

FEDERAL GOVERNMENT OF SOMALIA



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

**UPDATED STAKEHOLDER ENGAGEMENT PLAN (SEP) FOR THE RESTRUCTURED
PROJECT**

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

JUNE, 2026

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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

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)¹. 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 There is no publicly available data after 2020

² 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).

³ 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

- Strengthen management capacities and systems at federal and state levels, including improving fiduciary mechanisms and increasing budget allocations to the education sector.
- Support learners and strengthen societal resilience among communities affected by natural disasters and conflict.
- 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.
- Improve the quality of learning outcomes, especially at early grade levels, and to ensure the market relevance of learning opportunities.

⁴ 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

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**

- The primary objective of Component 1 is to empower adolescent girls and women by equipping them with essential skills that enhance their ability to participate effectively in social and economic activities. These skills include basic literacy and numeracy, socioemotional and life skills, and foundational vocational competencies. By addressing these areas, the component aims to improve livelihoods and create pathways for sustainable economic participation. Specific sectors for support will be guided by demand and labour dynamics and in consultation with regional authorities, existing institutions, civil society and employers.

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Component 1 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 Technical and Vocational Education and Training (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.

Target Beneficiary Groups: The program is structured around two primary groups of beneficiaries. Based on initial consultations with key stakeholders, there was an Official Use Only agreement to adjust the original target beneficiaries under both groups. Group 1, which comprises girls and women who lack functional skills in literacy and numeracy, was adjusted to target 24,000 individuals (from original target of 30,000). Group 2, which consists of girls and women who

already have basic literacy and numeracy skills, will target about 13,000 beneficiaries (increased from 3000 original). Similarly, the target for beneficiaries with disability was also adjusted to reflect realism of implementation. By clearly defining these groups, the program aims to address diverse educational and skills needs within the population.

Implementation Progress - FGS: The FGS, in collaboration with the above-mentioned four FMSs and the BRA, has made significant strides in enhancing public sector service delivery capacity. Developed and piloted models that are not only effective in their current scope but are also designed for potential expansion in the future. –

- **TVET courses:** A key achievement in this process has been the review, harmonization, and formal endorsement of eighteen TVET courses by MoECHE. These courses span a wide range of disciplines, ensuring that comprehensive skills development is accessible to a broad segment of the population.
- **PIP Selection and Evaluation:** The selection process for Project Implementing Partners (PIPs) are progressing in three FMSs including Galmudug, Jubbaland, and Southwest—as well as Banadir. The process is currently at negotiations stage for these FMSs and Banadir. In the context of Hirshabelle, progress has been comparatively slower than in other member states – currently at evaluation stage. Nevertheless, the program continues to move forward, with its commencement scheduled for March 2026.
- **The courses in FGS consist of:** Numeracy G1 & G2, Literacy G1 & G2, Somali G1 & G2, Reproductive Health (G1, G2), Climate Change, Digital Literacy, Financial Literacy, Veterinary G1 & G2, Bee Keeping, Carpentry, Childcare, Cooking and Catering, Electricity, Fishing, Hospitality, Interior Design, Mobile Computer and Repairing, Secretarial, Smart Agriculture, Tailoring. Official Use Only - 10 percent pilot through the public government TVET centers: Concurrently, the design phase for the government pilot has been completed. Preparations for enrollment are underway, the public TVET centers identified, and the launch of this pilot program is anticipated for January 2026.
- **10 percent pilot through the public government TVET centers:** Concurrently, the design phase for the government pilot has been completed. Preparations for enrollment are underway, the public TVET centers identified, and the launch of this pilot program is anticipated for January 2025.

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.

Subcomponent 2.1 Women’s Development Centers (WDCs)

- **Current Scope and Design:** The current approach to Subcomponent 2.1 focuses on enhancing women’s participation in higher education (HE) through targeted scholarship programs. These initiatives are designed to support young women who have completed secondary education and are ready to pursue post-secondary studies, as well as working women seeking advancement in their professional careers.
- **Diploma Scholarship Programs:** The program will offer Diploma scholarships in Education, Health Sciences (Midwifery, Nursing), and Administration. These scholarships are provided in collaboration with 28 higher education institutions (HEIs), including 25 in the Federal Government of Somalia (FGS) and 4 in Somaliland. The target is to reach 3,500 beneficiaries. The primary focus is on supporting young women who have completed secondary education and are prepared to continue their studies at the post-secondary level. Selection for these scholarships is based on a competitive process.
- **Master’s Scholarship Programs:** In addition to diploma scholarships, the program will provide Master’s scholarships with a target of 250 beneficiaries. The intended recipients are women working in both the public and private sectors who have not had the opportunity to move into high leadership positions. The master’s program is designed to offer these women the chance to pursue further academic qualifications in priority fields that align with national strategies. The program will be delivered collaboratively, with Kenyatta University serving as the lead institution and Somali National University as the host institution, under the oversight of a joint technical committee. All the FMSs including Puntland will benefit from the program. Given the limited budget allocated to Somaliland, it will not benefit from the master’s program.

- **Subcomponent 2.2 Consortium of Autonomous Women’s Colleges**

- **Current Scope and Design:** The implementation of the subcomponent through the consortium of autonomous women’s colleges was dependent on the successful establishment of WDCs under Subcomponent 2.1. Due to the lack of autonomous women’s colleges nationally, project delays, limited timeframes, and budgetary constraints, it proved unfeasible to establish WDCs within the project period. Consequently, a strategic adjustment was applied to sustain momentum towards the PDO. This subcomponent focuses on empowering women by preparing them for leadership positions through a dedicated leadership program. The program aims to benefit a total of 2,000 women, enhancing their skills and readiness for roles of influence and decision making. To deliver the program effectively, procurement of two firms or institutions is planned. These organizations will be responsible for designing and conducting leadership training. Only FGS will benefit from the Leadership program given the limited budget allocated to Somaliland. However, it has been agreed that all the Somaliland programs will include simplified modules on leadership to enhance the employability and interpersonal skills of the beneficiaries across the programs.
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• **Component 3: Systems Strengthening, Technical Assistance and Project Management**

- Component 3 aims to strengthen the education sector by supporting the National Commission of Higher Education and TVET in developing strategic plans, policies, accreditation, and quality assurance frameworks for 2025–2030. Efforts focus on aligning accreditation with regional and international standards, enhancing data systems (HEMIS and TVET-MIS), and advancing diagnostics and policy development. 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;
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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:
 - Change in basic proficiency rates in literacy and numeracy in the targeted population of second chance programs (*percentage, disaggregated by gender*).
 - Beneficiaries obtaining a skills qualification related to labor market needs or livelihood (*number, disaggregated by gender*).

