

FEDERAL GOVERNMENT OF SOMALIA



**MINISTRY OF EDUCATION, CULTURE,
AND HIGHER EDUCATION**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

Somalia Empowering Women Through Education and Skills Project
– “Rajo Kaaba” (P176898)

DRAFT 1

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ACRONYMS AND ABBREVIATIONS

ABE	Alternative to Basic Education
BRA	Benadir Regional Administration
CSO	Civil Society Organization
DECC	Directorate of the Environment and Climate Change
DG	Director General
EIE	Education in Emergency
ESCP	Environmental and Social Commitment Plan
ESIRT	Environmental and Social Incident Reporting
ESMF	Environment and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
ESSP	Education Sector Strategic Plan
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-based Violence
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDPs	Internally Displaced Persons
IP	Implementing Partner
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MIS	Management Information System
MoECHE	Ministry of Education, Culture and Higher Education
MoF	Ministry of Finance
MoLSA	Ministry of Labor and Social Affairs
MoPHWRH	Ministry of Public Works, Reconstruction and Housing
MoWHR	Ministry of Women and Human Rights
NFE	Non-Formal Education
NGO	Non-governmental Organization
NDP	National Development Plan
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PAPs	Project Affected Persons
PDO	Project Development Objective
PIU	Project Implementation Unit
PMC	Project Management Committee
PSC	Project Steering Committee
PWDs	Persons Living with Disabilities
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
STEM	Science, Technology, Engineering and Math
TVET	Technical and Vocational Education and Training
WBG	World Bank Group

1.0. INTRODUCTION

1.1. PROJECT BACKGROUND

1. Somalia’s potential progress is confronted with the substantial challenges of widespread poverty, low economic growth, and low fiscal capacity. Somalia is one of the poorest countries in the world with a per capita gross domestic product (GDP) of US\$327. An estimated 69 percent of the population live in poverty (below US\$1.90 per day according to the most recent 2018 estimate) currently with the poverty rate likely to increase as the population growth rate (2.83 per annum in 2015-2020) outpaces the annual economic growth rate (2.8 percent average in 2016-2020). The economy benefits substantially from foreign remittances, which are estimated to make up 31.2 percent of GDP (2020). Fiscal capacity continues to be low, with a government expenditure-to-GDP ratio of 12.4 percent (2020) and a tax-to-GDP ratio of 2.5 percent (2020). These factors all constrain the Government’s ability to deliver services.
2. Somalia’s high fertility and improved survival rates means that education, skills, and employment needs will remain high for decades to come. Adolescents and youth aged 10-24 years represent 34 percent of the population in Somalia, slightly higher than the Sub-Saharan African average share at 32 percent and much higher than the global share at 24 percent.¹ Moreover, the size of the population in this age group is projected to grow from about 5.5 million (2020) to between 12.6 million and 14.8 million in 2050.² These demographic changes will require expansion of fiscal space for education to keep up with demand and provide the skills required for economic transformation.
3. With the right investments in its people – particularly in educating girls and women – Somalia has the opportunity to capture a demographic dividend. Despite currently low levels of literacy and access to education, Somalia’s youthful population indicates a high return on investing not only in the school-age population but also in girls and women who have been left behind by the formal education system and could benefit from a second chance. Timely and effective investments in human capital for girls and women hold the promise of reducing the intergenerational transmission of poverty.
4. The World Bank proposes to engage and support the Federal Government of Somalia (FGS) and make targeted investments in the education sector with an emphasis on girls and women. The project aims to enhance the conditions for women's empowerment through improved literacy and numeracy skills, skills for income generation, and skills for leadership which is well-expressed in the project’s development objective.

¹ According to the UN WPP (2019), the median age of the Somali population was only 16.7 years. It is among the lowest in the world behind Niger (15.2), Mali (16.3), and Chad (16.6).

² Range is due to use of low-fertility scenario or high-fertility scenario.

5. The project is aligned with 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.
 - iv. Improve the quality of learning outcomes, especially at early grade levels, and to ensure the market relevance of learning opportunities.

³ Further details of the ESSP can be obtained at:
https://www.globalpartnership.org/sites/default/files/federal_government_of_somalia_essp.pdf

2.0. PROJECT DESCRIPTION

2.1. PROJECT DESCRIPTION AND COMPONENTS

6. The Project aims to support the government’s efforts to enhance the conditions for women by providing the fundamental skills, qualifications, competencies, and mindset needed to improve their labor force participation, enhance their informal and formal sector job success and self-employment, and expand their leadership roles across all sectors of the society and will include policy development and system management across project components. This will be designed through a multitrack approach that leverages Somalia’s advanced internet penetration and telecommunication coverage through the provision of second-chance education for girls and women who did not complete formal schooling, and investments in higher education to build leadership capacity and create aspirational pathways for young women, and to ensure these interventions achieve their desired outputs, access to education, quality and improved coherence. This project has three components.

- **Component 1: Skills for Life and Labor Market Success** seeks to address gaps in access to essential skills – including basic literacy and numeracy skills, skills for income generation, and cross-cutting life skills – for girls and women. Specific sectors for support will be guided by demand and labour dynamics and in consultation with regional authorities, existing institutions, civil society and employers. Component 1 will support the creation of a competitive Skills Development Fund (SDF) and finance service delivery through it. A skills fund is a centrally managed process to award contracts to organizations and institutions to deliver skills training in line with the objectives and guidelines of the Fund. In Somalia, the SDF will be a federal-level fund with a Grant Committee that includes FGS and FMS representatives, stakeholders from civil society, and representatives of the private sector. The Grant Committee will report to the project Steering Committee, oversee the Fund's operations, and make the final decisions on which grant applications to support. The Project will also establish and finance the SDF secretariat, which will manage the grantmaking process centrally.

The SDF will finance large-scale delivery of second-chance education and skills training in districts combining non-formal second-chance programs focused on functional literacy and numeracy and some sector-specific skills training initially (potentially in sectors of agriculture, childcare, hair and beauty and renewable energy). The delivery mechanisms will respond to present limitations and adopt a flexible approach which will include contracting NGOs that can provide a range of services using schools and public or private TVET centers where they exist, or by deploying alternative service delivery models. This subcomponent will also finance essential demand-side interventions by facilitating uptake through different interventions such as: (i) provision of stipends to reduce costs for the most vulnerable students, especially girls; (ii) provision of childcare services to enhance attendance; (iii) awareness campaigns and active engagement with the community and religious leaders; and (iv) completion bonuses for girls and women who complete courses and pass a test of competency.

- **Component 2: Higher Education for Women’s Leadership** will finance interventions that will help more women acquire the competencies, qualifications, confidence, and networks to advance into postsecondary education and more capably step into leadership roles including in government, politics, public service, business, education, and civil society. Through this component, the government of Somalia will take the first steps in creating an autonomous or semi-autonomous Somalia Women’s University (SWU) that will serve as the institutional hub for a system-wide expansion of women’s leadership development through participation in higher education. The principal aim of the SWU would be to provide Somali girls and women from all walks of life with strong academic potential with access to a dedicated, safe, and well-resourced higher education opportunity through which they can develop the knowledge, qualifications, and abilities to serve effectively in high-skilled employment and in leadership roles in politics, government, and the world of business. This university will serve two key strategic goals identified by the Government of Somalia as of national importance: (i) increasing the number of women with the high-level skills needed to serve at the highest levels of leadership in Somalia, including in the Parliament, where there is a national target already set to reach and maintain 30 percent female representation by the next parliamentary election cycle; and (ii) expanding opportunities for women to hone the academic learning and research skills needed to proceed through increasingly advanced levels of post-secondary education, including through Master’s and Doctoral level studies, particularly in science, technology, engineering and math (STEM) fields.

Initial implementation activities will consist of utilizing existing facilities and academic programs at selected institution(s) to implement women-centered short courses and foundational courses for upskilling and preparing girls/women for university. Independent campuses in at least two regions would be established by the close of the project, with possibilities for expansion beyond the life of the project. SWU would be independent of any umbrella university and would have at least two campuses—one in Mogadishu and one located in Somaliland, likely adjacent to or within one of the existing public universities. Component 2 will also help government build the strategy and policy framework to support, sustain, and grow pathways for Somali women to engage in and benefit from higher education and leadership support.

- **Component 3: Systems Strengthening, Technical Assistance and Project Management** will provide resources to support the project implementation by strengthening the management capacity of FGS Ministry of Education staff as well as state, regional and district level education administrators. Financing to be provided under this component will support staffing of key project staff at the FGS and FMS levels, capacity building and training activities, operating costs for project management, monitoring, and training programs, office equipment and furniture for project staff.

The component will finance the development of a robust system for collection and utilization of data on NFE, TVET, and higher education, with an emphasis on tracking gender gaps and informing the subsequent development of strategic policies and plans. The component will also finance cross-cutting technical assistance, including: a comprehensive approach to GBV prevention, risk mitigation and response, building on the GBV prevention and mitigation activities under the SEHCD Project; development of a national strategy on gender in higher education for Somalia;

and pilot studies, qualitative evaluations, and impact evaluations on the innovative activities developed under both Components 1 and 2

2.2. PROJECT DEVELOPMENT OBJECTIVE

7. The Project Development Objective (PDO) is to enhance the conditions for women's empowerment through improved literacy and numeracy skills, and skills for leadership.
8. The PDO will be measured via the following indicators:
 - i. Change in basic proficiency rates in literacy and numeracy in the targeted population of second chance programs (*percentage, disaggregated by gender*).
 - ii. Beneficiaries obtaining a skills qualification related to labor market needs or livelihood (*number, disaggregated by gender*).
 - iii. Female graduates of Women’s University programs in leadership roles (cumulative, disaggregated by disability status).

