FEDERAL REPUBLIC OF SOMALIA

MINISTRY OF FINANCE (MOF)

PROJECT: SOMALIA RECURRENT COST & REFORM FINANCING PROJECT - PHASE 3 AF

STAKEHOLDER ENGAGEMENT PLAN (SEP)

12th May 2022

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1.INTRODUCTION

The Recurrent Cost and Reform Finance (RCRF) Project phase 1 became effective in 2014 and closed after a year. A second phase of RCRF became effective in July 2015 and is currently expected to close in June 2022. The third phase became effective in December 2020 and is expected to close in December 2023, was under the World Bank's new Environmental and social framework. An additional financing has been requested to extend the project by two years to December 2025. The Project Development Objective (PDO) of the RCRF is **to support the Federal Government of Somalia and Eligible Federal Member States to strengthen resource management systems, the inter-governmental fiscal framework, and service delivery systems in health and education**. The initial RCRF project focused on Benadir, and Puntland States. RCRF 2 has already expanded to Galmudug, Jubbaland, Hirshabelle and Southwest states and RCRF 3 has continued expanding to regions and districts of Somalia. In addition to system strengthening and capacity building the focus has been on bringing the existing cadre of health and education workers onto the government payroll, initially in high density urban areas. For RCRF 3 AF, 3, further expansion of staffing, will include need and equity considerations.

The project is run out of the Ministry of Finance and will finance dedicated staff to cover project coordination and management, administration, monitoring and evaluation, financial management, procurement, social safeguards, GBV prevention and communications. It will be implemented in coordination with the Ministries of Health and Education who will have dedicated social and environmental specialists funded under other World Bank Projects at the federal and state levels. Somalia's National Development Plan (2020 – 2024) highlights a commitment to environmental and social safeguards as a cross-cutting issue, with a special focus on ensuring gender and social equity.[1]

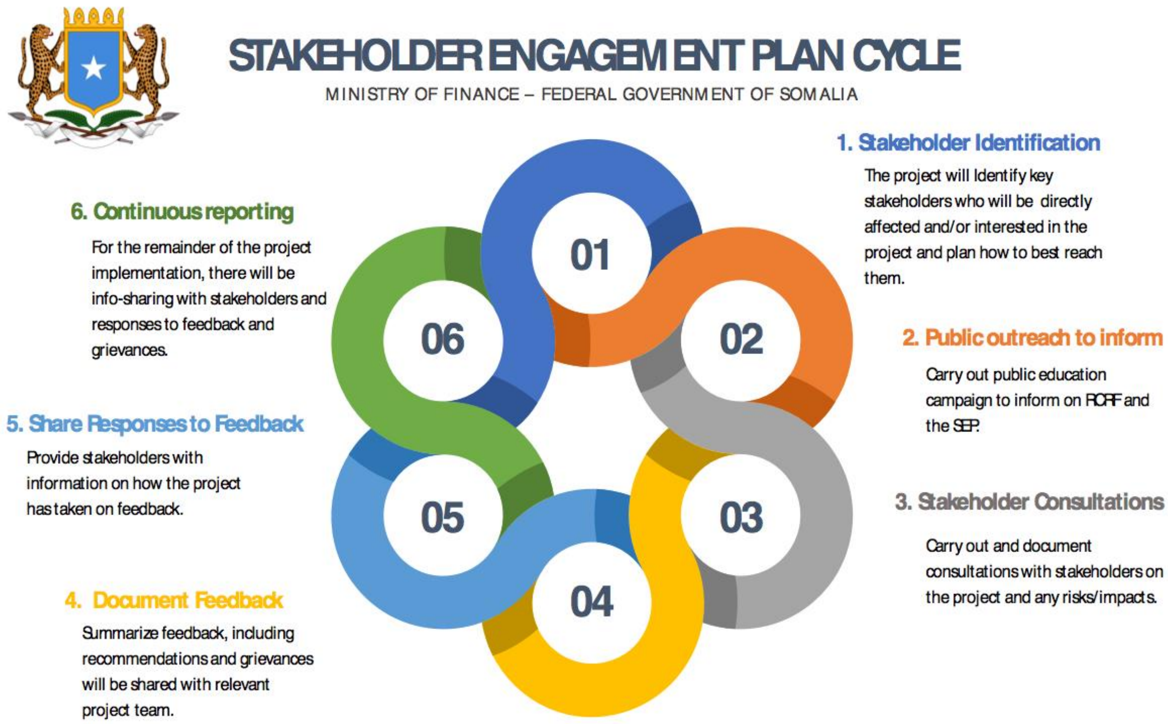
This Stakeholder Engagement Plan (SEP) is an update of the parent SEP, with additional stakeholder consultations conducted with 60 participants (including 22 women) and added in the annex. The parent SEP was implemented as planned, with some delays in conducting the stakeholder engagements at FMS and FGS levels and more need to reach vulnerable and marginalised groups and representatives including CSOs. Also the grievance mechanism has now been incorporated into the citizen engagement call centre as part of component 4, including outreach to communities to solicit feedback on services. Soliciting feedback on services through the call centre has elicited nearly 80% response rate from female health workers and is being expanded to community representatives. The SEP outlines how different stakeholders will be engaged throughout the project cycle and provides mechanisms for their feedback to be used to improve the project implementation. It also outlines what information will be collected from and provided to different groups to facilitate their meaningful engagement in identifying, monitoring and mitigating social and environmental risks associated with project implementation.

The SEP will be an iterative strategy that is reviewed and updated every year as a result of the feedback and information gleaned from the regular engagements. After each engagement, the government will summarize key feedback and share with relevant project staff. Stakeholders will be notified of the responses to the

[1] See Somalia's NDP (2020-2024) at http://mop.gov.so/wp-content/uploads/2019/12/NDP-9-2020-2024.pdf

feedback and/or grievances. The PIU will keep updated documentation on the engagements and the actions put forward as a result of the feedback.

The diagram below shows the SEP cycle for the RCRF:



2.PROJECT DESCRIPTION

The project supports Somalia's efforts toward a more resilient, inclusive and stable socio-economic environment. The project's benchmarks/Performance Based Conditions will incentivize the Federal Government of Somalia and the Federal Member States to sustain momentum of their reforms to reach the Heavily-Indebted Poor Country Completion Point. The project will help strengthen inter-governmental fiscal relations, and build state institutions, in support of the delivery of basic services in health and education. It will also support building a real-time feedback loop from the citizens who are intended to benefit from the investments.

The proposed AF will restructure the parent project RCRF III (P173731). These changes include: (i) scaling-up selected activities and piloting new areas of support; (ii) adding new or revising existing performance benchmarks and the results framework; and (iii) extending the closing date by two years to December 31, 2025. The proposed restructuring will bolster the development impact of the current RCRF III by strengthening the focus on policy reforms at the FGS and, especially at the Federal Member State (FMS) level, intensifying activities on inter-governmental dialogue, leveraging lessons learned in the service delivery in health and education, and intensifying the use of the government-owned and -led citizen engagement platform. The proposed restructuring will also help enhance alignment with the anticipated Somalia Enhancing Public

Resource Management Project (SERP) (P177298) and the recently approved World Bank operations in the health and education sectors. By strengthening institutions of service delivery, the AF is strategically aligned with Somalia's Country Partnership Framework (CPF), the Performance and Learning Review of the CPF (FY19–F22), and Somalia's Ninth National Development Plan (NDP9). It will also help Somalia to achieve the enhanced heavily indebted poor countries (HIPC) initiative Completion Point triggers.

Proposed Changes by Component

Component 1: Recurrent cost finance to reform resource management systems
This component will continue to finance the civil service wage bill through input-based or "baseline" financing on a declining scale and performance-based condition (PBC) financing.

Subcomponent 1.1 will continue to provide a decreasing "baseline" level of input-based financing of the FGS non-security sector civil service wage bill. As of December 2021, RCRF finances around 20 percent of the FGS civil service wage bill through the advance-replenishment model. AF target will be to decrease the RCRF share of financing to 10 percent by 2025. The spotlight will be on responding to the weaknesses in the RCRF-supported payrolls, such as input controls, inconsistent digitization, weak adjustments, and exceptions handling, as well as broader issues with HRM and accountability, including time and attendance.

