

FEDERAL REPUBLIC OF SOMALIA



MINISTRY OF EDUCATION, CULTURE AND HIGHER EDUCATION

STAKEHOLDER ENGAGEMENT PLAN

SOMALIA EDUCATION FOR HUMAN DEVELOPMENT PROJECT

25th FEBRUARY, 2021

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ABBREVIATIONS AND ACRONYMS

CBO	Community-based organization
CEC	Community Education Committee
CoC	Code of Conduct
CSO	Civil society organization
DG	Director General
EGRA	Early Grade Reading Assessment
ESC	Education Sectoral Committee
ESF	Environment and Social Framework
ESIRT	Environmental and Social Incident Reporting
ESMF	Environmental and Social Management Framework
ESS	Environment and Social Standards
ESSP	Education Sector Strategic Plan
FGS	Federal Government of Somalia
FMS	Federal Member State
FPIC	Free, prior, informed consent
GBV	Gender-based Violence
GDP	Gross Domestic Product
GER	Gross Enrolment Rate
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
IDA	International Development Association
IDPs	Internally Displaced Persons
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MOEACC	Ministry of Environment, Agriculture and Climate Change
MoECHE	Ministry of Education, Culture, and Higher Education
MoET	Ministry of Energy and Transport
MoPIC	Ministry of Planning and International Corporation
NGO	Non-governmental Organization
OHS	Occupation health and safety
OIP	Other Interested Parties
OOSC	Out of school children
PAI	Project Area of Influence
PCU	Project Coordination Unit
PDO	Project Development Objective
PIU	Project Implementation Unit
PMC	Project Management Committee
PMU	Project Management Unit
PWDs	Persons with disabilities
RPF	Resettlement Planning Framework
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference
TPDP	Teachers Professional Development Program

UNICEF
VMGs
WASH
WBG

United Nations Children's Fund
Vulnerable and marginalized groups
Water and Sanitation Hygiene
World Bank Group

1.0 INTRODUCTION

1.1 Background

1. More than three million children in Somalia, aged between 6 and 13 years, are reportedly out of school, according to the United Nations Children’s Fund (UNICEF).¹ Due to the absence of an enabling environment including school infrastructure, many students do not have the opportunity to attend school in the country, with a 30 percent average primary school enrollment rate that dips to 18 percent in hard-to-reach, less secure southern states of the country. Somalia has the sixth highest poverty rate in Sub-Saharan Africa.² Due to high poverty levels, high levels of civil unrest and insurgencies, especially in the south, and the prevailing pastoralist and nomadic way of life, sending children to schools is impractical and impossible for a lot of families.

2. The World Bank Group (WBG) proposes to support the education sector in Somalia by focusing on increasing access to basic education, with an emphasis on girls, and improving teacher quality. The proposed Project will be implemented over a period of five years (2020 to 2025), organized around four components, which are described further below, and financed by an International Development Association (IDA) Credit of US\$40 million. The Project design includes systemic interventions in the areas of access, quality, system building and management as well as targeted interventions to be implemented in predetermined locations to address some of the most pressing needs in education.

3. The project is aligned to the Federal Government of Somalia’s (FGS) Education Sector Strategic Plan (ESSP). The project will specifically support the attainment of four of the country’s priorities under the ESSP:³

- i. Strengthen management capacities and systems at federal and state levels, including improving fiduciary mechanisms and increasing budget allocations to the education sector;
- ii. Support learners and strengthen societal resilience among communities affected by natural disasters and conflict;
- iii. Continue expanding access to education for children, adolescents and youth, especially those from marginalized communities such as pastoralists, Internally Displaced Persons (IDPs), minority groups, and the urban poor; and
- iv. Improve the quality of learning outcomes, especially at early grade levels, and to ensure the market relevance of learning opportunities.

1.2 Project description

4. The project aims to support the implementation of high potential, short-term interventions that can rapidly increase schooling opportunities with a focus on the most disadvantaged communities in Somalia, specifically those residing in rural areas and girls. The project proposes to leverage Somalia’s strengths, specifically its high mobile telephony penetration to test innovative approaches to enhancing teacher quality and provide effective teaching and learning materials to students using digital technology. The project will also support the development of essential foundations for any intervention to be successful/sustainable in Somalia, i.e. a robust system for regularly and reliably collecting data on sector outcomes. The project will focus specifically on building systems to systematically and regularly collect information on student learning achievements.

¹ See <https://www.unicef.org/somalia/education>

² World Bank, 2019.

³ Further details of the ESSP can be obtained at:

https://www.globalpartnership.org/sites/default/files/federal_government_of_somalia_essp.pdf

5. The project aims to create schooling opportunities in Somalia at the primary education level and to promote literacy and numeracy in the country. It seeks to ensure that the schooling leads to learning and that girls participate equally in schooling. Expected project outcomes are: (i) increased number of children enrolled in primary school; (ii) increased gender parity in the targeted districts; and (iii) improvements in teacher quality.⁴ The project will have four components as described below.

Component 1: “Systems building” will focus on the establishment and strengthening of capacity and institutional systems at the ministries of education at the Federal and Member State levels of government, to establish an effective education system with a strong stewardship role for the Federal Government. This sub-component will be achieved through implementation of activities in three sub-components: (1) Subcomponent 1.1: “strengthening government’s stewardship role,” (2) Subcomponent 1.2: “establishment of a national student learning assessment system,” and (3) Subcomponent 1.3: “strengthening monitoring and evaluation.”

Component 2: “Expansion of access to quality schooling for the disadvantaged” will focus on supply-side constraints faced by school going-age children who do not have access to education due to a dearth of schools or who are inhibited from enrolling in local non-state schools due to their inability to pay school fees. The component will provide out-of-school children from disadvantaged backgrounds in the targeted 14 districts with access to good quality schools by (i) incentivizing nonstate providers to enroll children free of cost; and (ii) building new schools that provide a minimum package of support that includes teachers, classrooms and school grants to meet recurrent expenditures of these new schools.

For the new school construction:

- *School location planning.* School sites will be selected based on the findings of a needs assessment survey. Communities that have large numbers of primary-aged girls and boys that do not have a school (public or non-state) within a 30-minute walk will be prioritized. This survey will assess land tenure, social issues such as conflict over land, and presence of disadvantaged groups, environmental factors and community support for new schools and will determine the size of the school to be built (number of classrooms). During survey administration, community-based organizations will be consulted for advice on school location planning and demand for schooling.
- *Community mobilization.* Communities will be mobilized and supported to play a role in the placement, construction and management of the new schools. Their role will include: (i) selecting a Community Education Committee (CEC) for the school that will be responsible for day-to-day supervision of the school, including of decision-making on school management related issues and monitoring teacher attendance in line with government’s policy on CECs; (ii) enrolling students including meeting minimum targets for girls enrolment and following up on steps to reduce drop-outs; (iii) identifying potential teachers from their communities, with preference for female teachers; (iv) locating and arranging sites for schools and maintenance of school facilities; and (v) submitting periodic reports, including via a mobile app when possible, to District Education Officers on student, teacher, and school matters.
- *School construction.* New schools with a proportional allocation of gender-separated washrooms and water delivery points for each school will be constructed. Construction

⁴Details on the project components can be found in the Project Appraisal Document (PAD).

specifications for the new classrooms and schools⁵ will conform to the government’s school prototypes, align with agreed standards (safe, disability-inclusive, resilient, and climate-smart), and incorporate a modular approach as appropriate to suit local needs so as to ensure optimal coverage and minimal distances for children to travel. The MoECHE, with the support of its construction supervision contractor, will establish guidelines for phasing in the construction and opening of the schools over 4 years. All new schools will be provided with furniture for students, teachers, and administrators, as well as a core set of equipment for teaching and learning, such as white boards or instructional technology for the larger schools.