2.3. PROJECT CONTEXT AND TARGET POPULATION

9. The project will be implemented in targeted districts across Somalia screened to ensure that they meet a threshold of need, defined by female literacy levels and/or the presence of vulnerable populations such as IDPs. Direct project beneficiaries are women and girls primarily and may, in some target districts, also include disadvantaged boys and men all from primarily marginalized and disadvantaged populations. The selection criteria will include (i) two target districts and one alternate district per FMS and Somaliland, (ii) demand from regional and district officials, (iii) accessibility for government supervision, (iv) capacity to implement the programs, (v) availability of complementary demand-side interventions such as cash transfer programs, and (vi) avoiding duplication with similar programs, such as the FCDO-financed AGES program [Table 1 on selected districts](#)

Table 1: Geographical Coverage of Component 1 (to be agreed upon during Appraisal)

State	Region	Proposed Districts		Alternative District
Somaliland	Maroodi-Jeex	1	Hargaisa	Erigavo (Saanag Region)
	Togdheer	2	Burao	
Banaadir	Banadir Region Administration	1	Hodan	Yaqshid
		2	Hawl-wadag	
Jubaland	Lower Jubba and Gedo	1	Kismayo	Beled Hawo
		2	Luq	
Puntland	Bari and Nugal	1	Baran	Under discussion
		2	Eiyl	
Southwest	Bay and Lower Shahbelle	1	Baidoa	Under discussion
		2	Afgoye	
Galmudug	Galgaduud and Mudug	1	Adado	Galkacyo
		2	Abudwak	

Hirshabelle	Hiran and Middle Shabelle	1	Maxaas	Mahaday
		2	Warsheekh	

2.4. KEY ENVIRONMENTAL AND SOCIAL RISKS OF THE PROJECT

10. While Somalia has seen considerable improvement in security and governance, it remains vulnerable and fragile. The fragility includes high poverty and unemployment levels, the oligopolistic nature of key sectors of the economy, rapid urbanization, pressure on key natural resources (especially water and rangeland), and the biggest threat remains the threat of violent extremism. The country has also witnessed changed rain patterns and quantity of the rainfall received due to climate change creating impacts from droughts and floods which pose the most severe hazards to the country. For the water sector, declining ground water levels have driven up water prices and exacerbate the likelihood of a conflict over water and grazing areas.

11. The environmental risk rating is Substantial at this time. This is due to the environmental risks that may arise from proposed construction activities under Component 2 in the project. Construction of the College of Leadership for Women is likely to result in the occurrence of environmental impacts, including noise pollution, soil erosion, waste and wastewater management, loss of vegetation, e-waste, as well as possible occupational health and fire safety risks. Congregating large numbers of persons during the COVID-19 pandemic is likely to result in exposure to the virus. Occupational health and safety (OHS) risks and impacts are anticipated with little in-country knowledge of Good International and Industry Practice (GIIP) in relation to the implementation of both Components 1 and 2.

12. It is expected that the project will contribute considerably to the strengthening of women’s empowerment, not just among the immediate beneficiaries, but also indirectly to the society at large, and have positive social outcomes on peace processes and institutional building. Whereas project activities are expected to have significant positive impacts, the likelihood of project activities leading to adverse risks and impacts is rated High. Key social risks include: (i) security risks and extremist-instigated violence on project-affected communities resulting in discontinuity of the project; (ii) institutional and systems capacity weakness to identify, understand, monitor and prevent adverse social impacts on the project as this is only developing; (iii) impacts on the health, safety and well-being of project workers; (iv) use of child labor in hazardous work that jeopardizes the health and safety of children; (v) exclusion of vulnerable, marginalized and minority members from the project benefits due to project investments being rolled out in a context of limited resources against widespread need; (vi) challenges in access to beneficiaries for meaningful stakeholder engagements as well as grievance redress and monitoring; (vii) sexual exploitation and abuse, sexual harassment (SEA/SH) and other forms for gender-based violence (GBV) extending from registration of women attending skills development centers and interaction at the college; (viii) intentional and unintentional repercussions against women and girl beneficiaries, including varying forms of GBV, due to the unequal gender and power relations; and (ix) risks related to data collection activities..

3.0. STAKEHOLDER ENGAGEMENT PLAN (SEP)

3.1. PURPOSE OF THE SEP

13. The SEP seeks to define a structured, purposeful, genuine, and culturally appropriate approach to consultation and information disclosure. This SEP is being prepared in accordance with ESS10 of the World Bank’s Environmental and Social Framework. The FGS recognizes that the project’s stakeholder profile is diverse and heterogeneous and that their expectations and orientation, as well as the capacity to interface with the project, are different. This differential necessitates systematic efforts and requires the preparation, adoption, disclosure and implementation of this Stakeholder Engagement Plan (SEP). It is with this in mind that this SEP has been developed.
14. This plan will help the Government to identify elaborately different stakeholders and develop an approach for reaching each of the identified groups. The SEP provides an appropriate approach for consultations and disclosure. These in turn are expected to create an atmosphere of understanding that actively involves project-affected persons (PAPs) and other interested parties, reaching out to them in a timely manner and that each group is provided opportunities to voice their opinions and concerns.
15. Overall, this SEP serves the following purposes:
 - i. Identify and analyze different stakeholders at different levels.
 - ii. Plan engagement modalities by use of effective communication tools for consultations and disclosure.
 - iii. Define the role and responsibilities of different actors in implementing the SEP.
 - iv. Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings.
 - v. Establish a grievance redress mechanism (GRM) for the project.
 - vi. Outline platforms for stakeholders to influence decisions regarding the project.
 - vii. Outline project information dissemination modalities including differentiated considerations for inclusion of poor and vulnerable populations.
 - viii. 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.

3.2 STAKEHOLDER IDENTIFICATION, ANALYSIS AND ENGAGEMENT

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 the successful management of a project’s risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of project decisions and the assessment, management, and monitoring of the project’s environmental and social risks and impacts.

17. The project will engage a large and diverse array of stakeholders during planning and implementation. The FGS and the participating FMS will be responsible for project implementation and management, together with contracted implementation partners, who will implement project TVET interventions throughout the selected regions, in partnership with local organizations where possible. Non-state stakeholders—such as community leaders, citizens who benefit from the services provided, education workers, disadvantaged and vulnerable groups and their representatives and advocates, etc.—will be involved regularly throughout the life of the project. Additional diverse groups—such as private education providers, including universities in Somalia, international NGOs working in the education sector, and civil society groups—will also be engaged as appropriate. Relationships with existing non-government actors—including UN agencies, NGOs, and private sector organizations—will also be established and/or enhanced to ensure the project leverages the activities of the agencies within the education sector in Somalia
18. The process of stakeholder engagement will involve the following, as set out in further detail in this SEP:
 - stakeholder identification and analysis,
 - planning how the engagement with stakeholders will take place,
 - disclosure of information related to the project, and which can be released without negative security outcomes,
 - consultation with identified sectoral stakeholders,
 - addressing and responding to grievances, and
 - reporting to stakeholders.
19. The Government will engage with stakeholders throughout the project lifecycle, and in a meaningful, timely, and relevant manner. Ensuring the information is understandable and accessible to all and free of manipulation, interference, coercion, discrimination, and intimidation. The nature, scope and frequency of stakeholder engagement will be all-inclusive reflecting the nature and scale of the project, including the need for meaningful consultations with women, youth, and marginalized groups.
20. As part of project preparation, the Government will carry out a Stakeholder Engagement Analysis which will aim at identifying (a) who will be directly or indirectly affected by the project, (b) how the project will reach out to stakeholders, and (c) how the project would share information and get stakeholders involved in decision-making and implementation of the project.
21. Special consideration will be taken to ensure that women, youth, minority groups, and persons living with disabilities will be represented amongst the stakeholder groups. Various other stakeholders such as religious leaders, clan elders and opinion leaders - who may influence the perception and uptake of education services and involvement of women in the project, will also be engaged.

3.3 STAKEHOLDER MAPPING AND ANALYSIS

22. For the purpose of this ESS10, “stakeholders” are categorized into two major groups as below, details of which are provided in the tables.

- **“Project Affected Parties”**: These are 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 include . young girls, women and mothers, instructors in NFE schools both public and private, administrators, communities that will directly benefit from education support, the MoECHE staff and other government institutions; and staff that will be involved in service provision.