Female graduates of scholarship programmes-Diploma, Master and leadership programmes (cumulative, disaggregated by disability status).

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 includes (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.
10. Although the project was initially designed for implementation in two target districts and one replacement district, it became evident during the implementation phase that expanding the geographical coverage was necessary to achieve the project objectives. Consequently, the number of target districts across the Federal Member States (FMS) increased from 14 to 38, following the identification and inclusion of an additional 24 districts, as indicated in table 1. All newly selected districts were screened and found to meet the selection criteria outlined above.

Table 1: Component 10% and PIPS initial and additional target districts

STATE/REGION	INITIAL DISTRICTS	ADDITIONAL DISTRICTS
BRA	WADAJIR	DAYNILE
	HAWL-WADAG	HELIWAA
	YAQSHID	HODAN
		KAARAN
		KAHDA
		WAABARI
GSS	ADADO	BALANBALE
	ABUDWAK	BANDIRADLEY
	GALKACYO	GURIEL
		XERALE
		DHUSAMAREB
HSS	JALALAQSI	BALCAD
	WARSHEEKH	BELEDWEYNE
	MAHADAY	JOWHAR
JSS	KISMAYO	AFMADOW
	LUQ	BARDHERE
	DOLLOW	BELED-HAWO
		DHOBLEY
		Garboharey
southwest	Baidoa	Marka
	AFGOYE	Wajid
		BERDAALE
		BARAWE
		BURHAKABA
TOTAL	14	24
Total		38

11. 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.
12. Following the restructuring of the project, the construction component was discontinued due to financial and schedular constraints. In its place, existing universities were engaged to deliver educational services to women, rather than establishing a dedicated women’s college. As a result, the removal of the construction activities significantly reduced environmental risks, lowering the project’s overall environmental risk rating. Nevertheless, social risks, including gender-based violence (GBV) and security, remain significant, and therefore the overall social risk rating continues to be classified as high.
13. The project contributes to the strengthening of women’s empowerment, not just among the immediate beneficiaries, but also indirectly to the society at large, and has shown positive social outcomes on peace processes and institutional building. 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); (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..
14. To safeguard above social, GBV and security risk, the project is staffed with a full-time environmental specialist, social specialist, GBV specialist and security specialist. The project has also recruited GBV officers at the FMS level. During the reporting period, the project undertook E&S induction training including security training, universities supervision mission and E&S capacity building training to universities supported by the project and student orientation on GRM uptake channels. The project has GRM Manual that explains grievance categories, grievance procedures as well as how the grievances are logged, investigated, resolved and fed back to the complainant. The Project has fully functional GRM system and various uptake channels including email, hotline and in-person receipt of complaints and GRM focal points and suggestion boxes at the universities. To date, a total of 92

3.0. STAKEHOLDER ENGAGEMENT PLAN (SEP)

3.1. PURPOSE OF THE SEP

15. The Stakeholder Engagement Plan (SEP) seeks to define a structured, purposeful, genuine, and culturally appropriate approach to consultation and information disclosure. This SEP has been prepared and is periodically updated in accordance with ESS10 of the World Bank’s Environmental and Social Framework (ESF). 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 SEP. It is with this in mind that this SEP has been developed.
16. This plan helps 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.
17. Overall, this SEP serves the following purposes:
 - Identify and analyze different stakeholders at different levels.
 - Plan engagement modalities by use of effective communication tools for consultations and disclosure.
 - Define the role and responsibilities of different actors in implementing the SEP.
 - Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings.
 - Establish a grievance redress mechanism (GRM) for the project.
 - Outline platforms for stakeholders to influence decisions regarding the project.
 - Outline project information dissemination modalities including differentiated considerations for inclusion of poor and vulnerable populations.
 - 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

18. 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.

19. The project engaged with a large and diverse array of stakeholders during planning and continues to do so during implementation. The FGS and the participating FMS are responsible for project implementation and management, together with contracted implementation partners, who 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.— are 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—are also engaged as private universities were contracted to provide education services to women . Relationships with existing non-government actors—including UN agencies, NGOs, and private sector organizations— are enhanced to ensure the project leverages the activities of the agencies within the education sector in Somalia
20. The process of stakeholder engagement involves 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.
21. The Government engages 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 are all-inclusive reflecting the nature and scale of the project, including the need for meaningful consultations with women, youth, and marginalized groups.
22. As part of project preparation on the 7th 2022, the Government undertook a Stakeholder Engagement Analysis which aimed 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.

Special consideration has been taken to ensure that women, youth, minority groups, and persons living with disabilities are 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, have also been engaged as indicated in the table below.

Table 2: Stakeholder Engagement and Consultation Workshops During Implementation Phase

The government of Somalia maintains and discloses as part of the E&S compliance, 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 (see table below for this information). The details of the engagement consultation participant lists and their photos are also provided in Annex 6.

Place and Date	Type of Consultation	Stakeholders Consulted	Issues discussed
Southwest Contracted Universities, Biodoba, August, 2025.	Face-to-face meetings with higher education institutions and Diploma scholarship students regarding training based on Safeguards issues including GBV, GRM, female WASH facilities, student support and welfare provisions.	- Southwest MoE Director General and higher education director, 2 Contracted Higher Education Institutions' leadership, student affairs managers, lecturers and Rajo Kaaba project focalpoint in each university. - Successful diploma scholarship students.	- Discussion on the importance of compliance with environmental and social safeguards commitments under World Bank-financed projects, including the responsibilities of contracted universities in ensuring adherence to applicable safeguards requirements. - Induction and orientation of contracted universities on the project's Environmental and Social (E&S) instruments and safeguards requirements, including the Grievance Redress Mechanism (GRM), Labour Management Procedures (LMP), Stakeholder Engagement Plan (SEP), Gender-Based Violence (GBV) prevention and response measures, and other relevant safeguards obligations.
Galmudug State Contracted Universities, Dhusamareb, August, 2025.	Phase-to-phase meetings with higher education institutions and Diploma scholarship students regarding Safeguards issues including GBV, GRM, female WASH facilities, student support and welfare provisions.	- Galmudug MoE Director General and higher education director, 6 Contracted Higher Education Institutions' leadership, student affairs managers, lecturers and Rajo Kaaba project focalpoint in each university. - Successful diploma scholarship students.	- Emphasis on the importance of establishing accessible Grievance Redress Mechanism (GRM) uptake channels, ensuring their effective dissemination and visibility across university premises, and establishing Grievance Redress Committees (GRCs) to receive, manage, and resolve grievances raised by Rajo Kaaba scholarship beneficiaries and other project stakeholders. - Awareness-raising and capacity-building on the potential sources of grievances within higher education institutions, including disputes relating to grade allocation and assessment outcomes, lecturer–student conflicts, student–student conflicts, discrimination, and GBV/SEA/SH-related incidents, among other concerns. - Discussion on the benefits of maintaining an effective, accessible, and functional GRM, including its role in protecting institutional reputation, strengthening student confidence, enhancing stakeholder trust, and promoting accountability and transparency within participating universities. - Emphasis on the importance of student support and welfare services, including the provision of gender-