Fiscal pressures of the wage bill will be addressed through several measures. These include linkages to the IMF Extended Credit Facility (ECF), enhanced management and transparency of the non-formal civil service wage bill, support of internal control measures through SERP, and the use of PBCs to incentivize domestic revenue mobilization. With expected increases in revenues during project implementation and a better controlled public wage bill, the need for recurrent cost finance will reduce over the years.

Subcomponent 1.2. Financing eligible civil service salaries in FGS: reform benchmarks (PBCs). PBC financing currently enables the FGS to access up to US$6.3 million in 2022–2023 through reimbursement against eligible expenditures. These PBCs center on five key areas: (a) customs, (b) payment processes, (c) intergovernmental fiscal relations, (d) fiscal transfers to FMS, and (f) public administration. The AF aims to expand the scope of PBCs. The key areas will remain, but with a longer time horizon available. Additional intermediate benchmarks aimed at helping the FGS to avoid slipping off the reforms road map and longer-term benchmarks aimed at medium-term reform results are being added. New benchmarks will incentivize continued reform efforts in revenue administration, payroll management, fiscal federalism, fiscal sustainability of the civil service wage bill, enhanced roles for women in civil service. Furthermore, a new PBC on wage bill management is proposed to continue efforts, started under RCRF II 2021 restructuring, to increase transparency and fiscal sustainability of the non-formal wage bill. New benchmarks align closely with the SERP and other development partner activities in Somalia.

Component 2: Strengthen intergovernmental fiscal relations
Subcomponent 2.1. Supporting Intergovernmental Fiscal Forums and Secretariat. The AF will intensify support to the fiscal federalism agenda and federal entities. The intergovernmental dialogue will continue through support

of the Intergovernmental Fiscal Forum (IGFF) and Secretariat as well as sectoral (health, education) intergovernmental forums. Stronger analytical output and technical assistance will be provided in the areas of fiscal transfers, a revenue sharing formula, use of the new harmonized chart of accounts in budget preparation and execution, functional decentralization in service delivery, and local governance structures within selected FMSs. As SERP provides technical assistance on the harmonization of PFM and DRM systems between FGS and FMSs, a key priority for the RCRF will be to reinforce communication and coordination between the FGS and FMSs for strengthened intergovernmental fiscal relations. Support to the intergovernmental dialogue platform on civil service reforms initiated under the RCRF will be taken up by SERP to avoid duplication of activities and ensure stronger technical assistance support to the harmonization agenda.

Subcomponent 2.2. Reform benchmarks for improved governance and service delivery at the FMS level (PBCs). FMS-level reform benchmarks will be continued and expanded. The first round of PBCs targeted at FMSs was disbursed in August 2021 and, despite some initial delays, have served as an effective instrument for channeling intergovernmental transfers to frontline service delivery units. However, several lessons learned need to be taken into account in designing a new set of FMS PBCs. First, FMSs still have limited capacities and understanding of PBC-based financing mechanism. The existing service delivery PBCs are cumbersome and require a long list of documentation, which at times is duplicative and does not bring any value added to the reform's agenda. Second, launching new initiatives (such as performance-based school grants program) through PBC financing without project allocations to support design, piloting, and expansion have proved challenging; the approach will be revisited. Finally, additional benchmarks to increase accountability and transparency of PBC-based financing are required and should be aligned with SERP support

Subcomponent 2.3. Strengthening resource management systems. Subcomponent 2.3 will continue financing investments in the MoF and Office of the Accountant General (OAG) (notably External Assistance Fiduciary Sections (EAFS)), and contract management capability in the ministries of education and health, and social safeguards. This activity will be closely coordinated with the SERP and the Public Resource Management in Somalia (PREMIS) phase two project funded by the UK Foreign, Commonwealth, and Development Office (FCDO). Support to OAG will include developing OAGs in FMSs, assessing needs for professionalization and training for the government's accounting cadres, developing a three-year strategic plan, and maintaining strategic regional partnerships. FMS social/gender-based violence (GBV) specialist positions and their travel, community mobilization, and monitoring activities will be financed from this subcomponent. Subcomponent will also support building up expertise and sharing experiences across the World Bank's new operations in the health and education sectors in Somalia. Other Bank projects are also likely to leverage this support, especially during the early phases of implementation.

Subcomponent 2.4. Supporting local governance within FMSs (new). The World Bank team held several discussions with FMSs and development partners to gauge the demand for a new subcomponent to support the local governance agenda within FMSs. Districts, old and newly created, are at various stages of administrative and political development depending on the FMS, local political dynamics, conflict status, population, and urbanization. Local governments (districts/municipalities), especially the few urban, populous ones, need immediate support to regulate and complement the existing private and civic actor service delivery. Support will be needed to strengthen local government capabilities in basic administrative skills, as well as in the technical elements of strictly public services. While further engagement with the FGS and FMSs will be required, preliminary areas of support include (i) fostering intra-FMS dialogue with and capacity building of municipal/district governments in FMS capitals and interim capitals on functional and fiscal decentralization; (ii) funding technical assistance on urban property surveys, property registers, and property tax revenue sharing with these urban centers in selected FMS, (iii) building capacity of fit-for-purpose PFM and payroll systems in the capital districts (and Bosaso); (iv) promoting citizen engagement at all levels of government per demand; and (v) advising on mechanisms to enable emergency financing in response to climate-related and other disasters. This subcomponent will be carried out in close coordination with the United Nations' JPLG Program.

Component 3: Transfers for core government functions and foundational education and health service delivery mechanisms in eligible FMS

Subcomponent 3.1. Financing core government functions

This subcomponent will continue financing FMS recurrent costs. The subcomponent, through transfer grants from the FGS to FMSs, will continue financing (a) reforms to meet the participation eligibility criteria; (b) salaries and allowances for civil servants (excluding elected officials) in selected ministries, department, and agencies (MDAs), such as finance, health, and education; (c) salaries and allowances to government staff; (d) system strengthening and establishing basic accountability systems. At the same time, there is expected to be new funding under Component 2 via PBC 8, which will finance strategic staffing needs to be identified under the SERP, keeping in mind wage bill and fiscal stress implications. Financing of eligible non-salary recurrent costs for the finance, health, and education MDAs will also be executed through PBC 8 and PBC 7 for the education MDAs. Subject to the increases in domestic revenues, options will be explored to introduce co-financing of FMS civil service salaries.

Subcomponent 3.2. Financing education service delivery

The AF will continue supporting the FGS and FMS education ministries to strengthen their core systems for delivering and managing education services. The Education for Human Capital Development Project will support the access to and quality of primary education in underserved areas, while RCRF will continue financing teacher salaries, non-teacher education staff, and other recurrent expenses in FMS/BRA. The structure of teacher salaries in each FMS/BRA and their funding sources will be continuously revised while considering fiscal affordability and improved access to education for less advantaged children. A scale-up of teacher financing may be considered only in those FMS that are ready to include teacher and non-teacher education staff salaries into EEP and provide co-financing. In close coordination with SERP, which proposes to support sustainable and efficient planning, budget allocations, expenditure management, and HRM in FGS/FMS, RCRF will continue to support system strengthening activities through improvements in HR policies, payroll management processes, and incentivizing the participation of women in the teacher cadre through participation eligibility criteria and other tools as stipulated in the Project Operations Manual (POM).

The parent project's plans on piloting the performance-based school grants program have been revisited to avoid fragmentation of World Bank support. The Education for Human Capital Development Project, which became effective on December 24, 2021, intends to finance school grants to enable newly constructed schools to meet recurrent expenditures and ensure the schools maintain conducive learning environments and do not impose fees for disadvantaged children. Considering that the education project is better positioned to implement the performance-based school grants by leveraging economies of scale through technical assistance and building the capacities of FMS, head teachers, and community education committees to implement, administer, and provide oversight to the grants program, RCRF will no longer support the performance-based grants program. A draft performance-based grants policy developed with the support of RCRF will be further refined under the education project. The PBC 7 is reoriented toward the intergovernmental dialogue and functional assignment agreements in the education sector.