Table 2: Project-Affected Parties

No	Stakeholders	Description	Area of interest
1	Somali citizens, especially women and girls in youth age period.	<p>Somali citizens who reside in the project locations are the primary beneficiaries of services offered by the project. Their views about the potential environmental and social risks are essential in identifying and mitigating those risks. Their feedback about the project implementation is crucial to the overall success of the project and elicits views from disadvantaged groups and particularly from women themselves who are the main beneficiaries of the project.</p> <p>Provision of quality education services for all members of the society (especially women and youths and VMGs⁴) will lead to a population with higher literacy levels.</p> <p>The women and the girls across Somalia who may not have been able to finish their studies for various reasons are important parties for the project. Also, young women who might want to enroll into higher learning institution to be part of the political, and administrative leadership of the country. These include the vulnerable groups like the minority groups, disabled persons, IDPs, orphans, widows, etc.</p>	<ul style="list-style-type: none"> - Equitable access to these institutions. - Clear and transparent process to select those who will participate or those to be enrolled. - Clear and transparent process on how to higher the instructors to offer the services.

⁴ Vulnerable and Marginalised Groups

No	Stakeholders	Description	Area of interest
2	Communities that will benefit from the project	There is a possible role for communities, especially through established community education committees (CECs), who may be involved in providing space for project activities and follow-up of households to ensure women, and young mothers attend to the program.	<ul style="list-style-type: none"> - Meaningful community engagement in the project decisions. - Lack of interference in the function 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 Officials at the Ministry of Education Culture and Higher Education at the Federal level	The respective department under the MoECHE will have implementation responsibility through a dedicated PIU. The MoECHE will 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. - Selection of the proposed college of women site and schools to be used/ constructed for purposes of the second chance and life skills training. - Clear and transparent process related to Skills Development Fund establishment and award of funds. - Clear and transparent process on procurement of construction services and provision of supplies and equipment for proposed university
4	Ministry Officials at the Member State and District levels	The Ministry of Education (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.

No	Stakeholders	Description	Area of interest
5	Schools/TVET institutions and universities	The schools and TVET institutions will partly host the NFE trainings and the life skills training; the university will host the women’s university.	<ul style="list-style-type: none"> - Meaningful engagement with the school/TVET administrators and the CECs on the utilization. - Transparency in the process of school/TVET selection through the Skills Development Fund.
6	Civil society organization and Nongovernmental organization both local and international	These are organizations that have an interest in the women education at all levels and have activities to promote girls/ women education across the country and entrepreneurship among young women.	<ul style="list-style-type: none"> - Meaningful engagement on the target groups - Means of improving demand side of the project - Retention of NFE students - The best skills development activities and monitoring methods.

- **Other Interested Parties (OIP):** These include 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, NGOs, and partners engaged in the education sector in the country, NFE providers, Universities, development partners supporting the education sector, business companies employing women and entities that may be involved in the provision of services.

Table 3: Other Interested Parties

Stakeholders	Description	Area of Interest
CSOs and NGOs operating in the identified project districts.	Most development activities in rural and remote parts of the country are led by NGOs and CSOs funded directly by donors and religious bodies, and they also represent the vulnerable groups. They have social capital that the project can tap into.	<ul style="list-style-type: none"> - They complement government services in different areas, including education. - There is transparency and accountability in all aspects of the engagement. - Principles of engagement are observed in all aspects of the consultation.
<p>Other Ministries:</p> <p>Ministry of Finance (MoF)</p> <p>Ministry of Labor and Social Affairs, (MoLSA)</p> <p>Ministry of Public Works, Reconstruction and Housing (MoPWRH)</p> <p>Ministry of Women and Human Rights (MoWHR)</p> <p>Directorate of the Environment and Climate Change (DECC)</p> <p>Office of the Prime Minister</p>	<p>The other Ministries will be involved in as far as the implementation of specific activities and linkages with ongoing interventions:</p> <p>Labor and Social Affairs providing policy direction and guidance on all labor administration, particularly areas of protection and development of the labor force.</p> <p>Interior and Federal Affairs ensure security of project workers and investments.</p> <p>Women and Human Rights, ensure women representation and safeguard the human rights.</p> <p>Directorate of the Environment and Climate Change is standard-bearer institutional for environmental risk management for the project environment.</p>	<ul style="list-style-type: none"> • Implementation of specific activities and linkages with ongoing interventions. • Relevant policies and frameworks are followed.
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 the consultation process. • Information is shared in a timely manner.
Contractors and Consultants	These are part of service providers who have interest in the project.	<ul style="list-style-type: none"> • Transparency in project implementation and design. • Transparency in project hiring and procurement. • Continuous engagement and information sharing.
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

- **Marginalized and Vulnerable 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 vulnerable groups identified for this project include pastoralists, and women with disabilities, IDPs, minority groups, etc.

23. The government of Somalia will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

4.0. INSTITUTIONAL AND LEGAL FRAMEWORK FOR THE SEP

4.1. INTRODUCTION

24. The key legislation for this project can be subdivided into two groups:
- i. legislation, policies, and other legal frameworks on the education sector in Somalia.
 - ii. legislation on access to information.

4.2. LAWS, POLICIES AND OTHER LEGISLATION ON THE EDUCATION SECTOR IN SOMALIA

25. **The Constitution:** The constitution provides the legal framework for the right to education and the responsibility of the Government to provide education for the citizens. Article 30 makes free primary and secondary education a basic right.
26. **The Basic Education Act:** The Act provides for the regulation and provision of basic and adult education in the country.
27. **The Education Sector Strategic Plan (ESSP) (2018 – 2020)** is an important tool to support broader state building goals and help capitalize upon the potential of education as a peace dividend for Somali communities and improve social service delivery. The new ESSP is currently under development (2021-2026).⁵ This Plan calls for investment by Somalia’s development partners in the following strategic areas:
- i. Resilience and education in emergency (EiE)
 - ii. Early childhood care and education (ECCE)
 - iii. Primary education
 - iv. Secondary education
 - v. Alternatives to basic education (ABE)
 - vi. Technical and vocational education and training (TVET)
28. **National Education Policy Framework:** this policy intends to increase the level of community involvement in education, and successful piloting of early grade reading assessments in multiple jurisdictions.

⁵ The previous Education Sector Strategic Plan (ESSP) was prepared by the Ministry of Education Culture and Higher Education of Somalia, with support from its partners. The plan covers the period 2018 to 2020.

4.3. ACCESS TO INFORMATION AND STAKEHOLDER ENGAGEMENT IN SOMALIA

29. Somalia has enacted citizen and stakeholder engagement legislation that relates both the right to access information and participation in policy development and decision-making. However, this is still very much nascent, and the project will be guided by the necessary World Bank Environmental and Social Standards on stakeholder engagement. Despite this, Article 32 of the Constitution of the Republic of Somalia is also important for the project.
30. The right to information is guaranteed by the Constitution in Article 32, sub-articles 1,2 and 3
- i. Every person has the right of access to information held by the state.
 - ii. Every person has the right of access to any information that is held by another person which is required for the exercise or protection of any other just right.
 - iii. The Federal Parliament shall enact a law to ensure the right of access to information.
31. Somalia currently does not have clear national legislative provisions on citizen and stakeholder engagement in the more specific investment programs and projects. In those cases, it relies on the relevant provisions of the donor organizations. The project will include a local framework for stakeholder engagement as part of the Technical Assistance and capacity building products.

4.4. WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARD ON STAKEHOLDER ENGAGEMENT

32. The main World Bank Environmental and Social Standards (ESS) for Stakeholder Engagement is ESS10: Stakeholder Engagement and Information Disclosure, which recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. 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.

The World Bank’s Environmental and Social Standard 10 (ESS10) defines the requirements for stakeholder engagement as follows:

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

33. The objectives of ESS10 are as follows, as relevant to the project:

- i. To establish a systematic approach to stakeholder engagement that will help the Federal Government of Somalia identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- ii. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- iii. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- iv. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- v. To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow help [the Federal Government of Somalia] to respond to and manage such grievances.

5.0. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. CONSULTATIONS PRIOR TO THIS SEP

34. The analytical underpinnings of the project are based largely on Somalia’s needs assessments for education. The project has been conceived in light of Somalia’s Ninth National Development Plan, which has a special chapter dedicated to the need for investments in the country’s social sectors, including the education sector. The design and priorities of the project have been discussed and refined through a series of engagements between the World Bank and FGS representatives, including a joint project identification mission conducted between the World Bank and the FGS representatives virtually 13th – 15th December 2021 and subsequent meetings in January and February 2022 which involved important stakeholders including line ministries, federal member of states, and development partners such as UN agencies.
35. In addition, consultation meetings were held with project stakeholders, especially institutions present in the education space in Somalia. The initial consultations were held on October 11, 2021, in Mogadishu, while a follow-on workshop was held on February 7, 2022.
36. Under this SEP and its preparation, the Somali government conducted two project-specific essential stakeholder consultations. Initial stakeholder consultations began on October 11, 2021, when a consultative workshop was organized in Mogadishu for leading women in the educational sector as well as leading women activists and promoters of women’s education. The one-day workshop included lively discussions revolving around a set of previously prepared questions that aim to establish a foundation for the project by listening to the firsthand accounts of women in the frontline. The workshop was held in two sessions: the first session focused on the prospects of second chance education initiatives for young women and girls, and the second session focused on the provision of skills for employment and livelihoods.

