FEDERAL GOVERNMENT OF SOMALIA

Ministry of Labour & Social Affairs

PROJECT:
SHOCK RESPONSIVE SAFETY NET FOR LOCUST RESPONSE PROJECT

LABOUR MANAGEMENT PROCEDURES (LMP)

June 2020

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Abbreviations and Acronyms

CBT	Community-Based Targeting
EDLRP	Emergency Desert Locusts Response Program
ECT	Emergency Cash Transfers
ELRP	Emergency Locust Response Project
FAO	Food and Agriculture Organization of the Unite Nations
FGS	Federal Government of Somalia
FLA	Field Level Agreement
FMS	Federal Member States
FRS	Federal Republic of Somalia
FSNAU	Food Security and Nutrition Analysis Unit
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanism
HCT	Humanitarian Country Team
IDA	International Development Association
IDP	Internally Displaced Person
M&E	Monitoring and Evaluation
MIS	Management Information System
MoF	Ministry of Finance
MoLSA	Ministry of Labor and Social Affairs
MPA	Multiphase Programmatic Approach
NDP	National Development Plan
NGO	Nongovernmental Organization
PDO	Project Development Objective
PIU	Project Implementation Unit
PSEA	Prevention of Sexual Exploitation and Abuse
PP	Procurement Plan
SCALED-UP	Somalia Capacity Advancement, Livelihoods and Entrepreneurship through Digital Uplift Project

SEA	Sexual Exploitation and Abuse
SEP	Stakeholders Engagement Plan
SNHCP	Shock Responsive Safety Net for Human Capital Project
SNLRP	Shock Responsive Safety Net for Locust Response Project
SP	Social Protection
SSN	Social Safety Net
SRM	Social Risk Management
TA	Technical Assistance
TOR	Terms of Reference
TPM	Third-Party Monitoring
UN	United Nations
UNDSS	United Nations Department of Safety and Security
UNICEF	United Nations Children's Fund
UNSMS	United Nations Security Management System
USR	Unified Social Registry
WFP	World Food Programme

1. Country context:

1.1.   **The Shock Responsive Safety Net for Locust Response Project (SNLRP) for the Federal Republic of Somalia is the proposed second phase of the World Bank's regional response to the Desert Locust crisis – the 'Emergency Locust Response Program' (ELRP) – using the Multiphase Programmatic Approach (MPA).** The ELRP was approved by the World Bank's Executive Directors on May 20, 2020. The ELRP financing envelop is up to US$ 500 million International Development Association (IDA) grant/credit financing for country responses, including US$ 40 million IDA grant for the proposed SNLRP.

1.2.   **After more than two decades of conflict and insecurity, Somalia is gradually establishing the foundations for stability and a new political settlement.** Somalia has entered a new phase of relative peace and stability since 2011, with the Agreement on the Provisional Constitution and the establishment of the Federal Republic of Somalia (FRS) and a "road map" towards stabilization, recovery and reconstruction. There is a possibility of inclusive, peaceful, and credible national elections in 2020, as well as the potential for accelerated economic growth and development resulting from debt relief and progress towards the transfer of security responsibilities from the African Union Mission in Somalia to the Somali forces. The Federal system of governance, with the Federal Government of Somalia (FGS) at the center the newly formed Federal Member States (FMS), opened a new chapter for Somalia's development and offers hope for a stable future. However, the federation process is complex and presents both a significant development opportunity, as well as uncertainty over representation and power and resource-sharing.

1.3.   **Despite improvements in the macroeconomic outlook, economic challenges continue to be daunting, and growth remains insufficient to address widespread vulnerabilities.** Between 2013 and 2017, Somali real gross domestic product (GDP) was estimated to have grown at an average of 2.5 percent per year while population grew by 2.9 percent per year. This resulted in an annual contraction of per capita GDP of 0.3 percent a year.[1] The agriculture sector remains the backbone of the economy and accounts for about 75 percent of GDP, among the highest sectoral-share in the world.[2] The livelihoods of roughly half of Somalia's estimated population of 15 million individuals is reliant on pastoralism or agro-pastoralism, which implies that a significant portion of Somalia's population remains highly vulnerable to climate change and natural disasters. While spending by the FGS has increased significantly over the past five years, it remains concentrated on security and public administration, reflecting the immediate priorities of peacekeeping and state-building, and neither the FGS nor the FMS is able to allocate meaningful resources for early recovery and development.[3] Pursuing integrated approaches and bridging the divide between humanitarian aid, development cooperation, and peacebuilding are generally seen as critical pre-conditions for making meaningful progress towards sustainable development outcomes.

1.4.   **Wide-spread poverty and vulnerability to covariate (natural disasters and epidemics) and idiosyncratic (injury, death, or unemployment) shocks, threatens the well-being of millions of Somalis.** Nearly 80 percent of Somalis live below the international poverty line with poverty being more acute in rural areas, making Somalia the third poorest country in the region. Further, nearly half of the population does not reach average consumption of food items. While gender is not a predictor of monetary poverty in the Somali context, fewer women have access to education and social norms constrain their access to

[1] World Bank. 2018. *Somalia Economic Update – Edition No 3*. Washington, DC: World Bank.
[2] World Bank. 2018. *Country Partnership Framework for the Federal Republic of Somalia.* Washington, DC: World Bank.
[3] World Bank. 2019. *Draft Somalia Economic Update. Rebuilding Human Capital to Return to Prosperity*. Fourth Edition. Washington, DC: World Bank.

jobs and economic opportunities. Almost two thirds of Somali households reported experiencing at least one type of shock in the past 12 months related to fluctuation in climate and its impact on livelihoods and the economy. Given the dominance of agro-pastoralism in the economy, household welfare is closely linked with changes in rain patterns. One in every five households experienced high food prices and two out of five Somali households experienced multiple types of shocks within a year.

1.5.   **Somalia is highly vulnerable to natural disasters, namely repeated cycles of droughts and floods driven by climate change, resulting in protracted humanitarian crisis and large-scale food insecurity.** Somalia has experienced 14 droughts since 1960, averaging one every four years. The most recent drought in 2016/17 left an estimated 6.7 million people in urgent need of humanitarian assistance. In 2018 and 2019, Somalia also experienced major flooding, which further displaced some 230,000 and 250,000 people, respectively, worsening the impacts of the 2016/17 drought and aggravating the humanitarian crisis. According to the International Organization for Migration, about 2.6 million people remain internally displaced. These successive cycles of shock have also worsened the food insecurity whereby about 3.4 million people were estimated to be in the 'Stressed' (IPC2) phase through June 2019, while an additional 1.5 million were estimated to be in the 'Crisis' (IPC3) and 'Emergency' (IPC4) phases. The Center for Global Development therefore ranks Somalia as the most vulnerable country to climate change among 167 countries, adjusted for coping capacity.

1.6.   **Women and girls in Somalia face specific socio-economic challenges and gender-based violence (GBV) remains a perennial a threat.** Traditional and religious norms limit women's roles outside the domestic sphere, for example, in participation in political and public decision-making forums. Despite their increasing engagement in economic activities, women continue to be far poorer than men, as wealth is unevenly distributed in the household and across the wider economy. Even among the women engaged in income-generating activities, the majority are in the informal sector. Further, women's involvement in wage labor remains low (33–40 percent) and predominantly concentrated in the agriculture sector. In addition, a 2016 GBV survey found that 17 percent of Somali women have experienced some form of physical or sexual violence from a non-partner. Intimate partner violence continues to be a common experience that has been found to be often linked to women's engagement in income-generating activities, affecting 36 percent of women interviewed. Displaced women and girls are among the most affected due to extreme poverty, marginalization and conflict, and climate-related shocks, such as droughts.

1.7.   **The recent outbreak of desert locusts in Somalia further risks exacerbating the humanitarian crisis and food insecurity, worsening gender and development outcomes.** In December 2019, small clusters of desert locusts were first detected in northern parts of Somalia. By February 2020, the FGS declared a state of emergency after confirmation of the worst desert locust outbreak in 25 years. Desert locusts are projected to continue breeding in the coming months, precipitating further infestation throughout the rest of Somalia and coinciding with rangeland regeneration and planting activities in the country. Consequently, it is expected that the population requiring urgent food assistance will increase by 137 percent by September 2020 due to the desert locust outbreak.

1.8.   **It is expected that forty-three districts will be affected by the locust infestation.** Over 2.6 million people are currently located in areas affected by the desert locust outbreak. Of those, 246,000 people are already considered to be in acute food insecurity (IPC 3+),[4] with food security of households which were previously only in "Stressed" category (IPC2) rapidly worsening. Overall, it is estimated that over half a million people will be in "Stressed" or worse food insecurity levels (IPC2+) by September 2020.

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[4] Based on FSNAU-FEWSNET projections.

1.9.   **The broad impact of the desert locust infestation across different livelihood zones will likely involve reduced access to food, loss of income, resource-based conflict, increased debt levels, and limited migration options.** For agropastoral households, this will adversely affect cropping activities, resulting in depleted harvest, declined food reserves, and minimized access to income from agricultural produce. The total annual cereal output is expected to decline by 10-15 percent, the approximate equivalent of food requirements for almost half a million people over six months. Pastoral households will also face losses due to rapid depletion of rangeland resources and pasture availability, impacting quality, yield, and access to livestock products. It will thus be critical to deliver immediate relief to those acutely affected by the locust outbreak, while enabling households to mitigate and withstand the impact on income and food security throughout its duration.

