

FEDERAL REPUBLIC OF SOMALIA



MINISTRY OF FINANCE (MOF)

PROJECT: SOMALIA RECURRENT COST & REFORM FINANCING
PROJECT - PHASE 3 AF (P181407)

STAKEHOLDER ENGAGEMENT PLAN (SEP)

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1. INTRODUCTION

1.1 Background Information

The Recurrent Cost and Reform Finance (RCRF) Project phase 1 became effective in 2014 and closed after a year. RCRF II became effective in July 2015 and closed in June 2022. The third phase (RCRF III) became effective in December 2020 and was expected to close in December 2023. Subsequently an additional financing (AF) was approved for the RCRF III with a closing date of December 31, 2025. Among the three phases of the project, the first two were implemented under the Operational Policies on environmental and social (E&S) safeguards and only RCRF III was implemented under the World Bank's new Environmental and Social framework (ESF). This is the second Additional Financing for the RCRF III project.

The Project Development Objective (PDO) is **to support the Federal Government of Somalia and Eligible Federal Member States to strengthen resource management systems, the inter-governmental fiscal framework, and service delivery systems in health and education**. The initial RCRF project focused on Benadir, and Puntland States. RCRF 2 expanded to Galmudug, Jubbaland, Hirshabelle and Southwest states and RCRF 3 has continued expanding to other regions and districts of Somalia. In addition to system strengthening and capacity building the focus has been on bringing the existing cadre of health and education workers onto the government payroll, initially in high density urban areas. This AF is requested to help the Federal Government of Somalia (FGS) and Federal Member States (FMS) prepare for a transition after reaching Heavily Indebted and Poor Countries (HIPC) completion point and phasing out of the recurrent cost financing. In addition, the AF will extend the project closing date by 12 months until December 2026 to enable the full implementation of the reform agenda supported by performance-based conditions (PBCs).

The project is run out of the Ministry of Finance and will finance dedicated staff to cover project coordination and management, administration, monitoring and evaluation, financial management, procurement, social safeguards, GBV prevention and communications. It will be implemented in coordination with the Ministries of Health and Education who will have dedicated social and environmental specialists at the federal and state levels funded by other World Bank Projects. Somalia's National Development Plan (2020 – 2024) highlights a commitment to environmental and social safeguards as a cross-cutting issue, with a special focus on ensuring gender and social equity.¹

This Stakeholder Engagement Plan (SEP) is an update of the parent SEP, with additional stakeholder consultations conducted with 50 participants and added in Annex 2. The parent SEP was implemented as planned, with some delays in conducting the stakeholder engagements at FMS and FGS levels and more needs to be done to reach vulnerable and marginalized groups and representatives including CSOs and communities. Also, the grievance mechanism has now been incorporated into the citizen engagement call center as part of component 4, including outreach to communities to solicit feedback on services. Soliciting feedback on services

¹ See Somalia's NDP (2020-2024) at <https://mop.gov.so/wp-content/uploads/2022/07/Somali-National-Development-Plan-9-2020-2024.pdf>

through the call center has elicited nearly 80% response rate from female health workers and is being expanded to community representatives.

The SEP outlines how different stakeholders will be engaged throughout the project cycle and provides mechanisms for their feedback to be used to improve the project implementation. It also outlines what information will be collected from and provided to different groups to facilitate their meaningful engagement in identifying, monitoring and mitigating social and environmental risks associated with project implementation and described how the Grievance Mechanisms can be made more accessible and trusted by communities.

The SEP will be an iterative strategy that is reviewed and updated periodically as a result of the feedback and information gleaned from the regular engagements. After each engagement, the government will summarize key feedback and share with relevant project staff. Stakeholders will be notified of the responses to the feedback and/or grievances. The PIU will keep updated documentation on the engagements and the actions put forward as a result of the feedback.

The diagram below shows the SEP cycle for the RCRF:



STAKEHOLDER ENGAGEMENT PLAN CYCLE

MINISTRY OF FINANCE – FEDERAL GOVERNMENT OF SOMALIA



1.2 SEP objectives

This Stakeholder Engagement Plan (SEP), which is a key requirement of the World Bank's Environment and Social Framework (ESF) is aimed at:

- i. Identifying and analyzing different stakeholders at different levels.
- ii. Planning engagement modalities through effective communication, consultations, and disclosure.
- iii. Outlining platforms for stakeholders to influence decisions regarding the project.
- iv. Defining roles and responsibilities for the implementation of the SEP.
- v. Defining reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings.
- vi. Elaborating the grievance redress mechanism (GM) for the project.
- vii. Outlining the dissemination of relevant project materials, including explanations of intended project benefits and, where appropriate, the setup of a project website; and
- viii. Documenting stakeholder consultations on proposed project design, environmental and social risks and impacts, mitigation measures, the proposed SEP, and draft environmental and social risk management instruments.

1.3 World Bank requirements for stakeholder engagement

This project is being prepared under the World Bank's ESF. As per the Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, the implementing agencies are required to provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Stakeholder engagement is an inclusive process conducted throughout the project lifecycle. Where properly designed and implemented, the SEP supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.

The ESS10 defines the requirements for stakeholder engagement as follows:

- a. Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them.
- b. Assess stakeholder interests and support for the project and enable stakeholders' views to be taken into account in project design;
- c. promotes and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle; and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.

2. PROJECT DESCRIPTION

2.1 Project Development Objectives

To support the Federal Government of Somalia and Eligible Federal Member States to strengthen resource management systems, the inter-governmental fiscal framework, and service delivery systems in health and education.

2.2 Project Components

The project supports Somalia's efforts toward a more resilient, inclusive and stable socio-economic environment. The project's benchmarks/Performance Based Conditions will incentivize the Federal Government of Somalia and the Federal Member States to sustain momentum in helping the FGS and FMS transition after reaching the Heavily Indebted and Poor Countries (HIPC) completion point by the end of 2024 and phasing out of the recurrent cost financing. The project will help scale up inter-governmental fiscal relations, and build state institutions, in support of the delivery of basic services in health and education. It will also support building a real-time feedback loop from the citizens who are intended to benefit from the investments and extend the project life to December 2026.

The proposed AF (P181407) will restructure the parent project RCRF III (**P173731**) by (i) scaling up financing the intensified inter-governmental dialogue on fiscal federalism and functional assignments in health and education as well as the establishment and piloting transfers from FMS to local governments and capacity building for local governments and communities for participatory budgeting (ii) adding new or revising existing performance-based conditions (PBCs) and results indicators; and (iii) extending the closing date to December 31, 2026. This will be the second extension of the RCRF III project.

The proposed restructuring will bolster the development impact of the current RCRF III by strengthening the focus on policy reforms at the FGS and, especially at the Federal Member State (FMS) level, intensifying activities on inter-governmental dialogue, leveraging lessons learned in the service delivery in health and education, and intensifying the use of the government-owned and -led citizen engagement platform. The proposed restructuring will also help enhance alignment with the anticipated Somalia Enhancing Public Resource Management Project (SERP) (P177298). By strengthening institutions of service delivery, the AF is strategically aligned with Somalia's Country Partnership Framework (CPF), the Performance and Learning Review of the CPF (FY24–F28), and Somalia's Ninth National Development Plan (NDP9) 2020-24.

2.3 Project Components

Component 1: Recurrent cost finance to reform resource management systems

This component will continue to finance FGS civil service salaries through input-based advance replenishment model ("baseline" financing) on a declining scale and performance-based financing through PBCs.

The AF will finance only the performance-based portion of the FGS civil service payroll while the government share of the "baseline" FGS civil service salaries financing will reach 100% starting January 2026. Performance-based financing of FGS civil service will comprise around 15 percent of FGS civil service salaries by the end of CY2026.

Selected PBCs benchmarks are revised, and new benchmarks are added with the following considerations: (i) the cost of several benchmarks was increased to add more value to the reform and provide greater incentives; (ii) additional benchmarks were added in 2025-2026 to incentivize sustained implementation beyond the adoption of respective policies and regulations; (iii) the target days for selected reforms were extended while intermediate benchmarks added to reflect realistic timelines and allow for reform sequencing. Annex 2 details the proposed changes. PBCs will continue complementing DPO series and SERP by incentivizing reform implementation and their sustainability.

Subcomponent 1.1 will continue to provide a decreasing “baseline” level of input-based financing of the FGS non-security sector civil service wage bill. As of December 2021, RCRF finances around 20 percent of the FGS civil service wage bill through the advance-replenishment model. AF target will be to decrease the RCRF share of financing to 10 percent by 2025. The spotlight will be on responding to the weaknesses in the RCRF-supported payrolls, such as input controls, inconsistent digitization, weak adjustments, and exceptions handling, as well as broader issues with HRM and accountability, including time and attendance.

Fiscal pressures of the wage bill will be addressed through several measures. These include linkages to the IMF Extended Credit Facility (ECF), enhanced management and transparency of the non-formal civil service wage bill, support of internal control measures through SERP, and the use of PBCs to incentivize domestic revenue mobilization. With expected increases in revenues during project implementation and a better controlled public wage bill, the need for recurrent cost finance will reduce over the years.

Subcomponent 1.2. Financing eligible civil service salaries in FGS: reform benchmarks (PBCs). PBC financing currently enables the FGS to access up to US\$6.3 million in 2022–2023 through reimbursement against eligible expenditures. These PBCs center on five key areas: (a) customs, (b) payment processes, (c) intergovernmental fiscal relations, (d) fiscal transfers to FMS, and (f) public administration. The AF aims to expand the scope of PBCs. The key areas will remain, but with a longer time horizon available. Additional intermediate benchmarks aimed at helping the FGS to avoid slipping off the reforms road map and longer-term benchmarks aimed at medium-term reform results are being added. New benchmarks will incentivize continued reform efforts in revenue administration, payroll management, fiscal federalism, fiscal sustainability of the civil service wage bill, enhanced roles for women in civil service. Furthermore, a new PBC on wage bill management is proposed to continue efforts, started under RCRF II 2021 restructuring, to increase transparency and fiscal sustainability of the non-formal wage bill. New benchmarks align closely with the SERP and other development partner activities in Somalia.

Component 2: Strengthen intergovernmental fiscal relations.

This component will scale up the support to the intergovernmental platforms with the objective of strengthening fiscal federalism structures and contribute to the operationalization of intergovernmental agreements following the intensification of the federalism dialogue at the national level. Furthermore, the FMS level PBCs will be expanded to test the viability of performance-based financing of the FMS civil service payroll and introducing the declining scale of “baseline” financing (see Annex 2 for the list of PBCs). The FMS PBCs will need to balance the ambition of the reform with its viability to ensure predictable and uninterrupted financing of FMS level civil service salaries. Therefore, the verification processes will be refined and detailed in the Project Operations Manual (POM)

to allow for timely and predictable disbursements in January-February each year. The Eligible Expenditure Program will include both FGS and FMS civil service wage bill. Intergovernmental transfers from FMS to selected local governments will continue to be piloted with the primary goal of strengthening PFM systems and building capacity for participatory and accountable local government transfers for service delivery and climate change mitigation and adaptation.