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Place and Date	Type of Consultation	Stakeholders Consulted	Issues discussed
			sensitive support mechanisms, a safe and conducive learning environment, and adequate gender-segregated Water, Sanitation and Hygiene (WASH) facilities to support the wellbeing and academic success of students. • Encouragement of the enrollment and inclusion of students from marginalized and underserved communities, particularly minority groups identified in the Stakeholder Engagement Plan (SEP), including Reer Xamar/Baravane, Somali Bantu (Gareer Weyne), Bajuni, and Gaboye communities, to promote equitable access to educational opportunities. • Reinforcement of the importance of fulfilling contractual obligations relating to programme delivery and curriculum implementation, including adherence to approved curricula and the provision of practical training components. Participating universities were encouraged to ensure that Health Sciences students are placed in appropriate healthcare centres and hospitals, and that Education students are placed in schools, to enable them to acquire the practical skills and experience required for successful completion of their studies.
BRA Contracted Universities, Mogadishu, September, 2025	• Phase-to-phase meetings with higher education institutions and Diploma scholarship students regarding Safeguards issues including GBV, GRM, female WASH facilities, student support and welfare provisions.	• BRA Education Directorate, Director General • 9 Contracted Higher Education Institutions’ leadership, student affairs managers, lecturers and Rajo Kaaba project focalpoint in each university. • Successful diploma scholarship students.	
Hirshabelle State Contracted Universities, Beltweyne and Jowhar, Oct, 2025.	• Phase-to-phase meetings with higher education institutions and Diploma scholarship students regarding Safeguards issues including GBV, GRM, female WASH facilities, student support and welfare provisions.	• Hirshabelle MoE Director General and higher education director, • 5 Contracted Higher Education Institutions’ leadership, student affairs managers, lecturers and Rajo Kaaba project focalpoint in each university. • Successful diploma	

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Place and Date	Type of Consultation	Stakeholders Consulted	Issues discussed
		scholarship students.	
Jubbaland State Contracted Universities, Kismayo.	Phase-to-phase meetings with higher education institutions and Diploma scholarship students regarding Safeguards issues including GBV, GRM, female WASH facilities, student support and welfare provisions.	- Jubbaland MoE Director General and higher education director, 2 Contracted Higher Education Institutions’ leadership, student affairs managers, lecturers and Rajo Kaaba project focalpoint in each university. - Successful diploma scholarship students.	
National Stakeholder Engagement Workshop, Mogadishu, April, 2026	National Stakeholder Consultation Workshop bringing together diverse influential partners operating in social sector.	- Numerous UN and INGOs partners working in education sector. - Women and Youth local NGOs contributing to the employability programmes. - Private companies working in different sectors aligned to the Project’s TVET skills. - Officials from the Office of the Prime Minister (OPM) and related Ministries. - Safeguards Practitioners from Somali Bank Portfolio	- Dissemination of project information, including the geographical areas in which the project will operate and the categories of beneficiaries it is expected to reach. - Discussion on the importance of collaboration among implementing partners to maximize the project’s positive impact and expand its reach to intended beneficiaries. - Emphasis on the importance of collaboration with local NGOs and other development partners to complement one another’s interventions and minimize duplication of programmes and resources. - Dissemination of the project’s environmental and social safeguards compliance commitments and the requirements applicable to all contractors, suppliers, and implementing partners. - Discussion on the importance of private sector engagement and awareness-raising among private companies to enhance recognition and uptake of the skills developed through the project’s TVET programmes. - Examination of the role that local NGOs can play in aligning their employability and livelihood mentoring programmes with the skills and competencies being developed through the project’s TVET interventions.
Contracted INGOs for Component 1, Mogadishu, May, 2026	Induction Workshop for INGOs implementing Component 1	- Windle International operating in Galmudug State. - Alight implementing Component 1 in both Jubbaland and Southwest States. - WARDI Relief and	As the contracted INGOs primarily operate in urban and peri-urban areas, they were encouraged to implement the project’s Inclusion Plan and ensure the effective targeting and participation of marginalized and underserved communities, particularly the minority groups identified in the project’s Stakeholder Engagement Plan (SEP).

Place and Date	Type of Consultation	Stakeholders Consulted	Issues discussed
		Development Initiative operating in BRA.	- Emphasis was placed on the importance of ensuring that all participating TVET centres provide a safe learning environment. Contracted INGOs were encouraged to undertake safeguards assessments and ensure that Occupational Health and Safety (OHS) reports are prepared and regularly monitored. - Discussion on the importance of fulfilling the project’s safeguards commitments, including implementation of the Inclusion Plan, adherence to labour and community health and safety requirements, and the application of Gender-Based Violence (GBV) risk mitigation measures. - Emphasis on the importance of student welfare and support services to promote student retention, wellbeing, and the successful completion of education and skills development programmes. - Emphasis on the establishment of accessible and functional Grievance Redress Mechanism (GRM) uptake channels, ensuring their effective dissemination and visibility across TVET Centres’ premises, and the formation of Grievance Redress Committees (GRCs) to receive, manage, and resolve grievances raised by Rajo Kaaba Component 1 beneficiaries and other project stakeholders in a timely and transparent manner.

3.3 STAKEHOLDER MAPPING AND ANALYSIS

23. 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. Other key stakeholders include public and private TVET centres delivering the selected occupational skills programmes, their instructors, and the international NGO implementing partners responsible for delivering the overall outputs under Component 1. With respect to Component 2, following the restructuring of the project,

approximately 24 existing universities were contracted to deliver diploma scholarship programmes targeting nearly 3,000 female students pursuing studies in Health Sciences and Education.

Table3. : Project-Affected Parties

No	Stakeholders	Description	Area of interest
1	Somali citizens, especially women and girls in youth age period.	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. 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. 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.	- 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.	- 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.