A follow-on stakeholders’ consultation workshop was conducted virtually on February 7, 2022. The session was attended by national and international organisations with activities, projects and programs in the education sector in Somalia, women groups, representing of vulnerable groups, and minority groups representatives. This second consultative workshop focused primarily on highlighting the key environmental and social risks as well as the various project instruments.

The summary of all consultations that shall be held for this project is described in the table below.

Table 4: Summary of stakeholder consultations undertaken under the aegis of the Somalia Empowering Women through Education and Skills Project in Somalia

Consultation Meeting on 11th October 2021

No	Issues raised	Responses
1	Basic skills as a priority need for women’s well-being and success.	The participants agreed that it was a key priority for women to have the basic skills of Somali language reading and writing as well as basic calculation skills. They also stressed the close correlation between having command of these basic skills and the capacity to reach financial independence which they attributed as the main driver of self-confidence for young women and a contributing factor to the stability and sustainability of households which are all key priorities that lead to women’s success and well-being. Lastly, participants indicated that they needed psychological support, especially confidence building, as two important factors contributing to women’s long-term well-being.
2	Factors that have interfered with girls’ ability to complete their primary education besides the lack of access to affordable schools nearby.	<ul style="list-style-type: none"> a) Cultural beliefs also act as hindering factors. Especially with families who treat boys and girls differently, believing a girl’s place is at home. b) Early marriage and the environment at home. c) Abuse and harassment in the school place, mistreatment, discouragement, and use of demeaning language by male teachers. d) Insecurity and risks when traveling to the schools as other hindering factors.
3	Factors that help motivate young women and girls to return to school to acquire the basic skills if second chance programs were offered.	<ul style="list-style-type: none"> a) Providing free of charge opportunities as financial burdens constitute the most significant hindering factor for their access to education. b) Provision of a safe and conducive environment that supports women, managed by women and taught by women to limit the risks of harassment and discouragement. c) Provision of other forms of support such as meals and financial support for these young women and girls while attending these programs, childcare services, or part-time employment opportunities.

		<ul style="list-style-type: none"> d) Creation of after-graduation support programs such as microfinance opportunities for those who would like to start a business after acquiring relevant skills or guaranteed work placements for those who would like to find jobs. e) Provision of advocacy and awareness-raising, specifically promoting positive examples, narratives, and role models from similar backgrounds.
4	<p>Activities to be incorporated into second chance programs to help ensure girl’s retention and completion once enrolled.</p>	<ul style="list-style-type: none"> a) Ensuring there are more qualified female teachers to create an overall supportive environment. b) Teaching them on their basic rights, how to defend themselves against abuse and harassment and what the channels of support are, is also an important factor. c) Providing guidance and counselling for family members to raise their awareness and allow them to become more supportive of the girls and young women seeking second chance education. d) Provision of safe transportation solutions to mitigate the harassment and security risks related to travelling to school, e) Provision of safe places and good infrastructure such as clean private toilet facilities, and cool air-conditioned environments, private prayer facilities, financial incentives, employable skills, funding for starting businesses, and free child-care services on site. f) Incorporation of fun activities and programs such as sports, arts, dancing, or poetry classes to make schools fun. g) Providing on-going motivation throughout the program through organizing motivational speeches or debates and creating school-papers. h) Focusing on business skills along with basic skills such as digital marketing, product design, inventory, communications, human resource management, financial management and accounting which are key skills for the successful implementation of employable skills. Some of the other key skills recommended besides basic skills of reading and writing, and calculation are daycare as a profession; teaching; hospitality; nutrition; and handcrafts such as jewelry.

		<ul style="list-style-type: none"> i) Creating strict supervision and quality assurance mechanisms for any new second-chance education programs to ensure a long-lasting positive impact. j) Creating a public relations department within these programs dedicated to following up with girls who drop out of the program, understand the reasons for leaving the program and offering them support in the form of at-home education options for those who are willing to continue learning.
5	Initiatives that could help families and husbands encourage young women to attend second chance education programs.	<p>Second-chance education programs that:</p> <ul style="list-style-type: none"> a) does not interfere with their household responsibilities and is conducted at an appropriate time. b) there is some form of financial incentives. c) there is the prospect of employment/self-employment which could support the family. d) the education is provided for free, at safe environments and there is safe transportation provided. e) there is no extra burden placed on the families such as extra childcare responsibilities.
6	Other ways that could enable young women to acquire the basic skills are besides creating new second-chance programs.	<ul style="list-style-type: none"> a) Purpose-driven trainings such as capacity building initiatives and on-the-job training. b) Provision of at home learning solutions through digital means or through TV and radio. c) Provision of full-course content on free and accessible digital platforms such as Facebook or YouTube, or the creation of dedicated free apps to provide online education. d) Use of popular social media platforms as channels to raise awareness for drop-out women and girls, and the promotion of education such as creating positive short videos on TikTok. e) Creating spaces for open discussions and dialogue between the young women to help them exchange ideas.
7	Other programs are that help women acquire basic skills.	They listed: Gaari Dumar; Hano Academy; Kaafiya; Hiigso; iRise Hub; Microfinance initiatives such as Kim’s; Awood; Fursad Abuur as some significant and successful initiatives.

8	Efforts to help women work outside the home.	Participants indicated that while it is overall highly recommended for young women and girls to seek some form of financial independence either by self-employment or seeking a job outside the home, they stressed that given Somalia’s current environment where labor laws are not fully followed, where workplace harassment is on the rise, and where there is widespread insecurity, we should be cautious of blindly pushing for young women to work outside the home. Their personal safety should be a priority. Working in all-women environments such as women’s schools, or beauty parlors, or teaching them entrepreneurial skills and skills that allow for them to be self-employed such as professional sewing and graphic designing could be an option.
9	Main reasons why women are not working in the labor market.	<ul style="list-style-type: none"> a) Lack of employable skills. b) Lack of experience; a workplace culture which is skewed towards supporting and promoting men more than women. c) The general culture in Somalia which doesn’t fully support the presence of women in the public; and the household environment where several responsibilities are placed solely on women including childcare and house chores.
10	Risks women face working in paid employment and how these risks can be eliminated.	<p>Participants indicated that personal harassment and abuse along with insecurity are some of the top risks faced by women in the workplace. These suggested that these can be eliminated by:</p> <ul style="list-style-type: none"> a) promoting the employment of more women in the workplace especially in higher managerial positions to create a supportive network for women. b) Clear communication to both male and female staff what exactly constitutes harassment and abuse. c) Strict laws and punishment mechanisms should also be clearly stipulated by human resource departments and communicated with everyone in the workplace. d) Need for departments headed by female officers or managers at the workplace who can take in the complaints of female workers and investigate them duly outside the influence of male managers.

11	Role of civil society organizations in helping Somali women acquire market relevant skills is.	<p>a) Conducting a market assessment and basing their programming on the actual needs and trends in the society they are serving.</p> <p>b) Providing the necessary tools to use the skills that are taught, such as providing necessary sewing equipment for those participating in sewing courses or pain and painting tools for those who learn painting and graphic design so they can be able to practice the skill they are learning to earn income.</p>
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Consultation Meeting on 7th February 2022

No	Issues	Response
	Discussions on the environmental and social risks likely to be faced by the project and how to mitigate them.	<p>Executive summaries of all project’s ESF documents to be translated into Somali language.</p> <p>The necessity of Including the disabled persons and vulnerable communities such as IDPs and returnees.</p> <p>The role played by the rural women and how the participation in the project will help them.</p> <p>The need to Include and support to girl school dropouts.</p>
	Environmental and Social Management Framework	The group appreciated the explanation from the WB presentation and addressed areas of concern in terms of implementation of such instruments.
	How the project is incorporating environmental issues in the design and implementation	The group delved into the impact the environmental and climate conditions are affecting the rural and urabn populations. And they will be keen to see key environmental issues addressed.
	Discussion on the LMP and how the instrument is meant to address issues related to labour, forced labour, child labour and the risks associated with discriminations against the vulnerable mainly women, IDPs, minority groups.	The group participated widely on issue of equal opportunity in the project works and any employment opportunities.

