stakeholder engagements.

Grievance Recipient: The person who receives a grievance on behalf of LECC this includes designated members of staff of contractors that are engaged by LECC.

Grievance Processing: Once received the Grievances shall be processed. The process shall involve acknowledgment of the grievance by the recipient. Then the grievance shall be assessed, resolved and reported. The Processing of the grievance will follow the grievance redress process outlined in *Table 10* below.

Table 10: Outline of the Grievance Redress Process

Process	Description	Time frame	Process Description
Identification of grievance	Face to face; phone; letter, e-mail; recorded during or after public or community meetings or engagements	1 Day	A number of uptake channels will be used to identify and accept
Grievance assessed and logged	Significance assessed and grievance logged in GRM Register Form (Appendix 11 – Form 1)	4-7 Days	Once PAP have submitted a grievance, it will be accessed and logged in the grievance register (Appendix 11 – Form 1) and PAP will receive acknowledgment of receipt within 4-7 days, regardless of whether they were received in writing or verbally unless AP refrain from providing contact details. The grievance will be assessed and investigated (Appendix 11 - Form).
Grievance is acknowledged	Acknowledgement of grievance will be through appropriate medium,	4-7 days	telephone, acknowledgement form, email, WhatsApp etc. to be used to confirm receipt of a grievance from an PAP and may invite the PAP to an initial grievance meeting.
Development of response	Grievance assigned to appropriate party for resolution Response development with input from management/ relevant stakeholders	4-7 Days 7-14 Days	It's important to respond to every grievance in a timely, fair manner, taking the proper grievance- handling steps.
Response signed off	Redress action approved at appropriate levels	4-7 Days	Each redress stage requires a response sign off by the resolution provider.
Implementation and communication of response	Redress action implemented and update of progress on resolution communicated to complainant	10-14 Days	Throughout the redress process, effectively communicating the status, progress, and referrals made, to PAP will be critical to acceptable resolution.

LECC STAKEHOLDER ENGAGEMENT PLAN

Complaints Response	<p>Redress action recorded in grievance log book</p> <p>Confirm with complainant that grievance can be closed or determine what follow up is necessary</p>	4-7 Days	The step gives PAP opportunity to accept or reject the provided resolution in writing within 4-7 days of receiving a resolution, for documentation, and future reference.
Close grievance	<p>Record final sign off of grievance</p> <p>If grievance cannot be closed, return to step 2 or refer to sector minister or recommend third-party arbitration or resort to court of law.</p>	4-7 Days	Final sign off by LECC Project Manager if it is successfully resolved.

11 Monitoring and Evaluation

The Monitoring and Evaluation of the SEP for the DTIC project. Shall be done ensure that the engagement activities are effectively implemented, stakeholder feedback is appropriately addressed, and project objectives are met.

The primary objectives of Monitoring and evaluation of the SEP are to:

- Track the progress of stakeholder engagement activities.
- Assess the effectiveness of engagement strategies and activities.
- Identify and address any issues or challenges in real-time.
- Ensure stakeholder feedback is incorporated into project decision-making.
- Measure the impact of engagement on project outcomes.
- Provide accountability and transparency to stakeholders and development partners .

The M&E framework for the SEP will consist of the following key components: Indicators and metrics, evaluation processes, reporting and documentation.

Indicators and Metrics: gender responsive indicators and metrics which are quantitative and qualitative will be used to measure the performance of stakeholder engagement activities. The indicators will cover aspects such as the number of engagements, stakeholder participation levels, stakeholder satisfaction, and feedback implementation rates, with a focus on equitable representation and engagement of all genders. These indicators include:

- Frequency of public engagement activities, ensuring balanced participation of women, men, and vulnerable groups;
- Number of participants in different engagement activities, disaggregated by gender;
- Newly identified stakeholders, with a focus on ensuring diverse gender representation;
- Number and details of vulnerable individuals, including women, men, involved in consultation meetings;
- Number of public grievances received within a reporting period (e.g., monthly, quarterly, or annually) and the number of those resolved within the prescribed timeline, disaggregated by gender where possible;
- Type of public grievances received, with analysis of gender-specific concerns;
- Number of press materials published/broadcasted in the local and national media, with attention to gender-sensitive language and representation.