RCRF will closely coordinate with the education project to ensure that RCRF-financed teachers benefit from the teacher professional development program, improve their teaching quality, and raise their students' outcomes. RCRF will continue financing school supervision activities between now and December 2023, but the technical design will be supported by the education project to ensure interlinkages with the school grants program and other activities envisaged under the education project. While continuing RCRF financing of school supervision, the focus will be on using digital tools, encouraging self-assessment, and reducing costs to make them sustainable. Digital data reporting and self-assessment will increasingly replace physical supervision visits and decrease long-distance travel by half, thus contributing to reduced greenhouse gas (GHG) emissions. Furthermore, RCRF-financed project staff in the education sector will become part of the education project implementation unit (PIU), while their salaries will continue to be financed from the RCRF. At the FMS level, project managers financed under the education project will support RCRF activities and their linkages with the education project.

Subcomponent 3.3. Financing health service delivery

In close collaboration with the Damal Caafimaad project, the AF will continue to support the foundation systems delivery of community health services, focusing on ensuring last-mile delivery in the community health sector, consolidating data systems and beneficiary engagement, and expanding the coverage of the female health worker (FHW) program with the government-led delivery. With around 900 FHWs recruited and trained, and the ambition of reaching 3,000 FHWs across Somalia by 2025, the AF will support enhanced FMS capacities in the FHW program management, improved data collection and analysis, data linkage with HMIS, increased cost-efficiency in supportive supervision activities, and improved training materials based on lessons learned. Since communities served by FHWs often suffer from climate-related events and are more susceptible to cholera and other water-borne illnesses, a special training component will be developed to sensitize FHWs on climate-change risks and mitigation measures at community level. Through extensive household level digital data collection, FHWs will generate knowledge on the spread of climate induced diseases and will help identify vulnerable communities at risk of severe illness and death as a result of floods and cyclones.

In locations where the Damal Caafimaad project is implemented, the FHWs will be integrated into the health programs for purposes of training, support, supervision, and monitoring. The NGOs contracted by the Damal Caafimaad to deliver essential packages of health services in those specific regions will have additional oversight, wherever needed, for the FHWs and supervisors under their jurisdiction to provide ongoing mentorship and training, supervision and reporting, and provision of essential supplies. An independent MA procured under the Damal Caafimaad project will also support the FHW verification and validation processes. Continuous monitoring of FHW program results and mid-term impact evaluation will provide insights into the program's effectiveness and inform policy decisions regarding future expansion of government-led community health program across Somalia.

Community health plans financed through PBCs will also be expanded to support last-mile service delivery and increase budget allocations to the health sector. Service delivery transfer agreements signed between FGS and the FMSs will be further strengthened and reoriented toward functional assignments in health service delivery. With regard to service delivery at the community level, the project will prioritize areas where health indicators are lagging, especially uptake of modern family planning methods and childhood immunization, as well as where communities were affected by climate-related events.

Substantial progress has been achieved in promoting the use of digital tools to improve the performance of the FHW program. All FHWs have been provided with a tablet, solar charging system, training, software tools, and monthly data money to enable them to report on their daily activity, with geo-tagging and photo evidence, where necessary (provided the security situation allows such ICT use) to help strengthen their day-to-day work. More than two dozen videos have been translated and their use rights procured to improve the quality of training and behavior change communication with communities. Going forward, the focus will be on building FGS and FMS MOH capacities in ensuring uptake of the digital tools, developing and implementing day-to-day performance metrics, and using information to enhance the program's planning. To ensure integrity and transparency of performance and investments into the program and to improve delivery of services to the Somali citizens, no new FHW/FHS will be recruited and deployed in any state or the BRA unless the digital performance management, data collection, and training tools (and a system of pharmaceutical procurement and supplies), with standards developed by FGS, are fully deployed and in use among the existing set of staff.

Component 4: Citizen engagement and feedback

The AF will continue to support citizen engagement activities, building on lessons learned from the ongoing pilots and consolidating results. Services of a Mogadishu-based call center have been procured and its capacities have been built to serve as a platform to provide calling, texting, and IVR services for inbound and outbound calls/communication for FGS and FMS. The call center is well positioned to extend its support to other Bank projects. Budget transparency and citizen engagement activities will be closely coordinated with the SERP. AF will lead budget transparency efforts at the FGS level, while SERP will focus on FMS key budget documentation, parliamentary scrutiny, citizens' budgets, and engagement of citizens in the budgeting process. Going forward, the component will focus on institutionalizing citizen engagement initiatives across ministries of finance, health and education at the national and federal levels to make it a truly government owned, managed and led activity.

Component 5: Project management

Project management and implementation modalities will remain unchanged. As noted earlier, the parent project's requirement is for the FGS to select and engage verification consultant(s) to assist the OAuG in preparing the PBC verification reports. As the DRM&PFM project that financed a verification consultant is closing in June 2022, the AF will finance such a consultant going forward.

More information on the RCRF 3 – AF project can be found in the Project Appraisal Document: https://documents.worldbank.org/en/publication/documents-reports/documentdetail/906861592186453726/somalia-third-phase-of-recurrent-cost-and-reform-financing-project - to be updated

A summary of the project in Somali is published on the Ministry of Finance website: https://mof.gov.so/taxonomy/term/165 - to be updated

3.STAKEHOLDER IDENTIFICATION AND ANALYSIS

The project will engage a large and diverse array of stakeholders during implementation. The FGS and the participating FMS will be responsible for project implementation and management. Non-state stakeholders such as community leadership, citizens who benefit from the services provided, teachers and health workers, members of disadvantaged groups e.g. IDPs, minority groups, women, youth and people living with disabilities will be involved regularly through the life of the project. Other groups such as teacher training institutes, private sector health and education providers, civil society, will similarly be engaged as appropriate. Relationships with existing non-government actors, including UN agencies, NGOs and private sector organizations, will also be established to ensure the project leverages their activities within the health, education and civic engagement space.

Careful consideration will be taken to ensure that women, youth, the elderly, persons with disabilities, IDPs and minority groups will be represented amongst the stakeholder groups engaged. Various other stakeholders such as religious or clan elders—who may influence the perception and uptake of education and health services and involvement of women and VMGs in the project will also be engaged.

For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

a. **Affected Parties**: persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actual or potential) 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, sharing of project benefits, and management measures.
b. **Other Interested Parties**: individuals/groups/entities that may not experience direct impacts from the project but who 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; and
c. **Vulnerable Groups:** persons who may be disproportionately impacted or further disadvantaged by the project as compared with other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal and effective representation and participation in the

consultation and decision-making processes, including in taking advantage of project benefits, associated with the project. Members of disadvantaged groups can be affected parties or other interested parties, depending on the circumstances.

3.1.Affected Parties

The affected stakeholder groups and their relevance and needs can be classified as follows:

Project stakeholders	Relevance to the project	Needs
The FGS and line ministries, departments, and government agencies directly supported by the project.	The government ministries, departments and agencies are integral to the overall success of the project at all stages. They are crucial to the establishment of the physical, technical, legal and regulatory framework of the project as well as providing the human resources. Inter-and intra-agency collaboration will be essential for the implementation of the project activities. The main government ministries to be engaged will be ministries of education and health and FMS line ministries, as well as others involved in ESF implementation such as the Ministry of Labour and Social Affairs and Civil Service Commission and others that will benefit from improved citizen engagement and feedback and other WB supported project that may have good practice and experience to share.	To be informed and identify potential social and environmental risks, grievances - in order to address and mitigate and monitor implementation.

People who will benefit from project-related employment e.g. social service workers (i.e. teachers and health workers in FGS, FMS administrations)	Successful implementation of the Project will increase the legitimacy and functionality of the State and bring benefits to the public. The payment of salaries and support of expenditures in the social sectors, particularly health and education, is an essential precondition for the restoration of public confidence in the legitimacy of state structures and could support peace, with security dividends resulting from the improved fiscal position of recipient governments. Genuine citizen engagement and responsive complaints mechanisms also have the potential to build trust and cohesion. Those directly engaged as workers are able to provide insights on whether the activities are expanding access to improved social services and enabling government functionality. They are also able to inform project management of any issues (whether fiduciary or programmatic) that may emerge during implementation. The project will generate employment or business opportunities for the community through engagement of firms and consultants and hiring of field staff and enumerators for data collection.	To share their feedback on project implementation and whether social and environmental risks are adequately being addressed/mitigated.