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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.	- 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 higher education institutions for purposes of higher education provisions and the second chance and life skills training in TVET Centres.
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.	- 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 contracted universities	The schools and TVET institutions will partly host the NFE trainings and the life skills training; the existing universities will host the women's higher education pursuit.	- 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 implementing Component 1.	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. The INGOs was contracted as Project Implementing Partners (PIPs) for TVET skills as well as NFE education to maximise project objectives.	- 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. - Somali women participating in higher education that may lead

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			hold leadership roles.

- **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 4 : 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.	- 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.
Other Ministries: Ministry of Finance (MoF) Ministry of Labor and Social Affairs, (MoLSA) Ministry of Public Works, Reconstruction and Housing (MoPWRH) Ministry of Women and Human Rights (MoWHR) Directorate of the Environment and Climate Change (DECC) Office of the Prime Minister	The other Ministries will be involved in as far as the implementation of specific activities and linkages with ongoing interventions: Labor and Social Affairs providing policy direction and guidance on all labor administration, particularly areas of protection and development of the labor force. Interior and Federal Affairs ensure security of project workers and investments. Women and Human Rights, ensure women representation and safeguard the human rights. Directorate of the Environment and Climate Change is standard-bearer institutional for environmental risk management for the project environment.	• 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.	• 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.	• 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.	• 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.

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:

- legislation, policies, and other legal frameworks on the education sector in Somalia.
- 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) (2022 – 2026)** 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:

- Resilience and education in emergency (EiE)
- Early childhood care and education (ECCE)
- Primary education
- Secondary education
- Alternatives to basic education (ABE)
- 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 Environment 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
- Every person has the right of access to information held by the state.
 - 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.
 - 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 Standard (ESS) for Stakeholder Engagement is ESS10: Stakeholder Engagement and Information Disclosure, which recognizes the importance of open and meaningful 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:

- Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them.
- Assess stakeholder interests and support for the project and enable stakeholders’ views to be taken into account in project design.
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle.
- 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:

- 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.
- 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.
- 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.
- 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.
- 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. STAKEHOLDER ENGAGEMENT

5.1. PRINCIPLES OF STAKEHOLDER ENGAGEMENT

34. 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.

5.2. STAKEHOLDER ENGAGEMENT ACTIVITIES

35. The project interventions are countrywide. Therefore, the project stakeholder engagement activities need to be streamed horizontally and vertically.

36. 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 8 below presents the stakeholder engagement matrix s for 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	- CSOs - NGOs - CECs - Communities	- Public announcements - Face-to-face consultation meetings) - 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	- CSOs, - Affected groups (IDPs, pastoralist / nomadic communities) - Community leaders/elders/ women leaders - Key informants	- Public announcements - Face-to-face consultation meetings - 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	- Would-be affected individuals and groups - Locally based CSOs/NGOs - Contracted Universities - Community leaders/elders/ women leaders - Key informants	- 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 received from contracted universities, TVET Centres, etc.
Social Assessment (SA)	PMC (social safeguards specialist) Consultants GBV/SEA specialist	Adversely affected individuals, households, and groups including diploma, TVET skills, and NFE students	- 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	- Disadvantaged and vulnerable groups - Community leaders/elders/ women leaders and other stakeholders	- Committees (formal or informal)	Implementation of the Inclusion Plan and the SEP.
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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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5.3. INFORMATION DISCLOSURE

37. 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.
- 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.

5.4. INFORMATION DISCLOSURE PROCEDURES

The table below outlines project artefacts that have been disclosed on the project website and how this was 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 (https://moe.gov.so/en/reports/) and WBG, with summary of SEP and ESCP	All key stakeholders	PMU/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 PMU/PMC - WBG Team - Implementing Partners
During Implementation			

, ESCP, GRM Manual, SEAH Prevention and Response Action plan.	- MoECHE Website - Local administration offices. - project social media platforms, toll-free numbers. - 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	- The official website of the Ministry of Education - Stakeholder consultation meetings - Print, audio and visual media outlets, - GRM uptake channels - toll-free numbers, emails and suggestion boxes across universities	Key stakeholders and project beneficiaries at FGS and FMS level including vulnerable groups or their representatives	- PMU/PIU - PMC - PSC

5.5. INCLUSION PLAN

Imperative for the Inclusion Plan

38. 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.
39. The project takes special measures to ensure that members of disadvantaged and marginalized groups have an equal opportunity to contribute positive outputs. This includes 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 reflects and promote diversity (see Labor Management Procedures [LMP] and Environment and Social Management Framework [ESMF]). For example, the current female employee of the project is third of the overall project staff consisting of about 40 staff.
40. =There are number of measures that project team adopted to address barriers to disadvantaged and vulnerable groups participating in and benefiting from project services. Measures adopted included

training of service providers including contracted universities, TVET centres and NFE schools, as well as education staff on the need to promote inclusion and diversity in staffing. Physical measures, such as ramps and rails are available in all facilities used by the project implementing partners whilst also ensuring that information is presented in accessible formats including sign language and braille. The project implementing partners ensure access to separate and culturally appropriate facilities for males and females in the TVET and higher education facilities supported by the project.

41. There are social, economic and physical barriers that prevent disadvantaged and vulnerable individuals and groups from participating in projects, which include lack of financial resource, 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. To address the exclusion of women with disabilities, the project allocated 10% of all targeted beneficiaries to students with disabilities. This provision applies across both Component 1—covering TVET skills development and the Non-Formal Education (NFE) sector—and Component 2, which includes higher education and leadership skills development programmes. All implementing partners are required to meet this target and are expected to adopt targeted outreach approaches that prioritize the inclusion and participation of women with disabilities. 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 ensures 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. The PIU team ensures that both men and women are involved in consultations and all the other aspects related to access to project benefits.

Engaging disadvantaged, minorities and vulnerable groups

42. The project promotes inclusion of disadvantaged and vulnerable groups by ensuring their involvement in consultations in the sub-project design.. 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.
43. Stakeholder and community engagement have been key in the sensitization of community level structures and means by which complaints and grievances related to the project was 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.
44. The participation of disadvantaged and vulnerable groups in the selection, design and implementation of project activities largely determined the success of this Inclusion Plan. Where

adverse impacts were likely, the project implementing teams at both FGS and FMS levels undertook 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 were to:

- a. Understand the operational structures in the respective communities.

Seek input and feedback to avoid or minimize the potential adverse impacts associated with the planned project interventions. Identify culturally appropriate impact mitigation measures.