Component 3: “Enhanced instruction quality” proposes to support the development of a 2-year Teachers Professional Development Program (TPDP). This program will be delivered using a blended learning approach and build the capacity of 6,000 teachers. Activities in the TPDP include defining learning outcomes and associated course structures, creating individual course frameworks and identifying the content to be covered in each course, developing and refining course content and materials, and creating a contextually suitable student support system.

Component 4: “Project management” will finance key project staff at the FGS level including a project director for overall management, project coordinator to work closely with the various implementing entities, M&E, fiduciary and safeguards staff. Funds will also be provided for office equipment and furniture to adequately resource project staff to manage implementation. Project staff will also be hired at the FMS level to manage activities at that level and regularly supervise project activities.

6. Project preparation will focus on specific interventions and design aspects to promote girls’ enrollment and completion of basic education. Based on initial analysis, the project will focus on the following areas: (a) systematically monitor girls’ participation including on new enrollment; (b) ensure gender and disabled friendly elements in the civil works for schools that will be constructed; (c) prioritize recruitment of female teachers and their training to increase the proportion of female teachers in the system; and (d) identify and address constraints to women joining the teaching profession in the country.

7. The project proposes to phase in access to education in the country with a focus on underserved areas. Given the nascent stage at which the FMS are at establishing their service delivery structures and limited capacity of the State MoEs, a phased approach will enable intensified support to the targeted FMS to enhance quality of implementation and lower the risk from working with a larger number of low capacity institutions at once.

1.3 Project beneficiaries

8. The first 14 of 26 short-listed districts to sign onto a Participation Agreement stipulating that they will comply with minimum education policy conditions, including the mandatory use of the national curriculum, submission of a feasible plan to maintain the schools supported under the project, and a commitment to specified targets for girl’s enrollment. It is anticipated that two districts each from Banadir, Galmudug, Hirshabelle, Jubaland, Puntland, Southwest and possibly Somaliland will be selected.

9. While the project supports country-wide policy and system development, such as the platforms for teacher development and content delivery to student and Early Grade Reading Assessment (EGRA),

⁵Approximately 180 new primary schools, providing altogether 820 classrooms.

the focus will be on the educationally most disadvantaged parts of the country through Component 2 of the project to create supply of schooling opportunities with quality. Under the project, priority will be given to districts in which children do not attend school because of either an inadequate supply of school places or because they experience social hardships that inhibit their demand for schooling. Districts will be selected based on current education access rates; those with Gross Enrollment Rates (GER) below 10 percent would be considered eligible, with priority given to districts that engage directly in social safety net support programs, thereby ensuring demand-side support that enables children to attend school. Districts that are not accessible due to security reasons for adequate supervision by the World Bank will be excluded at this stage.

10. Once districts selection has been confirmed, an assessment of schools will be carried out to prioritize schools for rehabilitation. These new schools will be in areas where there are no existing schools in a 30 min radius thus they are expected to be in rural areas only. This assessment will likely be carried out by a consortium of organizations working in the different districts using a participatory methodology. The assessment will screen out areas where there is contested land or where resettlement is needed. Consultations with all residents, users and claimants on the land that they are willing to donate the land for the school will be an important aspect of site selection. Consideration will be made of geographical spread, and inclusivity ensuring that in any particular district all schools are not selected in one clan's area. The assessment will also explain the objectives and criteria of the project and provide information about stakeholder engagement plans and grievance redress mechanism (GRM) focal points. The assessment will also help identify the existence and capacity of potential construction companies and their capacity to comply with E&S requirements as well as measures to prevent elite capture by involving CECs and other community oversight mechanisms.

11. The project will benefit approximately 100,000 primary school-aged students, at least 50 percent of whom will be girls, in the selected 14 target districts. Benefits will accrue through improved access to new schools in close proximity to communities enabling children to attend school. The project targets the areas with the lowest access rates to maximize benefits from investments. Component 2 will directly benefit these students through the establishment of new schools, addition of classrooms and rehabilitation of existing facilities to improve learning environments, provision of teachers and school grants for teaching and learning materials and support for poor households to send their children to non-state schools free of charge.

12. Students, teachers and communities country-wide will benefit from improved system performance and a greater focus on learning outcomes. In particular, interventions under component 3 will benefit students throughout the country through the availability of digital content and improved instruction and teacher quality. In addition, a total of 6,000 teachers are expected to benefit from professional development through a blended training program.

13. The FGS will be responsible for sustaining the investments in the education sector beyond the project financing period. This would be done by absorbing the established schools and the teachers into the Federal and State Education structures. The ongoing restructuring and strengthening of the education sector will take into account the structures being established through this and other education projects.

1.4 Objectives of the SEP

14. The SEP seeks to define a structured, purposeful, genuine and culturally appropriate approach to consultation and information disclosure. The FGS recognises the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities at which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to improved decision making. Overall, this SEP will serve the following purposes:

- i. Identify and analyze different stakeholders at different levels;
- ii. Plan engagement modalities through effective communication, consultations and disclosure;
- iii. Outline platforms for stakeholders to influence decisions regarding the project;
- iv. Define roles and responsibilities for the implementation of the SEP;
- v. Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings;
- vi. Define roles and responsibilities of different actors in implementing this Plan;
- vii. Elaborate the GRM for the project;
- viii. Outline the dissemination of relevant project materials, including explanations of intended project benefits and, where appropriate, the setup of a project website; and
- ix. Document stakeholder consultations on proposed project design, environmental and social risks and impacts, mitigation measures, the proposed SEP, and draft environmental and social risk management instruments.

1.5 World Bank Requirements for Stakeholder Engagement

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

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

17. The ESS 10 defines the requirements for stakeholder engagement as follows:

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

2.0 SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES

2.1 Consultations Prior to the development of this SEP

18. The analytical underpinnings of the Somalia Education Human Development Project (SEHDP) are based largely on the National Development Plan (2020-2024), which has a chapter dedicated to the required improvements in the relevance and efficiency of the human capital development through education in Somalia. The design and priorities of the SEHDP were discussed at the WBG office in Nairobi, Kenya in January 2020 and involved important stakeholders including representatives of the Ministries of Education of the Federal Government and Member States, line ministries and local education groups. Engagements and consultation on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant Government and implementing agencies as summarized in Table 1.

Table 1: Stakeholder planning meeting held in January 2020

Agenda discussed	Participants	Key points discussed
Ministry of Finance (MoF)	DG	Funding formula for the project, efficient use of the resources and accountability
Ministry of Labor and Social Affairs	DG	Policy direction and guidance on all labor administration
Ministry of Energy and Water Sources	DG	Safety and health of potential workers
Ministry of Public Works and Reconstruction	DG	How the Ministry can support the project in the area of construction standards, land acquisition policies and restrictions on land use
Ministry of Posts, Telecom and Technology	DG	ICT in education, infrastructure building, etc.
National office for Environment	Director	How the Office would provide necessary advice on the area of regulation, forest protection, minimization of air pollution, preservation of bio-diversity etc.

2.2 Brief Summary of Previous Stakeholder Engagement Activities

19. A stakeholder consultation was held on December 3, 2020 that used virtual communication given the Covid-19 context and meeting restrictions. The meeting was attended by 40 participants (6 of them women) representing the Federal Government and Member States, civil society organizations (CSOs), development partners and the World Bank. Six (6) of the participants were women. Table 2 presents a summary of the key issues raised and how they have been incorporated in this SEP. The list of participants is presented in Annex 1.