1.10.   **To make matters worse, the locust crisis is unfolding against worsening socio-economic impacts in the country due to the COVID-19 pandemic.** As Somalia relies on food imports to feed its population, the lock down of key supply markets, closure of borders and restrictions on domestic movements are already affecting basic commodity prices, and export restrictions in source markets such as Oman and India are having a ripple effect in markets in Somalia. COVID-19 related panic buying, coupled with the Ramadan season, have led to increases in retail and wholesale prices of imported food items in markets. The March 2020 Consumer Price Index published by the Federal Directorate of National Statistics indicates an increase of up to 2.12 percent. Moreover, reports indicate that remittances, received by an estimated 40 percent of Somali households, may have dropped by as much as 50 percent. With the FGS projecting an 11 percent decline in nominal GDP through 2020, an economic slowdown threatens to impact negatively on access to livelihoods and income generating activities across Somalia, and to place additional pressures on households trying to meet basic needs. Protection related risks include forced evictions; family separation due to infection within households; increased GBV; neglect and exploitation of children and vulnerable households; and stigmatization and targeting against specific communities, particularly marginalized groups, migrants and refugees.

2. Sectoral and Institutional Context

2.1   **Somalis rely on traditional and informal kinship-based safety net systems in the face of frequent shocks.** Together with family, community, or religious leaders, remittances represent an important component of income for the bottom 40 percent of households. However, these come under strain in the face of covariate shocks, and remittances are concentrated within specific clans, lineages, and extended families and in urban areas. As such, remittances often do not reach the neediest, who are most likely to fall through the cracks of informal safety nets. Marginalized and minority rural groups are also likely to be excluded from such benefits because they lack access to resources.[5]

2.2   **Several humanitarian and development agencies are actively supporting multiple programs to help the targeted communities and households absorb shocks**. Given the large scale of food insecurity in a context of limited resources, these programs mostly target people who are in a crisis or emergency food security status (IPC 3+). These programs vary in scale, scope, type, and coverage duration, while emphasizing support to IDPs who mostly reside in urban areas. In recognition, there is a growing effort to coordinate among these programs, and a gradual attention to align with the recently approved FGS's Social Protection Policy. World Food Programme's (WFP) digital beneficiary database (SCOPE), which contains information on around 6 million people who have participated in WFP-implemented projects in

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[5] Rift Valley Institution. 2017. *Remittances and Vulnerability in Somalia*. Nairobi, Kenya.

Somalia over the years, is utilized to support coordination through data cross-checking for beneficiary overlap across main programs. However, moving from a program-specific beneficiary list to a national digitized unified social registry requires a functional ID system. The World Bank is leading the support to the FGS on this front through its safety net delivery systems building interventions under the Shock Responsive Safety Net for Human Capital Project (SNHCP) and the Somalia Capacity Advancement, Livelihoods and Entrepreneurship through Digital Uplift Project (SCALED-UP, P168115).

2.3   **In 2019, the FGS launched its first SP Policy that calls for a gradual shift from a humanitarian approach to a Government-led social protection agenda.** The policy makes commitment to the establishment of a strong system of SP, as reflected in the National Development Plan's (NDP, 2017–2019) Recovery and Resilience Framework. The Ministry of Labor and Social Affairs (MoLSA) has been assigned as the ministerial lead for SP at the federal level, with the support of the Ministry of Humanitarian Affairs and Disaster Management and the Ministry of Planning, Investment, and Economic Development.[6] MoLSA is also leading a 'Food Security, Nutrition and Social Protection' sub-working group[7] at the federal level. Further, MoLSA has created a Technical Working Group on Social Protection comprising of focal points from the Offices of the President and the Prime Minister and relevant ministries, including the Ministry of Finance (MoF) and the Ministry of Agriculture and Irrigation, as well as focal points from all the FMS. In addition, the FGS established a social protection sub-working group as part of the Resilience Working Group. These coordination bodies nevertheless vary in how active they are, and the FGS increasingly aiming to mainstream these structures to two coordination bodies, a Government Social Protection Steering Committee; and a Social Safety Net Working Group. Thus, the development of a formal SP system is still at a nascent stage, particularly in terms of institutional and governance arrangements at the federal and state levels, and the institutional framework for SP in Somalia continues to evolve.

2.4   **The World Bank-funded SNHCP supports the FGS to lay the foundations for a Government-led shock-responsive safety net system.** The SNHCP is a US$ 65 million equivalent from the IDA Pre-Arrears Clearance Grant for Somalia which aims to support FGS establish its first Safety Net Program, known as **Baxnaano** (meaning "Uplifting" in Somali) Program. The SNHCP provides 200,000 poor and vulnerable households (about 1.2 million individuals) with predictable and nutrition-linked cash transfers to meet their immediate consumption gaps and protect against food insecurity and malnutrition risks. With a view toward longer-term development, it also supports efforts by the FGS to strengthen institutional resilience and establish the basic delivery systems of a national and shock responsive safety net system, including the development of a unified social registry (USR) which could support rapid identification of potential beneficiaries in times of shock and enhance coordination across social programs. The SNHCP is in its first year of implementation and it is being implemented over a three-year period by MoLSA, in strategic partnership with WFP (supporting cash delivery) and UNICEF (supporting long-term delivery system).

2.5   **The proposed Shock Responsive Safety Net for Locust Response Project (SNLRP) operationalizes the shock responsive aspect of the SNCHP through rapid scale up of coverage to support vulnerable households affected by the desert locust outbreak.** The SNLRP will respond to the threat of the locust outbreak by protecting locust-affected households, especially subsistence farmers and pastoralists, from falling into deeper food insecurity, as well as preventing the sale/loss of their productive assets through the provision of cash transfers. The implementation of the project will benefit from the delivery system and procedures established under the SNHCP, in continued partnership with WFP, with a primary focus on rural districts with severe locust infestation. In doing so, it will help to address impacts of a climate-

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[6] Federal Government of Somalia, Social Protection Policy (2020-2040)
[7] Several ministries are represented in this sub-working group, which includes Agriculture, Planning, Humanitarian Affairs and Disaster Management, and Office of the Prime Minister.

induced natural disaster that could potentially serve as a driver of fragility by enabling households to mitigate and withstand the impact on income and food security throughout its duration.

2.6 **Efforts under the proposed SNLRP will be complemented by the recently approved World Bank-funded Somalia Crisis Recovery Project (SCRP, P173315); together both projects would support all three pillars of the MPA.** The SCRP is an US$ 137.5 million IDA Grant that aims to *"support the recovery of livelihoods and infrastructure in flood and drought affected areas and strengthen capacity for disaster preparedness nationwide."* Components 1 and 3 of the SCRP, among other interventions, will support (a) controlling the desert locus population through ground and aerial spraying operations and carrying related impact assessment and surveillance activities; (b) restoration of farmers' livelihoods after control efforts have stabilized the situation, particularly agricultural production through the provision of inputs (i.e. seed packages and basic farming tools), as well as pre-positioning of livestock feed-stocks; and (c) development of a local locust early warning and control systems, and capacity building activities. Thus, while the SCRP will largely concentrate on control, restoration and prevention measures, the proposed SNLRP will focus on addressing the negative immediate impact of the locust infestation on poor and vulnerable households by meeting their short-term food security and consumption needs through emergency cash transfer.

3. Project Development Objectives

3.1. The SNLRP aims to "protect food security and livelihoods of poor and vulnerable households affected by the locust outbreak."

3.2. The project will respond to the threat of the locust outbreak by protecting the poor and vulnerable from falling into deeper food insecurity. This will be achieved through the provision of emergency cash transfers to targeted poor and vulnerable households, delivered through the FGS' World Bank-funded on-going SNHCP, or the Baxnaano Program in Somali.

The project has two Components:

Component 1: Emergency Cash Transfers (ECT)

3.3. **Component 1 will respond to the threat of the locust outbreak by providing emergency cash transfers to approximately 100,000 poor and vulnerable rural locust-affected households,** equivalent to about 600,000 persons. The transfers will be delivered using the delivery system and procedures of the FGS' Baxnaano program (supported by the SNHCP, P171346). MoLSA will strategically partner with WFP to support the implementation of Component 1, governed by a Standard Output Agreement

3.4. **Beneficiaries of the ECT will be selected poor and vulnerable households residing in locust impacted districts.** The SNRP will target the 43 locust-affected districts, as determined by the data from the Food Security and Nutrition Analysis Unit (FSNAU) and in consultation with the Ministry of Agriculture and Irrigation. Households that are registered under Baxnaano for cash transfer and reside in severely locust-affected districts will automatically become eligible for the ECT. Households that are not part of Baxnaano and reside in severely locust-affected districts will have to meet eligibility criteria, namely those whose livelihoods depend on activities related to agriculture (small crop) or livestock either as subsistence farmers or as farm laborers, and those assessed to be at risk of food insecurity). These new households will be selected through the Baxnaano's participatory and transparent community-based targeting (CBT) process.