	Security challenges posed by the project or project activities.	The participants appreciated the social economic importance of the project and commented on the how society is resilient in ensuring they achieve the intended gains despite the security issues. The ministry officials elaborated on the security mitigation measures to be put in place to ensure all intended beneficiaries gain from the project. Also, the state protection is provided to the extent possible.
1	Project design and target locations.	The project is designed to provide education, employment opportunities and skills (no formal) training to adolescent girls and women in specific target districts, to be confirmed by the Ministry of Education. The project will be implemented across Somalia including Federal Member states.
2	Inclusion of minorities and vulnerable groups such as Internally Displaced Persons (IDPs) and returnees in the discussion and project benefits	The project does include minority and vulnerable communities who are not attending schools in education programs.
3	Inclusion of women living with disabilities in the project.	The project is designed to provide education, employment opportunities and skills (non formal) training to adolescent girls and women. This also includes girls and women with disabilities. The World Bank promotes best practices in facilities design in terms of universal designs methods that provide access to persons with disability to enable them to access buildings, structures, and facilities. This will be part of the project infrastructure design to ensure that it is disability inclusion. The comments from the disability group was well received by majority of the participants.
4	Rural women’s participation in the project.	The target beneficiary districts have not been finalized. The Ministry will decide upon which will be the final target districts. The discussions for the project have included both representatives from the Federal Ministry of Education and Federal Member States (FMS) Ministries of Education. There has been extensive regional consultations and engagement. Each FMs will choose two target districts using fair criteria that would be applied, but there has been no decision yet on

		whether they would be rural or urban. The government is struggling with challenges related to rural areas and the accessibility of vulnerable children living in the rural area. There are efforts to develop alternative education systems such as distance learning program.
5	Addressing low levels of girl enrolment in higher education.	Suggestions purposed for special considerations include incentives/motivations for girls to help increase the enrolment rates. Examples included providing take home rations, weekend classes, specialized female teachers etc.
6	Skills training for adult women Students that have passed school age.	The project is focused on providing non-formal education to adolescent girls and women. This could include the provision of basic literacy and numeracy skills and sector specific skill training in sectors such as fishery, agriculture, tailoring, beauty, childcare, and life skills that enable women to succeed. Other suggestions made include typing, driving, hair dressing etc.
7	The inclusion of girls and women exclusive education classes.	It was suggested that project should focus on women exclusive classes to enable them to participate and express themselves. The project will establish a women’s college cater to developing their knowledge and skills.
8	Inclusion and support to girl school dropouts.	Girls drop out of school due to early marriage or for family livelihood reasons. The project includes girl dropouts in the target population for the project. The project is designed to meet the needs of different girls and women depending on their choice. For example, some might choose to enrol in sector specific course of study that leads to employment or learn a new trade e.g. child care and then later on open their own child care centre or learn about new technology related to agriculture or solar energy. Some might be entrepreneurs and be given additional training to increase their knowledge on literacy and numeracy to improve their work.
9	Local and international NGOs application for funds to the project.	The World Bank works directly with governments to design and implement projects. The funding of the Bank flows to government who then implements the project.
10	Provision of opportunities to already existing skill training	During implementation of the project a skills development fund will be set up where an institution will be created to oversee the skills training and identify the process for

	<p>institutions/centres that are under capacitated and under resourced.</p>	<p>providing the training across districts in Somalia and this will create opportunities for NGOs and other organization to apply to the skills development fund to deliver the trainings. This will be probably a year or two from the approval of the project and the skills development fund is established and running.</p>

6.0. STAKEHOLDER ENGAGEMENT

6.1. PRINCIPLES OF STAKEHOLDER ENGAGEMENT

37. To meet best practice approaches, the project will apply the following stakeholder engagement Principles.

Openness and life-cycle approach: transparent public consultations for the project will continue during the whole project lifecycle from preparation through implementation. Stakeholder engagement will be free of manipulation, interface, coercion, and intimidation.

Informed participation and feedback: information will be provided and widely distributed among all stakeholders in an appropriate format. Consultations will be conducted based on timely, relevant, understandable, and accessible information related to the project; opportunities provided to raise concerns and assure that stakeholder feedback is taken into consideration during decision making.

Inclusiveness and sensitivity: stakeholder identification will be undertaken to support better communications and building effective relationships. The participation process for the projects is inclusive. All stakeholders are always encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders’ needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, particularly women-headed households, youth, elderly and the cultural sensitivities of diverse ethnic groups, with targeted processes put in place to avoid exclusion.

6.2. PLANNED STAKEHOLDER ENGAGEMENT ACTIVITIES

38. The project interventions are countrywide. Therefore, the project stakeholder engagement activities need to be streamed horizontally and vertically.
39. The horizontal stream implies an engagement with stakeholders on a national level. Activities on the horizontal level are assumed to improve awareness and coordination of efforts in the implementation of planned construction activities, enrolment of students and general management of the project activities. On the other hand, vertical stream implies the application of cascading mode which will allow the project to establish communication with project-affected parties.

Table 4 below presents the stakeholder engagement activities envisaged under the project.

Table 5: Stakeholder Engagement Matrix for Somalia Empowering Women through Education and Skills Project – “Rajo Kaaba” in Somalia

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Beneficiaries including disadvantaged and vulnerable individuals and groups		
Project design, verification of existing and location/sites for projects	PMC Project Social Safeguards Consultants	<ul style="list-style-type: none"> - CSOs - NGOs - CECs - Communities 	<ul style="list-style-type: none"> - Public announcements - Face-to-face meetings (observe COVID-19 measures) - Virtual meetings. 	First-hand assessment of the local people’s perceptions of potential project benefits and risks
Screening of the proposed projects	PMC, Ministry Officials, Social Safeguards Consultants and other stakeholders	<ul style="list-style-type: none"> - CSOs, - Affected groups (IDPs, pastoralist / nomadic communities) - Community leaders/elders/ women leaders - Key informants 	<ul style="list-style-type: none"> - Public announcements - Face-to-face meetings (observe COVID-19 measures) - Virtual meetings 	Identification of concerns on project impacts, and 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	PMC, Project Consultants (Social Safeguards Specialist), NGOs, CSOs, Other knowledgeable persons GBV/SEA specialist	<ul style="list-style-type: none"> - Would-be affected individuals and groups - Locally based CSOs/NGOs - Community leaders/elders/ women leaders - 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)	PMC (social safeguards specialist) Consultants GBV/SEA specialist	Adversely affected individuals, households, and groups	<ul style="list-style-type: none"> - Structured survey - Questionnaires covering quantitative and qualitative information 	Inputs for disadvantaged and vulnerable groups and identification of issues that could be incorporated into the design and implementation of the project
Implementation	PMC (social safeguards Consultant Locally based NGOs/CSOs GBV/SEA specialist	<ul style="list-style-type: none"> - Disadvantaged and vulnerable groups - Community leaders/elders/ women leaders and other stakeholders 	<ul style="list-style-type: none"> - Committees (formal or informal) 	Implementation of the Inclusion Plan and the SEP.

Monitoring and Evaluation	PMC (social safeguards specialist) Consultants NGOs & CSOs	- Individuals and groups of the disadvantaged and vulnerable	Formal participation in review and monitoring	Identification and resolution of implementation issues, effectiveness of the Inclusion Plan.
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6.3. INFORMATION DISCLOSURE

40. Information that is needed to be disclosed to relevant stakeholders and affected communities:

- Project activities, timing, progress, and employment opportunities.
- Dissemination of Grievance Redress Mechanism to project-affected parties.
- Environmental and Social Management Framework.
- Environmental and Social Commitment Plan.
- Site-specific environmental and social management plan.
- Resettlement Action Plan.
- Labor management plan including labor influx.
- Stakeholder Engagement Plan
- SEAH Prevention and Response Action Plan
- ToRs for various studies including feasibility and technical designs.

6.4. INFORMATION DISCLOSURE PROCEDURES

The table below outlines what information should be disclosed on the project and how this shall be done.

Table 6: Project Information Disclosure

Information to be Disclosed	Method of Disclosure	Target Group	Responsibility
Before Appraisal			
Disclosure of PAD, SEP and ESCP	Website MoECHE and WBG, with summary of SEP and ESCP in Somali	All key stakeholders	PMC
After Appraisal			
Disclosure of the project documents ESMF, Updated SEP, LMP, SEAH prevention and response Action Plan, among others	- Websites - MoECHE and WBG. - Brief summaries of the main features of the project SEP, LMP, ESMP, ESCP and SEAH prevention and Response Action Plan in Somali	- MoECHE and all partners involved in the project - Open access to all interested parties - All beneficiaries.	- MoECHE PMC - WBG Team - Implementing Partners
During Implementation			
ESMP, ESCP, GRM, SEAH Prevention and Response Action plan and ToRs.	- Website - Local administration offices - PIU and at the respective project sites	- Beneficiaries - Contractors - The community at large	- PIU - Social Safeguards Specialist - GBV specialist

Monitoring and Reporting			
Quarterly Annual report on progress and lessons learnt, complaints resolution and feedback	<ul style="list-style-type: none"> - The official website of the Ministry of Education - Stakeholder consultation meetings - Print, audio and visual media outlets 	Key stakeholders and project beneficiaries at FGS and FMS level including vulnerable groups or their representatives	<ul style="list-style-type: none"> - PIU - PMC - PSC

6.5. INCLUSION PLAN

Imperative for the Inclusion Plan

41. There are social, economic, and physical barriers that prevent vulnerable and marginalized 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. There are also biases and elitism which may contribute to the poor and minorities being included in project deliberations. In this regard, the project will deploy strategies to engage target communities and other stakeholders and overcome social stigma and encourage inclusion.
42. The project will take special measures to ensure that members of disadvantaged and marginalized groups have an equal opportunity to contribute positive outputs. This will include ensuring that they are involved in consultations on project siting and design, ensuring the project activities are accessible to people with physical disabilities, and project implementors at the local levels are guided on their responsibilities to provide services without discrimination. In addition, the staffing part will be made to reflect and promote diversity (see Labor Management Procedures [LMP] and Environment and Social Management Framework [ESMF]).
43. E&S assessment and management plans developed under the project after effectiveness will identify and address barriers to disadvantaged and vulnerable groups participating in and benefiting from project services. Measures will be included in the contractors’ ES documents and contractors as well as via training of service providers and education staff on the need to promote inclusion and diversity in staffing. Physical measures, such as ramps and rails in facilities to be developed under this project, including the College of Leadership, will be considered as well as means of ensuring that information is presented in accessible formats including sign language and braille. The project will ensure access to separate and culturally appropriate facilities for males and females in the TVET and higher education facilities supported by the project.
44. There are social, economic and physical barriers that prevent disadvantaged and vulnerable 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, PWDs are often not effectively engaged in consultations due to lack of access, social stigma and cultural beliefs that ensure they are not prioritized in education service delivery due to their limited productivity in society. Women with disabilities, for instance, have continued to have less access to education services due to stigma. In this regard, the project will deploy viable strategies to engage targeted communities and other stakeholders to overcome social stigma and promote inclusion.