45. Consultations were carried out broadly in two stages. First, prior to the commencement of any project activity, the MoECHE arranged 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 have been continuous stakeholder engagement that ensured the active involvement of disadvantaged and vulnerable groups as part of overall project monitoring.
47. The Ministry of Education:
 - Facilitated broad participation of disadvantaged and vulnerable individuals and groups with adequate gender and generational representation, community elders/leaders, religious leaders, and CBOs.
 - Provided the disadvantaged and vulnerable individuals and groups with all relevant information about the project including on potential adverse impacts.
 - Ensured communication methods are appropriate given the low level of literacy, local dialects and communication challenges for PWDs.
 - Organized and conduct the consultations in forms that ensure free expression of their views and preferences.
 - Documented 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.
 - Shared any input/feedback offered by the target populations.
 - Provide an account of the conditions agreed with the people consulted.
46. The disadvantaged and vulnerable individuals and groups were identified in the project area, the provisions in this Inclusion Plan ensured mitigation measures of any adverse impacts of the project were implemented in a timely manner. The project ensured benefits to the disadvantaged and vulnerable by ascertaining that they were consulted, and always have an accessible and trusted GM to channel the complaints they might have on the project.
47. The project team in different levels ensured that the process does not marginalize , women and other vulnerable groups, representation for these groups were captured in the grievance committee (GC) tasked to resolve grievances/complaints at the community level.
48. The following issues are being 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, such as PIPs implementing Component 1 and the contracted higher education institutions implementing Component 2. .

- 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.
- Project team ensured appropriate budgetary allocation of resources for this Inclusion Plan was allocated to ensure that the engagement of marginalized communities are maintained and consulted with them regularly.
- Provision of technical assistance for sustaining the activities addressing the needs of the disadvantaged and vulnerable individuals and groups are always available to the implementing as well as project workers.

Snapshots of the Minorities and the Disadvantaged Groups in Somalia

49. There are some minority and disadvantaged groups spread around the country. Nevertheless, some of these communities reside around the project implementation areas, especially Component 1 target districts. As outlined below, PIPs were instructed to ensure that at least 10% of enrolled students are drawn from minority communities and that their participation is appropriately captured and categorized within enrollment and monitoring tools. The minority groups include the following:

- Somali Bantu (in the south-central regions),
- Rer-Xamar and Baravnese (in Benadir and coastal regions),
- Bajuni (in the coastal areas), and
- Gaboye, Tumul, Yibir and Galagala grouping (in central regions as well as in the north, especially in the NW forest ecosystems).

50. Other disadvantaged groups in the country include the following:

- Internally Displaced Peoples (IDPs),
- People who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities,
- Urban poor,
- Nomadic pastoralist communities,
- Persons living with disabilities (PWDs),
- Female-headed households,
- Orphans and unaccompanied minors, and
- Elderly persons.

51. The FGS and FMS project teams have undertaken several measures to ensure the inclusion and prioritization of students from marginalized communities during the student enrolment process. Under Component 1, which is implemented through INGO implementing partners, partners were oriented and instructed to prioritize minority and marginalized groups in the enrolment of beneficiaries for literacy, numeracy, and TVET skills development programmes. As implementing partners are currently conducting student enrolment and have been guided to prioritize these groups,

it is expected that marginalized students will be adequately represented within the Component 1 target beneficiaries.

52. With regard to Component 2, which is primarily implemented through contracted universities, the universities received training and orientation on the inclusion of marginalized and minority groups. They were encouraged to undertake targeted outreach activities, including visits to areas where marginalized communities reside, to improve access and participation. In addition, FGS and FMS project teams disseminated information on Component 2 through social media platforms and Ministry websites to maximize outreach to these groups. Project staff also conducted visits to contracted universities to strengthen awareness of the project's inclusion strategy and emphasize the importance of reaching marginalized students.

54. The project has therefore, given special consideration to disadvantaged groups and learning from the best practices.

6.0. SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1. CONSULTATIONS PRIOR TO THIS SEP

55. 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.
56. 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.
57. 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 have been held during project initiation is described in the table below.

Table 7 : Summary of stakeholder consultations undertaken under the aegis of the Somalia Empowering Women through Education and Skills Project in Somalia

Consultation Meeting Held during Project Initiation (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.	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.	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 inductive 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.

		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	Activities to be incorporated into second chance programs to help ensure girl's retention and completion once enrolled.	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.

		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.	Second-chance education programs that: 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.	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.	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.	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: 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.	a) Conducting a market assessment and basing their programming on the actual needs and trends in the society they are serving. 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.
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Table 8: Consultation Meeting Held during Project initiation on (7th February 2022)

No	Issues	Response
1	Discussions on the environmental and social risks likely to be faced by the project and how to mitigate them.	Executive summaries of all project's ESF documents to be translated into Somali language. The necessity of Including the disabled persons and vulnerable communities such as IDPs and returnees. The role played by the rural women and how the participation in the project will help them. The need to Include and support to girl school dropouts.
2	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.
3	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 urban populations. And they will be keen to see key environmental issues addressed.
4	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.

5	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.
6	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.
7	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.
8	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.
9	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.
10	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.
11	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.
12	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.
13	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.
14.	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.

6.2. Summary of Planned Stakeholder Engagement Activities

There are a number of planned stakeholder engagement activities, particularly under Component 1, which is implemented by PIPs and requires meaningful engagement with local communities, learners, TVET and NFE Centre instructors, and managers. It is vital to ensure that both implementing partners and beneficiaries understand not only the E&S compliance commitments but also the operationalisation of effective GRM procedures across all project settings. Moreover, as Member State governments are implementing 10% of Component 1 activities, the E&S team will equally assess the TVET and NFE centres utilized by PIPs and government-supported centres to ensure that occupational health and safety risks are identified, managed, and appropriately mitigated.

Table 9. Summary of planned stakeholder engagement activities

No	Issues	Response
1.	Discussions with PIPs, TVET and NFE Centres Managers and Instructors on the environmental and social risks likely to be faced by the project and how to mitigate them.	Disseminating information about the E&S risk and how to mitigate them. The lot of emphasis will be given the role that local community will play in the success of this project including inclusion of the marginalized communities' and the prevention any social conflicts arising from project benefits.
2.	Discussion on how to support women to enroll these courses and complete successfully.	• The project beneficiaries will be informed the financial allowance they will obtain for transportation to facilitate regular attendance. • Provisions of regular advice and guidance for these learners since they may not possess prior formal education. • All information sharing will be delivered in Somali language.
3.	Operationalisation of effective GRM and dissemination of project information across TVET and NFE Centres by Centres' Managers and Instructors.	PIU/PMU team to train PIPs focalpoints, TVET and NFE Centre managers and instructors to ensure that they create GRM focalpoints for all centres and disseminate project uptake channels in Somali language.
4.	Discussions on the marginalization of minority communities.	The risks that that prioritised during stakeholder engagement include the exclusion of marginalized communities. PIU/PMU team will provide marginalized communities' that mentioned in this document and the specific outreach approaches that will be utilized to ensure proper representation of minority groups is achieved.