Subcomponent 2.1. Supporting Intergovernmental Fiscal Forums and Secretariat. The AF will intensify support to the fiscal federalism agenda and federal entities. The intergovernmental dialogue will continue through support of the Intergovernmental Fiscal Forum (IGFF) and Secretariat as well as sectoral (health, education) intergovernmental forums. Stronger analytical output and technical assistance will be provided in the areas of fiscal transfers, a revenue sharing formula, use of the new harmonized chart of accounts in budget preparation and execution, functional decentralization in service delivery, and local governance structures within selected FMSs. As SERP provides technical assistance on the harmonization of PFM and DRM systems between FGS and FMSs, a key priority for the RCRF will be to reinforce communication and coordination between the FGS and FMSs for strengthened intergovernmental fiscal relations. Support to the intergovernmental dialogue platform on civil service reforms initiated under the RCRF will be taken up by SERP to avoid duplication of activities and ensure stronger technical assistance support to the harmonization agenda.

Subcomponent 2.2. Reform benchmarks for improved governance and service delivery at the FMS level (PBCs). FMS-level reform benchmarks will be continued and expanded. The first round of PBCs targeted at FMSs was disbursed in August 2021 and, despite some initial delays, have served as an effective instrument for channelling intergovernmental transfers to frontline service delivery units. However, several lessons learned need to be taken into account in designing a new set of FMS PBCs. First, FMSs still have limited capacities and understanding of PBC-based financing mechanism. The existing service delivery PBCs are cumbersome and require a long list of documentation, which at times is duplicative and does not bring any value added to the reform's agenda. Second, launching new initiatives (such as performance-based school grants program) through PBC financing without project allocations to support design, piloting, and expansion have proved challenging; the approach will be revisited. Finally, additional benchmarks to increase accountability and transparency of PBC-based financing are required and should be aligned with SERP support.

Subcomponent 2.3. Strengthening resource management systems. Subcomponent 2.3 will continue financing investments in the MoF and Office of the Accountant General (OAG) (notably External Assistance Fiduciary Sections (EAFS)), and contract management capability in the ministries of education and health, and social safeguards. This activity will be closely coordinated with the SERP, and the Public Resource Management in Somalia (PREMIS) phase two project funded by the UK Foreign, Commonwealth, and Development Office (FCDO). Support to OAG will include developing OAGs in FMSs, assessing needs for professionalization and training for the government's accounting cadres, developing a three-year strategic plan, and maintaining strategic regional partnerships. FMS social/gender-based violence (GBV) specialist positions and their travel, community mobilization, and monitoring activities will be financed from this subcomponent. Subcomponent will also support building up expertise and sharing experiences across the World Bank's new operations in the health and education

sectors in Somalia. Other Bank projects are also likely to leverage this support, especially during the early phases of implementation.

Subcomponent 2.4. Supporting local governance within FMSs (new). The World Bank team held several discussions with FMSs and development partners to gauge the demand for a new subcomponent to support the local governance agenda within FMSs. Districts, old and newly created, are at various stages of administrative and political development depending on the FMS, local political dynamics, conflict status, population, and urbanization. Local governments (districts/municipalities), especially the few urban, populous ones, need immediate support to regulate and complement the existing private and civic actor service delivery. Support will be needed to strengthen local government capabilities in basic administrative skills, as well as in the technical elements of strictly public services. While further engagement with the FGS and FMSs will be required, preliminary areas of support include (i) fostering intra-FMS dialogue with and capacity building of municipal/district governments in FMS capitals and interim capitals on functional and fiscal decentralization; (ii) funding technical assistance on urban property surveys, property registers, and property tax revenue sharing with these urban centers in selected FMS, (iii) building capacity of fit-for-purpose PFM and payroll systems in the capital districts (and Bosaso); (iv) promoting citizen engagement at all levels of government per demand; and (v) advising on mechanisms to enable emergency financing in response to climate-related and other disasters. This subcomponent will be carried out in close coordination with the United Nations' JPLG Program. The FMS MoF will sign a grants manual agreement on the fiscal transfers with the FGS MoF and sign a service delivery agreement with the districts to specify *inter alia* eligible activities, selection criteria, accountability, reporting, inclusivity, and community engagement and grievance mechanism requirements. The grants manual will include E&S screening and instrument preparation requirements noting that the following exclusion criteria will apply: no physical construction activities other than minor rehabilitation; no activities in highly insecure areas.

Component 3 will introduce a declining scale for the “baseline” (input-based) recurrent financing for FMS with the target of at least 40 percent of FMS civil service salaries financed from FMS own revenue and reimbursed through PBCs. Non-salary recurrent costs will continue to be financed from advance replenishment to ensure the adherence to the agreed reform roadmap and compliance to the PFM regulations through third-party monitoring. AF will scale up financing to the Marwo Caafimaad (Female Health Worker) program with the focus on the newly liberated areas in close coordination and labor division with the Improving Healthcare Services in Somalia Project (“Damal Caafimaad”, P172031). Input-based support to education sector is expected to scale down after the RCRF financed teachers have transitioned to Government-financed teacher cadre. At the same time, FGS and FMS level earmarked PBCs in the education sector will provide the financing cushion during the transitional period between the phase out from the recurrent cost support to post-HIPC financing terms.

Component 4 will have a strengthened focus on citizen engagement, open budget, accountability, transparency, and inclusivity. As initial activities laid the foundations for citizen engagement by improving transparency and collecting citizen feedback, the new activities will focus on closing the feedback loop, citizen participation and trust building, and encouraging government accountability. The AF will consolidate around successful pilots and incrementally expand them with the above objectives in mind. For the call center, this will entail personalization of messaging, integration of social media, and promoting open data. For the mass media, behavior change, and

feedback campaign, this will entail rolling out the pilot to a wider geographic scope with a greater focus on collecting actionable feedback and showing how it is used. Finally, on budget transparency, this will entail strengthening and institutionalizing pilot budget hearings held by parliament and budget consultations held by the MoF along with publication of feedback received and government response. Activities will be closely coordinated with SERP, with the AF taking the lead at the FGS and SERP leading in the FMS.

Component 5 will continue providing support to project management and coordination. The component will also procure the services of an Independent Verification Agent or consultants to validate FGS and FMS level PBC achievements.

2.4 Environmental and social risk of the project

The overall risk rating for the project is High, with four risks: political and governance, macroeconomic, fiduciary, and other (mainly comprising security risks). Risks include the broad geographic and technical scope of project activities. While many benefits exist to taking an all of Somalia and comprehensive governance reform approach, it also comes with risks related to the dynamics between FGS, FMS.

The environment risk rating is Moderate. This is mainly due to the waste generated from the medical kits to be supplied to female health workers. The absence of medical waste management procedures may cause uncontrolled outbreaks of contagious diseases and is a threat to public health.

The social risk rating is rated Substantial taking into account the following key social risks and impacts: (i) potential nepotism and exclusion of disadvantaged and vulnerable groups in recruitment and service provision; and (ii) labor risks including OHS and security risks especially in newly liberated areas, (iii) sexual exploitation and abuse, sexual harassment, and other forms of gender-based violence (GBV) that may occur in recruitment, or retention and/or dismissal of skilled or unskilled female workers and the delivery of both health and education services; (iv) potential risks of increased social tension in the community (for example, on how services are delivered, or siting of services); (v) contextual risks of operating in a conflict zone and complex social context where effective and inclusive community consultations, monitoring, and developing effective and trusted grievance redress mechanisms are challenging.

All social and environmental risk mitigation measures have and continue to be detailed in the appropriate ESF instruments, including the Environmental Social Management Framework (ESMF), the GBV/SEA/SH prevention and responsive action plan, the Stakeholder Engagement Plan (SEP) and Labour Management Plan (LMP).

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The project will engage a large and diverse array of stakeholders during implementation. The FGS and the participating FMS will be responsible for project implementation and management. Non-state stakeholders such as community leadership, citizens who benefit from the services provided, teachers and health workers, members of disadvantaged groups e.g. Internally Displaced Persons (IDPs), minority groups, women, youth, and people living with disabilities will be involved regularly through the life of the project. Other groups such as teacher training institutes, private sector health and education providers, civil society, will similarly be engaged as appropriate. Relationships with existing non-government actors, including UN agencies, NGOs and private sector organizations, will also be established to ensure the project leverages their activities within the health, education and civic engagement space.

Careful consideration will be taken to ensure that women, youth, the elderly, persons with disabilities, IDPs and minority groups will be represented amongst the stakeholder groups engaged. Various other stakeholders such as religious or clan elders—who may influence the perception and uptake of education and health services and involvement of women and vulnerable groups in the project will also be engaged.

For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- a. **Affected Parties:** persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actual or potential) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation, sharing of project benefits, and management measures.
- b. **Other Interested Parties:** individuals/groups/entities who may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and
- c. **Vulnerable Groups:** persons who may be disproportionately impacted or further disadvantaged by the project as compared with other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal and effective representation and participation in the consultation and decision-making processes, including in taking advantage of project benefits, associated with the project. Members of disadvantaged groups can be affected parties or other interested parties, depending on the circumstances.

3.1 Affected Parties

The affected stakeholder groups and their relevance and needs can be classified as follows:

Table 1 Different Stakeholders and their relevance and needs.

Project stakeholders	Relevance to the project	Needs
The FGS and line ministries, departments, and government agencies directly supported by the project.	The government ministries, departments and agencies are integral to the overall success of the project at all stages. They are crucial to the establishment of the physical, technical, legal and regulatory framework of the project as well as providing the human resources. Inter-and intra-agency collaboration will be essential for the implementation of the project activities. The main government ministries to be engaged will be ministries of education and health and FMS line ministries, as well as others involved in ESF implementation such as the Ministry of Labour and Social Affairs and Civil Service Commission and others that will benefit from improved citizen engagement and feedback and other WB supported project that may have good practice and experience to share.	To be informed and identify potential social and environmental risks, grievances in order to address and mitigate and monitor implementation.
People who will benefit from project-related employment e.g. social service workers (i.e. teachers and health workers in FGS, FMS administrations)	Successful implementation of the Project will increase the legitimacy and functionality of the State and bring benefits to the public. The payment of salaries and support of expenditures in the social sectors, particularly health and education, is an essential precondition for the restoration of public confidence in the legitimacy of state structures and could support peace, with security dividends resulting from the improved fiscal position of recipient governments. Genuine citizen engagement and responsive complaints mechanisms also have the potential to build trust and cohesion. Those directly engaged as workers are able to provide insights on whether the activities are expanding access to improved social services and enabling government functionality. They are also able to inform project management of any issues (whether fiduciary or programmatic) that may emerge during implementation. The project will generate employment or business opportunities for the community through engagement of firms and consultants and hiring of field staff and enumerators for data collection.	To share their feedback on project implementation and whether social and environmental risks are adequately being addressed/mitigated.
FMS and local government (Municipality Departments, Municipal	Local government institutions protect the rights of inhabitants in the project area and represent the local communities. Through the project, state and local capacities will be augmented to provide improved service delivery. These constituencies will also benefit from improved citizen engagement in government budgeting and feedback on services.	To be informed of potential social and environmental risks, grievances - in order to address and mitigate, as possible.