Component 2: Project Management, Monitoring and Evaluation and Learning

3.6	**Component 2 will support the overall management and administration, monitoring of the project implementation, and learning from the experience of the locust response.** Project management and administration will be supported by the well-staffed Project Implementation Unit (PIU) of the SNHCP/Baxnaano, housed within MoLSA. Specifically, the PIU will monitor the implementation of the project components and coordinate project activities at the local level. Given the shock-responsive nature of the project, the PIU will be enhanced with a position focused on managing MoLSA's humanitarian coordination with stakeholders on the SNLRP, particularly with the Ministry of Humanitarian Affairs and Disaster Management and Ministry of Agriculture and Irrigation, as well as broader humanitarian partners and agencies. Component 2 will also support additional operational activities linked to the monitoring and management of the SNLRP activities, such as field visits by the PIU and other MoLSA representatives in non-Baxnaano districts, and consultations with FMS representative on relevant aspects of the SNLRP implementation, especially communication, among others.

3.7	**Monitoring the implementation of the regular Baxnaano cash transfers will be conducted by an independent TPM agency on a quarterly basis using a systematic sample-based monitoring approach.** Component 2 under the SNLRP will support the expansion of the TPM activities in terms of increased size and geographic coverage of the TPM sample to reflect the coverage of new districts and additional ECT beneficiaries. Beneficiary views and feedback will be collected through the TPM exercise.

3.8	**The Project will contribute to the MPA global learning agenda by producing an analytical product that will assess the experience of expanding the existing safety nets to respond to the locust outbreak**, documenting challenges encountered and lessons learned. The report will draw on TPM findings and recommendations, the targeting evaluation[8], and grievance redress mechanism (GRM) reports, paying special attention to lessons related to coordination of multiple locust response interventions and avoiding overlaps and duplication of coverage. The "Learning Product" will be implemented by the World Bank under the *"Somalia Social Protection Support: Building Blocks Towards a National Social Protection System" Technical and Advisory Activity ASA (P168945),* funded by the Somalia Multi-Partner Fund (P147233).

4. Environmental and Social Standards and purpose of the LMP

4.1.	The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development. The ESS is comprised of the ESS1 (Environmental and Social Risks), and of the ESS2, which focuses on labour conditions and risks for the staff employed in this project.

4.2.	**ESS1**: During the appraisal mission, the social risks associated with the project were rated as substantial. Mitigation measures for ESS1 have been developed and are documented in the Social Management Plan (SMP) and the Stakeholder Engagement Plan (SEP), which constitute two separate documents.

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[8] The SNHCP targeting evaluation of the Baxnaano will be implemented by the World Bank and co-funded by the Somalia Multi-Partner Trust Fund and UK Department for International Development (DFID) (EFO 1568).

4.3.   **ESS 2: Labor and Working Conditions:** The objective of ESS 2 is:

• To promote safety and health at work • To promote the fair treatment, non-discrimination and equal opportunity of project workers • To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate • To prevent the use of all forms of forced labor and child labor • To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law • To provide project workers with accessible means to raise workplace concerns.

In order to meet the objectives of the ESS2, the Labour Management Procedures (LMP) details the rules and procedures in place under the SNLRP component 1, related to the contractual arrangements for the staff hired under this project, either by WFP directy, or by its contracted partners.

5. Overview of staff employed under Component 1 of the SNLRP:

5.1.   Three categories of staff will be employed under the SNLRP component 1 i): WFP staff- engaged directly by WFP; ii) staff of the NGOs contracted by WFP - engaged through third party to perform work related to core function; iii) staff of the service provider (Standard Chartered Bank), contracted by WFP as primary suppliers.

5.2.   Overall, the main activities for the WFP staff employed on this project will be to: i) coordinate the project and conduct the consultations with the Government, and the World Bank; ii) contract partners and manage contracts; iii) oversee and follow up on the implementation of the activities, including participating in community consultations; iv) train partners and provide them with necessary material for the project (including the programme cards for beneficiaries); v) monitor the project; vi) transfer the cash entitlements to beneficiaries; vi) reconcile accounts; viii) receive and handle complaints and give feedback when applicable; and ix) report to the government and the World Bank.

5.3.   The main activities for NGO staff will be to: i) conduct the community consultations and community targeting; ii) issue the programme cards to beneficiaries; (iii) following the prescribed procedures delivering SIM cards to identified beneficiaries who don't possess a / matching number; iv) top up the programme entitlement cards on a quarterly basis; and v) monitor the project and report to WFP.

5.4.   The main activities for service provider staff will be to; i) verify and validate beneficiary phone numbers to ensure that they match the names of the principal household recipients as registered in SCOPE; ii) issue new Sim-cards to the household's principal recipients who do not have Sim cards and those that have non-matching records; and iii) create a platform (online portal) for WFP to transfer the monetary entitlements directly to the beneficiaries.

5.5. **WFP staff:** Directly Engaged by WFP:

Staff position	Base	Responsibility
Senior Programme Policy Officer, P5 (STP),	Mogadishu	**Project leader:** - Provide technical and managerial oversight to the SNLRP project. - Oversee operations and day to day management - Oversee all the specificity related to SCOPE-registration, enrolment, top up, timely cash distribution, security of distribution, reporting and reconciliation. - Partner management and oversight of all the steps of cash transfer. - Ensure that Social Management Plan is implemented.
Social Protection Officer – NOC	Mogadishu	- Liaison with Government; - coordination and implementation - Support field offices with implementation of the project. - Liaise with partners and oversee day to day implementation.
Programme Associates (FT-6) x 5	Field Offices in Somalia	- Provide specialized project management support to safety net programme - Support partners with implementation of cash transfer - prepare a range of reports and data analysis - Undertake all aspects of SCOPE registration - Work closely with the government
Programme Associates (SC-6) x2, Transfer Management Team	Nairobi	- Coordinate biometric registration & validation of safety net beneficiaries in SCOPE; - Support WFP Area Offices to plan and deliver transfers through the SCOPE platform; - Coordinate with Area Offices and Finance Unit to ensure timely disbursement
Gender and Protection officer	Nairobi	- Oversight and technical guidance over implementation of gender and protection aspects of the project; - Coordination and implementation of training of CPs and other staff on protection and gender requirements of this project. - Act on monitoring reports, follow-up, escalate and report on protection related incidents and/or concerns.
Programme monitors (10 persons – for 43 districts)	Somalia/ Somaliland	- Undertake regular monitoring as per WFP standards and established protocol; - Undertake regular reporting;

Digital Assistance Services Support Assistant (SSA-4)	Garowe / Roaming	- Coordinate the preparation of registration kits as well as updating config files and cache - Perform basic testing and support the roll out of new version and types of SCOPE related software and equipment related directly to the above projects - Coordinate with different stakeholders to ensure registration data quality - Receive, analyse and resolve all SCOPE technical related issues from different stakeholders, in a timely manner. Escalate and follow-up to resolution when necessary - SCOPE support from registration to entitlement transfers

5.6. In addition to the above listed staff who will be working full time on this project, other regular WFP staff will also be substantially involved in the SNLRP, both for overall supervision and guidance, participation in consultations, and support for implementation. This will be the case, in particular, for the Somalia Head of Programme, Deputy Country Director, Social Protection Officer, Head of Finance, Head of Budget, Communications Officer, Accountability to Protected Populations Officer, Heads of Area Offices as well as Heads of Programmes in the area offices.

5.7. Cooperating Partners: The following is a list of staff of the NGOs contracted by WFP - engaged through third party to perform work related to core function. It is expected that each district will have one partner implementing the project, subject to variation based on coverage capacity.

Staff position**	Base	Responsibility
Programme Manager	Somalia	- Overall planning, directing and overseeing the operations - Maintaining work systems, procedures, and policies that enable and encourage the optimum performance of people and other resources . - Attend meetings with key stakeholders - Leading the people/Staff - In charge of reporting to WFP on the overall implementation of the project.
Administration and Finance officer	Somalia	- Dealing with all administration and finance matters related to the project activities and reporting
Field officer/s	Somalia	- In charge of direct implementation of the project at field level
Field Monitor/s	Somalia	- Monitoring, implementation, Reporting and overall supervision of activities at Field Level
SCOPE Registrar/s	Somalia	- In charge of Biometric registration of targeted selected HHs under the project,

Office -field security Guard/s	Somalia	- Support security and safety for office staff, assets and during registration, top up and field operations.

*** As WFP is yet to contract NGO partners, the exact positions and the number of staff will be known after the project commences implmentation.*

5.8. **Financial service provider: Tentative structure**

Staff of the service provider (Hormuud Telecom), contracted by WFP as primary service provider for mobile money transfer.