Table 2: Summary of consultations held on December 3, 2020

#	Issue	Responses
1.	Criteria for selection of schools to be supported by the project	The national poverty index will be used to select the districts and beneficiary schools. The focus will be on the poorest parts of the country which low education enrolment. The criterion is described in Section 1.3 of this SEP.
2.	Inclusion of the poor and marginalized including those with IDPs and minority clans	The selection of the districts and the areas to be supported by the project is aimed at supporting communities that are poor and marginalized. The Inclusion Plan, presented in section 5 of this SEP, outlines how the various marginalized groups will be involved in all stages of the project. The grievance redress mechanism (GRM), described in section 6 sets out ways through which the communities will be able to channel their complaints and get redress.

3.	Recruitment and retention of female school teachers in schools	The community education committees will be enlisted to aid the recruitment process. The selection of female teachers, that are resident in the communities will be key to ensuring that they are kept in the education system. There will also be incentives to attract and retain female teachers (see Section 1.3 of this SEP).
4.	Grievance redress mechanism	The project has established a GRM system that is presented in Section 6 of this SEP. The aim of the system is to ensure there are accessible channels for communication, that the process for resolution is expedited and that the complainants get timely responses.
5.	Gender based violence (GBV) and other crimes	The risk of GBV is articulated in Section 6.9 of this SEP. It is notable that a separate process will be established, through the GBV Action Plan, to manage GBV and sexual exploitation and abuse (SEA).
6.	Coordination and management of the project	There will be a PMU established with representation at the Federal level. The officers will ensure that all the stakeholders are consulted and information is shared in timely manner as indicated in Section 7 of this SEP. At the State level, Project Implementation Units (PIUs) will be established under the guidance of the Federal level PMU.
7.	Sustainability of the interventions beyond project funding	The Federal Government of Somali will absorb the costs of managing the investments from the project beyond the project funding. This is indicated in Section 1.3 of this SEP.

20. It is anticipated that further consultations will be undertaken to get the views of the key stakeholders in the country to inform the engagement process. The MoECHE teams will continue engaging in extensive consultations with all relevant stakeholders including the Federal Member States (FMS), local administrators in the selected project areas, community leaders, education officers and business entrepreneurs. Information gathered through these consultations will be used to update the SEP as necessary.

3.0 STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Project stakeholders

21. Project stakeholders are defined as individuals, groups or other entities who are interested in the Project at different levels. Engagements with the project affected communities will be conducted upon project effectiveness and will be sustained throughout project implementation and closure. For effective engagement, project stakeholders are categorized into three main groups, as described below.

- a. **Affected Parties:** persons, groups and other entities within the Project Area of Influence (PAI) that are impacted or likely to be impacted directly or indirectly, positively or adversely, by the project. Such stakeholders are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. This category of stakeholders may include community members living within the project planned areas of intervention, government officials, business entities and individual entrepreneurs in the project area that can benefit from employment/business opportunities, community-based organizations (CBOs), local non-governmental organizations (NGOs) that represent local interest groups, among others.

For this project, the direct beneficiaries are the school going children, the school teachers and administrators, communities that will be directly benefit from education support, the MoECHE staff and other government staff that will be involved in service provision.

- b. **Other Interested Parties (OIP):** constitute individuals/groups/entities whose interests may be affected by the project and who have the potential to influence project outcomes. OIP may not experience direct impacts from the Project but they may consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Such stakeholders include CSOs and NGOs who may become project partners. Others include business owners and providers of services, goods and materials within the project area who may be considered for the role of project's suppliers; mass media and associated interest groups, including local, regional and national print and broadcasting media, digital/web-based entities, and their associations, among others.

The partners whose interests may be affected include CSOs and partners engaged in the education sector in the country, development partners supporting the education sector, business companies and entities that may be involved in the provision of services and the media and interest groups.

- c. **Disadvantaged Groups:** persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerability and that may require special efforts to ensure their equal representation in the project consultation and decision-making processes.

The disadvantaged groups identified for this project include nomadic pastoralists, adults and children with disabilities, IDPs, minority groups, female headed households and orphans etc.

3.2 Identification of stakeholders

22. There are several categories of people and institutions with an interest in the Project at different levels that will need to be consulted and engaged in the project activities, as summarized in Table 3.

Table 3: Stakeholders description and areas of interest

#	Stakeholder	Description	Areas of interest
1.	Beneficiary schools, learners and teachers	The schools to benefit from this project will be distributed in 14 of the poorest districts in Somalia. The project will target an increase in the enrolment of girls and recruitment of female teachers. In addition, the schools will receive direct support in the form of instruction materials and equipment to make them functional.	<ul style="list-style-type: none"> • Clear and transparent selection process of schools to be selected for support • Agreement criteria for selecting the female teachers to be recruited for the project • Affirmative action in the support to girls to focus on the neediest and those with special needs, including those with disabilities • Equitable access to equipment and materials distributed to aid learning
2.	Communities that will receive support from the project	Communities will be expected to form CECs that will be involved in providing space for school construction and/or expansion, recruitment of teachers and follow-up of households to ensure that children are in school, among other roles.	<ul style="list-style-type: none"> • Meaningful community engagement in the project decisions • Lack of interference in the formation of the CECs at the community level • CECs are trained and facilitate to perform their multiple roles • CECs conform to a code of conduct that is clear on the GBV/SEA in accessing project benefits
3.	Ministry officers at the Federal Government level	MoECHE will have the overall responsibility of managing all the components of the project. It will work closely with the FMS receiving project support.	<ul style="list-style-type: none"> • MoECHE identifies and meaningfully engages with partners in all aspects of the project • The coordination between the Federal and States is done in a transparent and accountable manner • Principles of engagement are observed in all aspects of consultation at the different levels
4.	Ministry officers at the Member State and District levels	The MoEs at this level will be responsible for the implementation of the project activities and policies.	<ul style="list-style-type: none"> • The selection of districts to be supported is based on a transparent criterion • The coordination between the State and districts is done in a transparent and accountable manner • Principles of engagement are observed in all aspects of consultation at the different levels
5.	Other ministries: Finance; Labor and Social Affairs; Energy and Water Services; Public works; Infrastructure and Reconstruction; Posts, Telecom and Technology; Interior and Federal Affairs; and the	The other Ministries will be involved in as far as the implementation of specific activities and linkages with ongoing interventions: Labor and social affairs – safety net program Public works - school construction/refurbishment Posts, Telecom and Technology – e-learning Interior and Federal Affairs – ensure security of project workers and investments	<ul style="list-style-type: none"> • Principles of engagement are observed in all aspects of consultation at the different levels • Information is shared in a timely manner and feedback is used to inform further engagement on the project • Clarity on terms of engagement is provided from the beginning

	National office for Environment	Energy and Water Services – water, sanitation and hygiene (WASH) in schools, etc.	
6.	Non-State School Managers	Component 2 has provisions of support non-state schools. The schools will be expected to enroll a specific number of children yearly and they will be monitored to assess whether this engagement will proffer results for the Country.	<ul style="list-style-type: none"> • The identification of the schools to receive support is done in a transparent manner • The non-state schools receive information and provide feedback in a free, prior, informed consent (FPIC) manner • There is accountability in all aspects of the support provided to the schools and the results • Information is provided in a timely manner
7.	CBOs and NGOs operating in the identified project districts	Most development activities in rural and remote parts of the country are led by NGOs and CBOs funded directly by donors and religious bodies. They have social capital that the education project can tap into.	<ul style="list-style-type: none"> • The CBOs/NGOs receive information and provide feedback in a timely manner • There is transparency and accountability in all aspects of the engagement • Principles of engagement are observed in all aspects of consultation
7.	Development Partners (UNICEF, etc.)	Most of the education activities are supported by donors who tend to fund the activities separately.	<ul style="list-style-type: none"> • Principles of engagement are observed in all aspects of consultation • Information is shared in a timely manner
8.	Media and online platforms of communication	The role of the media is key in keeping people informed about the project. Media can also be used to share grievances and complaints on project activities.	<ul style="list-style-type: none"> • Information shared by the media will be accurate • Complaints and grievances shared on social media platforms will be picked and addressed as necessary

3.3 Stakeholder engagement principles

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

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

4.0 STAKEHOLDER ENGAGEMENT PROGRAM

24. Stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle. Table 4 presents the key stakeholder engagement activities during the project preparation stage through to implementation and closure.