FMS and local government (Municipality Departments, Municipal Councils, and District offices)	Local government institutions protect the rights of inhabitants in the project area and represent the local communities. Through the project, state and local capacities will be augmented to provide improved service delivery. These constituencies will also benefit from improved citizen engagement in government budgeting and feedback on services.	To be informed of potential social and environmental risks, grievances - in order to address and mitigate, as possible.
Communities where project activities are implemented.	Communities will benefit from the improved quality and continuity of services provided by health, education and other workers supported through the project as well as improved government budgeting and service provision through citizen engagement and feedback mechanisms. There already exist local structures which the project can engage with such as health committees and community education committees, as well as traditional local leadership, including clan heads/chiefs and religious leaders.	To share their feedback on project implementation, including the sharing of project benefits, and whether social and environmental risks are being adequately addressed/mitigated.

3.2.Other interested parties

Project stakeholders	Relevance to the project	Needs
International NGOs and bilateral donor agencies	Development partners will be able to provide technical advice and financial assistance and performance standards for service provision in the education, health and civic engagement sectors. Engagement with these groups can improve coordination and leverage investments.	To learn about the project’s activities, share information, lessons learned, and explore opportunities to maximize synergies and impact with similar projects.

Civil society organizations (i.e. women and youth, and persons with disabilities groups) and direct and indirect representatives of the poor and excluded	Civil society organizations especially those which work closely with vulnerable and marginalized groups are often able to articulate issues and amplify the voices of those who may be otherwise hard to reach or not sufficiently empowered to raise issues.	To learn about the project's activities and to have a platform to advise on social risks management and mitigation.

3.3.Disadvantaged/vulnerable individuals or groups

Project stakeholders	**Relevance to the project**	**Needs**
The poorest communities, IDPs, persons with disabilities, and minority groups and their representatives	These vulnerable or marginalized groups have the most to benefit from accessing the health and education services under this project.	To contribute their feedback and concerns regarding project implementation and sharing of project benefits, through an easily accessible mechanism.

4.STAKEHOLDER ENGAGEMENT

The government will ensure genuine stakeholder engagement to build mutual trust, foster transparent communication with both the project beneficiaries and other stakeholders, and ensure social and environment risks and impacts are identified and mitigated. In Somalia, consistent and meaningful dialogue with stakeholders is critical to maximize opportunities for the project's success, enhance project acceptance and ownership and to improve the social contract between the government and its citizens. The SEP and the citizen engagement component will be implemented in such a fashion as to promote monitoring of social and environmental risks while also setting mutual expectations, clarifying the extent of the government's commitments and resources, and obtaining feedback on activities. Lastly, the SEP will include a grievance mechanism (GM) to allow the government to act upon complaints and suggestions for improvements in a timely fashion.

4.1.Summary of stakeholder engagement done during project preparation

Engagement on the project design and the planned activities and implementation arrangements have been carried out with relevant government agencies, development partners and non-government project-affected stakeholders. As part of the development of the SEP and the ESMF, the PIU carried out consultations with a diverse set of stakeholders including government staff, health workers, civil society and NGO staff including representation of marginalized groups including women's and minority groups etc. This Stakeholder Engagement Plan (SEP) is an update of the parent SEP, with additional stakeholder consultations conducted with 60 participants (including 22 women). The consultations were made meaningful by seeking participants suggestions and good practice experiences on E&S management and the sessions provided valuable insights on the potential social and environmental risks and mitigation measures related to the implementation of the RCRF 3. Due to the COVID 19 pandemic, these engagements were done virtually. Once conditions permit, more in-depth stakeholder engagement to regularly validate the identified social and environmental risks will commence on the ground. The SEP will be a living document that is continuously updated based on the information gleaned from the multiple and concurrent stakeholder consultations.

Given the fragile state context of Somalia, the social risk rating is substantial. The rating takes into account the weak governance institutions, continued insecurity, and conflictual socio-political dynamics that contribute to a myriad of social risks. The following socials risk have been identified through the initial consultation process:

Equity

- Hiring decisions may not reflect transparent and fair processes and instead be influenced by nepotism or clannism. Minority clans and groups including minority groups, IDPs, and persons with disabilities are particularly at risk of discrimination.
- Some recruited health and education staff may fail to provide services without discrimination, including to disadvantaged groups.
- The plan to tie support for schools to performance based on test scores or other qualitative measures may marginalize poorer communities where students do not have the socio-economic conditions, access to tutoring services or other methods of improving learning outcomes.

Occupational Health and Safety (OHS)

- Workers may be directly targeted by violent non-state actors for their affiliation with the government. This is a particular threat for those working near areas outside of government control, areas where people congregate, e.g., health centres and schools may also be a target.
- Physical structures from which workers provide services to the community may not cater to females (e.g. separate toilets) and persons with disabilities (access).
- Female health workers may be exposed to COVID-19, and other infectious diseases because of a lack of personal protective equipment (PPE).

Gender-based Violence (GBV)

- FHWs often travel alone and by foot to homes to provide services. As a result, they are particularly vulnerable to GBV.
- Limited trainings for key personnel (health and education) providing services to GBV survivors as well as lack of information on who provides what, can increase harm, violence, and death.
- Due to limited understanding of survivor-centered approaches, reinforcement of community conflict resolution in some cases may cause harm to women and girls including revictimization, stigma and marriage to the perpetrator.
- With the current COVID 19 pandemic, women working in frontline services such as health may experience abuse including intimate partner violence at home and other forms of sexual harassment and exploitation or abuse while in the community.

Sexual Exploitation Abuse and/or Harassment (SEAH)

- Female workers (whether civil servants, FHW or teachers) may be subject to GBV/SEAH in the recruitment or retention process given men dominate the hiring management in most if not all government offices.
- Lack of integrated policies providing protective environment free from GBV/SEAH and services for survivors.

Other gender issues

- While official government policy is to allow for female employees to take maternity leave and have access to time off for breastfeeding, women are vulnerable to losing their jobs after pregnancy since these policies are rarely adhered to in practice.
- The lack of female representation in school management may serve to limit the ability of communities to increase the number of female teachers – a critical component in providing a welcoming environment for female students and other female teachers.

Political dynamics

- Resources destined for state-level social services may be held up due to increased political contestation within or between federal or state level authorities.

Other potential risks

- The focus of support exclusively to FHWs may marginalize traditional birth attendants who are the primary providers of pre and post pregnancy care in rural areas.

The discussions with the stakeholders provided an understanding of the potential social risks identified. Below are some of the key issues:

- Challenges using smart phones/ODK/taking photos/security – 3 stolen
- Perceptional conflict between FHWs & Traditional birth attendants.
- Complaints – delays in salaries, safety and security, storing kits,
- Lack of attention of areas with marginalized groups

Mitigation measures for the social risks outlined above will be provided in the Environmental and Social Management Framework (ESMF). The Labor Management Procedures (LMP) will outline fair treatment, non-discrimination and equal opportunity of project workers and define separate worker grievance procedures. A GBV/SEAH prevention and response action plan has been developed and details the necessary operational measures to be put in place to prevent GBV/SEAH among staff, students and community members and ensure a separate, survivor-centric, and confidential grievance mechanisms and procedures for dealing with cases and provision of services for survivors.

4.2.Summary of project stakeholder engagement tools and techniques

The government will tailor its engagement according to the most effective mechanisms to reach identified stakeholders including vulnerable and disadvantaged groups. To minimize costs and maximize impact and access to stakeholders, the SEP will be implemented closely with the citizen engagement platform and build on and strengthen existing intra-government engagement structures for FGS and FMS dialogue. At the community-level, project coordinators in FGS, and participating FMS will build a coalition of change agents and community monitors or work with existing structures by adopting various communication and participatory methods designed to inform, consult, involve, collaborate or empower. These will include vulnerable and disadvantaged groups such as IDPs, minority groups including minority groups, women, and remote communities including nomadic pastoralists. Due to the obstacles to participation for these vulnerable groups, the project will work closely with organizations who advocate for equitable services to ensure their views are taken in consideration and their issues addressed.