7.0. IMPLEMENTATION ARRANGEMENTS

7.1. IMPLEMENTATION ARRANGEMENTS FOR THE PROJECT

58. During the project restructuring phase, it was agreed that Component 1 would be delivered through the following implementation arrangements:

- **Project Implementing Partners (PIPs):** International Non-Governmental Organizations (INGOs) were contracted to deliver 90% of the Component 1 beneficiary targets. These implementing partners are currently undertaking student enrolment, including the inclusion of minority groups and students with disabilities. The PIPs are expected to reach over 35,000 project beneficiaries, primarily through literacy and numeracy programmes, while a significant proportion of beneficiaries will also receive TVET skills training in selected occupations.
- **10% Pilot through Public TVET Centres:** A pilot initiative was established through public government TVET centres to ensure that public institutions and instructors directly benefit from the project. The pilot is also intended to strengthen government service delivery capacity and support the development of TVET occupational curricula.

59. Regarding Component 2, the programme was fully restructured and designed to be delivered through both national and regional higher education institutions:

- **National Universities - Diploma Scholarship Programs:** The program will offer Diploma scholarships in Education, Health Sciences (Midwifery, Nursing), and Administration. These scholarships are provided in collaboration with 28 higher education institutions (HEIs), including 25 in the Federal Government of Somalia (FGS) and 4 in Somaliland. The target is to reach 3,500 beneficiaries. The primary focus is on supporting young women who have completed secondary education and are prepared to continue their studies at the post-secondary level. Selection for these scholarships is based on a competitive process.
- **Regional University - Master's Scholarship Programs:** In addition to diploma scholarships, the program will provide Master's scholarships with a target of 250 beneficiaries. The intended recipients are women working in both the public and private sectors who have not had the opportunity to move into high leadership positions. The master's programme is designed to offer these women the chance to pursue further academic qualifications in priority fields that align with national strategies. The program will be delivered collaboratively, with Kenyatta University serving as the lead institution and Somali National University as the host institution, under the oversight of a joint technical committee. All the FMSs including Puntland will benefit from the program. Given the limited budget allocated to Somaliland, it will not benefit from the master's program.

7.2. STAKEHOLDER COMMUNICATION ENGAGEMENT METHODS

60. Suitable ways of communicating were developed using the Somali language where appropriate to improve project perception, design, implementation and contribute 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.
61. The following is a summary of some of the methods of engagement applied with the project stakeholders, and the responsible entity.
- **Community Meetings:** The PIU, with PMU GBV, environmental and social specialists, organized 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 were organized prior to the commencement of the project implementation phase. .
 - **Digital Communication:** The PIU, with PMU GBV, environmental and social specialists, also organized project engagements using digital tools such as email distributions and toll-free numbers for comments, WhatsApp, SMS,.
 - **IEC materials /Mass Media:** There are two main methods of media employed during project stakeholder engagement. Firstly, PIU, accompanied by the social, GBV and environmental specialists, developed Information, Education and Communication (IEC) materials that were written in Somali language and disseminated to all project-affected people. Secondly, project information was disseminated through project social media pages and websites of the Ministries to maximise the visibility and reach of project.
 - **Training and Workshops:** Number of trainings were provided to the MoECHE staff, PIU, FMS MoE staff, contracted universities on a variety of project related issues such as project targeting, GBV, SEA, disability and inclusion, GRM and the project’s safeguards instruments.
 - **Grievance Redress Mechanism:** In compliance with the World Bank’s ESS10 requirement, a specific grievance mechanism was set up for the project. Accurate communication materials for the GRM were developed to help project-affected people to familiarize themselves with the grievance redress channels and procedures. The PIU within the Ministry of Education implemented a grievance mechanism to ensure that it is responsive to any concerns and complaints, particularly from project-affected parties and communities.

7.3. BUDGET

The Ministry of Education set aside a dedicated budget of US\$,250, 000 for the implementation of this SEP at the remaining of the project. The budget is being 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 GRM uptake channels, development of IEC materials, cost of training and workshops and travel and expense of project workers travelling in different regions. , study outputs, environmental and social instruments in a manner that is easily accessible and culturally appropriate. An indicative budget is included below (*see Table 5*)

Table 10: Budget for implementing the Stakeholder Engagement Plan for the Somalia Empowering Women through Education and Skills Project

ITEM	INDICATIVE COST (\$)
FM radio press conferences and call ins (one per year at FGS and FMS levels), FM radio	\$30,000
Communication Materials for the Project implementation Phase	\$20,000
Stakeholder consultation and feedback meeting (one in each FMS and FGS)	\$20,000
Trainings of all staff and contractors on GM	\$ 70,000
Maintaining Project GRM uptake channels across member States	\$30,000
Operational Costs for Stakeholder Engagements (Travel, Logistic Support, Security, Transportation & Accommodation)	\$150,000
Monitoring the SEP	\$ 30,000
Total Budget	\$ 250, 000

8.0. GRIEVANCE REDRESS MECHANISM (GRM)

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 helps the Project to respond to concerns and grievances of project-affected parties related to the performance of the project activities. The Project provided mechanisms to receive and facilitate resolutions to such concerns.
63. Transparency and accountability is a 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 aides 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 operates in addition to SEAH Prevention and Response Action Plan, which includes reporting and referral guidelines (there is a stand-alone SEAH Prevention and Response Action Plan developed for this project). The GRM also operates in addition to specific workers’ GRMs, which are laid out in the LMP and includes 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. The types grievances received and resolved so far include:
- Fairness of contracting from Consultant Firms;
 - Project workers’ rights;
 - Diploma students complaints;
 - Lack of scholarship place.
 - Delayed allowance payment
 - Transfer to another course/university
 - Master Students Complaints
 - Master scholarship selection process
 - Master student logistical arrangement during face-to-face learning

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.