Councils, and District offices)		
Communities where project activities are implemented.	Communities will benefit from the improved quality and continuity of services provided by health, education and other workers supported through the project as well as improved government budgeting and service provision through citizen engagement and feedback mechanisms. There already exist local structures which the project can engage with such as health committees and community education committees, as well as traditional local leadership, including clan heads/chiefs and religious leaders.	To share their feedback on project implementation, including the sharing of project benefits, and whether social and environmental risks are being adequately addressed/mitigated.

3.2 Other interested parties

Project stakeholders	Relevance to the project	Needs
International NGOs and bilateral donor agencies	Development partners will be able to provide technical advice and financial assistance and performance standards for service provision in the education, health and civic engagement sectors. Engagement with these groups can improve coordination and leverage investments.	To learn about the project's activities, share information, lessons learned, and explore opportunities to maximize synergies and impact with similar projects.
Civil society organizations (i.e. women and youth, and persons with disabilities groups) and direct and indirect representatives of the poor and excluded	Civil society organizations especially those which work closely with vulnerable and marginalized groups are often able to articulate issues and amplify the voices of those who may be otherwise hard to reach or not sufficiently empowered to raise issues.	To learn about the project's activities and to have a platform to advise on social risks management and mitigation.

1.1. Disadvantaged/vulnerable individuals or groups

Project stakeholders	Relevance to the project	Needs
The poorest communities, IDPs, persons with disabilities, and minority groups and their representatives.	These vulnerable or marginalized groups have the most to benefit from accessing the health and education services under this project.	To learn about the project and its benefits and provide their feedback and concerns regarding project implementation and sharing of project benefits, through an easily accessible mechanism.

4. STAKEHOLDER ENGAGEMENT

The government will ensure genuine stakeholder engagement to build mutual trust, foster transparent communication with both the project beneficiaries and other stakeholders, and ensure social and environment risks and impacts are identified and mitigated. In Somalia, consistent and meaningful dialogue with stakeholders is critical to maximize opportunities for the project's success, enhance project acceptance and ownership and to improve the social contract between the government and its citizens. The SEP and the citizen engagement component will be implemented in such a way as to promote monitoring of social and environmental risks while also setting mutual expectations, clarifying the extent of the government's commitments and resources, and obtaining feedback on activities. Lastly, the SEP will include a grievance mechanism (GM) to allow the government to act upon complaints and suggestions for improvements in a timely fashion.

4.1 Stakeholder Engagement Principles

Stakeholder analysis generates information on the perceptions, interests, needs, and influence of actors on the project. Identifying the appropriate consultation approach for each stakeholder throughout the project lifecycle is necessary. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement.

- i. **Openness and life-cycle approach:** public consultations for the project will continue during the whole project lifecycle from preparation through implementation to closure. Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation.
- ii. **Informed participation and feedback:** information will be provided and widely distributed among all stakeholders in an appropriate format; conducted based on timely, relevant, understandable and accessible information related to the project; opportunities provided to raise concerns and ensure that stakeholder feedback is taken into consideration during decision making.
- iii. **Inclusivity and sensitivity:** stakeholder identification will be undertaken to support better communication and building effective relationships. The participation process for the project will be inclusive. All stakeholders will be encouraged to be involved in the consultation processes. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups, particularly civil servants in low grades, female workers, minority groups and those with disabilities.

4.2 Summary of stakeholder engagement done during project preparation

Engagement on the project design and the planned activities and implementation arrangements have been carried out with relevant government agencies, development partners and non-government project-affected stakeholders. As part of updating the SEP and the ESMF, the PIU carried out consultations with various stakeholders such as such as government officials, civil society organizations, United Nations representatives, international non-governmental organizations etc. This Stakeholder Engagement Plan (SEP) is an update of the parent SEP, with additional stakeholder consultations conducted with 50 participants virtually. Participants were engaged meaningfully, actively seeking their suggestions and experiences in E&S management. These sessions yielded valuable insights into potential social and environmental risks and mitigation measures associated with

implementing RCRF 3 AF. Furthermore, the PIU will also conduct a physical stakeholder consultation meeting at the FGS and FMS level for in-depth stakeholder engagement to regularly get further insights on how to mitigate social and environmental risks on the ground. The SEP will be a living document that is continuously updated based on the information gleaned from the multiple and concurrent stakeholder consultations.

Given the fragile state context of Somalia, the social risk rating is substantial. The rating takes into account the weak governance institutions, continued insecurity, and conflictual socio-political dynamics that contribute to a myriad of social and environmental risks. The following risks have been identified through the various consultation processes:

Equity

- The selection criteria for districts on component 2.4 should be clear and transparent;
- Hiring decisions may not reflect transparent and fair processes and instead is influenced by nepotism or clannism. Minority clans and groups including minority groups, IDPs, and persons with disabilities, and women are particularly at risk of discrimination.
- Dismissal / termination of some project workers mainly FHWs and teachers may not be done in a transparent manner and may involve favoritism and discrimination, particularly in relation to: persons from minority clans, IDPs, persons with disabilities.
- Some recruited health and education staff may fail to provide services without discrimination, including to disadvantaged groups.
- The plan to tie support for schools to performance based on test scores or other qualitative measures may marginalize poorer communities where students do not have the socio-economic conditions, access to tutoring services or other methods of improving learning outcomes.

Occupational Health and Safety (OHS)

- Workers may be directly targeted by violent non-state actors for their affiliation with the government. This is a particular threat for those working near areas outside of government control, areas where people congregate, e.g., health centers and schools may also be a target.
- Physical structures from which workers provide services to the community may not cater to females (e.g. separate toilets) and persons with disabilities (access).
- Female health workers may be exposed to COVID-19, and other infectious diseases because of a lack of personal protective equipment (PPE).

Gender Based Violence (GBV)

- FHWs often travel alone and by foot to homes to provide services. As a result, they are particularly vulnerable to GBV.
- Limited trainings for key personnel (health and education) providing services to GBV survivors as well as lack of information on who provides what, can increase harm, violence, and death.
- The need to strengthen referral pathways.

- Due to limited understanding of survivor-centered approaches, reinforcement of community conflict resolution in some cases may cause harm to women and girls including revictimization, stigma and marriage to the perpetrator.

Sexual Exploitation Abuse and/or Harassment (SEA/SH)

- Female workers (whether civil servants, FHW or teachers) may be subject to GBV/SEA/SH in the recruitment or retention process given men dominate the hiring and management in most if not all government offices.
- Lack of integrated policies providing protective environment free from GBV/SEA/SH and services for survivors.

Other gender issues

- While official government policy is to allow for female employees to take maternity leave and have access to time off for breastfeeding, women are vulnerable to losing their jobs after pregnancy since these policies are rarely adhered to in practice.
- The lack of female representation in school management may serve to limit the ability of communities to increase the number of female teachers – a critical component in providing a welcoming environment for female students and other female teachers.

Lack of trust in stakeholder feedback and grievance mechanisms

- Stakeholders may fear providing honest feedback or reporting grievances due to lack of trust in whistleblower protection and that the information will be dealt with confidentially and appropriately.
- The need to integrate grievance mechanisms and citizen engagement platforms and collaborate with district council members in each district was proposed to enable efficient feedback and handling of complaints.

Other potential risks

- The focus of support exclusively to FHWs may marginalize traditional birth attendants who are the primary providers of pre and post pregnancy care in rural areas.
- The need to consider climate mitigation activities and ensure the sustainability of these activities beyond World Bank support, including the need for long-term strategies and plans for a well-designed exit strategy well before the project closure timeline.
- The need to streamline security support for the World Bank funded projects by developing a single approach across projects.

The discussions with the stakeholders provided an understanding of the potential social risks identified. Below are some of the key issues:

- Challenges using smart phones/ODK/taking photos/security.
- Conflict over perceived overlap of roles between FHWs & Traditional Birth Attendants.
- Complaints – delays in salaries, safety and security, storing kits,

- Lack of attention to areas with marginalized groups

Mitigation measures for the social risks outlined above will be provided in the updated Environmental and Social Management Framework (ESMF). The updated Labor Management Procedures (LMP) will outline fair treatment, non-discrimination and equal opportunity of project workers and define separate worker grievance procedures. A GBV/SEA/SH prevention and response action plan will be updated and will detail the necessary operational measures to be put in place to prevent GBV/SEA/SH among staff, students and community members and ensure a separate, survivor-centric, and confidential grievance mechanisms and procedures for dealing with cases and provision of services for survivors. The Grievance Mechanism will be strengthened, and trust building measures enhanced.

4.3 Summary of project stakeholder engagement tools and techniques

The government will tailor its engagement according to the most effective mechanisms to reach identified stakeholders including vulnerable and disadvantaged groups. To minimize costs and maximize impact and access to stakeholders, the SEP will be implemented closely with the citizen engagement platform and build on and strengthen existing intra-government engagement structures for FGS and FMS dialogue. At the community-level, project coordinators in FGS, and participating FMS will build a coalition of change agents and community monitors or work with existing structures by adopting various communication and participatory methods designed to inform, consult, involve, collaborate or empower. These will include vulnerable and disadvantaged groups such as IDPs, minority groups, women, and remote communities including nomadic pastoralists. Due to the obstacles to participation for these vulnerable groups, the project will work closely with organizations who advocate for equitable services to ensure their views are taken in consideration and their issues addressed.

To expand the audience for public information campaigns, the project will utilize strategic communications depending on the audience, for example radio, social media and TV discussions. The FGS Ministry of Finance has contracted a mass media and communication firm that would develop communication and behavior change strategy, including clear messaging for each audience and segmentation, and explain and show how information is used. The company will also develop and test campaign tools. The firm has partnership with major media houses to deliver the message and would take the advantage of the social media platforms for reaching different stakeholders. Both the call center and mass media firms would inform the stakeholders on the availability of the GM through SMS voice call and posting to the social sites including increased anonymity. In addition, periodic community feedback surveys will be carried out to get insights on the social and environmental impacts of services provided by the project and an understanding of whether there is awareness on the GM and whether it is trusted and functioning. These feedback mechanisms could include call centers and SMS texts that to can expand engagement with communities where the RCRF III is to be implemented. In a country with limited literacy rates, technologies such as interactive voice response (IVR) allow beneficiaries to give direct feedback to the government in a quick and easy format. So far, the call center conducted several beneficiary engagement activities targeting the FHWs and supervisors in different locations via SMS and voice call. The call center uses Ushahidi technology platform to send and receive SMS, while call record management software has been used for the calls as 7575 short codes. There are several other campaigns planned to be conducted very soon. So far, the call center contacted more than 660 FHWs in different locations for different campaigns with a response rate exceeding 80%

average. The major challenges highlighted in the implementation process include technology difficulties to accommodate different interfaces and poor mobilization in some locations.

