



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 10/08/2020 | Report No: ESRSC01559



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Somalia	AFRICA EAST	P174875	
Project Name	Somaliland Civil Service Strengthening Project II		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Governance	Investment Project Financing		1/11/2021
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Somaliland Civil Service Commission		

Proposed Development Objective

The project development objective is to strengthen basic functions for payroll, human resources and policy management in selected central government agencies and line ministries.

Financing (in USD Million)	Amount
Total Project Cost	4.35

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The main challenges the CSSP II seeks to respond by providing additional financing to the ongoing CSSP are related to the GoSL persistently lagging capacity for effectively managing its wage bill stemming from outdated and therefore ineffective practices of workforce, capacity building and human resources management. The challenges that stand out are:

- Difficulties with public sector (i.e. going beyond MDAs) establishment control;
- Absence of a HRMIS and Pay and Grading system able to support active civil service management and payroll control;
- Absence of pension system preventing timely and dignified retirement of public sector employees; and



- Lack of internal capacity building system for civil service cadre that is currently further exacerbated by COVID-19 pandemic and inability of civil servants to attend in-person trainings.

More specifically, the additional financing will mostly support the following activities:

1. Further headcount activities, implementation of the HRMIS, design and implementation of the new Pay and Grading system, and establishment of the public service pension system (through the CSSP II Component 1);
2. Response to the COVID-19 pandemic by expansion of web-based and e-learning (Component 2);
3. Support implementation of policies developed and adopted under the CSSP (Component 3);
4. Provide support to project management and other components during the extended period of project implementation (Component 4).

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project is being implemented in Somaliland, targeting ministries, departments and agencies within the Somaliland Government. While it has remained relatively peaceful to date, a number of factors make Somaliland vulnerable to conflict and fragility. These include high poverty and unemployment, the oligopolistic nature of key sectors of the economy, rapid urbanization, pressure on key natural resources (especially water and rangeland), and the threat of spillover of violent extremism.

Implementation of project activities is national in scope and will seek to advance achievements under the first phase of the CSSP. Whereas key project activities related to policy management and strengthening core capacities will be implemented at the national level, some activities will require access to other parts of the country. Human resource audits of civil servants and some elements of setting up of web-based and e-learning will require physical visits. The implementation of policies developed under the first phase of the CSSP and the expansion of web based and e-learning capabilities to respond to Covid-19 will be implemented through technical assistance.

There are minimal environmental risks and impacts as the project is not expected to include civil works. There are similarly no impacts related to resettlement or cultural heritage anticipated as the project will not involve activities leading to land acquisition and restriction to land use. The roll-out of web-based and e-learning will similarly not involve the fitting out of new labs or laying of ICT infrastructure

D. 2. Borrower's Institutional Capacity

The capacity of the client to identify, understand and manage adverse environmental and social impacts and risks on the project is just developing. With respect to social impacts and risks, the project incorporates in all major initiatives extensive consultations with all stakeholders, which are routinely incorporated in key TOR and their resulting contracts. Other measures to be enhanced include capacity on labor management, GBV/SEA-H and responsive structures for redressing adverse impacts where harm has occurred. The project could benefit by enhanced monitoring of social risks and impacts as well as initiatives to improve social outcomes. Accordingly, the project will include training in regular, systematic monitoring and evaluation of social risks and impacts faced by the project's reform efforts.

The project will be implemented by the CSC that, although has experience and institutional capacity in the implementation of the first phase, has no prior experience in the implementation of environment and social



requirements under the ESF. Key experiences from the first phase include stakeholder consultations and consensus building on project activities and setting up of mechanisms and polices related to Complaints and Grievance Management and Civil Service Code of Conduct. To address this gap, significant efforts will be required to build social capacity . The Bank will organize ESF trainings for the relevant staff in the PIU and a social specialist seconded from other ministries, agencies or cross support from other projects. In addition, relevant social risk management and inclusion capacity requirements will be in-built into ToRs for technical assistance activities.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Low

The environmental risk rating is assessed as Low. The Project will not generate any potential environmental impacts as its activities are focused on strengthening basic functions for payroll, human resources and policy management in selected central government agencies and line ministries.. It will not finance civil works, neither will it fund investments that generate potential environmental impacts. Other potential risk relate e -waste generation as the project may purchase computers. Risks related to Occupational Health and Safety arising from security incidences is conceivable.