66. The MoECHE has 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 Officers in the FMSs acknowledges, logs, forwards, follows up grievance resolution and informs the complainant of the outcome. The complainant has the right to remain anonymous. Thus their name and contacts are not logged and whistleblower protection for complaints raised in good faith will be ensured. The FGS Social Specialist carried 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 oversees awareness-raising on the GRM at the national level.
67. A Grievance Redress Committee (GRC) was established at FMS and FGS levels chaired by the project manager, and the relevant staff were 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 meets 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 are held in case of significant complaints to be addressed at the MOE/PIU level. Significant complaints are 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 Officers 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. All contractors and suppliers are 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).

Receive and Register Complaints: The beneficiaries have multiple ways of channeling complaints on any aspect of the project. This will be through, mobile phones, community meetings, email, toll-free numbers, etc.

There is also 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 logs them into the Complaints Register.

69. **Acknowledge, Assess and Assign:** An acknowledgment of receipt is sent to the complainant within 7

days of receipt of the complaint. The GRM focal point assesses 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 are treated with utmost confidentiality.

70. **Incident Reporting:** Incidents that are considered severe, which cause significant adverse effects on the society, 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).
71. 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.
72. For all other grievances, the respective IP determines 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 is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback will be given to the concerned persons bilaterally.
73. 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 are captured in an excel spreadsheet. The information collected, where possible and for only for non-GBV related complaints, includes the name of the person reporting, district, State, cooperating partner where applicable, project activity, and the nature of the complaint or grievance.
74. **Propose a Response:** The GRM focal point proposes 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.

Where a negotiated grievance solution is required, the IP will invite the aggrieved party (or 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.

75. 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

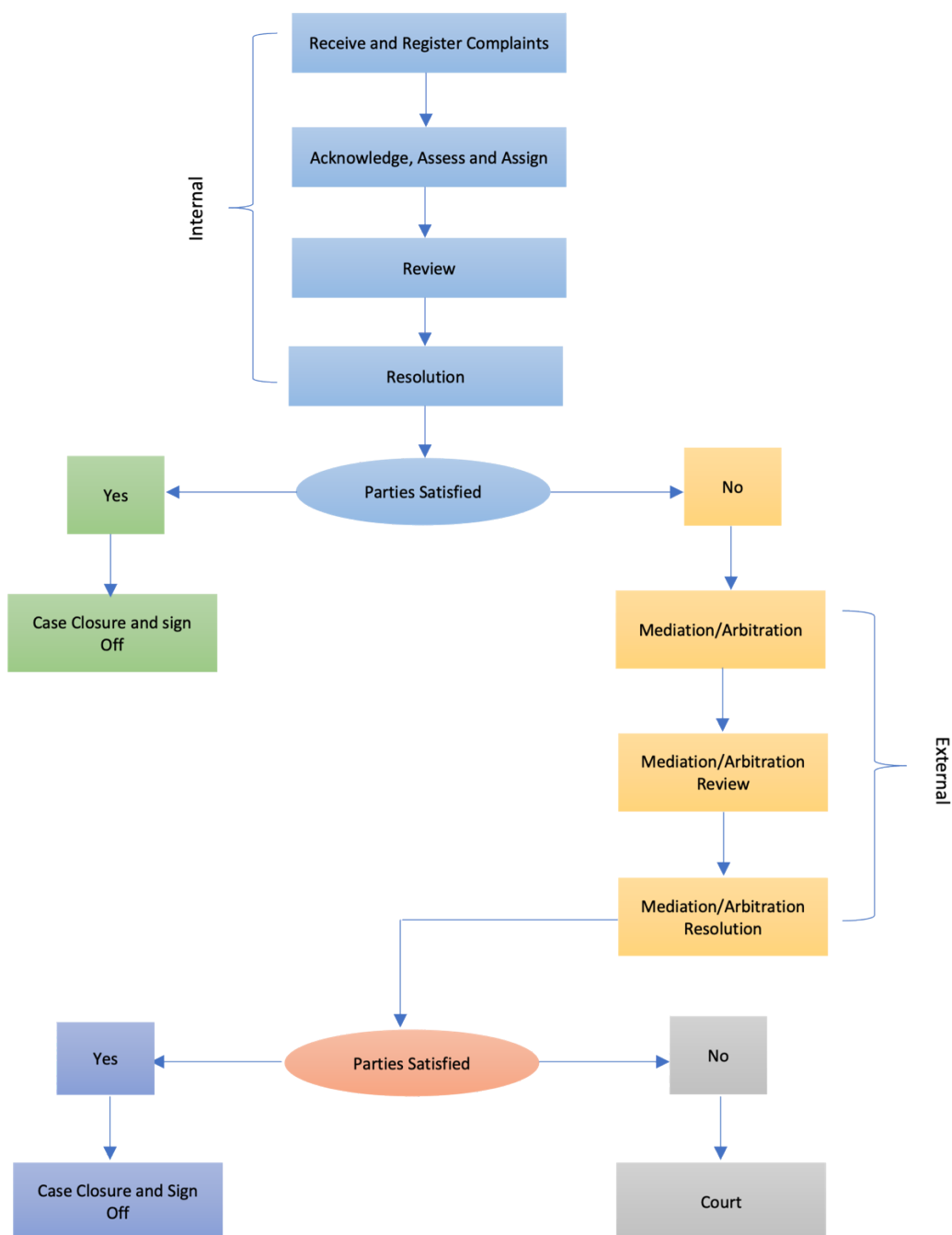
it will be reviewed by the PMC GRM Team and will be decided on jointly with the PIU Coordinator. Where aggrieved parties are dissatisfied with the response of the PMC, they can report cases directly to the World Bank or use the available national grievance resolution mechanisms.

76. **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.
77. **Review of the Grievances:** The GRM team conducts 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 records the actions recommended by the GRM team and file a monthly report to the PIU. Most importantly, all cases filed are logged and monitored by the PIU, contractors and primary suppliers.