Meaningful stakeholder engagement depends on timely, accessible, and comprehensible information and accessible opportunities to influence the program in ways that do not present risks to those raising what can be critical and sensitive issues. This requires that the PIU ensures that relevant project-related information is available as early as possible and throughout the project life cycle in a manner, format, and language appropriate for each stakeholder group. The following table indicates the methodology for stakeholder engagement and information disclosure. Formats to provide information may include presentations, printouts, non-technical summaries, project leaflets, non-literate diagrams and posters and pamphlets, depending on stakeholder needs. Due to the COVID-19 pandemic, the project will use a mix of in person meetings and remote and virtual methodologies, as well as radio and other social media platforms. In the context of stakeholder engagement, the project will ensure compliance with national law requirements as well as World Bank guidance, including World Bank “Technical Note: Public Consultations and Stakeholder Engagement in World Bank-supported operations when there are constraints on conducting public meetings,” March 20, 2020, regarding the COVID-19 situation.

For the new subcomponent 2.4. Supporting local governance within FMSs (new). The FMS MoF will sign a grants manual agreement on the fiscal transfers with the FGS MoF and sign a service delivery agreement with the districts to specify inter alia eligible activities, selection criteria, accountability, reporting, inclusivity, and community engagement and grievance mechanism requirements. The grants manual will include E&S screening and instrument preparation requirements noting that the following exclusion criteria will apply: no physical construction activities other than minor rehabilitation; no activities in highly insecure areas. Different community groups (including separate consultations with women and minority groups) will be consulted on how the local government grants will be used and potential E&S risks in the activities and mitigation measures. Site specific awareness raising will be conducted on the GM.

4.4 Proposed strategy for consultation

Table 2: Proposed Consultation Strategy

Stakeholder	Channels of Engagement	Frequency	Purpose	Who will carry out
Line ministries, departments, government agencies	High-level policy meetings at FGS-FMS level Working sessions with FGS and FMS technical ministry and local government counterparts Joint periodic surveys	At launch and regular intervals e.g. 6 months	Project reviews including social risks and how they are being managed. Seeking clearance to implement the project components. Raise awareness of key provisions to provide a protective environment free from GBV, SEA/SH Review GM monitoring processes. To promote shared responsibility and partnership.	PIU and Social/GBV specialists at FGS and FMS level

Local organizations and interested citizens in districts with health, education and community engagement components	Public Forums Interactive FM radio programs	Before activities in each FMS	To inform public of the project's activities and goals. To share information on mechanisms for stakeholder engagement, GM and GBV/SEA/SH risks and mitigation measures. Some of the mitigation related to stakeholder engagement Includes regular meetings to share project information, risks as well as developing a strategy to identify appropriate methods to disseminate and the disclosure of information to stakeholders. Development of GBV /SEA information guide integrated into the health and education materials for outreach teams	PMT and Social/GBV specialists at FGS and FMS level
UN, international and local NGOs and bilateral donor agencies	Donor, sectoral/cluster level meetings Knowledge sharing forums for health, education and civic engagement	Every 6 months at FGS and FMS level	To solicit guidance and feedback on: Project implementation and social risk management. To strengthen collaboration and a multi-sectoral approach to services including to GBV/SEA/SH survivors	PMT and Social/GBV specialists at FGS and FMS level
Communities, including members from vulnerable and marginalized groups, served by project-funded health and education workers. Other community service providers such as traditional birth attendants and madrasa teachers.	Public fora using approaches such as community conversations or dialogue forums and separate sessions with vulnerable groups only and differential measures of engagements including focus group discussions, women and other vulnerable groups' representatives etc.	At the launch of activities in a region and every year.	To inform communities on the project's goals, activities and mechanisms. To assess effectiveness of project services and how they can be improved. To identify social and environmental risks and how they could be managed, or their management improved. Provide dialogue opportunities where citizens have access to government representatives and other stakeholders. Collect feedback from the target communities to understand their concerns, issues and perceptions of the overall project implementation.	Social/GBV specialists at FGS and FMS level
	Billboards – with visual posters on information on support to community and GM	Throughout the life of the project in project sites.	Provide information on key project related GBV risks, as well as on reporting and response services	

	Annual user feedback surveys for sampled community representatives including vulnerable groups where targeted services are provided	Yearly	through the identified GM procedures. Provide feedback to the targeted communities on concerns, suggestions, perceptions they have raised regarding project implementation.	
	Websites – FGS and FMS websites with information on the project and contacts, process and functionality of GM	Throughout the life of the project.		
	Social media e.g. WhatsApp, Twitter etc.	Throughout the life of the project.		
People who will benefit from project related employment (e.g. civil servants, teachers, FHWs)	Regular meetings to review progress. Surveys to assess job satisfaction. Virtual tools to report and effectiveness and challenges. WhatsApp groups to share information and suggestions	Throughout the project life.	To provide timely access to information, data, documents, and other relevant project information Learn about any issues related to social and environmental risk management and what can be improved. To increase understanding and support the effectiveness of the GM and GBV prevention.	Supervisors and social/GBV specialists at FGS and FMS level
Civil society organizations, private sector	Public forums, knowledge sharing forums. Social media	Annual	To share project information To strengthen multi-sectorial approach to services provided including to GBV survivors. To promote public-private partnerships, such as joint committees, which will help strengthen impact of project	Social/GBV specialists at FGS and FMS level

4.5 Proposed strategy for information disclosure

The Government will ensure that information to be disclosed at the federal, state and local/district levels is:

- i. Accurate, up-to-date and easily accessible.
- ii. Emphasizes shared values.
- iii. Articulates the principle and rationale for the various strategies being used by the project at the different levels.
- iv. Includes an indicative timeline and phasing of the project activities (more so where construction will be done);

- v. Includes explanation of measures that will be used in the selection of workers and how the effects on the public and communities will be minimized; and
- vi. Includes information on where people can go for more information, ask questions, channel their complaints and grievances, and provide feedback (and contact persons as appropriate) and acts on their feedback appropriately and confidentially.

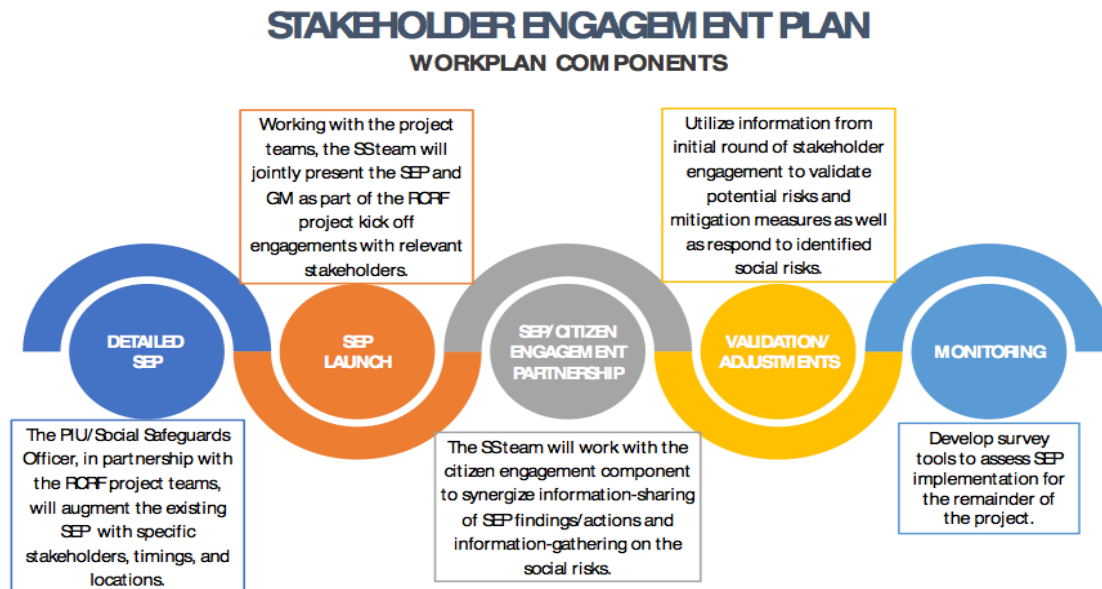
Other key considerations will include:

- i. Over time, based on feedback received through the GM and other channels, information disclosed should also answer frequently asked questions by the public and the different concerns raised by stakeholders.
- ii. During implementation, the Communication Officer will monitor social media regularly for any misinformation about the project and craft responses to be disseminated by the Social Safeguards Specialist and Communication Officer; and

If the engagement of security or military personnel is considered for any aspect of the project, ensure that a communication strategy is in place to inform stakeholders of their involvement and the possibility of raising concerns and grievances on their conduct through the GM.

4.6 SEP activity cycle

Below illustrates the key SEP activity cycles of the project after effectiveness:



4.6 Stakeholder engagement plan

The project team will prepare and disclose documents based on the schedule provided in table below. Updated versions of the various instruments will be developed as necessary and disclosed.

Table 3: Stakeholder Engagement Plan

Stakeholder Engagement Plan			
Project stage	Target stakeholders	Information to be disclosed	Methods and timing proposed
Before implementation	Directly affected ministries at the federal state levels and districts MDAs and other agencies directly engaged in the delivery of some aspects of the project	Technical details of the project. The ESF instruments including the updated ESMF SEA/SH Prevention and Response Action Plan, LMP and the SEP. Awareness-raising on the GM. ESMF, LMP, SEA/SH Prevention and Response Plan and SEP disclosures.	Public and individual meetings during the preparation of the project documents. Disclosure of written information - widespread Radio, TV (in parts of the country), social media, mobile phone. Brochures/flyers translated in Somali. Face-to-face meetings: separate meetings specifically to people and groups directly affected by the project or within the vulnerable groups. Grievance mechanism.
	Other interested parties including development partners, CSOs, media, etc.	Technical details of the project. Compliance with national regulations and collaboration with relevant programs.	Social Media Public and individual meetings during the preparation of the project. Disclosure of written information - Brochures, posters, flyers, websites (Social Media Communication) – translated in Somali.
	Disadvantaged and vulnerable groups including IDPs, persons with disabilities, and minority groups and their representatives.	Awareness raising about the GM SEA/SH Prevention and Response Plan, LMP and SEP. ESMF, LMP, SEP disclosures.	Meetings with group representatives and members of the groups as necessary. Separate meetings and differential methods specifically to affected disadvantaged and vulnerable groups and individuals, including separate meetings, forums and focus group discussion Grievance mechanism.
Project Implementation	Key stakeholders	Area/subproject specific ESMPs including plans for implementation of SEP, ESMF, SEA/SH Prevention and Response Plan, and LMP.	WB and MoF website. FMS and regional consultation meetings and community consultation meetings with all groups including disadvantaged and vulnerable group representatives. GM sensitization and awareness

		Processes for providing stakeholder feedback	campaign mainly within the vulnerable groups and persons.
Annual reports	Key stakeholders and project beneficiaries at FGS and FMS level including disadvantaged and vulnerable groups.	Annual report on progress and lessons learnt, complaints resolution and feedback.	MoF website, FGS and FMS stakeholder consultation meetings.