Evaluation Processes: Evaluation processes will assess the overall effectiveness and impact of the SEP at key milestones and at the end of the project. Maximum of three (3) surveys shall be undertaken. Two mid-term reviews and project close out evaluation. These shall cover a representative of the different categories of stakeholders. To provide insights into stakeholders' perceptions of the engagement process and their level of satisfaction with the project outcomes. Information from the surveys, will be analysed to

draw out **lessons learned** and best practices will help improve future stakeholder engagement strategies and inform similar projects.

Reporting and Documentation: The SEP will maintain detailed records and documentation of all engagement activities, including the nature of the activities, participants (disaggregated by gender), issues discussed, decisions made, and follow-up actions. Regular reporting will be done to track progress and inform stakeholders. The following reporting requirements shall form the LECC SEP Monitoring and Evaluation. Copies of these reporting documents shall be sent to the Bank as part of the E&S Quarterly reporting requirements.

The documents are listed below as:

Monthly Engagement Reports – these document all stakeholders interaction for all phases of the project from planning to rehabilitation and handover phase.

- **Quarterly Reports** – The PIU working with the EA will prepare the brief quarterly reports on stakeholder engagement activities conducted on quarterly basis. (Public Outreach activities : meetings with stakeholders, ensuring gender – balanced participation, entries in grievance register, new identified stakeholder groups, emerging new issues or challenges)
- **Annual Stakeholder Reports** – Post-project reports that highlights corrective measures and lessons learnt that shall inform future project engagement strategies.
- **Reporting back to communities** - Sharing and publish reports and have them available on project website and copies sent to stakeholders (District authorities, Other stakeholders on the project e.g. NGOs and other government ministries).

To achieve successful engagements the project will ensure that the following principles are adhered to:

- a) Ensuring sufficient resources to undertake the engagement;
- b) Inclusivity (inclusion of key groups, attention to gender balance) of interactions with stakeholders;
- c) Promotion of stakeholder involvement;
- d) Sense of trust in District implementing Units and its leadership shown by all stakeholders;
- e) Clearly defined approaches; and
- f) Transparency in all activities.

12 Implementation Resources and Budget

12.1 Human Resource Requirements

The successful implementation of the Stakeholder Engagement Plan (SEP) for the DTIC-P relies on clearly defined roles and responsibilities across different levels of the project's institutional arrangement. The key roles are as follows:

- a) **Project Manager** - Oversees implementation of SEP
- b) **Environmental and Social Safeguards Specialist** – is responsible for ensuring that all stakeholder engagement activities are conducted in line with applicable environmental and social safeguards, national legislation, and donor requirements. The Specialist will provide technical guidance on integrating environmental and social considerations into project decision-making, facilitate inclusive consultations with affected communities and stakeholders, and oversee the implementation of grievance redress mechanisms. In addition, the Specialist will monitor and report on the effectiveness of stakeholder engagement processes, ensuring that the concerns of vulnerable groups, including women, youth, and persons with disabilities, are adequately addressed. This role will serve as the primary focal point for communicating E&S issues between the Project Implementation Unit, contractors, regulatory authorities, and the wider community.
- c) **Community Liaison Officer** - works in close collaboration with the site agent and contractors. The CLO will be responsible for daily liaison with local stakeholders affected by construction activities. His/her tasks will include:
 - Facilitating temporary servitudes negotiations with all landowners and or property owners
 - Liaising with the contractor to inform them which land parcels have been clear.
 - Supervising and monitoring contractors CLO activities
 - Carrying out the final site inspection past construction, prior to the handover of all temporary sites
 - Facilitating the handing over of all temporary sites to their owners
 - Main point of contact for local stakeholders or communities where construction activities are on-going. They liaise communication between the contractor and the communities.
 -
- d) **Communications Team** – Develops and disseminates materials during project planning. They coordinate and approve the messaging from the contractors during construction phase.
- e) **Contractors** - Ensure compliance with engagement guidelines
- f) **Headmen/ Village Chiefs (Marena a metse)**– They hosts community meetings and public notices for their respective communities.

They also act as the first point of entry when community grievances/ complaints are being lodged. Accepts and record all complaints coming from the community under his/her village. Verifies the complaints by conducting an inspection or requesting proof from the complainant. Transfer the complaints to the Area Chiefs office for office recording. This shall take place during the official sitting of the chief's council.