Table 4: Consultation matrix for stakeholders

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Beneficiaries including disadvantaged individuals and groups		
Verification of existing and location/sites for projects	PMU, project consultants (social specialists) and other stakeholders	Groups, CBOs, community leaders/elders	<ul style="list-style-type: none"> • Public announcements • Face-to-face meetings (adhering to government guidelines on COVID-19) • Virtual meetings using Webex/Skype/zoom 	First-hand assessment of the local people's perceptions of potential project benefits and risks
Screening of the proposed projects	PMU consultants (social specialists) and other stakeholders	<ul style="list-style-type: none"> • Affected groups (IDPs, pastoralist / nomadic communities) • CBOs • Community leaders/elders • Key informants 	<ul style="list-style-type: none"> • Public announcements • Face-to-face meetings (adhering to government guidelines on COVID-19) • Virtual meetings using Webex/Skype/zoom 	Identification of concerns on project impacts, feedback from would-be affected persons
In-depth study of risks and benefits taking into consideration, inter alia, the conditions that led to community consensus	PMU, project consultants (social specialists), NGOs /CBOs, Other knowledgeable persons	<ul style="list-style-type: none"> • Would-be affected individuals and groups • Locally-based CBOs/NGOs • Community leaders/elders • Key informants 	<ul style="list-style-type: none"> • Formal/informal interviews • Focus group discussions • Discussion on specific impacts, alternatives, and mitigation; etc. 	More concrete views of project impacts and feedback on possible alternative mitigation and development measures
Social Assessment (SA)	PMU (social specialists) -Consultants	Adversely affected individuals, households and groups	<ul style="list-style-type: none"> • Structured survey • Questionnaires covering quantitative and qualitative information 	Inputs for disadvantaged groups and identification of issues that could be incorporated into the design and implementation of the project
Implementation	PMU (social specialists) -Consultants	<ul style="list-style-type: none"> • Individuals and groups of disadvantaged groups, 	<ul style="list-style-type: none"> • Implementation • Monitoring committees (formal or informal) 	Quick resolution of issues, effective implementation of the Inclusion Plan

	-Locally based NGOs/CBOs	<ul style="list-style-type: none"> • Community leaders/elders and other stakeholders 		
Monitoring and Evaluation	- PMU (social specialists) -Consultants -NGOs & CBOs	Disadvantaged individuals and groups of the	Formal participation in review and monitoring	Identification and resolution of Implementation issues, effectiveness of Inclusion Plan

4.2 Project Information Disclosure

25. Information will be packaged and shared with the key stakeholders using different methods. The PMU will be responsible for ensuring that the information gets to the stakeholders in a timely manner. Feedback from stakeholders will be taken into view and improvements will be made to ensure robust and consistent information flow. Table 5 presents a summary of the information disclosure for the project. The SEP is a living document that may be modified and changed following input and suggestions from project stakeholders.

Table 5: Disclosure of project information at different stages of the project cycle

Information to be disclosed	Method used	Target stakeholders	Responsibilities
Before appraisal			
Disclosure of project documents (PAD, ESMF, RPF, SEP, ESCP)	<ul style="list-style-type: none"> • Websites - MoECHE and WBG • Brief summaries of the main features of the project SEP 	All key stakeholders	<ul style="list-style-type: none"> • MoECHE PMU
After appraisal			
Publicity on project approval and roll-out plans	<ul style="list-style-type: none"> • Audio-visual messages on project information (radio, TV in different local languages) • Newspaper stories/supplements • Printed materials on project information • Social Media (Twitter, Facebook, Instagram, WhatsApp) • Emails • Press releases • Speeches • Websites (FGS and FMS, WBG) 	All key project stakeholders	<ul style="list-style-type: none"> • MoECHE PMU • Communication expert • Social specialists
Disclosure of the project documents ESMPs, updated SEP, LMP, GBV Action Plan, among others	<ul style="list-style-type: none"> • Websites - MoECHE and WBG • Brief summaries of the main features of the project SEP • Audio-visual messages on the project (radio, TV in different languages) • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) 	<ul style="list-style-type: none"> • MoECHE and all partners involved in the project • Open access to all interested parties • Distribution of printed flyers to schools and other institutions 	<ul style="list-style-type: none"> • MoECHE PMU • WBG Team

	<ul style="list-style-type: none"> • Emails • Press releases • Speeches 		
During implementation			
Roll-out of direct support to schools and learners	<ul style="list-style-type: none"> • Key informant interviews with key stakeholders • Community discussions (through public meetings and call-in radio sessions/activations) • Newsletters • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails) • Press releases • Speeches • Mobile phone block messages 	<ul style="list-style-type: none"> • Learners • School administrators • Community Engagement Committees (CECs) • Communities 	<ul style="list-style-type: none"> • MoECHE PMU • Communication expert • Social specialists
Highlights on project activities, achievements and lessons learned	<ul style="list-style-type: none"> • TV/Radio spots/activations and announcements • Print materials (newsletters and flyers) • Town hall meetings • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails • Press releases • Speeches • Mobile phone block message 	<ul style="list-style-type: none"> -Project beneficiaries (learners, teachers, CECs) -Other interested parties 	<ul style="list-style-type: none"> • Social specialists
Update on project process	<ul style="list-style-type: none"> • Print materials (newsletter, flyers, etc.) • Project progress reports • Town hall meetings 	All stakeholders	<ul style="list-style-type: none"> • Social specialists • PMU and PIUs at Member States • MoECHE leadership
Complaints/Compliments about the project implementation	Logs and reports from the national GRM focal person, State GRM focal persons (GRM complaints points in schools, district education offices, etc.)	<ul style="list-style-type: none"> • Receivers of information and services • Information or Data managers 	PMU and social specialists
	Surveys and direct observations of the project beneficiaries	<ul style="list-style-type: none"> • Different stakeholders • Disadvantaged populations 	<ul style="list-style-type: none"> • MoECHE • Communication Officer • M&E Officer

Monitoring and reporting			
Feedback of effectiveness of different modalities of engagement	<ul style="list-style-type: none"> • Semi-structured interviews • Online surveys • Satisfaction surveys 	Project primary beneficiaries	<ul style="list-style-type: none"> • Social specialists • M&E Officer
Quarterly	Progress report including summaries of complaints and resolution	<ul style="list-style-type: none"> • MoECHE offices at the Federal and State level offices 	M&E officer

26. The MoECHE and the PMU will provide appropriate background and relevant technical information to stakeholders whose feedback is sought on various project issues with sufficient advance notice (7-10 business days) so that the stakeholders have enough time to prepare to provide meaningful feedback.

5.0 INCLUSION PLAN

27. The project will give special consideration to disadvantaged groups. These include:
- i. Minority casts and groups;⁶
 - ii. Internally displaced persons;
 - iii. Those who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities;
 - iv. Nomadic pastoralist communities;
 - v. Adults and children living with mental and/or physical disabilities;
 - vi. Widows; and
 - vii. Single heads of households;
 - viii. orphans.