Staff position**	Base	Responsibility
WFP LO Finance	Nairobi	- Oversee the operations - Verification of payments - Real time transfer to beneficiaries through Hormuud portal system - Oversee planning and timely disbursements; - Oversee reporting and reconciliations. - Any issue raised by their agent address and resolve with WFP
Hormuud NGO coordinator	Mogadishu	- Coordinate all branch operations - Issuance of SIM cards to WFP AOs - Mobilising resources - Ensure all branches have enough cash liquidity - Provide feedback for any technical issues -
WFP TMT	Districts	- Oversee operations; - Oversee planning and timely disbursements; - Oversee reporting and reconciliations.
WFP HOA ,	Districts	- Oversee the project financial transactions; - Plan and ensure timely disbursements; - . -

*** As WFP is yet to finalize all cash distribution sites based on communities selected for the project, the exact positions and the number of staff will be known after this step is completed.*

6. Labour Risks and Mitigation measures

6.1.   The potential risks for the labour force working on this project are summarized below, together with the mitigation measures.

6.2.   **Risk of insecurity:** Conflict and insecurity remain persistent challenges in Somalia and have, in the past, impeded delivery of services. Ensuring security for project operations (including the handling of cash) amid armed groups in a region with a recent history of relative lawlessness and the potential for increased

conflict due to the drought, will remain a challenge. Delivery points cash transfers may be targeted by opportunistic armed actors including Al-Shabaab. This general insecurity may impact project workers.

6.3.   **Mitigation**: The above risks are carefully mitigated through a combination of programmatic and administrative measures. These measures are briefly discussed in the below sections and elaborated in the documents in annex 2 .

Programmatic design: The SNLRP targets food insecure yet relatively permissive parts of Somalia and excludes Al-Shabaab controlled areas. This allows WFP to partly mitigate some of the security risks for project workers, associated with active conflict and insurgency.

Administrative and Operational procedures:

Security procedures within the UN System:

The World Food Programme (WFP) is part of the Security Management System (UNSMS) of the United Nations Organization. Without prejudice to, and while not abrogating the responsibility of a Host Government for its obligations, the United Nations has a duty as an employer to reinforce and, where necessary, supplement, the capacity of the Host Government to fulfil these obligations in circumstances where United Nations personnel are working in areas which are subject to conditions of insecurity which require mitigation measures beyond those which the Host Government can reasonably be expected to provide. The UNSMS Framework for Accountability specifies the responsibilities and accountabilities of United Nations officials and personnel for such measures. The goal of the UNSMS is to enable the conduct of United Nations activities while ensuring the safety, security and well-being of personnel and the security of United Nations premises and assets. To achieve this goal, all organizations shall maintain a robust and cohesive security management system and adhere to three principles:

Determination of acceptable risk;

- Provision of adequate and sustainable resources to manage the risk to personnel and their eligible dependents, premises and assets; and
- Development and implementation of security policies and procedures.

The governance of security management for the UNSMS (as a whole) is constituted as follows:

- The Inter-Agency Security Management Network (IASMN), consisting of the senior managers who have oversight of security functions within each member organization of the UNSMS, reviews existing and proposed policies, procedures and practices of the UNSMS and their implementation, and provides its recommendations on these to the High-Level Committee on Management (HLCM); and
- A comprehensive review of policies and resource-related issues pertaining to the entire United Nations security management system is a standing item on the agenda of the HLCM; the HLCM reviews the recommendations made by the IASMN, and either decides on them directly or recommends their endorsement and implementation to the United Nations System Chief Executives Board for Coordination (CEB), which is chaired by the Secretary-General.

Staff movement and security coordination in Somalia

In accordance with WFP's established security protocols for Somalia and in conformity with Inter-Agency Standing Committee's (IASC) non-binding guidelines, WFP uses armed escorts for humanitarian convoys. The non-binding guidelines seek to advice and enable WFP UN and non-UN humanitarian organizations to collectively and/or individually assess the need for, and the impact of using, armed escorts for humanitarian actions.

In 2013, the IASC convened to hold a common position on critical security matters. The IASC recognizes that every humanitarian organization (UN or non-UN) adopts security measures according to its own risk profile and differentiated needs. While it is not possible for all agencies to operate in an identical manner, common position on critical matters can potentially increase the level of security for all. Consequently, the UN Designated Official (DO) should consult widely within the humanitarian community (UN and non-UN) before deciding on the use of armed escorts by the United Nations. Similarly, non-UN humanitarian organizations considering using armed escorts should consult with the UN Designated Official before making a decision. Besides the DO led SMT, the Humanitarian Country Team (HCT) chaired by the UN Resident Coordinator (RC) provides an ideal platform for such consultations. As an operational decision-making forum participated by operationally relevant humanitarian agencies (UN and non-UN) the HCT provides invaluable inputs for adopting common position on critical security matters.

In Somalia, the United Nations Security Management System (UNSMS) uses a structured Security Risk Management (SRM) approach for implementing safe and efficient humanitarian actions. The SRM assists UNSMS to proactively identify, manage and mitigate operational risks. The information gathered through this type of decision-making, planning and incident management. One of the outcomes of the risk assessment is the recommendation to use armed escorts to mitigate or manage some of the identified risks. WFP has developed an internal guideline on considerations for use of armed escorts. It is pertinent to note that in accordance with the IASC guidelines, WFP does not impose the use of armed escort or security forces on NGO partners – recognizing that every humanitarian agency has its own risk profile and corresponding security management considerations and strategies. Each organization therefore must consider its own position on the use of armed escorts or security forces.

Security procedures applicable to Cooperating Partner NGOs and Service Providers

WFP works with over one-hundred national and international NGOs in Somalia. Majority of the cooperating partners are small community-based Local NGOs (LNGOs) that are well-grounded within the local communities. The implementation arrangements with cooperating partners are governed by a Field Level Agreement (FLA), which refers to the SPHERE standards regarding well-being and security of personnel. In particular, the first chapter of SPHERE states the common standards which, among others, defines the responsibility of actors towards the safety and protection of their staff as well as their beneficiaries. According to chapter 8.9 of the Core Humanitarian Standards, regarding *Policies in place for the security and the well-being of staff: " an agency's duty of care to its workers includes actions to promote well-being and avoid long-term exhaustion, burnout, injury or illness"; " Managers must make aid workers aware of the risks and protect them from exposure to unnecessary threats to their physical and emotional health. Measures that can be adopted include effective security management, preventative health advice, active support to work reasonable hours and access to psychological support when required*".

Partner organizations are accountable for the safety and security of their personnel in accordance with their 'duty of care' obligations as employing organizations. This responsibility extends to the NGO

provided guesthouses, as applicable. However, in practice, this mainly applies to International NGOs as local NGOs typically do not operate guesthouses.

Accordingly, organizations that wish to cooperate under the Saving Life Together Framework (in annex) are required to maintain internal security risk management procedures, contingency planning as well as adequate and reliable arrangements to respond to security emergencies.

Updated in 2015, Saving Lives Together is a series of recommendations aimed at enhancing UN and NGO security collaboration in the field. SLT is a voluntary engagement. Under the SLT framework, the UN and the humanitarian community cooperate in the collection, analysis and dissemination of critical security and safety information, while operational decisions made on the basis of such information remains the responsibility of the respective organizations.

Organizations that wish to become SLT partner organizations are required to commit to the adoption of the principles, objectives and arrangements comprised in this framework.

Partners must consult on security coordination with host country authorities and other local actors with a view to achieving a coordinated and/or common approach where appropriate; and consult with UNDSS on contracted security services, e.g. security escorts, with a view to achieving a coordinated and/or common approach, where appropriate.

Each NGO perceives risks and assess vulnerabilities differently, accepts different levels of risks, and implements security arrangements, which they consider suitable for their organisation and operational conditions. For instance, local NGOs, who constitute most of WFP partners, have strong roots in the local communities, and their social and information networks, as well as acceptability within the communities, minimize their exposure to security risks.

WFP will not provide NGOs with internal security risk management procedures, contingency planning, or arrangement mechanisms to respond to security emergencies. Also, WFP will not individually assess NGO security risk management arrangements. However, in line with the SLT Framework, and following the SLT guidelines endorsed at the IASC, WFP shall provide NGO partners involved in the implementation of projects with safe distribution guidelines, regardless if the NGO is part of the SLT or not (Annex 2 refers). WFP designed a safe distribution guide to enhance partner NGOs ' ability to make informed decisions and implement necessary security arrangements to improve the safety and security of their personnel and beneficiaries in WFP funded projects only.

Once an NGO receives training on the safe distribution guide, it effectively becomes responsible for putting in place appropriate mitigation measures to prevent and respond to incidents within its operational environment. The NGO is responsible for sensitizing staff on threats and risks and corresponding mitigating measures. With this, an NGO must also have appropriate support and insurance in place to assist staff affected by an incident, which WFP cannot be held liable for or expected to provide. The WFP guidelines and accompanying checklist provided to NGOs establish the underlying mechanism for WFP to perform its oversight role. WFP designed the list to document and NGO's consistency and completeness, or the lack of it, in implementing the guidelines. The list also provides evidence to WFP that a minimum risk management system is in place at distribution sites, which could then be measured or verified.

WFP will keep on file each NGO's checklist, which will serve as the primary record to undertake periodic oversight reviews, where access is feasible, to ensure responsible security management practices on the part of the NGO.