45. In view of the risk of clannism, nepotism and elite capture and potential exclusion of disadvantaged and vulnerable groups, the social safeguards team at the MoECHE will ensure that the FMS-based project teams put measures in place to reach areas where disadvantaged and vulnerable groups live. They will also promote inclusion in project consultations and access to education services. There will be a need to be deliberate in ensuring that men are involved in consultations and all the other aspects related to access to project benefits.

Engaging disadvantaged, minorities and vulnerable groups

46. The project will promote inclusion of disadvantaged and vulnerable groups by ensuring their involvement in consultations in the sub-project design and the development of the ESMPs. This will include ensuring that education facilities are accessible to people with physical disabilities (e.g., having ramps and rails where appropriate) and training Somali government staff and community education committees on their role of providing services without discrimination. In addition, efforts will be made to promote diversity in staffing (see project’s LMP). In addition, community education committees will have diverse representation including disadvantaged and vulnerable individuals and groups.
47. 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 understand their own vulnerabilities compared to external actors and the engagement of local structures is most effective in such projects where administrative capacity is limited.
48. The participation of disadvantaged and vulnerable groups in the selection, design and implementation of project activities will largely determine the success of this Inclusion Plan. Where adverse impacts are likely, the project implementing teams at both FGS and FMS levels will undertake prior and informed consultations with the communities likely to be affected and those who work with and/or are knowledgeable of the local development issues and concerns. The primary objectives will be to:
 - a. Understand the operational structures in the respective communities.
 - b. Seek input and feedback to avoid or minimize the potential adverse impacts associated with the planned project interventions.
 - c. Identify culturally appropriate impact mitigation measures.

49. Consultations will be carried out broadly in two stages. First, prior to the commencement of any project activity, the MoECHE will arrange for consultations with community leaders, community education committees and representatives of disadvantaged and vulnerable groups about the need for, and the probable positive and negative impacts associated with, the project activities as part of the development of the project environmental and social risk management instruments. Second, there will be continuous stakeholder engagement that will ensure the active involvement of disadvantaged and vulnerable groups as part of overall project monitoring.
47. The Ministry of Education will:
- Facilitate broad participation of disadvantaged and vulnerable individuals and groups with adequate gender and generational representation, community elders/leaders, religious leaders, and CBOs.
 - Provide the disadvantaged and vulnerable individuals and groups with all relevant information about the project including on potential adverse impacts.
 - Ensure communication methods are appropriate given the low level of literacy, local dialects and communication challenges for PWDs.
 - Organize and conduct the consultations in forms that ensure free expression of their views and preferences.
 - Document details of all consultation meetings with disadvantaged and vulnerable individuals and groups on their perceptions of project activities and the associated impacts, especially the adverse ones.
 - Share any input/feedback offered by the target populations.
 - Provide an account of the conditions agreed with the people consulted.
50. Once the disadvantaged and vulnerable 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 vulnerable by ascertaining that they are consulted, have an accessible and trusted GM to channel the complaints they might have on the project.
51. To help ensure that the process does not marginalize , women and other vulnerable groups, representation for these groups will be required in the grievance committee (GC) tasked to resolve grievances/complaints at the community level.
52. The following issues will be addressed during the implementation stage of the project:
- Provision of an effective mechanism for monitoring implementation of the Inclusion Plan throughout the project life by the PIU and social safeguards team and with the help of contracted third parties, if any.
 - Ensure that the project beneficiaries must reflect all groups including the minority groups, persons with disability and the IDPs. The actual number per project will depend on the degree of the availability of the group in the district.

- Ensuring appropriate budgetary allocation of resources for this Inclusion Plan as part of the project ESF instruments, including the ESMPs.
- Provision of technical assistance for sustaining the activities addressing the needs of the disadvantaged and vulnerable individuals and groups.

Snapshots of the Minorities and the Disadvantaged Groups in Somalia

53. There are some minority and disadvantaged groups in the country, and these include the following:
 - i. Somali Bantu (in the south-central regions),
 - ii. Rer-Xamar and Baravnese (in Benadir and coastal regions),
 - iii. Bajuni (in the coastal areas), and
 - iv. Gaboye, Tumul, Yibir and Galagala grouping (in central regions as well as in the north, especially in the NW forest ecosystems).
54. Other disadvantaged groups in the country include the following:
 - i. Internally Displaced Peoples (IDPs),
 - ii. People who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities,
 - iii. Urban poor,
 - iv. Nomadic pastoralist communities,
 - v. Persons living with disabilities (PWDs),
 - vi. Female-headed households,
 - vii. Orphans and unaccompanied minors, and
 - viii. Elderly persons.
55. The project will, therefore, give special consideration to disadvantaged groups and learning from the best practices.

7.0. IMPLEMENTATION ARRANGEMENTS

7.1. IMPLEMENTATION ARRANGEMENTS FOR THE PROJECT

56. The project will be jointly implemented by the Federal Ministry of Education, Culture and Higher Education (MoECHE), FMS, and Somaliland Ministry of Education. The Federal MoECHE will be responsible in consultation with the FMSs for policy development, standard-setting and monitoring and states are mandated to implement education programs and policies.
57. The Federal MoECHE will be responsible for the oversight and coordination of all project activities and overall reporting on project progress and performance. FMS will be responsible for the service delivery in their respective jurisdictions. Regional, District Education and Community Education Committees (CECs) will also play an important role in the delivery of the project activities at the regional, district and facility level.
58. The project implementation arrangements would build on the institutional and implementation arrangements including the Project Steering Committee (PSC) and Project Management Committees (PMC) used for the recently approved Somalia Education for Human Capital Development Project (P172434) and propose new ones where applicable. The PSC will be chaired by the FGS Minister of MoECHE and will provide overall project leadership. The PMC headed by the Federal Director General (DG) and including DGs from participating FMS will provide technical leadership for project implementation.

7.2. STAKEHOLDER COMMUNICATION ENGAGEMENT METHODS

59. Suitable ways of communicating will be developed using the Somali language where appropriate to improve project perception, design, implementation and contributes greatly to the achievement of project objectives. Often, effective communication with the project stakeholders gives a greater understanding of the project by the stakeholders and enable them to review and adapt how to support and deliver the project. To sufficiently meet the needs of all stakeholders.
60. The following is a summary of some of the methods of engagement, and the responsible entity, proposed to be applied with the project stakeholders.
 - i. **Community Meetings:** The PIU, with environmental and social specialists, organizes project-related meetings to allow the stakeholders to interact with the Project by contributing towards its planning and to be developed in an effective and culturally appropriate manner. These meetings will be organized in a quarterly manner and as needed.
 - ii. **Digital Communication:** The PIU, with environmental and social specialists, can also organize project engagements using digital tools such as email distributions and call for comments, WhatsApp, SMS, phone, WebEx, and Zoom.
 - iii. **Local Radio Broadcasting/Mass Media:** The PIU, accompanied by the social and environmental specialists, will organize TV and radio announcements to update the

- stakeholder at the local level through mass media includes email, website, social media, leaflets, ads, posters, brochures, hand-outs the content of which will be in the local language.
- iv. **Training and Workshops:** With the observance of COVID-19 social distancing regulations, on-location trainings to be provided to the MoECHE staff, PIU, FMS MoE staff on a variety of project related issues such as project targeting, GBV, SEA, disability and inclusion.
 - v. **Grievance Redress Mechanism:** In compliance with the World Bank’s ESS10 requirement, a specific grievance mechanism will be set up for the project. Accurate communication materials for the GRM will be developed to help residents to familiarize themselves with the grievance redress channels and procedures. The PIU within the Ministry of Education will implement a grievance mechanism to ensure that it is responsive to any concerns and complaints, particularly from project-affected parties and communities.

7.3. BUDGET

61. The Ministry of Education will set aside a dedicated budget of US\$ 1,039,500 for the implementation of this Stakeholder Engagement Plan. The budget shall be utilized to put together a communication strategy for the project, cost of face-to-face and virtual stakeholder consultations throughout the project cycle. The budget will also be used to defray the costs of setting up and maintaining of GRM throughout the project implementation phase and disclosure activities such as translation and disclosure of ToRs, study outputs, environmental and social instruments in a manner that is easily accessible and culturally appropriate. The budget will also pay for the services of a Stakeholder Engagement Specialist as appropriate. An indicative budget is included below (*see Table 5*) and will be clarified during further project preparation work.