28. There are social, economic and physical barriers that prevent disadvantaged individuals and groups from participating in projects, which include lack of financial resources, inaccessibility of meeting venues, social stigma, lack of awareness and/or poor consultation. For instance, people living with disabilities are often not effectively engaged in consultations due to lack of access and social stigma and cultural beliefs that they are not able to participate or benefit from school or have limited productive roles in society. In this regard, the project will deploy viable strategies to engage target communities and other stakeholders and overcome social stigma and encourage inclusion. These strategies will include ensuring that these groups are targeted in public consultations, the formation of Social Accountability Committees (SACs), which will promote inclusion and ensure the representation of the disadvantaged groups. Teachers and communities will be trained on inclusion of disadvantaged groups including people with mental and physical disabilities, etc. In addition, the monitoring tools will also have questions on inclusion and be used to strengthen strategies.

29. In addition, due to likely clannism and elite capture and potential exclusion of the disadvantaged groups during the life span of the project, there shall be a social accountability committee, which will report directly to the social specialists at FMS level. They will promote accountability and transparency in the running and management of the project at the district or school level and receive complaints or concerns from the community, which will be raised directly with the CEC and the school management or reported to the FMS social specialist. They will also be a link with the community for virtual reporting e.g. photographic monitoring or for phone call back mechanisms. The committee members, shall reflect the diversity of the community including disadvantaged groups and will have its own code of conduct (CoC).

30. District selection under component 2. The targeting criteria for identifying the districts to benefit from the activities specified under Component 2 is based on districts with data indicating that they have a primary gross enrollment rate below 10 percent. This criterion will also meet necessary requirements that include technical correctness, equity and fairness, as well as project financing feasibility. Two additional criteria were applied to select the districts from those that have enrollment below 10 percent. First, an important consideration in selection of the districts was their accessibility from a security perspective for civil works execution and supervision of schools. Second, the districts that have existing cash transfer or nutrition interventions to meet demand-side needs of children attending school were prioritized. Thus 14 districts have been selected for support.

⁶ This shall include all groups falling outside the big four clans and not genealogically associated with them in a specific district or geographical area including the ethnic, occupational groups.

31. *School site selection:* In the selected districts, surveys will be undertaken to identify school sites to benefit from the project. The following criteria will be applied for selection of new school sites:

- i. Site selection will be needs based. The process will consider areas with the highest population of primary aged children (% of school-aged population = Population of school aged children (5 - 13)/total population). Within these areas, those with the largest number of out of school children (OOSC) children will be prioritized. In addition, school site selection will ensure equity and inclusivity considerations, particularly for minority groups and casts and IDPs, so all the investments are not all in mainstream majority clan areas.
- ii. District authorities must predefine location of the school;
- iii. The served community should have a school feeding or another nutrition/cash transfer program;
- iv. The site location must not be contested land or have multiple claims. Residents and users of the land as well as other stakeholders must agree in writing on its use for the school;
- v. Climate zones of the school site must be defined;
- vi. Key environmental and social factors of the school site will need to be considered;
- vii. School sites should be located in secure and accessible areas;
- viii. District authorities will need to develop a plan for the schools that demonstrate the ability to enroll children from disadvantaged backgrounds and lack basic resources, including teaching resources and trained teachers (e.g. IDPs, rural children, disabled children etc.).
- ix. A CEC for the prospective school will need to be formed and commits to maintaining at least 50% girls' enrolment in schools.
- x. Site selection should take into account local administration that can demonstrate the ability to support funded activities even after the completion of the site construction. Priority should be given to the local administrations that can produce those documents (this process is further detailed in the Resettlement Planning Framework (RPF);
- xi. The district authorities should demonstrate operational sustainability plan of the school site;
- xii. School sites selected for construction must be registered with the MoE at the FGS/FMS level and all relevant ministries and authorities;
- xiii. District authorities should produce supporting documentations that shows the registered schools under their authority are implementing the National Curriculum; and
- xiv. District authorities should involve and consult with the school communities in all interventions.

5.1 Engaging disadvantaged and marginalized groups

32. The project will take special measures to ensure that members of disadvantaged and marginalized groups have equal opportunity to project benefits. This will include ensuring that they are involved in consultations on project siting and design, ensuring the schools are accessible to people with physical disabilities (e.g. having ramps and rails where appropriate) and teachers and CECs are trained on their responsibilities to provide services without discrimination. In addition, efforts will be made to promote diversity in staffing (see labor management procedures (LMP) and environment and social management framework (ESMF)) and social accountability committees will have diverse representation including disadvantaged groups.

33. Community and teacher training will emphasize non-discrimination and access to education for all including minority groups and people living with disabilities. The approach will involve the use of

community engagement modalities, including the use of the CECs to identify the most vulnerable households, vulnerable girls and persons with disabilities to benefit from the project.

34. Stakeholder and community engagement will be key in the sensitization of community level structures and means by which complaints and grievances related to the project will be received, handled and addressed. The understanding is that communities know their own vulnerabilities than external actors and the engagement of local structures is most effective in such projects where administrative capacity is limited.

35. The participation of disadvantaged and marginalized groups in the selection, design and implementation of project activities will largely determine the extent to which the Inclusion Plan will be achieved. Where adverse impacts are likely, the PMU will undertake prior and informed consultations with the likely affected communities and those who work with and/or are knowledgeable of the local development issues and concerns. The primary objectives will be to:

- Understand the operational structures in the respective communities;
- Seek their input/feedback to avoid or minimize the potential adverse impacts associated with the planned interventions;
- Identify culturally appropriate impact mitigation measures; and
- Assess and adopt economic opportunities, which the MoECHE could promote to complement the measures required to mitigate the adverse impacts.

36. Consultations will be carried out broadly in two stages. First, prior to commencement of any project activities the PMU will arrange for consultations with community leaders, the CECs and representatives of disadvantaged and marginalized groups about the need for, and the probable positive and negative impacts associated with the project activities. Secondly, after initial roll-out of the project activities, a rapid assessment will be conducted to ascertain how the disadvantaged groups in general perceive the interventions and gather any inputs/feedback they might offer for better outcomes, which would inform the project delivery.

37. The PMU will:

- a) Facilitate broad participation of disadvantaged and marginalized individuals and groups with adequate gender and generational representation; community elders/leaders; and CBOs;
- b) Provide the disadvantaged and marginalized individuals and groups with all relevant information about project activities including on potential adverse impacts;
- c) Organize and conduct the consultations in forms that ensure free expression of their views and preferences; and
- d) Document details of all consultation meetings, with disadvantaged and marginalized groups on their perceptions of project activities and the associated impacts, especially the adverse ones;
- e) Share any input/feedback offered by the target populations; and
- f) Provide an account of the conditions agreed with the people consulted.

38. Once the disadvantaged and marginalized individuals and groups are identified in the project area, the provisions in this Inclusion Plan will ensure mitigation measures of any adverse impacts of the project are implemented in a timely manner. The project should ensure benefits to the disadvantaged and marginalized by ensuring that they are consulted, have accessible and trusted complaints mechanism and benefit from project activities.

39. The following issues will be addressed during the implementation stage of the project:

- i. Provision of an effective mechanism for monitoring implementation of the Inclusion Plan;
- ii. Development of accountability mechanisms to ensure the planned benefits of the project are received by disadvantaged individuals and groups;
- iii. Involve suitably experienced CBOs/NGOs to address the disadvantaged individuals through developing and implementing action plans;
- iv. Ensuring appropriate budgetary allocation of resources for the Inclusion Plan;
- v. Provision of technical assistance for sustaining the activities addressing the needs of the disadvantaged and marginalized; and
- vi. Ensure that disadvantaged and marginalized groups' traditional social organizations, cultural heritage, traditional political and community organizations are protected.

6.0 GRIEVANCE REDRESS MECHANISM

40. Transparency and accountability will be core elements of the SEHDP. The goal of the GRM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve the project impacts.

41. Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.⁷ One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances’.⁸ This GRM should facilitate the SEHDP to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SEHDP will provide mechanisms to receive and facilitate resolutions to such concerns.