- g) **Area Chief (Morena oa Sebaka)** - Receives all complaints from the different villages and consolidates them. The Area Chief acts as a control point and neutral point to address issues from all sides (Community, LECC and Contractors).
 - Ensure that all complaints are collected and recorded accordingly.
 - Compile the register of complaints to be transferred to the local community committee.
 - Liaise with both the headmen and community committee to ensure proper transfer of complaints.
 -
- h) **Principal Chief (Morena oa Sehloho)** - Acts as the overseer on the whole process, the Principal may intervene when matters seem to be getting way out of hand.

Training needs

The successful implementation of the SEP requires a thorough understanding of the existing capacity gaps among stakeholders, particularly in communication, negotiation, and conflict resolution skills. The capacity gap analysis revealed several critical areas needing enhancement:

- a) **Communication Skills:** Many stakeholders, especially at the grassroots level, lack effective communication skills to articulate their needs and concerns. This gap can hinder meaningful participation and feedback during engagement activities. Some project technical staff who will interact with communities lack facilitation skills to fully engage stakeholders effectively.
- b) **Technical Knowledge:** There is a notable gap in the technical knowledge required to understand the project's components and proposed mitigation measures as well as the project ESMP and the legal requirements of the project. This can lead to misconceptions and resistance to project initiatives.
- c) **Data Collection and Analysis:** Limited capacity in data collection and analysis can affect the quality of information gathered during stakeholder engagements, thereby impacting the decision-making process. Gender mainstreaming skills in data collection are lacking and decisions may end up exacerbating gender inequality.

To equip the PIU and key stakeholder involved in the implementation of the SEP. There shall be a need for provide Environmental and Social Safeguards Training. The training content all align with the project's Environmental and Social Impact Assessment (ESIA), ESMP. The following preliminary training needs are identified for all stakeholders:

1. Sexual Exploitation Abuse and Harassment induction training for all key personnel

2. AfDB Environmental and Social Safeguards
3. Community Engagement: Communication with local communities about project activities.
4. Labour and Working Conditions: Compliance with labour laws, fair wages, and preventing child or forced labour.
5. Occupational Health and Safety (OHS): Implementing safety measures to protect public and workers from hazards on site.
6. Cultural Heritage Protection: Identifying and protecting cultural and archaeological sites.
7. Grievance Mechanism: A process for workers and the community to raise concerns or grievances.
8. Land Agreements: The minimum requirements for land agreements made by the contractor for additional land parcel acquisitions.
9. Pre-Construction Property – Conducting surveys of properties near or within the construction processes.

12.2 Budget

Table 11: Estimated cost of the SEP implementation

Activity	Estimated Costs (Maloti)	Estimated Cost (USD)
Community meetings and awareness on GRM	M30,000.00	USD 1,666.67
Focal Points trainings on GRM and logistics support to key community based GRC members	M120,000.00	USD 6,666.67
Set up of GRM Infrastructure	M33,200.00	USD1,844.44
Communication materials and printing including Documentation and grievance logging tools	M50,000.00	USD2,777.78
Subtotal	M233,200.00	USD12,955.56
Contingency (10%)	M23,320.00	USD1,295.56
Grand Total	M256,520.00	USD14,251.12

13 Conclusion

Effective stakeholder engagement is vital for the success of DTIC-P. By fostering transparent communication, inclusive participation, and responsive feedback mechanisms, the project can ensure that it meets the needs and expectations of all stakeholders, leading to sustainable and inclusive growth in Lesotho. The engagement plan outlined here provides a framework for achieving these goals, with a focus on continuous improvement and adaptation based on stakeholder input and project experiences. This SEP is not only a statutory requirement but also a strategic approach to ensure the project's sustainability and success.

By actively involving local communities, government entities, private sector players, and other relevant parties, DITC P is poised to build a foundation of trust and cooperation. This foundation is essential for addressing challenges, seizing opportunities, and achieving the project's long-term objectives. Furthermore, the commitment to gender inclusivity and capacity building within the SEP underscores the project's dedication to equitable development. By enhancing stakeholders' skills and knowledge, the project ensures that all voices are heard and that the benefits of the project are shared broadly. In conclusion, the DITC-P SEP is a comprehensive and dynamic tool designed to guide effective stakeholder engagement. Through systematic monitoring, evaluation, and adaptive management, the project can navigate the complexities of stakeholder dynamics, ensuring that the ICT Sector in Lesotho becomes accessible and inclusive in a sustainable manner. The active and ongoing involvement of all stakeholders will be crucial in achieving the vision of a robust and resilient ICT sector.