4.7 Proposed strategy to incorporate the views of disadvantaged and vulnerable groups

The project will carry out targeted stakeholder engagement with vulnerable and disadvantaged groups and individuals to understand their concerns/needs in terms of accessing information, services, and any other challenges they are seeing with the project implementation. Groups working with or those representing voices of minority and disadvantaged individuals, including CSOs, CBOs and activists will be consulted in the respective areas of operation. Special attention will be paid to engage with women in appropriate ways, including using female facilitators. Strategies will be adopted to effectively engage and communicate to vulnerable and disadvantaged individuals and groups during project implementation.

The participation of disadvantaged and vulnerable groups in the selection, design and implementation of project activities will largely determine the success and sustainability of the project investments. Where adverse impacts are likely, the PIU and the FMS will undertake consultations with the likely affected civil servants and communities and those who work with and/or are knowledgeable of the local development issues and concerns. The primary objectives will be to:

- i. Understand the community structures in the respective project sites:
- ii. Identifying CSOs, community groups and activists working with the disadvantaged and vulnerable individuals and groups.
- iii. Seek input/feedback to avoid or minimize the potential adverse impacts associated with the planned interventions.
- iv. Identify socially and culturally appropriate impact mitigation measures; and
- v. Implement targeted actions to ensure inclusion of vulnerable and disadvantaged individuals and groups.

Consultations will be carried out broadly in two stages. First, prior to the commencement of any project activity, second, there will be continuous stakeholder engagement that will ensure the active involvement of the key stakeholders as part of the contractors' SEP and monitoring activities.

The implementing parties will:

- i. Facilitate broad participation of disadvantaged and vulnerable individuals and groups with adequate gender and generational representation and CBOs.

- ii. Provide the disadvantaged and vulnerable individuals and groups with all relevant information about the project including on potential adverse impacts.
- iii. Ensure communication methods are appropriate given the low level of literacy and communication challenges for PWDs.
- iv. Organize and conduct the consultations in forms that ensure free expression of their views and preferences.
- v. Document details of all consultation meetings with disadvantaged and vulnerable individuals and groups on their perceptions towards the project activities and the associated impacts, especially adverse ones.
- vi. Share any input/feedback offered by the target populations; and
- vii. Provide an account of the conditions agreed with the people consulted.

To help ensure that the process does not marginalize disadvantaged and vulnerable groups, representation for these groups will be included in the grievance committee (GC) tasked to resolve grievances/complaints at the local/district level. The following issues will be addressed during the implementation stage of the project:

- i. Provision of an effective mechanism for monitoring implementation of the project activities by the PIU and PMTs, social safeguards team;
- ii. Involve suitably experienced CBOs/NGOs to address the disadvantaged and vulnerable individuals and groups through developing and implementing targeted action plans that are issue focused (e.g. on recruitment of women and PWDs);
- iii. Provision of technical assistance for sustaining the activities focused on the needs of the disadvantaged and vulnerable individuals and groups.

5. RESOURCES AND RESPONSIBILITIES

5.1 Resources

The Ministry of Finance will be the main implementing agency for the project and will lead the implementation of project activities, including this SEP. The budget contains adequate funds for the SEP and GM and will be referenced when developing the detailed workplan. In addition to the amount allocated in the budget for the SEP, the funds allocated for the citizen engagement component will also be leveraged given the complementary activities.

5.2 Responsibilities

The FGS will provide strategic direction with respect to policy and financing of the SEP, led by the Social Safeguards Specialist, supported by the social/GBV safeguards officers in each of the participating FMS. The proposed governance arrangements will consist of a Project Steering Committee, a Project Implementation Unit (PIU) at FGS and FMS levels. At the FGS level, the PIU will be managed from the Ministry of Finance. These structures will work in close collaboration with the Project Management Teams (PMT) for the new World Bank Health and Education projects and a PFM Reform Coordination Unit, which would work closely with the External Assistance Fiduciary Section (EAFS) team in the Offices of the Accountant General. The FGS will engage a project coordinator while each participating FMS will engage a project manager that will be responsible for implementation in their entity.

The overarching implementation and monitoring of the stakeholder engagement plan will be the responsibility of the PIU. The direct responsibility of implementation will be designated to the Senior Social Safeguards/GBV Specialist assisted by the social/GBV specialist within the Ministry of Finance. He/she will work other ministry-level and state-level social/GBV safeguards officers to ensure that the objectives of the plans are met and with the appropriate allocation of the necessary resources for its implementation. An adequate budget for stakeholder engagement will be allocated from the overall project cost, which will include cost for organizing meetings, workshops and training, hiring of staff, field visits, translation and printing of relevant materials and operating GMs. Some of the costs will be co-shared with the citizen engagement platform. Reports on stakeholder engagement and a summary of grievances will be received by the social/GBV specialist from the social safeguard's officers at the FMS level every three (3) months. The social safeguards/GBV staff at FMS level will receive training from the social safeguard/GBV specialists at the FGS level and the Project Management.

6. GRIEVANCE MECHANISM

The project has been classified as having a Substantial social/GBV risk, as it may have some unintended social consequences e.g. risks of further exacerbating existing exclusion patterns or tensions between groups who feel they are under/misrepresented and undermining trust between citizens and government if transparency, equity, and appropriate citizen engagement is not fostered. A GM has been developed which will enable the effective redress of any grievances from the project stakeholders including from civil servants and communities where the project is being implemented. In addition to a call center with a toll-free line and outreach to communities to get feedback on the FHWs component, there will be confidential, appropriate mechanisms to deal with complaints regarding sexual harassment, exploitation, abuse, and harassment. There will also be a separate worker grievance mechanism for the use of all direct and contracted workers which will incorporate a whistle blower protection policy to raise employment-related concerns, in line with the provisions of ESS2. The project will put measures in place to ensure that this worker grievance mechanism is easily accessible to all project workers.

Responsibilities: The Ministry of Finance will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with the laws of FGS and the World Bank Environmental and Social Standards through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all grievances will be the social/GBV specialists at the FGS and FMS PIUs who will receive grievances by email or via the call center through publicized toll-free mobile lines and email addresses or at both FMS and FGS levels or through community level grievance focal points. They will acknowledge, log, forward, follow up grievance resolution and inform the complainant of the outcome. The head of the PIU at the FMS and FGS level will ensure that a systematic and fair process is in place to resolve all complaints. The complainant has the right to remain anonymous, in which case their identifying details will not be logged. Measures will also be put in place to ensure whistle-blower protection. Grievances related to the overall project will be dealt with by the Ministry of Finance/PIU at FGS and FMS level, however those about health or education service provision will be resolved in conjunction with the relevant ministry at the FGS and/or FMS. The FGS social/GBV specialist will carry out training of FMS social/GBV officers and other staff including complaints handling and reporting.

A grievance redress committee (GRC) will be established at FMS and FGS level chaired by the Project Manager, and the relevant PIU staff will be included as necessary depending on the complaint (procurement, finance, M&E, GBV advisor and communications officer), in addition, staff from the Ministries of Health and Education will be invited as required. The Social/GBV Specialists will minute the meetings and follow up the grievance resolution process and provide feedback to the complainant. The composition of the GRC meetings will depend on the issues raised in complaints even if they are non-urgent complaints. The aim of the meetings is to review complaints, ensure that they are dealt with fairly, respectfully and confidentially, progress on complaints resolution, assess progress on the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the system and the project. Immediate meetings will be held in case of significant complaints to be addressed at the Ministry of Finance/PIU level. Significant complaints will be outlined in the GM manual. For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, staff social/GBV specialist should immediately inform the FGS social/GBV specialist or head of the PIU, who will inform the World Bank within 72 hours as per the Environmental and Social Incident Reporting (ESIRT) requirements.

A serious incident is one that caused or may cause significant harm to the environment, workers, communities, or natural or cultural resources, is complex or costly to reverse and may result in some level of lasting damage or injury; or failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies; or failure to remedy indicative non-compliance that may potentially cause significant impacts. Examples of serious incidents may include SEA complaints, injuries to workers that require off-site medical attention, exploitation or abuse of vulnerable groups, consistent lack of Occupational Health and Safety (OHS) plans in a civil works project, and large-scale deforestation. Serious incidents require an urgent response and could pose a significant reputational risk for the Bank.

A severe incident is one that caused or may cause great harm to individuals or the environment or present significant reputational risks that could hamper the Bank's ability to operate in a country or region. The Borrower's inability or unwillingness to remedy situations that could result in serious or severe harm would be a factor in classification. A severe incident is complex and expensive to remedy (if possible) and is likely irreversible. A fatality is automatically classified as severe, as are incidents of major environmental contamination, forced or child labor, abuses of community members by project security forces or other project workers (including GBV), violent community protests a project, kidnapping, and trafficking in endangered species.

The social/GBV specialists are responsible for noting and reporting critical trends emerging in the GM process such as an increase/decrease in types of grievances to share with the GRC, as well as tracking complaints expressed on social media and whether and how these should be addressed. Throughout the process, the social/GBV specialists will receive support from the PIU.

Types of grievance: Complaints may be raised by staff, partners, consultants, contractors, members of the community where the programme is operating or members of the general public regarding any aspect of programme implementation. Potential complaints include:

1. Fairness of contracting
2. Fraud or corruption issues
3. exclusion
4. Social and environmental impacts
5. Payment related complaints
6. Quality of service issues
7. Poor use of funds
8. Workers' rights
9. Gender Based Violence, sexual harassment or sexual exploitation and abuse.
10. Forced labour, including human trafficking and use of prison labour
11. Child labour
12. Threats to personal or communal safety

There will also be a separate worker grievance mechanism for the use of all direct and contracted workers to raise employment-related concerns, in line with the provisions of ESS2. This will be included in contractors' contracts and monitored by the social/GBV specialist.