In addition to the above, in Somalia, the International NGO Safety Organisation (INSO) supports NGOs regarding workers' safety. INSO is an international charity based in The Hague and Dubai with projects in fourteen countries. INSO provides registered NGOs with a range of free services including real-time incident tracking, analytical reports, safety related data and mapping, crisis management support, staff orientations and training.

INSO services helps NGOs with their day-to-day risk management responsibilities and improve their overall situational awareness to support evidence-based humanitarian access decisions. The menu of services on offer has been developed over many years in close consultation with literally hundreds of NGOs and can be adapted to local context as needed. INSO Services are recognized as meeting the most fundamental requirements in almost any context.

In addition to its services, INSO coordinates with the United Nations Department of Safety and Security (UNDSS) in order to facilitate effective NGO/UN cooperation under the Saving Lives Together framework. The presence of dedicated INSO staff in Somalia ensures the consistent, reliable and secure sharing of security information with NGOs and facilitates implementation of other aspects of SLT, such as, engagement with UN security managers, meeting common security related needs and collaborating and consulting on the development and delivery of training.

Security Incident Response and Reporting

In principle, NGOs are responsible for responding to and reporting security incidences that involve their staff, assets, and activities. The necessary process for responding to an incident begins with the security guards hired by the NGO. They are typically the first responders, followed by the local police force. WFP does not directly respond to an incident at the behest of an NGO. However, upon receiving information of an incident involving either the NGO itself or beneficiaries during a distribution, WFP may provide, if required, assistance on determining the cause of the event. WFP may further assist the NGO in coordinating with the local authorities or the local community leadership the identification of additional measures or resources to be implemented or deployed, if feasible, to prevent the reoccurrence of an incident. WFP follows an internal reporting process that records all NGO/beneficiaries security-related incidents and additional measures to be implemented, if any, through a corporate security information management and reporting system. All incidents involving NGO partners or beneficiaries are also reflected annually in WFP's global security trends reporting to the Executive Board.

6.4.   **Risk linked to occupational hazard:** No physical labor or hard work is envisaged under this project, for any of the staff employed by any party, therefore, this risk is considered as very low.

6.5.   **Lack of updated Labour Code:** The Somalis labour market is currently governed by Labour Act No. 65 of 1972, which was adopted before the current federal system was in place. It contains some basic provisions, such as the right of association, the interdiction of child or forced labour, the obligation for any worker to have a proper contract; however, remains succinct.

Mitigation: Since 2018, with the support from ILO, the Government of Somalia (Ministry of Labour) has developed a new Labour Code, which was approved by the Labour Steering Committee on 26th March 2019 and which is expected to go for Parliament approval in the coming months. Once approved by the

Parliament, the new legal framework will meet international legal standards and thereby increase the standards of labour engagement within the country.

WFP ensures through its contractual arrangement with its Cooperating partners and Service Providers, that they are legally registered in Somalia and abide by national laws (refer to section 7 on staff of NGOs and Service Providers, of this document). In addition, WFP has a large institutional presence in the country, through its 11 offices and over 330 staff, which allows the organization to closely monitor all projects and to ensure that standards are adhered to. WFP has a Grievance and redress mechanism (GRM) for all staff under WFP contract; and, in Somalia, a GRM for its beneficiaries. Any breach of contract by WFP staff or its contracting agents can result in contract termination.

The sections below give more details about the protection for the staff working on the project, either when directly employed by WFP, or by its partners or service providers.

7. Staff directly employed by WFP - WFP Human resource management[9]:

7.1. The WFP Human Resources Manual (HR Manual) applies to all staff members, namely, all persons who hold a staff appointment under the FAO Staff Regulations and Rules, whether in the General Service, National Professional Officer, or International Professional and higher categories of service. This Manual also sets out the general terms, conditions of service and procedures governing the engagement of personnel on short-term contractual arrangements (Short-Term Professional and General Service staff members, Consultants, Service Contract holders, Special Service Agreement holders, Interns, Volunteers and Casual Labourers).

Terms and conditions of employment with WFP:

7.2. WFP confirms every recruitment through a contractual letter signed by both WFP and the employee, which stipulates:

- The general terms of employment
- The salary and other payments and entitlments (Daily Subsistance Allowance and others as applicable)
- Provisions regarding resignation, termination and separation
- Social security and leave provision
- Pension arrangements
- Working hours
- Coprorate policies inclusive of HSHAP and PSEA are referenced in all appointment letters.
- The terms of reference are attached
- **Others:** various entitlements and details are also provided, such as annual leave, sick leave, maternity and paternity leaves, breastfeeding facilities and others.

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[9] Note that the entire HR part that follows is a non-exhaustive summary of relevant provisions pertaining to WFP's management of human resources from the FAO Staff Regulations & Rules, the HR Manual, policies and administrative issuances. It does not replace the official documents, and in case of any contradictions, the official documents prevail.

7.3.   **Duties and Obligations of Staff.** By accepting an appointment with WFP, staff members undertake to comply with a number of obligations, which are clarified in the "Standards of Conduct for the International Civil Service" contained in the WFP HR Manual. Staff members should conduct themselves with the interests of the Programme alone in view. Consequently, they must subordinate their private interests to those of the Programme and avoid placing themselves in a situation in which their interests might conflict with those of the Programme. They must exercise their functions with integrity, loyalty and impartiality and remain independent of any outside authority in the performance of their duties.

Standards of Conduct:

7.4.   WFP staff must be committed to the values, principles and standards set forth in the Standards of Conduct for WFP as well as the Standards of Conduct for the International Civil Service. Staff members are expected to take a positive and active approach to upholding the Standards of Conduct as well as to complying with other policies promulgated by the Programme and related to their duties and obligations as international civil servants. (Refer to: https://icsc.un.org/Resources/General/Publications/standardsE.pdf)

7.5.   **Managers and supervisors** must ensure that working relationship foster harmony. They are in positions of leadership and it is their responsibility to ensure a harmonious workplace based on mutual respect; they must be open to all views and opinions and make sure that the merits of staff are properly recognized.

7.6.   **Harassment,** in any shape or form, is not tolerated and no staff shall engage in any form of harassment. International civil servants have the right to a workplace environment free of harassment or abuse. WFP has established rules and provides guidance on what constitutes harassment and abuse of authority and how unacceptable behaviour will be addressed. This is enforced through compulsory on-boarding course on joining the organization, frequent reminders by supervisors and managers on the duty to report on any form of harassment and abuse; formally instituted staff association; regular HR workshops and trainings; gender training; Prevention of Sexual Exploitation and Abuse (PSEA) trainings.

7.7.   International civil servants are not allowed to abuse their authority or use their power or position in a manner that is offensive, humiliating, embarrassing or intimidating to another person. Any staff or member of public can report on this conduct through numerous channels of complaints available, anonymous letters, incident reports, emails, or through the call centre and regular monitoring. All employees and SEA Focal Points/Alternates are bound to maintain confidentiality of all reported allegations, including the identity of complainant/s and subject/s. OIGI- WFP's Office of Inspections and Investigations will launch an independent assessment of the cases and conduct investigations as required.

7.8.   **Staff association:** Freedom of association is a fundamental human right and international civil servants have the right to form and join associations, unions or other groupings to promote and defend their interests. Continuing dialogue between staff and management is indispensable for WFP. Management facilitates this dialogue through staff representatives to ensure staff welfare is always prioritized.

7.9.   **Security and Safety:** The WFP Country Director and Representative for Somalia shall allocate requisite staff in accordance with the demands of the services to ensure that the health, well-being, security and lives of all staff, without any discrimination whatsoever, and shall not be subjected to undue risks. WFP takes measures to protect the safety of staff and that of their family members. At the same time, it is incumbent on the staff to comply with all instructions designed to protect their safety. Apart from ensuring all staff are insured medically and have life insurance, staff are also required to undertake UNDSS Safe and Secure Approaches to Field Environments (SSAFE) and BSAFE trainings before going into Somalia. Furthermore, it is mandatory for United Nations system personnel and eligible family members to obtain security clearance for all official travel, regardless of location, and they cannot commence official travel without obtaining it.

7.10.   **Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination** policy. WFP is committed to working environments that respect the inherent dignity of all persons, affording them the opportunity to reach their fullest potential and empowering them to deliver the best possible results for all the people that WFP serves. WFP is committed to a zero-tolerance approach to abusive conduct. This means that any reports of abusive conduct will be dealt with promptly, justly and effectively in accordance with the applicable regulatory framework and the procedures set out in the Circular. Failure to meet obligations under this Circular may lead to administrative or disciplinary action, up to and including summary dismissal. This policy also describes mechanisms meant to ensure the responsibilities of WFP as an employer and of each WFP employee, of promoting safe and harmonious workplace environments, and taking action when alerted to potential abusive conduct. Finally, this policy provides guidance for WFP employees on how to seek support and raise concerns regarding any abusive conduct they have experienced or witnessed.

7.11.   **Special Measures for Protection from Sexual Exploitation and Sexual Abuse.** Acts of SEA constitute serious misconduct, and are grounds for disciplinary action, including summary dismissal. WFP's zero-tolerance policy is toward SEA committed by its employees or any other personnel associated with the work of WFP regardless of context or operation, or any other form of abuse and exploitation. All employees are expected to follow the core principles set forth in the Code of Conduct and carry themselves in accordance with the highest standards of integrity set out in the United Nations Charter and the applicable Staff Rules and Regulations.