To expand the audience for public information campaigns, the project will utilize strategic communications depending on the audience, for example radio, social media and TV discussions. The FGS Ministry of Finance has contracted a mass media and communication firm that would develop communication and behavior change strategy, including clear messaging for each audience and segmentation. The company will also develop and test campaign tools. The firm has partnership with major media houses to deliver the message and would take the advantage of the social media platforms for reaching different stakeholders. Both the call center and mass media firms would inform the stakeholders on the availability of the GM through SMS voice call and posting to the social sites. In addition, periodic community feedback surveys will be carried out to get insights on the social and environmental impacts of services provided by the project and an understanding of whether there is awareness on the GM and whether it is trusted and functioning. These feedback mechanisms could include call centers and SMS texts that to can expand engagement with communities where the RCRF III is to be implemented. In a country with limited literacy rates, technologies such as interactive voice response (IVR) allow beneficiaries to give direct feedback to the government in a quick and easy format. So far, the call center conducted several beneficiary engagement activities targeting the FHWs and supervisors in different locations via SMS and voice call. The call center uses Ushahidi technology platform to send and receive SMS, while call record management software has been used for the calls as 7575 short code. There are several other campaigns planned to be conducted very soon. So far, the call center contacted more than 660 FHWs in different locations for different campaigns with a response rate exceeding 80% average. The major challenges highlighted in the implementation process include technology difficulties to accommodate different interfaces and poor mobilization in some locations.

Meaningful stakeholder engagement depends on timely, accessible, and comprehensible information. This requires that the PIU ensures that relevant project-related information is available as early as possible and throughout the project life cycle in a manner, format, and language appropriate for each stakeholder group. The following table indicates the methodology for stakeholder engagement and information disclosure. Formats to provide information may include presentations, printouts, non-technical summaries, project leaflets, non-literate diagrams and posters and pamphlets, depending on stakeholder needs. Due to the COVID-19 pandemic, the project will use socially distanced meetings and remote and virtual methodologies, as well as radio and other social media platforms. In the context of stakeholder engagement, the project will ensure compliance with national law requirements as well as World Bank guidance, including World Bank "Technical Note: Public Consultations and Stakeholder Engagement in World Bank-supported operations when there are constraints on conducting public meetings," March 20, 2020, regarding the COVID-19 situation.

4.3. Proposed strategy for consultation

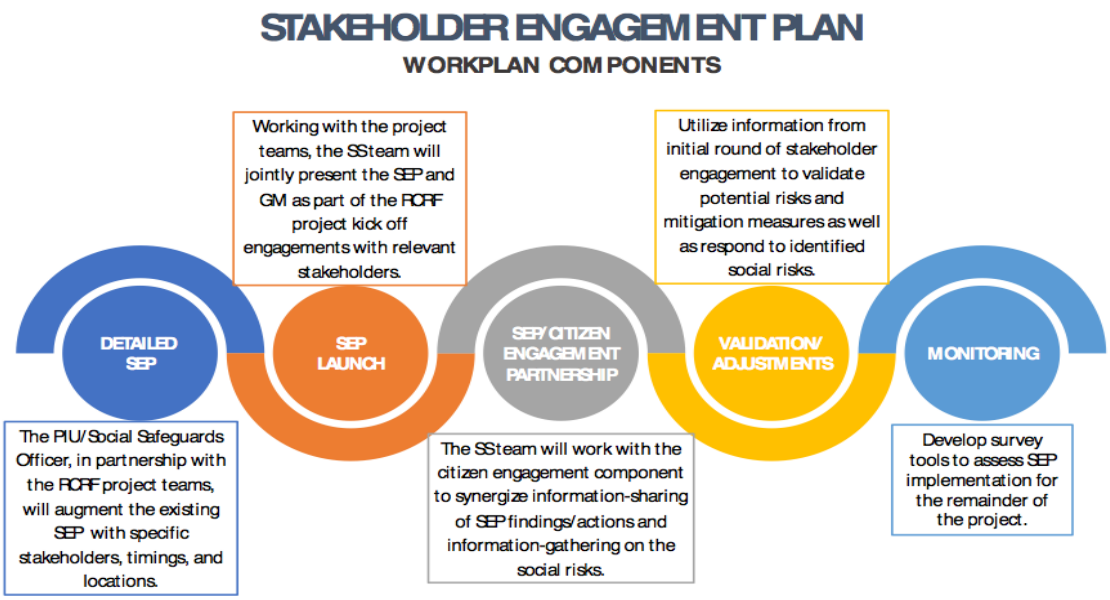
Stakeholder	Channels of Engagement	Frequency	Purpose	Who will carry out
Line ministries, departments, government agencies	High-level policy meetings at FGS-FMS level Working sessions with FGS and FMS technical ministry and local government counterparts Joint periodic surveys	At launch and regular intervals e.g. 6 months	Project reviews including social risks and how they are being managed Seeking clearance to implement the project components Raise awareness of key provisions to provide a protective environment free from GBV, SEAH Review GM monitoring processes. To promote shared responsibility and partnership.	PIU and Social specialists at FGS and FMS level

<table>
<tr><td>Non-government organizations and interested citizens in districts with health, education and community engagement components</td><td>Public Forums
Interactive FM radio programs</td><td>Before activities in each FMS</td><td>To inform public of the project’s activities and goals.
To share information on mechanisms for stakeholder engagement, GM and GBV/SEAH risks and mitigation measures. Some of the mitigation related to stakeholder engagement Includes regular meetings to share project information, risks as well as developing a strategy to identity appropriate methods to disseminate and the disclosure of information to stakeholders. Development of GBV /SEA information guide integrated into the health and education materials for outreach teams</td><td>PMT and Social specialists at FGS and FMS level</td></tr>
<tr><td>UN, international and local NGOs and bilateral donor agencies</td><td>Donor, sectoral/cluster level meetings
Knowledge sharing forums for health, education and civic engagement</td><td>Every 6 months at FGS and FMS level</td><td>To solicit guidance and feedback on:
Project implementation and social risk management.
To strengthen collaboration and a multi-sectoral approach to services including to GBV/SEAH survivors</td><td>PMT and Social specialists at FGS and FMS level</td></tr>
<tr><td rowspan="2">Communities, including members from vulnerable and marginalized groups, served by project-funded health and education workers. Other community service</td><td>Public fora using approaches such as community conversations or dialogue forums.</td><td>At the launch of activities in a region and every year.</td><td rowspan="2">To inform communities on the project’s goals, activities and mechanisms.
To assess effectiveness of project services and how they can be improved.
To identify social and environmental risks and how they could be managed or their management improved.
Provide dialogue opportunities where citizens have access to</td><td rowspan="2">Social specialists at FGS and FMS level</td></tr>
<tr><td>Billboards – with visual posters on information on support to community and GM</td><td>Throughout the life of the project in project sites.</td></tr>
</table>

providers such as traditional birth attendants and madrassa teachers.	Annual user feedback surveys for sampled community representatives including VMGs where targeted services are provided	Yearly	government representatives and other stakeholders. Collect feedback from the target communities to understand their concerns, issues and perceptions of the overall project implementation. Provide information on key project-related GBV risks, as well as on reporting and response services through the identified GM procedures. Provide feedback to the targeted communities on concerns, suggestions, perceptions they have raised regarding project implementation.	
	Websites – FGS and FMS websites with information on the project and contacts, process and functionality of GM	Throughout the life of the project.		
	Social media e.g. WhatsApp, Twitter etc.	Throughout the life of the project.		
People who will benefit from project related employment (e.g. civil servants, teachers, FHWs)	Regular meetings to review progress Surveys to assess job satisfaction Virtual tools to report and effectiveness and challenges WhatsApp groups to share information and suggestions	Annual	To provide timely access to information, data, documents, and other relevant project information Learn about any issues related to social and environmental risk management and what can be improved. To increase understanding and support the effectiveness of the GM and GBV prevention.	Supervisors and social specialists at FGS and FMS level
Civil society organizations, private sector	Public forums, knowledge sharing forums Social media	Annual	To share project information To strengthen multi-sectorial approach to services provided including to GBV survivors. To promote public-private partnerships, such as joint committees, which will help strengthen impact of project	Social specialists at FGS and FMS level

4.4.SEP activity cycle

Below illustrates the key SEP activity cycles of the project after effectiveness:



5.RESOURCES AND RESPONSIBILITIES

5.1.Resources

The Ministry of Finance will be the main implementing agency for the project and will lead the implementation of project activities, including this SEP. The budget contains adequate funds for the SEP and GM and will be referenced when developing the detailed workplan. In addition to the amount allocated in the budget for the SEP, the funds allocated for the citizen engagement component will also be leveraged given the complementary activities.