Social Risk Rating

Moderate

The social risk rating is assessed as moderate. Whereas project activities are expected to have significant positive impacts through the transformation of the civil service and overall service delivery to citizens, the likelihood of project activities leading to adverse risks and impacts is moderate. Key social risks include; a) systemic weakness as the capacity of the PIU to identify, understand and prevent adverse social impacts on the project is only developing; b) impacts on the health, safety and well-being of workers tasked with conducting human resource audits; c) exclusion of vulnerable, marginalized and minority members of the civil servants from audits and web-based and e-learning interventions due to project investments being rolled out in a context of limited resources against widespread need; d) challenges in access to beneficiaries for meaningful stakeholder engagements as well as grievance redress and monitoring; e) sexual exploitation and abuse, sexual harassment (SEA/H) and other forms for gender-based violence extending from HR audit activities and enrollment for other project benefits and; f) ensuring security for project operations including the protection of project workers, beneficiaries and affected persons

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The primary beneficiaries would be civil servants working in the targetted ministries, departments and agencies who will benefit from civil service reforms and the Somaliland citizenry that will equally benefit from improved processes and standards for policy management.

Under component 1, key social risks are associated with implementation of human resource audits and headcount, the roll-out of the new Pay and Grading system and establishment of the public service pension system. The



overarching risk is the exclusion of vulnerable, marginalized and minority members of the civil servants from human resource audits and headcounts, Pay and Grading system and pension. There is similarly the risk of challenges in access to beneficiaries for meaningful stakeholder engagements as well as grievance redress and monitoring where civil servants have been systematically or inadvertently left out of the HR audits and headcount, new Pay and Grading system and the public service pension system. In addition, perpetuation, and or exacerbation of sexual exploitation and abuse, sexual harassment (SEA/H) and other forms for gender-based violence could arise from the interaction of civil servants with personnel conducting HR audits and headcount activities as well as enrollment for pay, grading and pension activities. In addition, limited number of staff may potentially see their pay reduced as a result of the pay & grading reforms. Other risks relate to the unauthorised access, leakage and corruption of personal data as project activities will see the collection, processing, storage and reproduction of large amounts of personal data. Data breaches and hacks can lead to unauthorised access, exposure to harm and loss of personal data.

Under component 2, the social risks are associated with the expansion of web based and e-learning. Through weak or undefined and poorly implemented selection criterion, the roll-out of these activities may end up excluding civil servants from poor and marginalized areas as well as those without the requisite ICT skills. In addition, civil servants with key disabilities may be systematically excluded from project benefits where digital modes of learning do not take advantage of universal design and inclusivity principles. There are also risks of perpetuation, and or exacerbation of sexual exploitation and abuse, sexual harassment (SEA/H) and other forms for gender-based violence by implementors of the Head Count and web based and e-learning interventions. Whereas the web based mode of delivery significantly reduces the risks of SEA-H, the risk of demands for and or exchange of sexual favours for head count or enrolment in learning opportunities is conceivable. There is no risk of downstream impacts from retrenchment as the audit's main goal is to count, collect information and identification of ghost workers and will exclude retrenchment.

The risks of collective union, and or industrial action is minimal. Nevertheless, the project will take deliberate measures to identify and meaningfully consult labor relations groups, labor unions and collective bargaining organizations. The SEP will detail targeted mechanisms by which these organizations will be consulted and their views incorporated in the project design and how information on project activities, risks and impacts will be disseminated. Under component 3, key social risks arising from policy implementation relate to the exclusion of poor, vulnerable and marginalised members of the civil servants and ensuring security for project operations including the protection of project workers, beneficiaries and affected persons during policy implementation activities.

These risks and impacts will be mitigated by the preparation of a Social Management Plan (SMP) which will; i) provide the criteria and procedures for screening sub-projects, assessing institutional capacity and outlining risk mitigation strategies commensurate with the risks; ii) review the mapping process for the HR audits and headcount activities and the roll-out of the web based and e-learning interventions to ensure that they are disability inclusive, and ; iii) elaborate measures to ensure that standards on handling and processing a large amount of information, including personal data of its beneficiaries and prospective beneficiaries are robust.