There is a separate email address to receive GBV-related complaints and the call centre and FMS specialists are being trained on handling GBV complaints to enable reporting in a safe, confidential and survivor centric manner to be developed under the key activities under the SEA/SH prevention and response action plan and to be integrated into relevant project documents, such as the Project Operations Manual.

Building Awareness on GM: The PIU will continually raise awareness of all its staff, and the staff of the implementing Ministries and FMS PIUs, on the GM procedures to be used including the reporting and resolution, as well as how to handle and refer complaints if they receive them and whistleblower protection. A public awareness campaign will be conducted to inform all communities, stakeholders and financed staff on the mechanism, as well as it’s functionality and whistle blower protection procedures to promote trust so that stakeholders feel comfortable raising concerns. The call center will broadcast informational messages to all stakeholders, including FHWs, supervisors, and civil servants on the availability of the GM. A one pager will be developed providing details and a visual poster and leaflet provided in all areas where the project is implemented. Various mediums will be used to raise awareness on the GM including social media and FM radio to reach remote communities, including call ins with panels including community and government representatives and information on how complaints are handled and resolved. The radio stations will be carefully selected to reach communities targeted for support under the RCRF 3AF including vulnerable and marginalized groups. The GM procedure and contacts will also be published on Ministry of Finance website indicating a phone number, email and address for further information. The GM will be represented in simple visual material as well as Somali dialects.

The project will aim to address grievances with the following steps and indicative timelines:

Table 4 Grievances addressing steps and timelines

	Steps to address the grievance	Indicative timeline*	Responsibility
1	Receive, register and acknowledge complaint in writing. Serious complaints immediately reported to the PM who will report to the World Bank. For GBV related cases coming in, a separate guidance of managing cases of GBV/SEA/SH will be developed.	Within two days	The person receiving the complaint. Social/GBV specialist at FGS and FMS levels supported by PIU
2	Screen and establish the basis of the grievance. Where the complaint cannot be accepted (for example, complaints that are not related to the project), the reason for the rejection should be clearly explained to the complainant and where possible the complaint directed to the relevant department.	Within one week	Social/GBV specialist supported by PIU.

3	Program manager and social/GBV specialist to consider ways to address the complaint if required in consultation with the GRC.	Within one week	Program manager supported by PIU.
4	Implement the case resolution and feedback to the complainant.	Within 21 days	Program manager with support from GRC.
5	Document the grievance and actions taken and submit the report to PIU.	Within 21 days	Social/GBV specialist/GBV and GRC supported by PIU
6	Elevation of the case to the government judiciary system, if complainant so wishes.	Anytime	The complainant
* If this timeline cannot be met, the complainant will be informed in writing that the GRC requires additional time.			Social/GBV specialist, GRC supported by PIU

Reporting back to stakeholders

In addition to feedback to the complainant on how complaints have been resolved (mentioned above), broad feedback on common concerns will be shared during regular stakeholder consultations.

Grievances related to Gender Based Violence (GBV):

Serious complaints of sexual exploitation and abuse, sexual harassment and other forms of gender-based violence will be addressed immediately by referring the GBV survivors to support services as per the GBV Referral Pathway. GBV/SEA/SH cases can be reported through the general Project GM – identified project focal points, staff handling the call centers, or through the GM Hotline Operator. In addition, the PIU GBV Advisor at the FMS will have a dedicated telephone line and, email address (rcrfgenderunit@gmail.com) where such complaints can be raised.

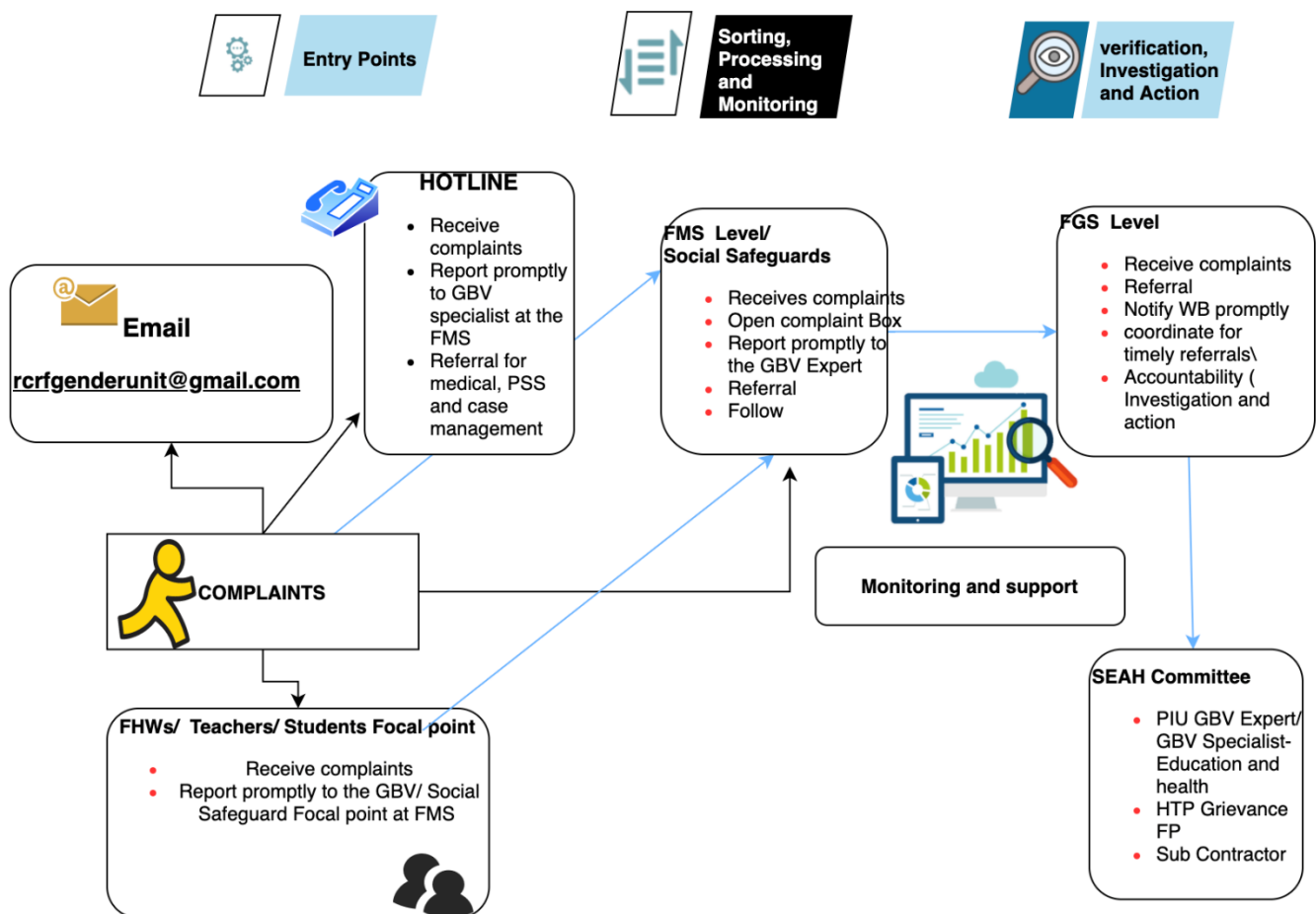
The RCRF parent project has designated the Senior social/GBV Advisor as the Focal Person at the Federal level under the Ministry of Finance. Each FMS has also identified 1 Grievance Focal Person (the social/GBV specialist) and 1 focal point from the female health workers (FHW Supervisor) and teachers in each project location. In line with the survivor-centered approach, the grievance recipient to whom an allegation is disclosed will provide a safe, caring, and supportive environment. This means being non-judgmental, empathetic, and compassionate, and demonstrating emotional support to the survivor while clarifying relevant information. It also means respecting confidentiality and the wishes of the survivor.

Once a case has been taken in by a GM operator or via the identified focal points, informed consent of the survivor is obtained to proceed with the case, the case file/information will be submitted to the RCRF senior social/GBV Advisor. The senior social/GBV advisor will ensure that the survivor has been provided with all necessary GBV referral services and will ensure that the survivor is safe.

All reporting will limit information according to the survivor's wishes regarding confidentiality. If the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information that may lead to the survivor's identification of any potential risk of retribution. Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor.

Where the RCRF project worker has allegedly committed the GBV/SEA/SH grievance, the case will be reported to the respective employing agency (HTP, sub-contractor, government Ministry of Education and Health). The PIU GBV Advisor will follow up and determine jointly with a specially constituted "SEA/SH Committee", the GBV Specialists from the Ministry of Health and Education, Health Technical Partner (HTP) GBV focal points, and sub-contractors on the GBV/SEA/SH allegations related to the RCRF project. The GBV Advisor will follow up and ensure that the Code of Conduct violation is handled appropriately according to the sanctions as indicated in the individual CoC. These sanctions may include oral, written warning, loss of salary, suspension from employment, termination of employment and report to the police if warranted.

SEAH REPORTING PROTOCOL



Project workers GM

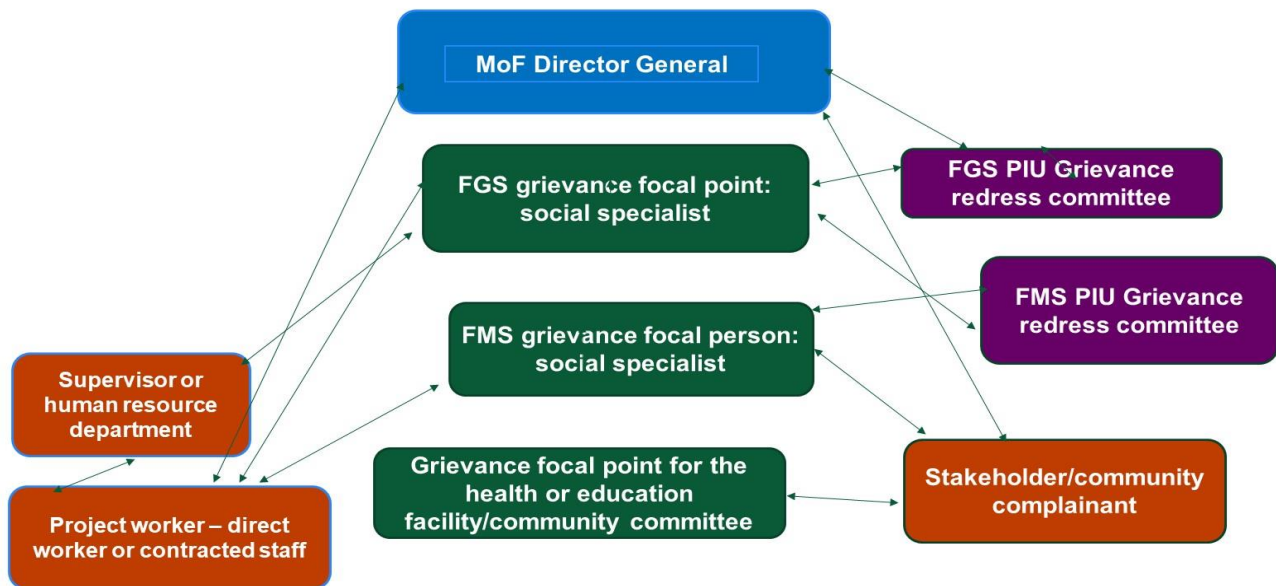
A grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. The workers GM should be accessible, impartial and functional and there should be an appeals process.