5.2.Responsibilities

The FGS will provide strategic direction with respect to policy and financing of the SEP, led by the Social Safeguards Specialist, supported by the social safeguards officers in each of the 4 participating FMS. The proposed governance arrangements will consist of a Project Steering Committee, a Project Implementation Unit (PIU) at FGS and FMS levels. At the FGS level, the PIU will be managed from the Ministry of Finance. These structures will work in close collaboration with the Project Management Teams (PMT) for the new World Bank Health and Education projects and a PFM Reform Coordination Unit, which would work closely with the External Assistance Fiduciary Section (EAFS) team in the Offices of the Accountant General. The FGS will engage a project coordinator while each participating FMS will engage a project manager that will be responsible for implementation in their entity.

The overarching implementation and monitoring of the stakeholder engagement plan will be the responsibility of the PIU. The direct responsibility of implementation will be designated to the Senior Social Safeguards/GBV Specialist assisted by the social specialist within the Ministry of Finance. He/she will work other ministry-level and state-level social safeguards officers to ensure that the objectives of the plans are met and with the appropriate allocation of the necessary resources for its implementation. An adequate budget for stakeholder engagement will be allocated from the overall project cost, which will include cost for organizing meetings, workshops and training, hiring of staff, field visits, translation and printing of relevant materials and operating GMs. Some of the costs will be co-shared with the citizen engagement platform. Reports on stakeholder engagement and a summary of grievances will be received by the social specialist from the social safeguards' officers at the FMS level every three (3) months. The social safeguards/GBV staff at FMS level will receive training from the social safeguard/GBV specialists at the FGS level and the Project Management.

6.GRIEVANCE MECHANISM

The project has been classified as a project with a moderate risk, as it may have some unintended social and environmental consequences e.g. risks of further exacerbating existing exclusion patterns or tensions between groups who feel they are under/misrepresented and undermining trust between citizens and government if transparency, equity and appropriate citizen engagement is not fostered. A GM has been developed which will enable the effective redress of any grievances of the project stakeholders including civil servants and communities where the project is being implemented. In addition to a call centre with a toll-free line and outreach to communities to get feedback on the FHWs component, there will be confidential, appropriate mechanisms to deal with complaints regarding sexual harassment, exploitation, abuse, and harassment. There will also be a separate worker grievance mechanism for the use of all direct and contracted workers to raise employment-related concerns, in line with the provisions of ESS2. The project will put measures in place to ensure that this worker grievance mechanism is easily accessible to all project workers.

Responsibilities: The Ministry of Finance will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with the laws of FGS and the World Bank Environmental and Social Standards through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all grievances will be with the social specialists at the FGS and FMS PIUs who will receive grievances by email or via the call centre through publicized toll free mobile lines and email addresses at both FMS and FGS levels. They will acknowledge, log, forward, follow up grievance resolution and inform the complainant of the outcome. The head of the PIU at the FMS and FGS level will ensure that a systematic and fair process is in place to resolve all complaints. The complainant has the right to remain anonymous, in which case their identifying details will not be logged. Measures will also be put in place to ensure whistle-blower protection.

Grievances related to the overall project will be dealt with by the Ministry of Finance/PIU at FGS and FMS level, however those about health or education service provision will be resolved in conjunction with the relevant ministry at the FGS and/or FMS. The FGS social specialist will carry out training of FMS social officers and project officers including complaints handling and reporting.

A grievance redress committee (GRC) will be established at FMS and FGS level chaired by the Project Manager, and the relevant PIU staff will be included as necessary depending on the complaint (procurement, finance, M&E GBV advisor and communications), in addition, staff from the Ministries of Health and Education will be invited as required. The Social Specialists will minute the meetings and follow up the grievance resolution process. The composition of the GRC meetings will depend on the issues raised in complaints even if they are non urgent complaints. The aim of the meetings is to review complaints, progress on complaints resolution, assesss progress on the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the system and the project. Immediate meetings will be held in case of significant complaints to be addressed at the Ministry of Finance/PIU level. Significant complaints will be outlined in the GM manual. For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, the FMS social specialist should immediately inform the FGS social specialist or head of the PIU, who will inform the World Bank within 72 hours as per the Environmental and Social Incident Reporting (ESIRT) requirements.

A serious incident is one that caused or may cause significant harm to the environment, workers, communities, or natural or cultural resources, is complex or costly to reverse and may result in some level of lasting damage or injury; or failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies; or failure to remedy Indicative non-compliance that may potentially cause significant impacts. Examples of serious incidents may include injuries to workers that require off-site medical attention, exploitation or abuse of vulnerable groups, consistent lack of Occupational Health and Safety (OHS) plans in a civil works project, and large-scale deforestation. Serious incidents require an urgent response and could pose a significant reputational risk for the Bank.

A severe incident is one that caused or may cause great harm to individuals or the environment or present significant reputational risks that could hamper the Bank's ability to operate in a country or region. The Borrower's inability or unwillingness to remedy situations that could result in serious or severe harm would be a factor in classification. A severe incident is complex and expensive to remedy (if possible) and is likely irreversible. A fatality is automatically classified as severe, as are incidents of major environmental contamination, forced or child labor, abuses of community members by project security forces or other project workers (including GBV), violent community protests a project, kidnapping, and trafficking in endangered species.

The social specialists are responsible for noting and reporting critical trends emerging in the GM process such as an increase/decrease in types of grievances to share with the GRC, as well as tracking complaints expressed on social media and whether and how these should be addressed. Throughout the process, the social specialists will receive support from the PIU.

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

1. Fairness of contracting
2. Fraud or corruption issues
3. Inclusion
4. Social and environmental impacts
5. Payment related complaints
6. Quality of service issues
7. Poor use of funds
8. Workers' rights
9. Gender Based Violence, sexual harassment or sexual exploitation and abuse
10. Forced labour, including human trafficking and use of prison labour
11. Child labour
12. Threats to personal or communal safety

There will also be a separate worker grievance mechanism for the use of all direct and contracted workers to raise employment-related concerns, in line with the provisions of ESS2. This will be included in contractors' contracts and monitored by the social specialist.

There is a separate email address to receive GBV-related complaints and the call centre and FMS specialists are being trained on handling GBV complaints to enable reporting in a safe, confidential and survivor centric manner to be developed under the key activities under the SEAH prevention and response action plan and to be integrated into relevant project documents, such as the Project Operations Manual.

Building Awareness on GM: The PIU will continually brief all its staff, and the staff of the implementing Ministries and FMS PIUs, on the GM procedures to be used including the reporting and resolution, as well as how to handle and refer complaints if they receive them and whistleblower protection. A public awareness campaign will be conducted to inform all communities, stakeholders and financed staff on the mechanism, as well as it's functionality and whistle blower protection procedures to promote trust so that stakeholders feel comfortable raising concerns. The call center will broadcast informing messages to all stakeholders, including FHWs, supervisors, and civil servants on the availability of the GM. A one pager will be developed providing details and a visual poster and leaflet provided in all areas where the project is implemented. Various mediums will be used to raise awareness on the GM including social media and FM radio to reach remote communities, including call ins with panels including community and government representatives and information on how complaints are handled and resolved. The radio stations will be carefully selected to reach communities targeted for support under the RCRF 3 including vulnerable and marginalized groups. The GM procedure and contacts will also be published on Ministry of Finance website indicating a phone number, email and address for further information. The GM will be represented in simple visual material as well as Somali dialects.

The project will aim to address grievances with the following steps and indicative timelines:

	Steps to address the grievance	Indicative timeline*	Responsibility
1	Receive, register and acknowledge complaint in writing. Serious complaints immediately reported to the PM who will report to the World Bank. For GBV related cases coming in, a separate guidance of managing cases of GBV/SEAH will be developed.	Within two days	The person receiving the complaint. Social specialist at FGS and FMS levels supported by PIU
2	Screen and establish the basis of the grievance. Where the complaint cannot be accepted (for example, complaints that are not related to the project), the reason for the rejection should be clearly explained to the complainant and where possible the complaint directed to the relevant department.	Within one week	Social specialist supported by PIU.
3	Program manager and social specialist to consider ways to address the complaint if required in consultation with the GRC.	Within one week	Program manager supported by PIU.
4	Implement the case resolution and feedback to the complainant.	Within 21 days	Program manager with support from GRC.
5	Document the grievance and actions taken and submit the report to PIU.	Within 21 days	Social specialist and GRC supported by PIU
6	Elevation of the case to the government judiciary system, if complainant so wishes.	Anytime	The complainant
* If this timeline cannot be met, the complainant will be informed in writing that the GRC requires additional time.			Social specialist, GRC supported by PIU

Reporting back to stakeholders

In addition to feedback to the complainant on how complaints have been resolved (mentioned above), broad feedback on common concerns will be shared during regular stakeholder consultations.