Table 1: Budget for implementing the Stakeholder Engagement Plan for the Somalia Empowering Women through Education and Skills Project

ITEM	INDICATIVE COST (\$)
Project Stakeholder Engagement Specialist	\$200,000
FM radio press conferences and call ins (one per year at FGS and FMS levels), FM radio	\$200,000
Communication Materials for the Project Preparation Phase	\$20,000
Stakeholder consultation and feedback meeting (one in each FMS and FGS)	\$20,000
Trainings of all staff and contractors on GM	\$50,000
Setting up and Maintaining Project GRM	\$300,000
Operational Costs for Stakeholder Engagements (Travel, Logistic Support, Security, Transportation & Accommodation)	\$150,000
Monitoring the SEP	\$50,000
Sub-total	\$990,000
Contingency (5%)	\$49,500
Total Budget	\$1,039,500

8.0. GRIEVANCE REDRESS MECHANISM (GRM)

8.1. INTRODUCTION

62. Under the World Bank ESS10, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.⁶ One of the key objectives of ESS10 (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’.⁷ This GRM should help the Project to respond to concerns and grievances of project-affected parties related to the performance of the project activities. The Project will provide mechanisms to receive and facilitate resolutions to such concerns.
63. Transparency and accountability will be core elements of the Project. The GRM is designed to ensure that grievances and perceived injustices are handled by the project, and that the project aids mitigating general conflict stresses by channeling grievances that occur between people, groups, communities, government actors, beneficiaries, project staff, NGOs, CSOs, 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.
64. As per World Bank standards, the GRM will be operated in addition to SEAH Prevention and Response Action Plan, which includes reporting and referral guidelines (there will be a stand-alone SEAH Prevention and Response Action Plan developed for this project). The GRM will also operate in addition to specific workers’ GRMs, which are laid out in the LMP and will include channels for safe and confidential reporting of cases of SEAH.
65. **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 issues;
 - iv. Social and environmental impacts;
 - v. Payment related complaints;
 - vi. Quality of service issues;
 - vii. Inefficient use of funds;

⁶Under ESS2 (Labor and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labor 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 mechanism, which will be defined in a separate GBV/SEAH Prevention and Response Action Plan.

⁷ World Bank, Environmental and Social Framework, 2018, p. 131.

- 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.
66. The MoECHE will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with FGS laws and 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 Safeguards 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 levels. The social safeguards 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 the national level.
67. 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 Specialist and communication). The Social Safeguards Officers 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, and the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the GRM 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 PMC, who will inform the World Bank within 48 hours as per the Environmental and Social Incident Reporting (ESIRT) requirements.
68. Considering the limited capacity in the Government system, the States may engage the support of CSOs 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).
69. **Receive and Register Complaints:** The beneficiaries will have multiple ways of channeling complaints on any aspect of the project. This will be through radio, mobile phones, community meetings, email

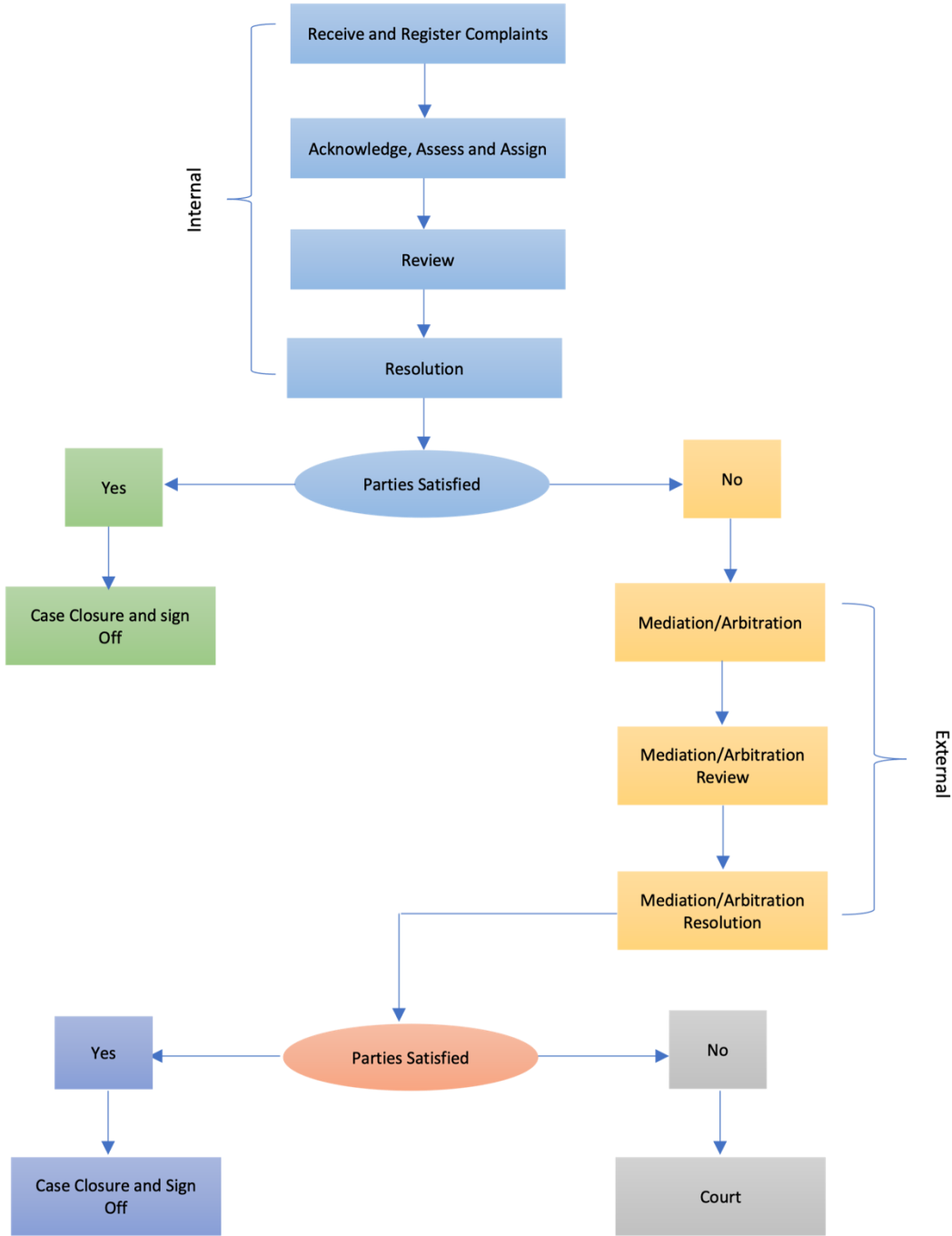
and websites. There will also be opportunities for in-person reports at the community level through the CECs or community leaders. Once the complaints have been received, the GRM focal point will log them into the Complaints Register.

70. **Acknowledge, Assess and Assign:** An acknowledgment of receipt will be sent to the complainant within 7 days of receipt of the complaint. The GRM focal point will assess the complaint and assign it to the relevant team, project implementing unit PIU or level of implementation (e.g., MoE at the State level). For instance, if the complaint is about the contractors, primary suppliers or the lack of community engagement, the issue will be forwarded to the relevant group/agency to address. All cases will be treated with utmost confidentiality.
71. **Incident Reporting:** Incidents that are considered severe, which cause significant adverse effects on the environment, the affected communities, the public or workers, e.g., fatality, GBV, forced or child labor, will be reported by the PIU to the PMC and the WBG within 24 hours (details on this process are described in the Labor Management Procedures).
72. Where grievances are of sexual nature and can be categorized as GBV/SEAH risks, the IP will handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the SEAH Prevention and Response Action Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GRM operators and relevant project staff.
73. For all other grievances, the respective IP will determine whether the grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. At all times, the IPs 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.
74. Records of all feedback and grievances reported will be established by the IP. 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.
75. **Propose a Response:** 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 SEAH Prevention and Response Action Plan.
76. Where a negotiated grievance solution is required, the IP 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.

77. After deciding a case, the IP will provide an appeals mechanism to the aggrieved party, which is constituted through the PMC. This is important in cases in which the aggrieved party is dissatisfied with the solution provided by the IP. In these instances, the PMC will step in and provide an appeals mechanism. The appeal should be sent to the PMC directly (a phone number will be provided), where it will be reviewed by the PMC GRM Team and will be decided on jointly with the PIU Coordinator. Where aggrieved parties are dissatisfied with the response of the PMC, they can report cases directly to the World Bank or use the available national grievance resolution mechanisms.
78. **Implement the Response:** 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.
79. **Review of the Grievances:** 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 PIU, contractors and primary suppliers.

Figure 1: The process to be adopted by the project in managing grievances.



80. Monitoring and Reporting of the GRM

- i. The PMC, specifically the Social Safeguards Specialist, will be responsible for monitoring the access to and implementation of the GRM by the PIU. 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.
- ii. The PIU, contractors and primary suppliers will provide analytical synthesis reports on a quarterly basis to the PMC, which will include the number, nature and status of grievances. These reports will form the basis of all regular reports from the PMC to the World Bank.
- iii. The PIU 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. They 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 PMC will extract lessons from the GRM and conduct an analysis on the overall grievances and share the results with the PIU.

81. World Bank’s Grievance Services (GRS)

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 Somalis office at: somaliaalert@worldbank.org.