All contractors including the Health Technical Partner and other contractors e.g., for the citizen engagement component or monitoring and citizen feedback, a workers GM will be required and included in bidding documents and contracts. Project staff at FMS and FGS level, will be encouraged to raise concerns with their immediate supervisor or the Project Coordinator (FMS) or Project Manager. However, if the concern relates to the LMP provisions they can also raise it via the social/GBV expert at FGS level who will forward to the Project Manager for resolution in conjunction with a worker’s GRC consisting of the procurement officer, the project secretary and the social/GBV specialist or if it is not resolved by the Director General of MoF.

See below for flowchart outlining grievance focal points and redress committees:

RCRF 3: GRIEVANCE FOCAL POINTS AND REDRESS COMMITTEES

PROJECT GRIEVANCE MECHANISM



Village level: for project components operating at village level, complaints can be raised with grievance focal points within education committee/health center linked to FHWs or Female Health Supervisor. The committee will receive and log complaints and resolve where possible or if not refer to FMS grievance focal person. If community members generally raise concerns with the chief or village elders, then the education committee or

village development committee should liaise with them on receiving and resolving complaints, where appropriate, noting that women and minority groups may prefer to raise concerns directly and have them resolved by the project GM. It is unlikely that the health, education, and the citizen engagement components will be implemented in the same village, however in such cases, synergy will be promoted where possible.

FGS level: concerns can be raised by toll free text or phone/WhatsApp: 7575/334 to or devoted email: rcrfgrm@gmail.com or rcrfgenderunit@gmail.com or with the FGS social/GBV specialist or the project manager.

1. **FMS level:** concerns can be raised devoted email: Southwest State: swssgrm@gmail.com
2. Jubbaland State: JL.RCRF.GRM@gmail.com
3. Hirshabelle State: Hssgrm@gmail.com
4. Puntland State: plrcrf.grm@gmail.com
5. Galmudug State: rcrf.grm.galmudug@gmail.com

or in person with the FMS social/GBV specialist or Ministry of Health and Education focal points and in the case of the Female Health Workers the Female Health Supervisors.

The responsibility of addressing the complaints is with the project implementing agency in conjunction with the Grievance Redress Committee. If no satisfactory response is reached, affected people can contact the following to facilitate the follow up process:

World Bank Somalia: If a grievance has been raised with the NPIU, and no satisfactory response has been received, an email can be sent to somaliaalert@worldbank.org

World Bank Washington Office: If no satisfactory resolution has been received from the World Bank Country office, grievances can be raised with the World Bank Office in Washington. For more information: <http://www.worldbank.org/grs>, email: grievances@worldbank.org

Or The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018
1818 H St NW
Washington, DC 20433, USA
Email: grievances@worldbank.org
Fax: +1 – 202 – 614 – 7313

Complaints may be submitted by mail, fax, e-mail, or hand delivery to the World Bank headquarters or any World Bank country office.

World Bank's Inspection Panel: If not satisfactory solution to the complainants is reached through the GRS, project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

www.inspectionpanel.org

7. MONITORING AND REPORTING

The overarching implementation and monitoring of the stakeholder engagement plan will be the responsibility of the PIU. In conjunction with the senior social/GBV specialist, he/she will ensure that the objectives of the plans are met and successful implementation of the plan by the allocation of the necessary resources for its implementation.

Ministry of Finance through the PIU will collect baseline data, using both quantitative and qualitative methods and report on the following indicators:

Indicator	Means of Verification
a. Number of government agencies, civil society organizations, private sector and other stakeholder groups that have been involved in consultations on the project implementation phase by FMS on a quarterly basis.	Minutes and reports of consultations disaggregated according to FMS, sector and gender.
b. Number of engagements (e.g. meeting, workshops, consultations participants sex and age disaggregated) with stakeholders during the project implementation phase (on an annual basis).	Minutes reports and other documentation of consultations.
c. Percentage of stakeholders who are aware of the GM mechanism including the workers and GBV GMs and report that they trust the mechanism to resolve complaints satisfactorily	Stakeholder meetings and surveys by FMS, type of stakeholder and gender
d. Percentage of complaints that are satisfactorily resolved and not resolved within timelines disaggregated by FMs and gender (according to the complainants (during stakeholder surveys and evaluations)	Stakeholder meetings and surveys by FMS, type of stakeholder and gender
e. Percentage of stakeholders who rate as satisfactory the level at which their views and concerns are taken into account by the project (responsible party for measuring this indicator is MoF and this will be undertaken by the PIU to conduct the Mid-Term and Terminal Evaluation).	Impact and satisfactory assessments as part of project evaluation.

The project performance assessed through monitoring activities and adjustments made through complaints management will be reported back to annual stakeholder forums at district, member state and FGS level. The lessons learned through the monitoring will also contribute to the design of future subprojects.

7.DOCUMENTS DISCLOSURE OF PROJECT

The following table outlines the disclosure of project documents:

Disclosure of project documents			
Project stage	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Before appraisal	Civil Service, health, and education stakeholders, the general public and GBV service providers	PAD, SEP, ESCP	WB and MOF website
Before effectiveness	All stakeholders identified above	Updated SEP, LMP, ESMF including the SEA/SH prevention and response action plan, Grievance Mechanism, and medical waste management plan	WB and MOF website
Before project activities	All stakeholders identified above	Summary in Somali of the project and GM including workers GM and GBV sensitive GM	MOF website, health centres and other public places where FHWs or the CE component is being implemented

7.INDICATIVE BUDGET, SUMMARY ACTIONS

ESMF Requirements	Budget basis and assumptions	Total Cost (US dollars)
Meetings, workshops and stakeholder engagement	For 30 persons/year * two workshops	20,000
Stakeholder Engagement at FMS and community level	One per year in each FMS	30,000
Grievance mechanism costs		Already included in citizen engagement platform and operational costs
Monitoring compliance and cost of third-party monitoring of stakeholder trust and satisfaction with the GM.	Assume quarterly monitoring activities over five days, each quarter, per year (two persons plus logistics, per diem etc.)	20,000
Monitoring compliance including assessment of medical waste management and PPE adequacy and usage by health workers	Assume quarterly monitoring activities over five days, each quarter, per year (one person plus logistics, per diem, etc.)	20,000
Stakeholder engagement training for contractors and other implementing partners on GM implementation, Monitoring, and reporting	One per year	20,000
Information Education Communication materials (leaflets, posters, brochure, banner on project and GM, GM forms, registers in Somali)	One per year	25,000
FM radio press conferences and call ins (twice per year at FGS and FMS level)	Twice a year	50,000
	TOTAL Estimated Budget	185,000
	Contingency (5%)	9,250
	Grand Total	194,250

ANNEX 1: MULTI-STAKEHOLDER CONSULTATION MEETING MINUTES

Held: 27th December 2023 10:00AM- 1:00PM

The objective: to get valuable inputs and suggestion on improving the social and environmental instruments for RCRF AF such as ESMF, LMP, GRM and SEP.

Target: the stakeholder consultation meeting will ensure that various stakeholder as such as government officials, civil society organization United Nations, internal displaced people, women groups, and beneficiary communities will be informed about the comprehensive nature of these new interventions. Their valuable input will be incorporated into project documentation, ensuring a collaborative and inclusive approach to this endeavor.

Time	Session	Lead
10:00 am-10:30 am	Opening, introduction to Additional Financing of RCRF III	RCRF, PC- MOF /PIU
10:30 am-11:30 am	Environmental and Social Risks	RCRF-Social Safeguard
11:30 am-12:00 pm	GBV/SEA/SH Prevention and Response Plan	Former RCRF GBV Expert
12:00 pm-12:40 pm	Plenary discussion on social and environmental risk and mitigation measures and their relevance competence.	Participants
12:40 pm-1:00 pm	Closing Remarks	RCRF PC-MoF-PIU

The stakeholder consultation meeting for the RCRF 3 AF 2 project was held on 27th December 2023 virtually and Around 50 participants attended the Stakeholder Consultation meeting representing community members, UN representatives, and Government officials, including Ministry of Finance, Health and Education directors, NGOs, Social Safeguards, and youth groups. Participants actively contributed to the meeting discussions by sharing their opinions about the projects.

A summary of the discussion points is detailed below.

The meeting was officially opened by the Project Coordinator(PC). The PC warmly welcomed all the participants to the meeting. In his opening remarks, the coordinator provided an overview of the project and objectives for organizing such stakeholder engagement workshop with all stakeholders while stressing the need to have regular community engagement and accountability discussions. He comprehensively explained the five components of the RCRF project:

1. Recurrent cost finance to reform resources management systems.
2. Strengthen intergovernmental fiscal relations.
3. Transfer for core government functions and foundational education and health service delivery mechanisms in eligible FMS.
4. Citizen engagement and feedback
5. Project management

He further mentioned the benefits of organizing stakeholder engagement and emphasized that such platforms are always beneficial for government entities/offices that run World Bank-funded projects since wider

contributions and inputs from stakeholders are confirmed. Better consultation reflects a better and well-designed project he said and has the following benefits:

1. **Enhanced Project Design and Implementation:** Stakeholder engagement allows for valuable inputs and insights from a diverse set of stakeholders, including local communities, NGOs, government officials, and experts. This involvement helps shape project implementation, ensuring it aligns with local needs, maximizes impact, and addresses potential challenges.
2. **Increased Ownership and Support:** Engaging stakeholders fosters a sense of ownership and accountability among various actors involved in the project. When stakeholders have a voice in decision-making processes, they are more likely to support and actively participate in project activities, leading to improved project outcomes.
3. **Effective Risk Identification and Management:** Engaging stakeholders enables a comprehensive understanding of local contexts, potential risks, and social and environmental impacts. This knowledge allows for early identification and management of risks, ensuring project sustainability and reducing unforeseen challenges during implementation.
4. **Knowledge Sharing and Capacity Building:** Stakeholder engagement provides a platform for knowledge exchange, sharing best practices, and building the capacity of local stakeholders. This collaborative approach enables the transfer of skills and expertise, empowering communities to become active participants in project implementation and long-term development.