<u>Grievances related to Gender Based Violence (GBV):</u>

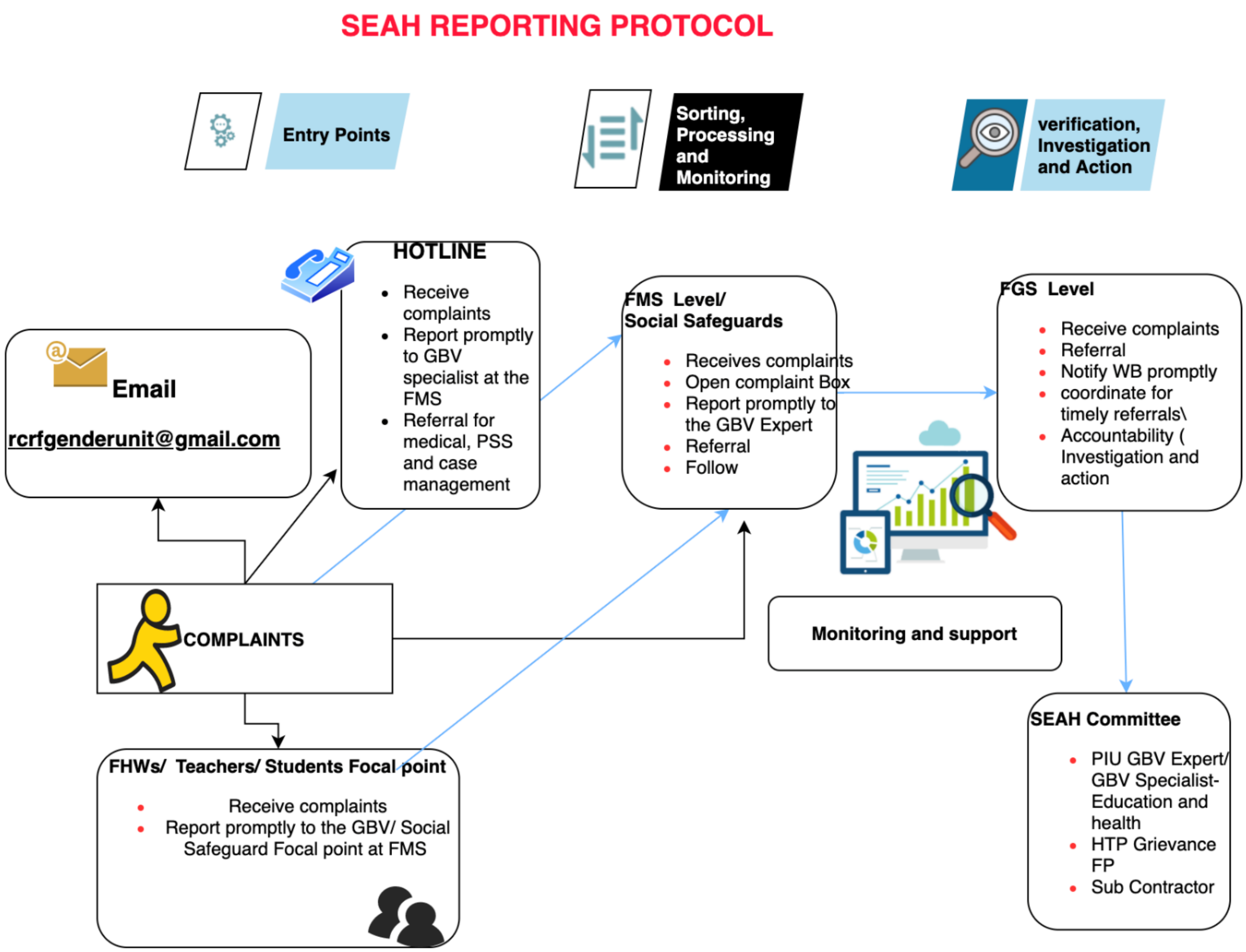
Serious complaints of sexual exploitation and abuse, sexual harassment and other forms of gender-based violence will be addressed immediately by referring the GBV survivors to support services as per the GBV Referral Pathway. GBV/SEAH cases can be reported through the general Project GM – identified project focal points, staff handling the call centres, or through the GM Hotline Operator. In addition, the PIU GBV Advisor at the FMS will man a reliable SMS, email address (**rcrfgenderunit@gmail.com)** where such complaints can be raised.

The RCRF project has designated the GBV Advisor as the Focal Person at the Federal level under the Ministry of Finance. Each FMS has also identified 1 Grievance Focal Person (the social safeguard specialist) and 1 focal point from the female health workers (FHW Supervisor) and teachers in each project location. In line with the survivor-centered approach, the grievance recipient to whom an allegation is disclosed will provide a safe, caring, and supportive environment. This means being non-judgmental, empathetic, and compassionate, and demonstrating emotional support to the survivor while clarifying relevant information. It also means respecting confidentiality and the wishes of the survivor.

Once a case has been taken in by a GM operator or via the identified focal points, informed consent of the survivor is obtained to proceed with the case, the case file/information will be submitted to the RCRF GBV Advisor. The GBV advisor will ensure that the survivor has been provided with all necessary GBV referral services and will ensure that the survivor is safe.

All reporting will limit information according to the survivor's wishes regarding confidentiality. If the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information that may lead to the survivor's identification of any potential risk of retribution. Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor.

Where the RCRF project worker has allegedly committed the GBV/SEAH grievance, the case will be reported to the respective employing agency (HTP, sub-contractor, government Ministry of Education and Health). The PIU GBV Advisor will follow up and determine jointly with a specially constituted “SEAH Committee”, the GBV Specialists from the Ministry of Health and Education, Health Technical Partner (HTP) GBV focal points, and sub-contractors on the GBV/SEAH allegations related to the RCRF project. The GBV Advisor will follow up and ensure that the Code of Conduct violation is handled appropriately according to the sanctions as indicated in the individual CoC. These sanctions may include oral, written warning, loss of salary, suspension from employment, termination of employment and report to the police if warranted.



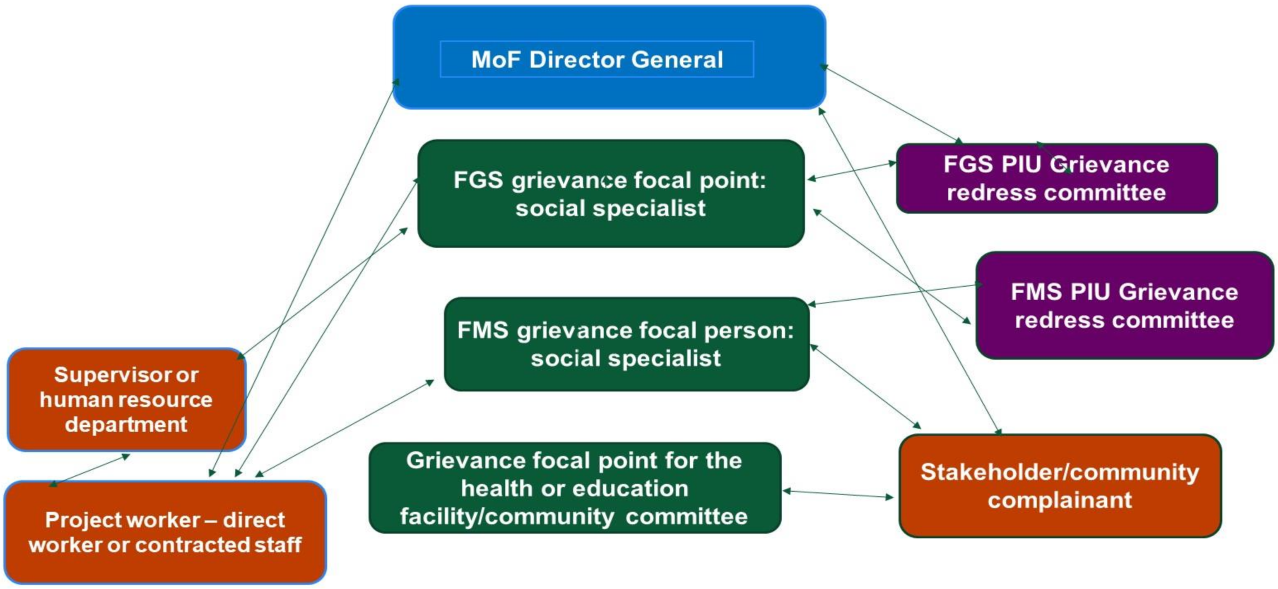
<u>Project workers GM</u>

All contractors including the Health Technical Partner and other contractors e.g., for the citizen engagement component or monitoring and citizen feedback, a workers GM will be required and included in bidding documents and contracts. Project staff at FMS and FGS level, will be encouraged to raise concerns with their immediate supervisor or the Project Coordinator (FMS) or Project Manager. However, if the concern relates to the LMP provisions they can also raise it via the social safeguards officer at FGS level who will forward to the Project manager for resolution in conjunction with a worker's GRC consisting of the procurement officer, the project secretary and the social safeguards specialist or if it is not resolved by the Director General of MoF.