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. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

(<http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>). A complaint may be submitted in English or Somali, although additional processing time will be needed for complaints that are not in English. A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA.

9.0. MONITORING, DOCUMENTATION AND REPORTING

9.1. INTRODUCTION

82. Monitoring of the stakeholder engagement process allows the Project to monitor and identify key performance indicators that reflect the objectives of the SEP and the specific actions and time frames. Monitoring the stakeholder engagement activities is important to ensure that consultation and disclosure is fruitful and that stakeholders have been meaningfully consulted throughout the process. Monitoring also allows the Project to improve its strategies through following feedback information acquired from the monitoring and evaluation activities. To monitor and evaluate the stakeholder engagement activities of the Project, the environmental and social management system will be used as the base of that monitoring and evaluation activities.

9.2. SEP ACTIVITIES REQUIRING MONITORING

83. The required outcomes of the stakeholder engagement process are being achieved and provide the opportunity to amend the process where necessary.
- i. Implementation of SEP that includes the update of stakeholder database and issues, as well as documentation of stakeholder engagement activities.
 - ii. Consultation and disclosure activities conducted with all stakeholders.
 - iii. Dissemination of information about Grievance Mechanism .
 - iv. Grievance logging and tracking.
 - v. Effectiveness of grievance management, and the number/ percentage of grievances cases solved.

9.3. PERFORMANCE REVIEW

84. The SEP is expected to be well implemented and performance will be measured against the following measures:
- i. Materials disseminated: type, frequency, and location;
 - ii. Number, place, and time of formal engagement events and level of participation by specific stakeholder categories and groups;
 - iii. Number of comments by issue/ topic and type of stakeholders, and details of feedback provided;
 - iv. Numbers and type of grievances and the nature and timing of their resolution;
 - v. Recording and tracking commitments made to stakeholders; and
 - vi. Community attitudes and perceptions towards the Project-based on and stakeholder feedback.

9.4. REPORTING

85. During SEP implementation, the Environmental and Social Specialist will prepare a quarterly progress report to the PSC. The stakeholder engagement activities and significant changes or updates in the process and upgrade, stakeholder’s concerns, environmental and social issues will be regularly reported and transparently disclosed to public websites. Data reported on will include the above-mentioned information.

Appendix 1: Grievance Information Form

Project Details:

Project/Subproject: Location:

Date: (yyyy/mm/dd)

Place of Registration:

Registration No:

Contact Details of the Complainant:

Name: Age:

Gender: Address:

Phone No:

Email Address:

Location Related to the Complaint / Issue:

Village/Town:

Category of Complainant:

Affected Person

Mediator for the Affected Person

Civil Organization / Service Organization

Other (specify)

.....

Summary of Grievance:

.....
.....
.....
.....
.....
.....

(Attach letter or a petition / document as submitted)

Source of Complaint:

Attachments: 1) _____ 2) _____ 3) _____

Prepared by: Date:(dd/mm/yyyy)

Appendix 2: Complaint Categorizing

S/N	Category	Tick	S/N	Category	Tick
1	General Complaints	<input type="checkbox"/>	14	Safety Issue	<input type="checkbox"/>
2	Exclusion	<input type="checkbox"/>	15	Gender Based Violence (GBV)	<input type="checkbox"/>
3	Lack of Consultations	<input type="checkbox"/>	16	Sexual Abuse and Exploitation and Sexual Harassment (SEA/SH)	<input type="checkbox"/>
4	Insufficient Access	<input type="checkbox"/>	17	Forced labor, including human trafficking and use of prison labor	<input type="checkbox"/>
5	Concerns on strategies and priorities including land acquisition strategy and risks	<input type="checkbox"/>	18	Child labor	<input type="checkbox"/>
6	Property Damage	<input type="checkbox"/>	19	Fairness of contracting	<input type="checkbox"/>
7	Land Acquisition	<input type="checkbox"/>	20	Accident During Material Transport	<input type="checkbox"/>
8	Crop Loss	<input type="checkbox"/>	21	Noise	<input type="checkbox"/>
9	Access Road Blockage	<input type="checkbox"/>	22	Vibration	<input type="checkbox"/>
10	Water Quality and Quantity Loss	<input type="checkbox"/>	23	Air pollution and Dust	<input type="checkbox"/>
11	Soil Erosion and Degradation	<input type="checkbox"/>	24	Smell	<input type="checkbox"/>
12	Forest Loss	<input type="checkbox"/>	25	Flooding	<input type="checkbox"/>
13	Other (specify)	<input type="checkbox"/>	26	Other (specify)	<input type="checkbox"/>

Appendix 3: Meeting Record Format (GRC)

Project/Subproject:

Location:

Date of the Meeting:

Complaint Register No:

Venue of meeting:

Details of Participants

Project/Government	Project/Government

Summary of the Grievance:

.....

Notes on Discussion:

.....

GRC Meeting Decisions /Recommendations:

.....

Issue Solved Unsolved

Name of Meeting Chairperson:

Signature: Date:(DD/MM/YYYY)

Appendix 4: Participants at Stakeholder Consultation Workshops

Screenshot of participants at the meeting and in addition, their names below.

Date: October 11, 2021

No	Name (Original Name)	Institution	Email
1	Dr. Sadiya Siad	Chancellor, Hano Academy	vc@hanoacademy.com
2	Najma Ahmed Hashi	Founder of Nujuum Arts and Freelance Artist	nujuumhashi@gmail.com
3	Sumaya Abdirashid	MOECHE Gender Unit	sumayya.abdirashid@gmail.com
4	Fatuma Mohamed Ali	Founder of Gaari Dumar Center for Women's development.	fatumaa9@hotmail.com
5	Jawahir Hassan Ahmed	Founder of AWOOD	Jaayaa201@gmail.com
6	Shukri Hassan Osman	Lecturer at SNU	umucartasom1976@gmail.com
7	Sara Badri	Founder of SARA Events management	Saraeventsmanagement@gmail.com
8	Hibo Kaahin	Gender mainstreaming expert	hiba.kaahin16@gmail.com
9	Fahmo Hassan	Gender mainstreaming specialist.	fahmahassan@gmail.com
10	Fatima Yusuf Aden	Hano Academy	
11	Fathia Ibrahim Husein	Hano Academy	
12	Qali Ali Omar	Hano Academy	
13	Dr. Hodan Osman	Somali Women Experts For a	drhodanosman@gmail.com

Date: February 7, 2022

No	Name participants	Title	Institution
1	Abdulaziz Nur Mohamed	Director of Tvet and Non-formal Education	MoECHE
2	Hiba Kahin	Senior Gender Advisor	MoECHE
3	Abdirahman Abdulle	Education Project Manager	Adventist Development and Relief Agency (ADRA) Somalia
4	Dahir Shire	Executive Director	Development Action Network
5	Fowziya Isack		
6	Minyu Mugambi	Program Director	Adventist Development and Relief Agency (ADRA) Somalia
7	Mohamed Haji		Comitato Internazionale per lo Sviluppo dei Popoli (CISP)
8	Mukana Harrison		
9	Ibrahim Hassan Mohamed Qorsheeye	Executive Director	MCA-Network/MVTC Network of marginalized and vulnerable groups
10	Mohamed Bishar		
11	Nasra Mohamud	Program Coordinator	Agency for Assistance and Development
12	Mandeq Abukar	Nurse/Safeguards Team	Concern Worldwide
13	Mohamud Sheikh	Executive Director	Iniskoy for Peace and Development Organization (IPDO)
14	Amina Abdikarim		
15	Ayan Said Tukale	GBV Expert	FGS MoF (RCRF)
16	Halima Farah	GRM	PIU Somali Crisis Recovery Project (SCRIP)
17	Mengistu Edo Koricha	Head of Education	Save the Children
18	Jama Ahmed	Project Officer	NADO Organization
19	Burhan Shiil		
20	Abikar Hussein	Director of Programs	Disability Aid Foundation
21	Abukar Mohamed Jimale	Director	HINNA Organization
22	Mohamed Ali	Education Project Officer	Concern Worldwide
23	Osman Muqbil	Project Coordinator	Concern Worldwide
24	Abdullahi Aden		
25	Mohamed Aded Ali	Executive Director	Somalia Non-state Actors (SONSA)
26	Osman Ibrahim Mohamed		Somali Vulnerable Actors
27	Farhia Jama		
28	Jamac Isack	Chairman	MIDNIMO Relief and Development Organization

29	Nur Hassan	Senior Wash Officer	Shabelle Education Umbrella (SHEDU)
30	Nasra Mohamud	Programme Coordinator	Agency for Assistance and Development of Somalia (AADS)
31	Amanda Devercelli	Global Lead for Early Childhood Development/ Program Manager for the Early Learning Partnership	World Bank
32	George Bob Nkulanga	Senior Social Development Specialist	World Bank
33	Ousman Abdullahi Ali	Education Specialist	World Bank
34	Jaafar Mohammad Aman	Social Specialist	World Bank
35	Shair Ibrahim	GBV Consultant	World Bank
36	Abdirahman Zeila	Senior Environmental Specialist	World Bank
37	Zahra Mohamed	Social Risk Management Consultant	World Bank