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

- i. Fairness of contracting;
- ii. Fraud or corruption issues;
- iii. Inclusion;
- iv. Social and environmental impacts;
- v. Payment related complaints;
- vi. Quality of service issues;
- vii. Poor use of funds;
- viii. Workers' rights;
- ix. Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and sexual harassment;
- x. Forced labor, including human trafficking and use of prison labor;
- xi. Child labor; and
- xii. Threats to personal or communal safety.

43. As per World Bank standards, the GRM will be operated in addition to GBV/SEA and GBV Action Plan, which includes reporting and referral guidelines (there will be a stand-alone GBV Action Plan developed for this project). The GRM will also operate in addition to specific workers’ GRMs, which are laid out in the LMP.

44. The GRM is designed to ensure that grievances and perceived injustices are handled by the project, and that the project aides mitigating general conflict stresses by channeling grievances that occur between people, groups, communities, government actors, beneficiaries, project staff, NGOs, CSOs,

⁷Under ESS2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labour Management Plans (LMPs). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanisms, which will be defined in a separate GBV/SEA and GBV Action Plan.

⁸ World Bank, Environmental and Social Framework, 2018, p. 131.

contractors or primary suppliers. Aggrieved parties need to be able to refer to institutions, instruments, methods and processes by which a resolution to a grievance is sought and provided. The GRM therefore provides an effective avenue for expressing concerns, providing redress, and allowing for general feedback from community members.

45. The GRM aims to address project-related concerns in a timely and transparent manner and effectively. Information on the GRM will be readily available to all project-affected parties. The GRM is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties. The availability of these GRM does not prevent recourse to judicial and administrative resolution mechanisms.

46. MoECHE will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with the laws of FGS and the World Bank Environmental and Social Standards through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all grievances will be with the social specialists at the FGS and FMS level who will receive grievances by phone, text or email to publicized toll free mobile phone lines and email addresses at both FMS and FGS level. The social specialists will acknowledge, log, forward, follow up grievance resolution and inform the complainant of the outcome. The complainant has the right to remain anonymous, thus their name and contacts will not be logged and whistleblower protection for complaints raised in good faith will be ensured. The FGS social specialist will carry out training of all PMT staff and Ministry of Education staff involved with the project, and contractors on receiving complaints and referral and complaints handling and reporting and will oversee awareness raising on the GRM at national level.

47. A grievance redress committee (GRC) will be established at FMS and FGS levels chaired by the project manager, and the relevant staff will be included as necessary depending on the complaint (procurement, finance, monitoring and evaluation (M&E), GBV advisor and communication). The social specialists will compile minutes for the meetings and follow up the grievance resolution process. The GRC will meet monthly to review minor complaints, progress on complaints resolution, review the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the system and the project. Immediate meetings will be held in case of significant complaints to be addressed at the MOE/PIU level. Significant complaints will be outlined in the GM manual. For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, the FMS social specialist should immediately inform the FGS social specialist or head of the PMU, who will inform the World Bank within 48 hours as per the Environmental and Social Incident Reporting (ESIRT) requirements.

48. Due to limited capacity in the Government system, the States may enlist the support of CBOs working in the project areas to support the GRM activities or NGOs/an independent call center to receive and help process complaints on an as-needed basis. All contractors and suppliers will be expected to sensitize their workers on the Project GRM and have a focal person to receive complaints regarding the construction and their workers and put in place complaints structures specific to the workers (as detailed in the LMP).

49. At community level social accountability committees with strong representation of disadvantaged groups will receive complaints directly from the community, contractors or school and forward to the FMS social specialist to support resolution and follow up. Figure 1 presents the structure to be adopted by the project in managing grievances.

PROJECT GRIEVANCE MECHANISM



Figure 1: Grievance structure for the project

6.2 Receive and register complaints

50. The beneficiaries will have multiple ways of channeling complaints on any aspect of the project. This will be through email, mobile phones, community meetings and websites. There will also be opportunities for in-person reports at the community level through contractors or project staff, CECs, SACs or community leaders. All complaints will be channeled to the relevant social specialist, who will log them into the Complaints Register (see a template in Annex 2).

6.3 Acknowledge, assess and assign

51. An acknowledgement of receipt will be sent to the complainant within 7 days of receipt of the complaint. The social specialist will assess the complaint in conjunction with the PM and forward it to the relevant level of implementation (e.g. MoE at the State level). If the grievance cannot be easily resolved, the social specialist in conjunction with the project manager will call a meeting of the Grievance Redress Committee (made up of relevant members of the project team) will develop a course of action. The GRC will meet every 2 months to review the functioning of the GRM and the Grievance log. All cases will be treated with utmost confidentiality.

52. **Incident reporting.** Severe incidents, those that caused an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, e.g., fatality, GBV, forced or child labor, will be reported by the IP to the PMU and the WBG within 24 hours (details on this process are described in the Labor Management Procedures).

53. Where grievances are of sexual nature and can be categorized as GBV/SEA or GBV Action Plan, the IP will handle the case appropriately, and refer the case to the GBV reporting protocols and referral

system, defined in the GBV/SEA and GBV Action Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEA will be required for all GRM operators and relevant project staff.

54. For all other grievances, the respective PIU will determine whether the grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first port of call will have in-depth knowledge of communal socio-political structures, hence will be able to address the appropriate individuals, if the case can be solved at the local level.

55. At all times, the PIUs will provide feedback promptly to the aggrieved party, for example through the phone or through the community structures established for addressing GRM. Feedback will also be communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback will be given to the concerned persons bilaterally.

56. Records of all feedback and grievances reported will be established by the PIU. All feedback will be documented and categorized for reporting and/or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible and for only for non-GBV related complaints, will include the name of the person reporting, district, State, cooperating partner where applicable, project activity, and the nature of the complaint or grievance.

6.4 Propose a response

57. The GRM focal point will propose the mechanism to be followed to resolve the grievance within 21 days and share findings with relevant stakeholders. Where an incident is reported, the IP will, in addition, follow the incident management protocol to resolve the issue. Verification and management of GBV/SEAH related grievances will follow specific, differentiated processes outlined in the GBV Action Plan.

6.5 Agreement of a response between the Complainant and the GRM Team

58. Where a negotiated grievance solution is required, the GRC will invite the aggrieved party (or a representative) and decide on a solution, which is acceptable to both parties and allows for the case to be closed – based on the agreement of both parties.

59. After deciding a case, the GRC will provide an appeals mechanism to the aggrieved party, which is constituted through the PMU. This is important in cases in which the aggrieved party is dissatisfied with the solution provided by the GRC. In these instances, the PMU will step in and provide an appeals mechanism. The appeal should be sent to the PMU directly (a phone number will be provided), where it will be reviewed by the PMU GRM Team and will be decided on jointly with the PIU Coordinator. Where aggrieved parties are dissatisfied with the response of the PMU, they can report cases directly to the World Bank or use the available national grievance resolution mechanisms (see below).

6.6 Implement the response

60. The GRM focal point will follow up on the recommended response mechanisms and ensure the resolution of the complaints. In case the resolution is successful, the case will be closed out but in cases where the complainant is dissatisfied with the response, the GRM focal point will guide the individual or group to seek alternative grievance resolution mechanisms including mediation, arbitration and judicial processes.

6.7 Review the Grievances

61. The GRM team will conduct a review of the cases reported on a monthly basis and agree on the next steps on cases that have not been closed out. The GRM focal point will record the actions

recommended by the GRM team and file a monthly report to the PIU. Most importantly, all cases filed will need to be logged and monitored by the contractors and primary suppliers. Figure 2 presents the process to be adopted by the project in managing grievances.