7.12.   The WFP Policy on Prevention of SEA obliges all employees to report concerns or suspicions of SEA and places the responsibility on managers at all levels to support and develop systems that maintain an environment that prevents SEA. SEA training is mandatory for all employees, including any related e-learning programme.

7.13.   In cases of SEA allegations, staff who receive and/or report and who are not a designated SEA focal point (including call centre operators) must:

   i.   Upon consent of the affected person, inform a designated WFP PSEA Focal Point at the field or country level as soon as possible.
   ii.   Provide accurate information about where to receive assistance e.g. medical/clinical, legal, psychosocial support (address, phone number).
   iii. Upon receipt of a complaint or referral, the PSEA Focal Point will ensure that consent has been obtained before reporting the incident to OIGI- WFP's Office of Inspections and Investigations.

Occupational Safety and Health Policy (OSH):

7.14.   WFP is dedicated to promoting and maintaining the highest degree of physical, mental and social wellbeing of all its employees. Accordingly, it seeks to offer a safe and healthy working environment which contributes to human dignity and self-fulfilment. WFP is committed to the prevention of accidents and injuries arising from, linked to, or occurring in the course of work, by mitigating the hazards and risk of the working environment.

7.15.   WFP designed safe distribution guidelines to enhance partner NGOs ' ability to make informed decisions and implement necessary security arrangements to improve the safety and security of their personnel and beneficiaries in WFP funded projects only. WFP Safe distribution trainings are provided to Cooperating Partners (CP) and local district officials involved in the implementation of programs. The guidelines is not an exhaustive examination of all safety, security and risk management systems that can be developed or implemented by partner organisations in Somalia. Instead, the document is intended to give guidance on the key needs that must be addressed at distribution and or registration sites. This guide uses checklists and step-by-step tools to ensure important duty of care needs are identified and managed as follows.

Reporting Channels and Grievance Mechanisms:

7.16.   WFP has several informal and formal bodies and mechanisms in place for its staff to raise workplace related concerns and grievances, report cases of suspected misconduct, fraud etc.

7.17.   Besides, WFP has a comprehensive disciplinary process in place to address all breaches of WFP regulations, rules and administrative issuances to protect the integrity and efficiency of the Programme. All staff have an obligation to report misconduct (or suspicions of misconduct) to their immediate supervisor, the Deputy Country Director/Country Director or The Office of Inspections and Investigations (OIGI), to collaborate with investigators, and to maintain confidentiality.

7.18.   The following bodies/ reporting channels are available to all categories of staff:

a)   The Office of the Ombudsman (OMB)

Staff may contact the Ombudsman for help on any issue related to work to get a different perspective outside of the formal channels. Issues may relate to conditions of employment, managerial practices, professional and staff relations, administration of benefits, interpersonal issues and standards of conduct. If a solution cannot be found to an issue through informal mediation, the OMB can provide information on how to proceed through more formal channels.

b)   The Office of the Inspector General (OIG)

OIGI carries out investigations in WFP in response to complaints from employees, its contractors, counterparts, implementing partners, UN agencies, and others. Reports may be made through several sources, including personal visits, phone calls, emails and letters. In addition, the Office operates a **dedicated Hotline**, which allows for confidentiality in the receipt of complaints. Cases of SEA may be

reported through the dedicated Hotline or to the designated PSEA Focal Points at the country or field office levels, or his/her alternate. WFP Somalia has nominated PSEA focal points in all its field offices, in the CO in Mogadishu and in the Liaison Office in Nairobi.

c) The Ethics Office

The Ethics Office Advises employees and management on standards of conduct and ethical matters, conflicts of interest (gifts, awards, hospitality, outside activities including speaking engagements, board memberships, publications, and more), political activities, pre- and post-employment issues. It administers the *Whistle-blower Protection Policy* to enable employees to report misconduct and cooperate with duly authorized audits, investigations and proactive integrity reviews (PIRs) without being subject to retaliation. It also administers the *Annual Conflicts of Interest and Financial Disclosure Programme (ADP)* for the purpose of helping to identify and address personal conflicts of interest.

8. NGOs and Service Providers contracted under component 1 of the SNLRP:

8.1.   WFP will work with partners, both NGO and other service providers (its financial service provider in particular) to deliver services under the project. Before contracting, WFP ensures that NGO partners through Field Level Agreements (FLA) meet a set of minimum Core Corporate Standards. The FLAs are corporate level legally binding agreements. In this document, please refer to section 6.2.8 on Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination policy; section 6.2.9 on Special Measures for Protection from Sexual Exploitation and Sexual Abuse Acts of SEA; and section 7.5 – Zero Tolerance of Child labour, 7.6 – minimum standards for FLAs, 7.7, 7.10 and 7.11 for more details on the legally binding corporate policies that impact labour procedures.

8.2.   In addition, NGOs working with WFP must be legally registered as a non-governmental, non-profit, non-political organization in the country of the operation. As per FLA clause 16.1, "The Cooperating Partner represents and warrants that it is legally registered as a non-governmental, non-profit, non-political organisation in the country of the Operation, that it has the required legal capacity to enter into this Agreement and implement the Programmes and that it shall comply with any legislation applicable to it". In Somalia, NGOs must obtain from the Government and share with WFP a certification that the organization is legally registered and authorized to work in the country. These certificates are renewed on a yearly basis by the government.

8.3.   NGOs contracted by WFP must abide by the national legislation. As per clause 16.9 of the FLA, "The Cooperating Partner shall comply with all laws, ordinances, rules, and regulations bearing upon the performance of its obligations under the Agreement".

8.4.   WFP also undertakes a contractual obligation with all its service providers covering issues related to delivery against the clearly specified outputs of the contract. WFP does not have specific clauses in its partnership agreements related to the specific terms of employment of the partner's staff (except for child labour and sexual exploitation, as per paragraphs 7.6 and 7.7 below, respectively), WFP undertakes partners assessments prior to engaging in a contractual agreement, which are based on both qualitative and quantitative indicators. The template is enclosed in the Annex –2 . T. Key indicators include a) Vision

& Strategy; b) Governance and Organizational structure- focusing on people's management; Gender, Protection and AAP; Programme capacity- Programme Design, Implementation, M& E; Financial Management and Resource Mobilization. The qualitative assessment is focusing on Sustainability; Due Diligence and Registration with the government. WFP also carries out partner performance evaluations at the completion of each Field Level Agreement (FLA). The evaluation measures performance against set indicators in different thematic areas, including sound recruitment procedures, Protection, Gender and Risk Management. NGOs are measured against the expectation that they should have sound hiring processes in place. All FLA contracts are considered for renewal based on satisfactory performance and adherence to all WFP mandatory provisions. In cases where certain issues are identified through the evaluation, improvement and prevention measures are included in the renegotiation process, or, based on the gravity of the risk, contract is not renewed. Annex 1 details the risk mitigation matrix in place in case areas for improvement are identified.

8.5.   **WFP has a zero tolerance for child labour** and while situations where children above the internationally recognized minimum age work under safe, dignified and healthy conditions may be accepted, WFP does not tolerate child labour including for its contracted partners NGOs and others service providers. Specifically, WFP does not allow children below the age of 14 years to be engaged by its contractors or in its activities. Failure to comply would lead to termination of partnership or contract with the NGO or contractor (refer to the Annex 2 on Guidance on Prevention on Child Labour in WFP Operations and Programmes.)

8.6.   As stipulated in the FLAs, by entering into an agreement with WFP, the Cooperating Partner undertakes to adhere to: (i) the standards set out in the Secretary-General's Bulletin Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13); (ii) any minimum operating standards adopted as a result of the Statement of Commitment on Eliminating Sexual Abuse and Abuse by UN and Non-UN Personnel of 4 December 2006; and (iii) any other Protection from Sexual Exploitation and Abuse (PSEA) policy or guideline as may be adopted by WFP, as notified to the Cooperating Partner by WFP from time to time.

8.7.   The Cooperating Partner shall ensure that its personnel, agents, contractors and subcontractors conform to the highest standards of moral and ethical conduct. Any failure by the Cooperating Partner to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof or to take corrective action, shall constitute grounds for termination of the Agreement.

8.8.   **WFP contractual procedures with Service Providers**: Under the mobile money option, WFP has contracted Hormuud which as countywide coverage as well as interoperable services with Telesom in Somaliland and Golis in Puntland to transfer monetary entitlements to the beneficiaries. WFP has conducted a capacity assessment and due diligence as per the procurement standards which includes coverage (geographic and subscription clientele), quality of services and vigorous background reference checks before signing contact with Hormuud as the selected service provider.

8.9.   WFP delivers cash in Somalia in partnership with Standard Chartered bank and its affiliate branches, AMAL. Before entering into the contractual commitment within Somalia, the vendor was vetted against the latest available consolidated United Nations Sanctions (UNSC) list. The list is the main point of reference for UN agencies in Somalia, and it is available at the Contractor Information Management System (CIMS) website at https://www.cims.so.one.un.org.