Annexes

Annex 1 – Evidence of Stakeholder Consultations



Photo 1: Stakeholder's Engagement at Qalakheng – Mohale's Hoek



Photo 2: Stakeholder's Engagement at Thaba Tseka - Thabong



Photo 3: Stakeholder's Engagement at Ha Belo – Botha Bothe



Photo 4: Stakeholder's Engagement Mafeteng - Matheneng



Photo: Stakeholder's Engagement Mafeteng - Matheneng



Photo: Stakeholder's Engagement Ha Tlai-Tlai – Leribe

Annex 2 – Stakeholder List and Contact Details

Stakeholder Name	Position
MOKHOTLONG DISTRICT	
	District Administrator Mokhotlong
Mr. Khau Maseru	District Council Planning Manager
Mr. Boipuso Moleko	District Council secretary
Morena Lerotholi Seeiso	Principal Chief
	Area Chief - Ntlholoetsane
Ms. Malehloa Khoarai	Chief Secretary
Ms. Nthabiseng Tekane	Mokhotlong Urban Council Town Clerk
	WASCo - Area Manager
	LEC - Area Manager
	District Environment Officer
	DRWS District Engineer
THABA TSEKA DISTRICT	
Mr. Tlali Mphafi	District Administrator
Mr. Lenka Letlatsa	District Council Secretary
Morena Ntaote	Principal Chief
Mr Tšabela Tlali	Thaba Tseka Urban Council Town Clerk
Chief Samonyane Ntaote	Area Chief – Thabong
	WASCo - Area Manager
	LEC - Area Manager
	District Environment Officer
	DRWS District Engineer
BOTHA BOTHE DISTRICT	
Mr. Tsepa Machaba	District Administrator
Mrs 'Mathulisi Mathusi	District Council Secretary
Chief Retšelisitsoe Mopeli	Principal Chief
Senate Nkuebe	Principal Chief Secretary
	Botha Bothe Urban Council Town Clerk
Chief Chonela	Area Chief of Ha Belo
	WASCo - Area Manager
	LEC - Area Manager
	District Environment Officer
	DRWS District Engineer
BEREA DISTRICT	
Mr. Phahlane Makoko	District Administrator
Mr. Paseka Letela	District Council Secretary
Chief Sempe Masupha	Principal Chief
Mrs. 'Mamolete Khothatso	Berea Urban Council – Town Clerk
	Area Chief - Ha Mokhothu

LECC STAKEHOLDER ENGAGEMENT PLAN

	WASCo - Area Manager
	LEC - Area Manager
	District Environment Officer
	DRWS District Engineer
LERIBE DISTRICT	
Mr. Letsema Khalanyane	District Administrator
Mr. Tšolo Thabana	District Council Secretary
Morena Joel Molapo	Principal Chief
Mofumahali Pontšo Mathealira Seeiso	Principal Chief
Mr. Molalle	Hlotse Urban Council – Town Clerk
Nchakha	Maputsoe Urban Council Town Clerk
Morena Molapo	Chief of Ha Mankoaeng
Pelesa Motsieloa	WASCo - Area Manager
	LEC - Area Manager
	District Environment Officer
Mr. Fusi	DRWS District Engineer
MAFETENG DISTRICT	
Mr. Bonang Morahanye	District Administrator
Mr. Paseka Letele	District Council Secretary
Morenaf Lerotholi Leshoboro Seeiso	Principal Chief
Mr. Monyetsane	Mafeteng Urban Council
Morena Tebello Sello	Chief - Matheneng
	WASCo - Area Manager
	LEC - Area Manager
	District Environment Officer
	DRWS District Engineer
MOHALE'S HOEK DISTRICT	
Mrs. 'Malebohang Lebele	District Administrator
Mr. Thabo Mothe	District Council Secretary
	Mohale's Hoek Urban Council
Chief Leteketa	Area Chief – Qalakheng
	WASCo - Area Manager
	LEC - Area Manager
	District Environment Officer
	DRWS District Engineer
QUTHING DISTRICT	
Mr. Bonang Tlali	District Administrator
Libuseng Matsenela	District Council Secretary
Ms. 'Majobo Lejaha	Quthing Urban Council
Morena Seeiso Nkuebe	Principal Chief
	WASCo - Area Manager