In addition, Labor Management Procedures (LMP) for PIU (direct workers) and contracted workers will be prepared, consulted upon and disclosed. Government civil servants working in connection with the project, whether full-time or part-time, will remain subject to the terms and conditions of their existing public sector employment arrangements. The LMP will detail occupational health and safety (OHS) requirements for project workers and set



about provisions to ensure proper working conditions and management of worker relationships, Codes of Conduct and occupational health and safety; and prevention of Sexual Exploitation and Abuse/Sexual harassment. The LMP will also detail procedures for protection of workers against discrimination and forced labor while setting a mechanism for a project workers grievance mechanism.

The SEP, LMP, SMP and Security Management Plan (as required) will be prepared prior to project approval.

Security risks in Somaliland is considered lower compared to other regions in Somalia. However as the specific risk of the project to the local context is not known, a security risk assessment will be conducted to inform the preparation of a Security Management Plan as required to support the mitigation of security threats to project operations.

Areas where “Use of Borrower Framework” is being considered:

None

ESS10 Stakeholder Engagement and Information Disclosure

As discussed, a key risk and impact under this standard relate to inadequate, ineffective and inappropriate stakeholder engagements and disclosure of information leading to exclusion of vulnerable, marginalized and minority members of the civil service from project benefits, amplified by the context of limited resources against widespread need.

The SEP provides the framework for identification of stakeholders, gauging stakeholder interest and providing systematic means and processes of inclusive and meaningful engagements with the stakeholders and communities in a way that influences project design and implementation under all components. Robust stakeholder engagements will be conducted before commencement of project activities as well as sensitization on the availability of a project GRM to support the systematic uptake, processing and resolution of project related complaints and grievances. The main stakeholders here include civil servants who are the target beneficiaries of the project.

As labor relations groups, labor unions and collective bargaining organizations form critical stakeholders for proposed project activities, the project will take deliberate measures to identify and meaningfully consult these stakeholders. The SEP will detail targeted mechanisms by which these organizations will be consulted and their views incorporated in the project design and how information on project activities, risks and impacts will be disseminated.

Considering Covid-19 restrictions the project will innovate ways to consultations fit for purpose, effective and meaningful in order to meet project and stakeholder needs and adhere to the restrictions put in place by the government to contain virus spread. Strategies to be employed include smaller meetings, small FGDs to be conducted as appropriate taking full precautions on staff and community safety. Where meetings are not permitted, traditional channels of communications such as radios and public announcements will be implemented. Other strategies will include one on one interviews through phones and skype.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions



There are risks related to security of workers, protection against child and forced labor, occupational health and safety and ensuring that labor for the project will be sourced and managed responsibly including the set-up of a labor specific GRM.

Project workers will mainly entail existing Government civil servants and contracted workers. Government civil servants will remain subject to the terms and conditions of their existing sector employment including relevant ESS 2 requirement applicable to civil servants. A review of the existing employment terms and conditions and the relevant ESS 2 requirements will be conducted and gap filling measures outlined in the LMP. Other project workers hired by the project including contractor workers they will be subject to the full requirements of ESS2. A Labor Management Procedures (LMP) will be prepared before the commencement of project activities. The GBV risk is assessed as moderate and will be addressed in an action plan in the LMP. The LMP sets out the Project's approach and requirements to meeting national requirements as well as the objectives of ESS2 and ESS4 on Community Health and Safety. It will include procedures on incident investigation and reporting, recording and reporting of nonconformance, emergency preparedness and response procedures and continuous training and awareness to workers. The LMP will be developed by the PIU and as specified in the ESCP and will include a Code of Conduct for project workers. It will apply to all Project workers whether full-time, part-time, temporary or seasonal. The LMP will also look at safety concerns and OHS in terms of working environment for workers, and will include provisions on OHS.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project will ensure that any e-waste generated from project funding is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers. Bins will be placed at specific points or at strategic locations for dumping the e-waste generated from project funding, hence segregating the e-waste from other wastes. These bins will be emptied regularly to licensed refurbishers, collection centers, or recyclers to avoid soil and groundwater contamination from toxic materials in the e-waste.