8.10.   WFP's contract with Hormuud explicitly stipulates that the MNO must comply with any applicable law, ordnances, rules and regulations. This includes the Somalia Labour Code detailed below in chapter 8.

8.11.   **The contract also explicitly forbids child labour** and, through the contract, warrants that neither it, its parent entities (if any), nor any of the service providers' subsidiary or affiliated entities (if any) is engaged in any practice inconsistent with the rights set forth in the Convention on the Rights of the child, including Article 32 which recognizes that "a child should be protected from all work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social".

8.12.   **Sexual exploitation is also clearly prohibited**, and, through the contract, the service provider warrants that it has taken all appropriate measures to prevent sexual exploitation or abuse of anyone by its employees or any other persons, engaged and controlled by the service provider to perform any services. Sexual activity with any person less than eighteen years of age, regardless of any laws relating to consent, shall constitute sexual exploitation and abuse, of such person.

8.13.   Failure to comply with those obligations constitutes grounds for WFP to terminate the agreement with Hormuud.

Complaints and Feedback Mechanism (CFM) for NGOs and Service Providers:

8.14.   WFP Somalia has a Complaints and Feedback Mechanism (CFM), as part of the 'Accountability to Affected Populations' framework, for all beneficiaries and non-beneficiaries of the project. The CFM, or hotline, which is largely detailed in the SMP, callers can ask questions or lodge complaints and grievances, report issues or wrongdoings related to the programme, which are individually followed up and responded to.

8.15.   While the CFM is primarily designed for beneficiaries, staff of the Cooperating Partners (CP), and Hormuud as the Service Provider (SP) can use it to report any wrongdoing.

8.16.   The CFM system is linked to an online case management system where every complaint is registered. All complaints will be logged into the system with details such as case description, complainant information (name, phone where the person can be called back), date, activity, CP etc. Each case registered in the system is assigned to specific WFP staff, who receive an automatic notification by email for follow up – for instance the Head of Programme in a specific WFP office. The staff responsible for taking action records his/her actions in that same system to close the loop, after which the call operators call back the complainants and inform them of the resolution of their issue.

8.17.   Different risk levels have different process flows and time limits for action, with high risk cases (suspicion of fraud for instance having a shorter timeline for action). WFP's M&E unit monitors case resolution closely, to ensure that cases are addressed within the defined timeframes. Cases can be closed in the system only after the complainant has confirmed that the issue was actually solved.

8.18.   Complaints of systemic and egregious exploitative practices such as systemic child labour, forced labour, etc, will be received through the CFM and will be examined by WFP. As they constitute a breach in the contract with WFP, if verified, they would be cause for contract termination.

8.19.   For other offences such as disputes over awards, working hours, or non-payment, or for issues that require an interpretation or enforcement of Somali law, WFP will refer complainants to the local ministry of labour, which is the counterpart on this project, and WFP will not investigate itself.

9. Labour Specific Complaints and Grievance Mechanism for NGOs and Service Provide workers

8.1   ESS2 on labour and working conditions require the setting up of a Complaints and grievance mechanism for project workers separate from the project wide GRM. Project workers that are a direct employees and consultants of WFP have robust internal human resource modalities that protect them from harmful labour practices and accord workers mechanisms to raise workplace concerns, complaints and grievances (detailed in section 6 above). This mechanism is materially consistent with the requirements of ESS 2, Somalia National Labour laws and international best practice.

8.2   Direct and contracted workers engaged by NGOs and other service providers can raise labour related complaints and grievances with the GRM mechanism within MoLSA which has already been set up and is being equipped to handle complaints of this nature. A GRM officer domiciled within MoLSA is already in place. Complainants contacting the WFP project wide GRM on labour issues will be referred to the MoLSA labour specific GRM for processing and resolution.

8.3   Measures are being put in place to ensure that the labour specific GRM:

a. is easily accessible to all NGO and service provider workers by phone or walk in or through the project wide GRM;
b. is known to NGO and service provider workers.
c. Contracts will also provide measures to protect them against reprisal for lodging a grievance;
d. addresses complaints promptly using a clear and transparent process that provides timely feedback in an appropriate language. Upon lodging a grievance, the system for its resolution will be provided to the complainant;
e. will operate in an independent and objective manner;
f. Use of this GRM will not impede access to other judicial or administrative remedies that might are available under Somali law or through other existing arbitration procedures, and;
g. does not substitute for grievance mechanisms provided through collective agreements.

8.4   Resourcing of the Labour GRM is already provided for under Component 3 of the SNHCP (Project Management, Monitoring and Evaluation, and Knowledge Management) who will coordinate GRM activities for both SNHCP and SNLRP. The component is financing the payments to the GRM officer as well as the GRM operational costs as required. The mechanism can be scaled up as appropriate proportional to the nature and scale of the potential risks, magnitude of complaints and grievances and span of geographical coverage. A term of reference for the GRM officer is attached as Annex 3.

10. National Labour Law applicable in Somalia:

10.1.   People employed by WFP's cooperating partners and financial service providers in Somalia are subject to the national legislation. The National Labour Code of October 1972 provides the legal definition of minimum labour standards, including working hours, leave entitlements, salary package, end of service benefit, right of association, setting the national benchmark for employment for Somalia, as follows:

- The code stipulates that all contracts of employment must include:
- The nature and duration of contract,
- The hours and place of work,
- The remuneration payable to the worker,
- The procedure for suspension or termination of contract; including notice of termination, compensation in lieu of notice, service gratuity, death benefit, payable damages for unjustified termination, reinstatement, transfer of undertakings, suspension of the employment relationship.

10.2.   All contracts, prior to signature, must be submitted to the competent labour inspector for pre-approval to ensure that all legal requirements have been met before employment begins. The failure to do so would render the contract void and non-valid.

10.3.   Employers have the obligation to put in place adequate measures for health & safety, to protect staff against possible related risks, including the provisions of a safe and clean working environment. Workplaces must be built, installed, equipped and managed in such a way that the workers are properly protected against possible risks. In addition, the workplace must be able to provide sanitary facilities, water and other basic tools and appliances in accordance to the work to ensure the workers' health and safety.

10.4.   Employers must also give due consideration to complaints of the workers. An employer is not allowed to withhold any monies payable to staff except subject to the limits of prescribed law, nor demand for any presents in return for employment.

10.5.   The code stipulates conditions of remunerations, in particular, around the adequacy and equality of remuneration, which must be in relation to the quality and quantity of the work requested of the employee, and must be non-discriminatory (age, gender, etc).

10.6.   Conditions of work also are specified and include the maximum number of working hours per week (8 per day for 6 days per week), the conditions and payment for over time, and set the national holidays. The Labour code specifies that workers are entitled to weekly rest (1 day, typically Friday), Public Holidays (9 set days per year) and annual leave with pay (15 days).

10.7.   Specific regulations govern the work of women and youth (15 to 18 years), with some specific work forbidden for them, as considered dangerous and unhealthy. For instance, works that imply carrying heavy weight, or night work, are forbidden. Maternity leaves and breastfeeding hours are also provisioned for, for pregnant and breastfeeding mothers.

10.8.   Child work (below 12 years of age) is specifically forbidden by the law, while employment for children aged 12 to 15 is strictly contingent upon the fact that it is "compatible with the proper protection, health and moral children of children".

10.9.   Freedom of association is also recognized, and employers are prohibited from engaging in any act of discrimination, or any act restricting the right of freedom of association. All workers are allowed to join trade union, which are primarily formed to protect the interest of and represent the employees in their dealings with the employers.

10.10.   The code also details the procedures for the settlement of individual and collective disputes, as well as for channels of arbitration.

The full labour code can be accessed on the following link:
https://public.huddle.com/a/LRxYNar/index.html

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Annexes:

I.   Annex 1: Risk Mitigation matrix
II.   Annex 2: WFP Guidance Documents
III.   Annex 3: ToR for the MoLSA Labor GRM Specialist

After the capacity assessment is completed, specific risk mitigation measures are applied if a partner's scores reflect weakness in the assessment areas. Below is a table that guide this process.

Risk mitigation linked to Partner Capacity Assessment (PCA)

Possible risks	Observations	Possible mitigation actions where appropriate
Vision and strategy		
Lack of clear mission statement	NGO has vague policy and mission documents.	Work with NGO to finalize mission statement/ help NGO formulate longer-term strategy building on comparative advantages of NGO.
Governance/people management		
Lack of Clear code of conduct	No documentation on staff rules and conduct.	Establish timeline for NGO completion of code of conduct/ Help NGO establish code of conduct based on WFP's documentation.
Inadequate governance structure and reporting lines	Roles and responsibilities are poorly defined/ unclear reporting lines/ no organigram (INGO- lacking strong connection to HQ).	Establish timeline for NGO completion of code of conduct / Work with NGO to make organigram and roles and responsibilities chart.
Policies and procedures unclear for staff performance reviews and no existing guidance on formal recourse for staff issues	No regular staff assessments are done and/or there is an absence of official guidelines on how to deal with recourse for employee performance issues.	NGOs should have sound hiring processes in place and periodic evaluations of employee performance, as well as official procedures for dealing with employees' performance issues.
Inadequate Training needs assessment or capacity building of staff	Affecting ability to deliver food assistance.	WFP can provide better opportunities for training and shadow monitoring/ increased field visits/ and help coordinate possible training with nearby INGO with better capacity.
Gender and protection		
Organization lacks gender policy and/or protection policy or guidance	No clear policy in place.	Work with NGO to create policies and have trainings for staff awareness.