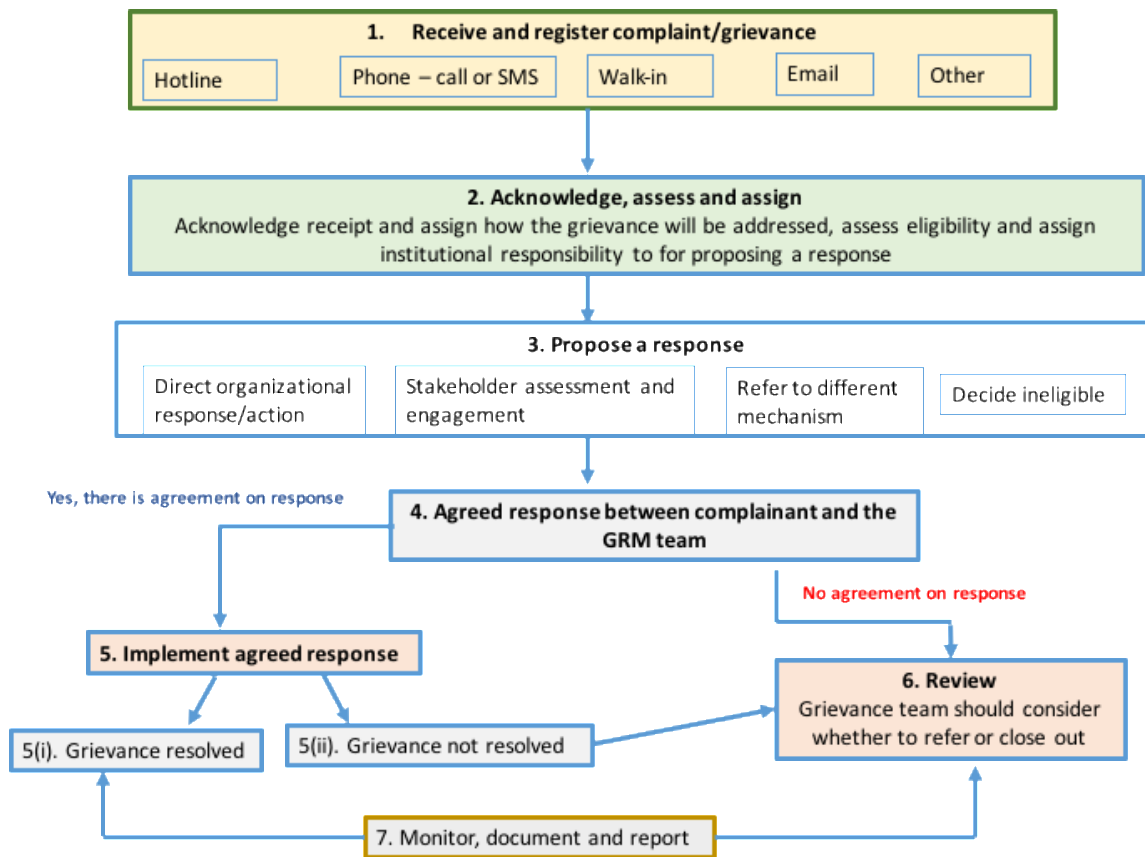


Figure 2: Grievance process for the project

6.8 Monitoring and Reporting of GRM

62. The PMU, specifically the Social Specialist, will be responsible for monitoring the access to and implementation of the GRM by all project teams at the Federal Government and state levels. The Specialist will include the GRM in his/her supervision and monitoring missions to the field and conduct spot checks on its implementation, or, where access is difficult recruit local teams to do so.

63. The contractors and primary suppliers will provide analytical synthesis reports on a quarterly basis to the PMU, which will include the number, nature and status of grievances. These reports will form the basis of all regular reports from the PMU to the World Bank.

64. The PMU will further provide an excel sheet summary of the feedback and grievances reported, which will be linked to the Project’s Management Information System (MIS) and to the M&E Results Framework. The summary will also include a breakdown of different categories complaints such as those related to GBV/SEA. The viability of having a separate GBV/SEA/H GRM will also be considered. The project team will further maintain a documented record of stakeholder engagements, including a description of the stakeholders consulted, a summary of the feedback/grievances received during community

consultations. The PMU will extract lessons from the GRM and conduct an analysis on the overall grievances, and share the results with all contractors and key project team members.

6.9 GBV and SEA

65. Cases of GBV/SEA can be reported through the general Project GRM. However, additional channels for reporting GBV/SEA complaints will be identified and integrated into the GRM (details are provided in the GBV Action Plan). The GBV survivor has the freedom and right to report an incident to anyone: community member; project staff; GBV case manager; or service provider. Given to the sensitive nature of GBV complaints, the GRM will provide different ways to submit grievances such as phone, text message and email. All relevant staff of the PMU will receive training on handling GBV complaints and referral systems, ideally during the project initiation phase and as part of the staff welcome package. The GRM Operators will be trained on key protocols including referral, reporting and informed consent protocols to receive those cases in an appropriate manner and immediately forward them to the GBV/SEA referral system. The GRM Operator will ensure appropriate response by: (i) providing a safe caring environment and respect the confidentiality and wishes of the survivor; (ii) if survivor agrees, obtain informed consent and make referrals; and (iii) provide reliable and comprehensive information on the available services and support to GBV survivors.

66. The GRM proposes the following key features on preventing GBV/SEA: (i) establish quotas for women in community level grievance management to facilitate safe reporting; (ii) provide multiple channels to receive complaints (channels to be determined after community consultation); (iii) resolve complaints at the point of service delivery to reduce information and transaction costs and gender sensitive independent channels for redress; and (iv) communicate GRM services at the community level to create GBV/SEA awareness and enable project-affected persons to file complaints.

67. Beneficiaries and communities will generally be encouraged to report all GBV/SEA cases through the dedicated GBV/SEA referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information. The GBV/SEA referral system will guarantee that survivors have access to necessary services they may need, including medical, legal, counselling, and that cases are reported to the police should the survivor choose to do so. Formal processes for disclosing, reporting, and responding to cases of GBV/SEA will be articulated within the GBV/SEA and GBV Action Plan.

68. If a GBV/SEA case is reported through the Project GRM, the GRM Operator will report the case within 24 hours to the PMU, and the PMU is obliged to report this case to the WB within 24 hours. Furthermore, cases of SH will be reported through the workers' GRM, if it concerns a direct worker or a worker from a sub-contractor, NGO partner or even a community worker following a survivor-centered approach. The PIUs will be in charge of holding sensitization sessions for contractors and primary suppliers regarding the Code of Conduct obligations and awareness raising activities in communities. All reporting on GBV/SEA will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

6.10 GRM Appeals and Escalation Mechanisms

69. Where agreement on grievance resolution has not been reached, the project team will offer the complainant with appeal options and processes available in the country. The approaches will include an Independent Panel; internal or external offices or individuals with appreciable degree of independence,

and third-party fact-finding, facilitation, and mediation missions as applicable. Depending on the grievance, the appeal may entail offering the aggrieved person the option to seek redress through statutory referral institutions operational in the country.

6.11 WBG's Grievance Redress Service (GRS)

70. **World Bank Somalia Office:** Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank Somalia office at: somaliaalert@worldbank.org.

71. **World Bank Grievance Redress Service (GRS):** If no response has been received from the World Bank Somalia office the grievance can be raised with the World Bank Grievance Redress Service email: grievances@worldbank.org. The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

7.0 RESOURCES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION AND MONITORING

7.1 Management

72. Overall project implementation and coordination will be led by the FGS MoECHE. The MoECHE will collaborate with all State MoEs to implement the different components of the program. A dedicated PMU will be formed. The PMU will be headed by a program coordinator and include small team of experts: (a) financial management specialist (FMS); (b) procurement specialist; (c) M&E specialist; (d) communication specialist; and (e) FMS program managers/focal points/safeguards officers. The program coordinator will coordinate the implementation of day-to-day administration of the program activities. The PMU will conduct quarterly review and a total of five in-country reviews to ensure the effective and timely implementation of program components and activities. The PMU coordinator will also closely work with the RCRF Project III PIU team to ensure coordination of the education activities as illustrated in Figure 3.