The Director of Public Health of the Ministry of Health then commended the World Bank for its valuable work in Somalia. The visible support from different parts of the community and governmental assistance were acknowledged. He also praised the environmental and social team for their tireless effort in prompting the protection of the environment and safeguarding social risks for FHWs, proper medical waste management is crucial for safeguarding the environment.

Thereafter, the FGS Social Safeguard Specialist made an overview presentation of the environmental and social management framework and emphasized environmental and social standards that apply to the RCRF Project.

- 1- **ESS1:** Assessment and Management of Environmental and Social Risks and Impacts
- 2- **ESS2:** Labor and Working Conditions
- 3- **ESS3:** Resource Efficiency and Pollution Prevention and Management
- 4- **ESS4:** Community Health and Safety
- 5- **ESS10:** Stakeholder Engagement and Information Disclosure

The RCRF social safeguard specialist talked about the environmental and social risk rating of the projects, the main environmental issue for the project relates to the handling and disposal of medical kits and limiting the spread of communicable diseases (e.g., COVID-19) through health and education provision. Other project activities do not pose risks since they relate to technical assistance, capacity building, and training. He also talked about the ES risk mitigation measures and confirmed that the participants received a well a rounded understanding of handling different environmental and social risks. Moreover, the FGS Social Safeguard emphasized the importance of the project complaint mechanism and highlighted the ministry's responsibilities for overseeing the resolution of all issues related to the project activities in accordance with the laws of FGS and the WB environmental and Social

Standards. Mr. Ahmed Shared with the meeting participants about the existing channels including the hotline number 7575/334 and the FGS and FMS Emails.

The former GBV Expert of RCRF, emphasized the importance of monitoring all forms of gender-based violence, particularly against female project workers and community members during project implementation. It was emphasized that elders, local authorities, and every community member have the responsibility to report any abusive behaviors towards women and girls. The Government maintains a zero-tolerance policy against perpetrators.

Suggestions made during the Consultations.

The Project Coordinator of the Damal Caafimaad, praised the achievements of the RCRF Project and appreciated the introduction of the new sub-component of local governance as the project activities are being decentralized and bringing the service delivery closer to the population. Nevertheless, he suggested that the RCRF and DC should think of integrating the Talo Wadaag Center Facility, (A Citizen Engagement Center) to have a unified and shared call center services for cost minimization and time efficiency since RCRF has effectively and efficiently established the citizen engagement center. He further added that Security management framework documentation should also be shared across World Bank projects for cost minimization and time efficiency purposes since the context is always the same.

The PM from Galmudug, suggested that all the stakeholders and different community segments should be engaged especially the traditional elders as they are respected in the communities.

The UN representative expressed the need for translating all project documents such as ESMF, LMP, and SEP into Somali.

The social specialist from the Ministry of Water and Energy commented on the selection criteria for districts, on a discussion point related to the local governance component, highlighting that prioritizing districts with established district councils might unintentionally exclude larger cities or districts from the consideration and thus may lead to underserved population.

The GBV specialist from SCRIP suggested that the project should conduct an impact assessment to see the level of impact of the project's initiative. She also recommended the social team to conduct field mentoring for safeguarding and environmental and social-related purpose.

Issues/comments raised during the meeting by other stakeholders.

- Questions were raised regarding the utilization of RCRF project funds for emergency operations, especially in Somalia, such as the recent floods that impacted numerous community members.
- Concerns were expressed about the sustainability of these activities beyond World Bank support, highlighting the need to ensure long-term strategies and plan for a well-designed exit strategy well before the project closure timeline.
- A suggestion was made to establish an integrated call center where local government systems can address issues directly.
- A referral pathway was also raised to be strengthened and enhanced within the established frameworks.
- Collaboration with district council members in each district was proposed to facilitate the work of project workers and enable efficient feedback and handling of complaints.

- One participant expressed interest in hearing documented examples of actual GRM and GBV cases.
- Damal Caafimaad to fully utilize the citizen engagement center was also underscored.
- Suggestion was made to streamline security support for the World Bank funded projects by just adopting and emulating one single document.

Lessons Learned:

Since RCRF is a flagship project for all World Bank funded projects in Somalia and is the leading project on social and environmental safeguarding instruments, engaging all community segments in various consultation meetings would build the community trust and making the GM accessible for all and upholding the transparency and the fairness of the complaint resolution process.

Conclusion:

The Project Coordinator has responded each question raised as per project guidelines and thanked everyone for their valuable input to the project implementation procedures. The meeting provided an opportunity for valuable discussions and insights from various stakeholders.

Overall, the meeting fostered engagement and constructive dialogue among stakeholders to enhance the effectiveness and positive outcomes of World Bank initiatives in Somalia.

ANNEX 2: LIST OF THE STAKEHOLDER ENGAGEMENT MEETING PARTICIPANTS

S/N	Title	Institution
1.	RCRF Project Coordinator	FGS-MOF
2.	RCRF Social Safeguard Specialist	FGS-MOF
3.	Director of Medical Service	FGS-MOH
4.	Admin and finance	FGS-OPM
5.	Communication Specialist	FGS-MOLSA
6.	RCRF CHC	FGS-MOH
7.	Director-General	NCSC
8.	RCRF Education Coordinator	MOECHE
9.	IGFF Secretariat	FGS-MOF
10.	IGFF Secretariat	FGS-MOF
11.	RCRF Communication Specialist	FGS-MOF
12.	Project Manager	SWS-MOF
13.	Project Manager	HSS-MOF
14.	Project Manager	JSS-MOF
15.	Project Manager	PSS-MOF
16.	Project Manager	GSS-MOF
17.	Program Officer	FGS-MOF
18.	PMT/CHC	PSS-MOH
19.	RCRF-Social Safeguard	SWSS
20.	RCRF-Social Safeguard	JSS
21.	RCRF-Social Safeguard	GSS
22.	RCRF-Social Safeguard	HSS
23.	Gender and Youth Program Specialist	UNFPA
24.	Head Nurse	UNSOS
25.	N/A	Save The Child
26.	Somali Programme Advisor	Life and Peace
27.	Human Rights Officer	UNSOM
28.	Operation Manager	MCAN
29.	Contact Person	SIMAE
30.	Contact Person	HISA
31.	Contact Person	SMWC
32.	Executive director	Lifeline org
33.	Deputy Chair	WIDEN

S/N	Title	Institution
34.	Director	MVG
35.	Chair Lady	SHABYA
36.	Chair Laday	HSORO
37.	Social Safeguard Specialist- SEHCD	FGS-MOE
38.	PCU Coordinator-Damal Caafimad	FGS-MOH
39.	GRM - SCRIP Project	FGS-MOF
40.	Communication Specialist- SEHCD	FGS-MOE
41.	Social Safeguard Specialist, Stats project	FGS-M
42.	Social Development Specialist, SERP	MOF-SEPR
43.	Social/GBV specialist-Scaled Up Project	FGS-MOF
44.	Social Development specialist, energy project	MoEWR
45.	Social development -SCRIP	FGS-MOF
46.	GBV Specialist, Groundwater project	MoEWR
47.	Social Safeguard specialist, Ground water project	MoEWR
48.	Head of Social Work course	City University
49.	Head of Social Work course	Mog University
50.	Head of Social Work course	Simad University

ANNEX 3: COMPLAINTS REGISTRATION FORM (to be translated into Somali)

1. Complainant's Details

Full name (optional) or Reference number (if confidentiality requested):

Male/Female

Mobile _____

Email _____

District _____

Relationship to the project

Age (in years): _____

2. Which institution or officer/person are you complaining about?
Ministry/department/agency/company/group/person

3. Have you reported this matter to any other public institution/ public official?

Yes No

4. If yes, which one?

5. Has this matter been the subject of court proceedings?

YES NO

6. Please give a brief summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

7. What action would you want to be taken?

Signature _____

Date _____

ANNEX 4: Complaints reporting log (include direct and contractor workers grievances)

No.	Date grievance received	Ref no	How grievance received? (in person, call centre, implementing partner, staff members, email, complaints box etc.)	Short description of complaint	Who complaint referred to/resolved by	Resolution/Corrective action taken so far or plan (please specify)	Date closed (feedback and agreement from complainant)	Improvements to project made/planned. as a result of complaints received

ANNEX 5: ESF requirements on GMs reporting template (to be included in quarterly report)

Period from: _____ to: _____

Requirements as per the ESF:	Y/N explanation/evidence
<i>Anonymised complaints log has been shared with the WB for this 3/6 month period including complaints from all FMS, contractors and implementing partners</i>	Attach
<i>Female focal points for grievances are available at community level to receive and forward anonymized complaints</i>	
<i>Awareness that complainant can also raise complaint with GRS included in awareness raising material</i>	
<i>Describe how anonymous complaints are being raised and addressed</i>	
<i>Publicly advertised procedures, are posted on website project/Ministry website (please state wording and whether in Somali)? Suggestions, concerns and feedback are welcomed by the xxx project to improve its performance. These can be communicated to project staff or via (toll free number) sent to: email. In the case of complaints relating to GBV these should be communicated immediately to (toll free confidential line) or email. All grievances will be treated confidentially, impartially and without retribution and can be submitted anonymously if desired. GBV/SEA/SH complaints will be dealt with by the GBV Expert using a survivor centered approach. Grievances will be acknowledged within 7 days of receipt and resolved within 21 days including feedback to the complainant. Complaints can also be raised via somaliaalert@worldbank.org or http://www.worldbank.org/GRS</i>	
<i>How has the GM been made accessible to remote communities, non literate people, minority groups, and women?</i>	
<i>Which groups are not complaining and why? How can accessibility and trust in the system be improved for these groups?</i>	
<i>What actions have been taken by the Project Coordinator in this period to promote the functionality of the GM system particularly: encouraging reporting and increase trust in the GM.</i>	
ESS2	
<i>Have all direct and contracted workers been oriented in the workers mechanism?</i>	
<i>Is there a summary of the workers grievance mechanism in all offices as well as an appeals process?</i>	
<i>Has whistle blower protection and sanctions been included in the project and contractor's workers code of conduct?</i>	
<i>Has the PIU carried out due diligence of contractors and monitoring of functionality of workers GM during this period?</i>	

ANNEX 6: REFERENCES

World Bank Environmental and Social Framework,

<http://documents.worldbank.org/curated/en/383011492423734099/pdf/114278-WP-REVISED-PUBLIC-Environmental-and-Social-Framework.pdf>

World Bank Good practice note on ESS10

World Bank Good practice note on Gender

<http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf>

World Bank, Grievance Mechanisms, Responsible Agricultural Investment (RAI) accessed on 14th January 2019

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World Bank (n.d.) How to Notes: Feedback Matters: Designing Effective Grievance Mechanisms for Bank-Financed Projects Part 1: the Theory of Grievance Redress,

<http://documents.worldbank.org/curated/en/342911468337294460/The-theory-of-grievance-redress>

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