ESS4 Community Health and Safety

Risks on community health and safety may be through exposure to security risks and sexual exploitation and abuse, sexual harassment (SEA/H) and other forms for gender-based violence. Potential risks of gender-based violence, for example, may increase with the sending of workers to conduct HR audits. Mitigation measures include develop and implement measures and actions to regularly assess and manage the risks of SEA/H and other forms of GBV extending from project activities. This will be detailed in the LMP. Considering Covid-19 restrictions the project will innovate ways to consultations fit for purpose, effective and meaningful in order to meet project and stakeholder needs and adhere to the restrictions put in place by the government to contain virus spread

Ensuring security for project operations (including the protection of project workers, beneficiaries and affected persons) remains a complex challenge in a region largely characterized by a dire humanitarian situation due to multiple and simultaneous crises afflicting the country compounded by developing government systems. A security risk assessment will be conducted to inform the preparation of a Security Management Plan as required to support the mitigation of security threats to project operations.



ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Activities relating the use of Land Acquisition, Restrictions on Land Use and Involuntary Resettlement currently not being considered under this project

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Activities relating the use of Biodiversity Conservation and Sustainable Management of Living Natural Resources currently not being considered under this project

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

There are no groups in Somaliland that are currently considered as IP/SSAHUTLC

ESS8 Cultural Heritage

Activities relating the use of Resource Efficiency and Pollution Prevention and Management currently not being considered under this project

ESS9 Financial Intermediaries

Activities relating the use of Financial Intermediaries currently not being considered under this project

B.3 Other Relevant Project Risks

Systemic weakness is an overall risk as the capacity of the PIU to identify, understand and prevent adverse social impacts on the project is only developing. This includes capacity for monitoring of environmental and social risks and impacts, stakeholder and community engagements, labor management, GBV/SEAH and redressing adverse impacts where harm has occurred.

To address this gap, significant efforts will be required to build social capacity. ESF trainings will be organized for the relevant staff in the PIU and a social specialist who will be seconded from other ministries, agencies or cross support from other projects. Considering Covid-19 restrictions the project will innovate ways to effectively deliver these trainings while adhering to the restrictions put in place by the government to contain virus spread. Strategies to be employed include smaller trainings to be conducted as appropriate taking full precautions on staff and project beneficiary safety. Where physical trainings are not permitted virtual trainings will be implemented In addition, relevant social capacity requirements will be in-built into ToRs for technical assistance activities

Ensuring security for project operations (including the protection of project workers, beneficiaries and affected persons) remains a complex challenge in a region largely characterized by a dire humanitarian situation due to multiple and simultaneous crises afflicting the country compounded by developing government systems. A security risk assessment will be conducted to inform the preparation of a Security Management Plan as required to support the mitigation of security threats to project operations.



C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

None

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

Preparation of Stakeholders Engagement Plan, Social Management Plan, Security Management Plan (as required), Labor Management Procedures and Environmental and Social Commitment plan before appraisal

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

The instruments that will be developed after Bank Approval are:

- a. Labor Management Procedures
- b. Social Management Plan
- c. Security risk assessment and Security Management Plan (as required)
- d. Updated Stakeholders Engagement Plan (SEP) to detail a project level GRM

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 16-Nov-2020

IV. CONTACT POINTS

World Bank

Contact:	Lucy Anyango Musira	Title:	Public Sector Specialist
Telephone No:	5327+6369 / 254-20-2936369	Email:	lmusira@worldbank.org
Contact:	Gregory Kisunko	Title:	Senior Public Sector Specialist
Telephone No:	+1-202-473-2965	Email:	gkisunko@worldbank.org

Borrower/Client/Recipient

Public Disclosure



Borrower: Ministry of Finance

Implementing Agency(ies)

Implementing Agency: Somaliland Civil Service Commission

V. FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: <http://www.worldbank.org/projects>

VI. APPROVAL

Task Team Leader(s): Gregory Kisunko, Lucy Anyango Musira

Practice Manager (ENR/Social) Helene Monika Carlsson Rex Recommended on 08-Oct-2020 at 02:55:19 GMT-04:00