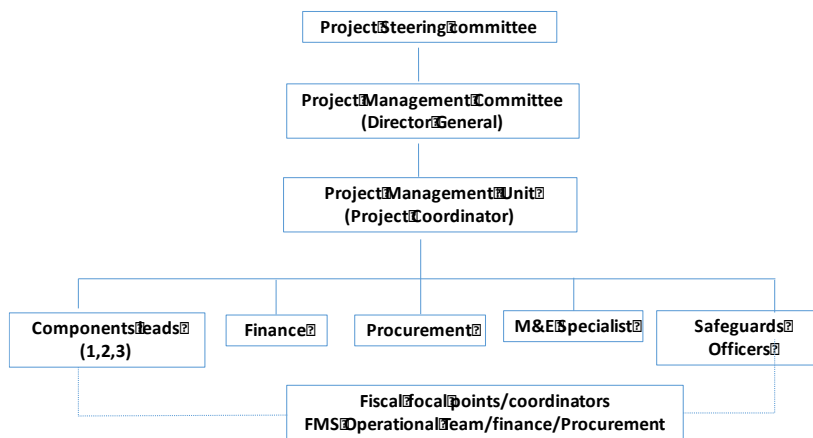


Figure 3: Project Management Structure

73. The social specialist will ensure that the SEP is appropriately implemented, monitored and evaluated. He/she will share the monthly reports with the PMU and the quarterly reports with the World Bank.

74. The PMC will provide collaborative management of program activities, decision-making around co-design and co-management of activities including the annual work plan and budget, co-monitor program activities, conducts quarterly progress reviews, make joint decisions on issues pertaining to implementation and ensure open communication and maximum accountability. The PMC team consists of program director, program coordinator, technical component leads, procurement specialist, finance manager, safeguards and M&E officers.

75. The PMU will be based in the MoECHE and will be responsible for technical oversight and support to the MoECHE and FMS MoEs, partner coordination, and financial and administrative management, program activity monitoring and reporting to the donor, as shown in Figure 1. The PMU will be responsible for day-to-day project management activities, including monitoring and reporting on project progress to all the relevant stakeholders (please see the table on Information Disclosure). For this purpose, the PMU will organize, at regular intervals, workshops involving representatives of all stakeholders to present project progress and seek stakeholder input. The costs for all these activities are budgeted under the Component 3 and may be adjusted on need basis.

7.2 Resources

76. The project has set aside funds to ensure that the planned stakeholder engagement activities are implemented and monitored effectively. The summary budget is presented in Table 6.

Table 6: Summary budget for implementing the SEP

Stakeholder Engagement Activities	# Qty (Yrs)	Unit Cost, USD	Total cost (USD)
GRM, MIS case management process, database (including running of hotline, record keeping, etc.)	5	60,000	300,000
Travel expenses of staff on stakeholder engagement missions	5	30,000	150,000
Activities related to the Inclusion Plan including social accountability committees	5	60,000	300,000
Communication materials (leaflets, posters)	bulk	20,000	20,000
Project press conferences or FM radio broadcasts (twice per year)	10	5,000	50,000
Training (social issues, outreach, GRM, etc.) for PMU, State, District and community levels	5	10,000	50,000
Project hotline to receive complaints and grievances related to the project (TA and Airtime)	bulk		20,000
Subtotal			890,000
Contingency (5%)			44,500
Total			934,500

8.0 MONITORING AND REPORTING

77. The SEP will be periodically revised and updated as necessary in order to ensure that the information and the methods of engagement remain appropriate and effective in relation to the project context and spread of COVID-19. Any major changes to the project related activities and to its schedule will be duly reflected in the updated SEP. Monthly/quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventive actions will be collated by responsible staff and referred to the senior management of the project.

78. The monthly/quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the project during the year may be conveyed to the stakeholders in two possible ways:

- i. Publication of a standalone annual report on project's interaction with the stakeholders; and
- ii. A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis and reported on.

79. The project team will conduct surveys on World Bank supported components at mid-point and three-quarter point. The results from these surveys will be used to inform the World Bank on the necessary steps to take towards meeting the project goals.

ANNEXES

Annex 1: Consultation meeting held with key stakeholders

Date 3/12/2020 Time: 10 am – 12 pm

List of participants for the IDA project stakeholder meeting Meeting Mode: Zoom

No	Name	Institution
1.	Shweta Sandilya	UNICEF
2.	Mengistu Koricha	Save the Children
3.	R. Drake Warrick	Creative Associates
4.	William Babumba	DRC
5.	Suleiman Ahmed	DRC
6.	Ahmed Dirshe	Concern WW
7.	Dr. Mohamed Hassan Nur	Mogadishu University
8.	Dahir Hassan	SIMAD University
9.	Dr. Salad	Jazeera University
10.	Abdirashid Mohamed	SCC
11.	Dahir Shire	DAN
12.	Abdikadir Isse Farah	FENPS
13.	Abdifitah Aden Abdi	WARDI
14.	Abdisahal Mohamed	Himilo Foundation
15.	Aweis Haji Hassan	Ayuub NGO
16.	Beryl Auma	World Vision
17.	Adan Mohamed	EFASOM
18.	Mohamed Idle	AET
19.	Mohamud Ahmed Rage	MOECHE
20.	Abdi Gashan Egal	MOECHE
21.	Suaad Abdulle	MOECHE
22.	Abdinur Jama	MOECHE
23.	Abdifitah Mohamed	ESC Coordinator
24.	Shueyb Youb	ARC
25.	Mohamed Abdulkadir Nur	MOECHE
26.	Abdirizak Mohamed	MOECHE
27.	Ousman Abdullahi	World Bank
28.	Abdirahman Zeila	World Bank
29.	Huma Ali Waheed	World Bank
30.	Farhia Farah	World Bank
31.	Mahdi Mohamud Abdi	EFASOM
32.	Ahmed Hassan Mohamed	Himilo Foundation
33.	Ismail Mohamed Ali	GPE Coordinator
34.	Ahmed Hassan Yusuf	DG-MOECHE
35.	Raymond S. Kirwa	World Bank
36.	Mary Amuyunzu-Nyamongo	World Bank
37.	Ahmed Kormeere	MOECHE
38.	Ismail Abdi	MOECHE

Agenda of the stakeholder consultation meeting

Activities	Time	Presenter
Welcome & introductions	10:00 – 10:15	All
Opening remarks	10:15 – 10:20	DG Ahmed Yusuf
Objectives of the consultation workshop	10: 20 – 10:25	World Bank Team
SEP project Presentation Project objectives, project component, target beneficiaries, project activities	10:25 – 10:50	MOECHE – Abdi Gashan
Q & A Session	10:50 – 11:20	All
Project risks and impacts - Questionnaire	11:20 – 11:40	World Bank team
Q & A session	11:40 – 11:55	All
Closing Remarks	11:55 – 12:00	DG Ahmed Yusuf

Annex 2: Complaints log

Date and complaint from	Complaint e.g. non-issuance of ID	Officer/ department complained against	Nature of complaint/ service issue, e.g. delay	Type of cause – physical (e.g. system failure), human (e.g. inefficient officers, slow, unresponsive) or organization (e.g. policies, procedures, regulations)	Remedy granted	Corrective/ preventive action to be taken	Feedback given to complainant