Possible risks	Observations	Possible mitigation actions where appropriate
Inadequate experience in gender analysis/ gender specific programming	No gender focal points have been appointed/ no previous gender specific programming.	Help find a designated focal point to attend NGO gender/WFP trainings/ couple with INGO, other organization, who is experienced in gender specific programming.
Inadequate Complaints Feedback Mechanisms (CFM)	The onsite CFM is underused and not known by most beneficiaries/ response time is inadequate.	Help organization set up and monitor a CFM properly/ increase field visits to ensure this is done.
Programme capacity		
Failure or delays in information and communications technology (ICT) systems	Lack of communication in remote areas/ unable to receive necessary updates on programme implementation; Lack of adequate data security mechanisms for sensitive information.	Direct support to partners to improve ICT infrastructure, including provision of hardware, software and training, as appropriate; checks to ensure data security is in place.
Lack of training staff on programme implementation	Quality of partner implementation affected by lack of expertise in new programme modalities (e.g. CBT) and capacity for large-scale roll-out.	WFP can provide training and mentoring as needed or help coordinate training opportunities through INGO partners and Clusters.
Demonstrating results and impact/ poor monitoring and evaluation systems in place	Ineffective/inefficient monitoring and evaluations.	Training on proper monitoring and evaluation procedures as well as possible seconding WFP staff for this.
Financial management		
Inadequate financial management systems in place	Inability to meet WFP reporting and invoice requirements. Delays in submissions.	Training and additional efforts to broaden knowledge of book-keeping and accounting. Internationalise critical functions if necessary (short- term). Ensure handover/training/coaching processes.

Annex 2: WFP Guidance Documents

DOCUMENT	LINK
GUIDANCE NOTE TO PREVENT CHILD LABOUR	Child Labour Policy.pdf
DISTRIBUTION GUIDANCE	2020 WFP Safe Distribution Guide.pdf 2020 Safe_Distribution_Reg
NGO CAPACITY ASSESSMENT TOOL	NGO capacity Assessement Tool.xl

I. Project Description

1. The Somalia Shock-Responsive Safety Net for Human Capital Project (SNHCP) aims to provide cash transfers to targeted poor and vulnerable households and establish the basic building blocks of a national shock-responsive safety net system. The SNHCP program will last three years (2019-2022) and include three components:
     i. Component 1: Nutrition-linked Unconditional Cash Transfers
     ii. Component 2: Delivery Systems and Institutional Capacity Building
     iii. Component 3: Project Management, Monitoring and Evaluation and Knowledge Management

2. The Shock Responsive Safety Net for Locust Response Project (SNLRP) project operationalizes the shock responsive aspect of the SNCHP through rapid scale up of coverage to support vulnerable households affected by the desert locust outbreak. Specifically, it aims to protect food security and livelihoods of poor and vulnerable households affected by the locust outbreak through two components: (i) Emergency Cash Transfer, and (ii) Project Management and Monitoring and Evaluation. In doing so, it responds to the threat of the locust outbreak by protecting locust-affected households, especially subsistence farmers and pastoralists, from falling into deeper food insecurity, as well as preventing the sale/loss of their productive assets through the provision of cash transfers. The implementation of the project will benefit from the delivery system and procedures established under the SNHCP, with a primary focus on rural districts with severe locust infestation. The emergency cash transfer will be undertaken for a period of six months.

3. The Social Protection Department of Ministry of Labor and Social Affairs (MoLSA) will contract services from WFP for the implementation of components 1, as a trusted partner with long-standing experience in supporting Somalia social protection sector. Institutional capacity of the Government of Somalia will be built across components 2; using learning from the implementation under Component 1.

4. **Component 1: Emergency Cash Transfers** will be implemented by WFP and provide emergency cash transfers to approximately 100,000 poor and vulnerable rural locust-affected households, equivalent to some 600,000 persons. The transfers will be delivered using the delivery system and procedures of the FGS' Baxnaano program (supported by the SNHCP, P171346). MoLSA will strategically partner with WFP to support the implementation of Component 1, governed by a Standard Output Agreement

5. **Component 2: Project Management and Monitoring and Evaluation** will support the overall management and administration, monitoring of the project implementation, and learning from the experience of the locust response. Project management and administration will be supported by the well-staffed Project Implementation Unit (PIU) of the SNHCP/Baxnaano, housed within MoLSA. Specifically, the PIU will monitor the implementation of the project components and coordinate project activities at the local level. Given the shock-responsive nature of the project, the PIU will be enhanced with a position focused on managing MoLSA's humanitarian coordination with stakeholders on the SNLRP, particularly with the Ministry of Humanitarian Affairs and Disaster Management and Ministry of Agriculture and Irrigation, as well as broader humanitarian partners and agencies. Component 2 will also support additional operational activities linked to the monitoring and management of the SNLRP activities, such as field visits by the PIU and other MoLSA representatives

in non-Baxnaano districts, and consultations with FMS representative on relevant aspects of the SNLRP implementation, especially communication, among others.

6. Environmental and Social Standard 2 (ESS2) of the World Banks Environmental and Social Framework (ESF) aims to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. In order to meet the objectives of the ESS2, Labour Management Procedures (LMP) have been developed which detail the rules and procedures in place under the SNHCP/SNLRP component 1, related to the contractual arrangements for the staff hired under this project, by WFP and contracted partners. One such element includes how grievances will be managed for cooperating partners (NGOs) who will implement component 1 on the ground and payment service providers to deliver the cash.

II.   Objectives of the Assignment

7. The objective of the assignment to provide oversight of the labour Grievance Redress Mechanism for the cooperating partners and payment service providers hired under the project. This will include management of grievance investigation, resolution, response, appeals and tracking of the same in compliance with the following regulatory requirements;
   - National Legislation
   - Requirements of the World Bank Environmental and Social Standard 2 (ESS2) on Labour and Working Conditions
   - ILO Core Conventions

8. The type of workers that will be covered under the LMP are staff of the NGO Cooperating Partners contracted by WFP for the direct implementation of Component-1 in selected communities, as well as the staff of the payment service provider (Hormud , contracted by WFP to deliver Mobile Money transfers to beneficiaries. The function of the assignment would not cover grievances and complaints by WFP staff and MoLSA civil servants.

9. Currently, the number of cooperating partners and associated staff are not known. However, cooperating partners and payment service providers will be required in each of location where the project will be implemented. The staff will be Somali based either in Mogadishu or the Districts.

III.   Scope of Work

10. The Labour GRM Specialist will be responsible for the following activities:

   - Establishing a GRM procedure that is accessible to all types of workers regardless of their geographical location and literacy levels and in particular workers working for Non-Governmental Organizations (NGOs) hired by WFP in the implementation of SNLRP/ SNHCP.
   - Training and capacity building of workers on the grievance redress mechanism notably the process, timescales, escalation procedures and what the GRM can and cannot address and achieve.
   - Implementation of the GRM including receiving grievances, investigation of grievances and providing feedback to complainants
   - Ensuring the GRM is implemented in a transparent manner free from coercion and intimidation and without cost to the complainant.

- Undertaking quarterly reporting to the MoLSA on the number of grievances received, the number (%) of grievances resolved within agreed timescales, the number of outstanding grievances.
- Support WFP and MoLSA to respond to any legal matters arising associated with grievances previously submitted through the GRM.

IV. Reporting Arrangements

11. The Labour GRM officer will be contracted by MoLSA under the project and will report to the Project Coordinator.

V. Contract Duration and Deliverables

12. The contract will be for a duration of 1-year subject to renewal based on satisfactory performance.

13. The following deliverables will be produced:

- Monthly report on the number of grievances received, number of grievances resolved and number outstanding.
- Bi-annual report on the number of grievances received, number of grievances resolved, and number outstanding compared to agreed timelines. The report should also include details of the number of grievances that have been referred to legal redress. Analysis should be undertaken to determine if there are any trends in the types of grievances received (e.g. payments, hours of work, security issues) and from a particular cooperating partner or payment service provider which may require a more systematic approach to resolution to avoid future complaints.

VI. Experience and Qualifications

14. The candidate will experience and qualifications:

- Bachelor of Arts or Bachelor of Sciences in relevant discipline such as human resources, business administration or management.
- 8 years of experience in human resources management, including grievance management
- Demonstrable knowledge of managing labour issues in line with international best practice/required regulatory requirements.
- Proven experience in conflict resolution in relation to labour/workplace complaints
- Experience of working to manage labour related grievances and complaints within NGOs, civil society or similar organisations would be an advantage.
- Knowledge of basic word processing functions including MS Word, Excel etc.
- Fluent in English and Somali
- Experience of working in Somalia and, or Horn of Africa region