LECC STAKEHOLDER ENGAGEMENT PLAN

	LEC - Area Manager
	District Environment Officer
	DRWS District Engineer
QACHA'S NEK DISTRICT	
Mr. Habofano pheko	District Administrator
'Manepo Makatjane	District Council Secretary
Mr. Realeboha Motlatsi	Qacha's Nek Urban
Chief M. Makhaola	Principal Chief
	WASCo - Area Manager
	LEC - Area Manager
	District Environment Officer
	DRWS District Engineer
MASERU DISTRICT	
Mr. Tšepo Lethobane	District Administrator
	District Council Secretary
Mr. Motlalepula Sepipi	Maseru City Council – Mayor
Mr. Moea Makhakhe	Maseru City - Town Clerk
Morena Moeketsi Hlatsi	Chief – Majoe - a – Litsoene
Morena Maama	Chief – Ha Maama
	WASCo
	LEC
	District Environment Officer
	DRWS District Engineer

Annex 3 – Sample Consultation Tools

Form 1 Meeting minutes template

Minutes of the (name) Stakeholder Engagement/
Community Consultation held on (date) in the (place)
.....

1. Present:

Name	Name	Name

2. Matters arising

	Actioned by	Completion Date
1.Update on Program progress		
2. Request for approval and authorisation/ stakeholder consensus		
Grievance Investigations Progress Update:		

Meeting closed at:

Next meeting to be held on: at
(Date and time)

Signature Chief/ Stakeholder Representative: Date:

Comments/ Further actions on behalf of LECC

.....

Signature
Representative: LECC Date:

LECC STAKEHOLDER ENGAGEMENT PLAN

Form 2 External Stakeholder Communication plan

This form is for the use to record site specific External Communication Plan. The form is to be adopted by all contractors and sub-contractors involved in implementation of the Digital Transformation and Inclusive Connectivity Project.

EXTERNAL COMMUNICATION PLAN					
STAKEHOLDER	POWER /INTEREST	KEY INTEREST & ISSUES	COMMUNICATION VEHICLE	FREQUENCY	COMMENTS

Annex 4 - GRM Form Templates

Form 1 Grievance Registration Form

This form is for the use to record any complaints, grievances, issues, comments, requests, suggestions or compliments they have with regard to the implementation of the Digital Transformation and Inclusive Connectivity Project.

Project Location: _____ **Grievance Number:** _____

Date: _____ **Time of Grievance Receipt:** _____

Mode of Reporting Grievance:

Name of Complainant: _____ **Gender:** Male/Female

Designation of Complainant: Property owner/ Care taker/ Chief/ Councilor/

Contact Details (mobile/ email) _____

Grievance Details

Village (origin of Complainant): _____ **Area Chief:** _____

Community Council: _____ **District:** _____

Specific Location (where grievance/ incident occurred): _____

Grievance Description:

_____ (Use extra page if needed)

Signature of Complainant: _____

Recording Officer Name _____

Signature (Grievance Recording Officer) _____ **Date** _____

Form 2

This form is for the use to record Grievance Investigations for all grievances recorded during the implementation of the Digital Transformation and Inclusive Connectivity Project.

PARTICULARS OF THE GRIEVANCE			
Name of Complainant:			
Grievance Number:			
Summary or Grievance Description:			
Grievance location (District, Community Council, Electoral Division, Village):			
TYPE OF INVESTIGATION CONDUCTED			
Field or Site Visit: Yes. <input type="checkbox"/> No. <input type="checkbox"/>	Desk Review: Yes. <input type="checkbox"/> No. <input type="checkbox"/>	Interviews: Yes. <input type="checkbox"/> No. <input type="checkbox"/>	Meetings: Yes. <input type="checkbox"/> No. <input type="checkbox"/>
Date conducted	Date conducted	Date conducted	Date conducted
Key people consulted/interviewed (Name, Contact, Dates):			
Narration of the investigation taken:			
INVESTIGATION FINDINGS			
Summary of the findings:			
Recommendations:			
Responsible/Investigation Officer Name:			
Signature:			

LECC STAKEHOLDER ENGAGEMENT PLAN

Designation:	
Date:	
District:	