Table 11: GRM Uptake Channels and Associated Focalpoints

Institutions	PMU/PIU Focalpoints	Email Address	Toll-Free Number
FGS (PMU)	Ms. Muna Ali	pmu.rajokaabagrm@gmail.com	2882
Hishabelle State (PIU)	Ms. Sumayo Mohamud Hassan	hss.rajokaabagrm@gmail.com	2883
Jubaland State (PIU)	Ms. Khadra Mohamed Abdullahi	jls.rajokaabagrm@gmail.com	2885
Southwest State (PIU)	Ms. Dunia Mohamed Mukhtar	sws.rajokaabagrm@gmail.com	2884
Galmudug State (PIU)	Ms. Hadiya Hassan Alas	gms.rajokaabagrm@gmail.com	2880
Banadir Regional Administration (PIU)	Ms. Leylo Abdo	bra.rajokaabagrm@gmail.com	2881

Figure 1: Grievance Management Process



78. Monitoring and Reporting of the GRM

- The PMC, specifically the Social Safeguards Specialist, is responsible for monitoring the access to and implementation of the GRM by the PIU. The Specialist includes 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.
- The PIU, contractors and primary suppliers provide analytical synthesis reports on a quarterly basis to the PMC, which includes the number, nature and status of grievances. These reports form the basis of all regular reports from the PMC to the World Bank. The PIU further provides logbook summarising the feedback and grievances reported, which linked to the M&E Results Framework. They further maintained 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 extracts lessons from the GRM and conduct an analysis on the overall grievances and share the results with the PIU.

79. 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

80. 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

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

9.3. PERFORMANCE REVIEW

82. Performance of the SEP is being measured against the following:
- Materials disseminated: type, frequency, and location;
 - Number, place, and time of formal engagement events and level of participation by specific stakeholder categories and groups;
 - Number of comments by issue/ topic and type of stakeholders, and details of feedback provided;
 - Numbers and type of grievances and the nature and timing of their resolution;
 - Recording and tracking commitments made to stakeholders; and
88. Community attitudes and perceptions towards the Project-based on and stakeholder feedback. These SEP implementation performance indicators are being monitored by Third-Party Monitoring (TPM) Firm that oversees all implementation activities and their alignment with the overall project results framework.

9.4. REPORTING

89. During SEP implementation, Social Specialist prepares 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.
90. The reporting of SEP implementation progress utilizes data collected internally by the project’s M&E and Safeguards Specialists, as well as findings from the external Third-Party Monitoring (TPM) firm, to assess overall project performance and the effectiveness of SEP implementation.

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

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)

Annex 4: Complaints Log Book

Date grievance received	Name and contact of the complainant (or reference number if anonymous)	How grievance received?	Describe the complaint, when, where, and details of the complaint	Who complaint referred to/resolved by	Corrective/preventive action taken so far or plan (please specify)	Feedback given to complainant and agreement given

Appendix5 : 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			
2			
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Date: February 7, 2022 (Stakeholder Engagement During Project Initiation Phase)

No	Name participants	Institution	User Email
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

Annex 6: Participant Lists and Photos of Stakeholder Engagement During Implementation Phase

Southwest State Universities Consultation Workshop



Galmudug State Universities Consultation Meeting



Consultation Meeting between Banadir University Health Science Students and Project Team



Galmudug State Universities Consultation Meeting Participants

No	Name	Institution	Designation
1	Mustafe Mohamoud Barkhad	Galmudug state university	Rector
2	Ibrahim abdinur ahmed	Galmudug state university	Deputy Rector Admin and Finance
3	Aisha Dahir	Galmudug state university	Student Affairs
4	Sadia Abdul mohamed	Galmudug state university	GRM Focal Point
5	abdirisaq ahmed dirshe	Galmudug state university	director of operation
6	Nor mohamud ali	Galmudug state university	HR Director
7	Madad Abdullahi Siad	Modern University	Rector
8	Abdirizak Khalif Adan	GU	Student affairs
9	Ahmed Muhudin Hiraabe	Plasma University	Rector of Plasma Galmudug
10	Shamso Nor Mohamud	Plasma University	Student Affairs
11	Dr. Jabril Mohamed Farah	Plasma University	Deputy Plasma University
12	Abdirizak Ahmed Mohamud	Hanano	Student Affairs
13	Mohamed Abdiweli	SNU	Head of Trainings
14	Halimo Hassan mohamed	SNU	GRM Focal Point
15	Omar Abdi	SNU	student affairs
16	Ibrahim abdinur ahmed	SNU	student affairs

Southwest

Universities Consultation Meeting Participants

No	Name	Institution	Designation
1	Mohamud Abukar Abdullahi	USS	Head of Academic and Student Affairs/Acting President
2	Eng .Isak Nor Daud	USS	Dean of Faculty of Education
3	Dr. Ahmed Omar Mohamed	USS	Head of Department of Nursing and Midwifery
4	Mohamednor Mohamed Abdirahman	BIU	University President
5	Ahmed Mohamed Adan	BIU	Board Director
6	Mukhtar Mohamed Isack	BIU	Academic Director
7	Mukhtar Adam Ibrahim	BIU	Hr Director
8	Adam Mohamed Nor	BIU	Admin and Finance

No.	Name	Institution	Designation
1.	Abdirahman Shuceyb Jeelle	Job Key University	Jowhar – Campus Director
2.	Ismail Mohamed Ahmed	Job Key University	Student Affairs
3.	Abdirahman Ali Abdullahi	Job Key University	Academic Affairs
4.	Ruqiyo Yusuf Moalim	Job Key University	Dean of faculty of Health Science
5.	Abdirahman Yusuf Ali	Job Key University	Lecturer
6.	Raho Mahdi Barre	Plasma University	Dean of Health Science
7.	Ibrahim Jama Hassan	Plasma University	Dean of Education
8.	Ahmed Adan Ahmed	Plasma University	Student Affairs
9.	Abukar Abdinasir	Plasma University	Lecturer
10.	Hidaayo Salad Tarabi	Plasma University	Lecturer
11.	Ahmed Adem Hussein	Beledweyne University	Academic Affairs
12.	Abdifatah Abdullahi Salad	Beledweyne University	Students Affairs
13.	Abdullahi Osman Hansh	Beledweyne University	Dean of faculty of Education
14.	Leyla Nuur Osman	Beledweyne University	Dean of faculty of Health Science
15.	Abdullahi Abdisalan Elmi	Hiiraan University	Academic Affairs
16.	Saida Elmi Abdi	Hiiraan University	Students Affairs
17.	Ahmed Yacquub Mohamed	Hiiraan University	Dean faculty Education
18.	Ayaan Abdi muse	Hiiraan University	
19.	Name: Faiso Omar Elmi	Hiiraan University	Student Affairs

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20.	Adan Abdulahi Mohamed	Central University	Deputy Rector Academic Affairs
21.	Ruqiya Shire Omar	Central University	Student Affairs
22.	Abdiwahid Mohamed Abdullahi	Central University	Head of Health science
23.	Yahye Abdirahman Muhumed	Central University	Registration and Student Affairs

Hirshabelle Universities Consultation Meeting Participants