See below for flowchart outlining grievance focal points and redress committees:

RCRF 3: GRIEVANCE FOCAL POINTS AND REDRESS COMMITTEES

PROJECT GRIEVANCE MECHANISM



Village level: for project components operating at village level, complaints can be raised with grievance focal points within education committee/health centre linked to FHWs or village development committee. The committee will receive and log complaints and resolve where possible or if not refer to FMS grievance focal person. If community members generally raise concerns with the chief or village elders, then the education committee or village development committee should liaise with them on receiving and resolving complaints, where appropriate, noting that women and minority groups may prefer to raise concerns directly and have them resolved by the project GM. It is unlikely that the health, education, and the citizen engagement components will be implemented in the same village, however in such cases, synergy will be promoted where possible.

FMS level: concerns can be raised by toll free text or phone/WhatsApp or devoted email or letter with the FMS social specialist.

FGS level: concerns can be raised by toll free text or phone/WhatsApp or devoted email or letter with the FGS social specialist or the project manager.

World Bank Somalia: If a grievance has been raised with the NPIU, and no satisfactory response has been received, an email can be sent to somaliaalert@worldbank.org

World Bank Washington Office: If no satisfactory resolution has been received from the World Bank Country office, grievances can be raised with the World Bank Office in Washington. For more information: http://www.worldbank.org/grs, email: grievances@worldbank.org

Or

The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018
1818 H St NW
Washington, DC 20433, USA
Email: grievances@worldbank.org
Fax: +1 – 202 – 614 – 7313

Complaints may be submitted by mail, fax, e-mail, or hand delivery to the World Bank headquarters or any World Bank country office.

World Bank's Inspection Panel: Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. www.inspectionpanel.org

7.MONITORING AND REPORTING

The overarching implementation and monitoring of the stakeholder engagement plan will be the responsibility of the PIU. In conjunction with the senior social specialist, he/she will ensure that the objectives of the plans are met and successful implementation of the plan by the allocation of the necessary resources for its implementation.

Ministry of Finance through the PIU will collect baseline data, using both quantitative and qualitative methods and report on the following indicators:

Indicator	Means of Verification
a. Number of government agencies, civil society organizations, private sector and other stakeholder groups that have been involved in consultations on the project implementation phase by FMS on a quarterly basis.	Minutes and reports of consultations disaggregated according to FMS, sector and gender.
b. Number of engagements (e.g. meeting, workshops, consultations participants sex and age disaggregated) with stakeholders during the project implementation phase (on an annual basis).	Minutes reports and other documentation of consultations.
c. Percentage of stakeholders who are aware of the GM mechanism including the workers and GBV GMs and report that they trust the mechanism to resolve complaints satisfactorily	Stakeholder meetings and surveys by FMS, type of stakeholder and gender

Indicator	Means of Verification
d. Percentage of complaints that are satisfactorily resolved and not resolved within timelines disaggregated by FMs and gender (according to the complainants (during stakeholder surveys and evaluations)	Stakeholder meetings and surveys by FMS, type of stakeholder and gender
e. Percentage of stakeholders who rate as satisfactory the level at which their views and concerns are taken into account by the project (responsible party for measuring this indicator is MoF and this will be undertaken by the PIU to conduct the Mid-Term and Terminal Evaluation).	Impact and satisfactory assessments as part of project evaluation.

The project performance assessed through monitoring activities and adjustments made through complaints management will be reported back to annual stakeholder forums at district, member state and FGS level. The lessons learned through the monitoring will also contribute to the design of future subprojects.

8.DISCLOSURE OF PROJECT DOCUMENTS

The following table outlines the disclosure of project documents:

Disclosure of project documents			
Project stage	**Target stakeholders**	**List of information to be disclosed**	**Methods and timing proposed**
Before appraisal	Civil Service, health, and education stakeholders, the general public and GBV service providers	PAD, SEP, ESCP	*WB and MOF website*
Before effectiveness	All stakeholders identified above	Updated SEP, LMP, ESMF including the SEAH prevention and response action plan, Grievance Mechanism, and medical waste management plan	*WB and MOF website*
Before project activities	All stakeholders identified above	Summary in Somali of the project and GM including workers GM and GBV sensitive GM	*MOF website, health centres and other public places where FHWs or the CE component is being implemented*

9.INDICATIVE BUDGET, SUMMARY ACTIONS AND TIMELINES

Stakeholder Engagement Activities	Timeline	Q-ty/per years (months)	Unit Cost, USD	of years	Total cost (USD)
Social officers (PIU) – 1 officer per FMS (6 total)	Before effectiveness	Per year	17,500	3years	315,000
GM toll free hotlines for all (FMS and FGS)	By April 2022	Per year	10,000	3years	30,000
Communication materials (leaflets, posters on project and GM, GM forms, registers in Somali)	By June 2022	Per year	25,000	3years	75,000
Training of all staff on GM	By April 2022	Per year	10,000	1 year	10,000
FM radio press conferences and call ins (twice per year at FGS and FMS level)	By May 2022	Twice a year	45,000	3years	135,000
Monitoring visits by FMS social officers	Once component activities start	Per quarter	27,000	3years	324,000
Annual stakeholder feedback survey (call centre)	By December 2022	Per year	150,000	3years	450,000
Subtotal					1,339,000
Contingency 5%					66,950
Total					1,405,950

ANNEX 1: MULTI-STAKEHOLDER CONSULTATION MEETING MINUTES

Held: 30th March 2022 9:00am-2:00pm
Objective: to get input and suggestions on improving the social and environmental instruments for RCRF 3 -AF including stakeholder engagement and Grievance Mechanism in the health and education sectors.

Participants: representatives of vulnerable and marginalised groups and different NGOs working in the health, education and citizen engagement and grievance redress sectors at FGS and FMS level

Time	Session	Lead
9-9.15	Opening and introduction to RCRF 3 (participants are requested to write name, function and office in the chat for the minutes)	Abdulkadir Suleiman - Min of Finance/PIU
9.15-10.15	Social risks, Stakeholder Engagement Plan and Labor Management Procedures	Ayan Said and Muhumed Hussein
10.15-10.30	Health break	
10.30-11	SEAH prevention and response action plan	Ayan Said and Muhumed Hussein
11-11.30	Environmental risks and mitigation measures	Ayan Said and Muhumed Hussein
11.30-12.30	Discussion and suggestions	Abdulkadir/ Min of Finance/PIU

The Stakeholder consultation meeting for the RCRF III Project was held on 30th March 2022 in Mogadishu. The participatory stakeholder consultation sessions were attended by the leadership of the Ministry of Finance, a representative from the office of the Prime Minister, the project team, representatives from other World Bank-financed projects, representatives from civil society organizations, UN agencies, National and International NGOs, the leadership of women groups, representative of the disabled group, University representatives, WB social safeguard specialist, and other stakeholders.

The meeting was officially opened by Suleiman Sheikh Omar a Director-General of the Ministry of Finance, The DG warmly welcomed all the participants to the meeting. In his opening remarks, the Director-General emphasizes the importance of ESF Instruments and thanked the World Bank for its support. He further urged the participants to benefit from each others' experience and provide feedback on the project's ES risks and mitigation measures through active participation in the meeting.

Mr. Abdulkadir Suleiman, RCRF Project Coordinator gave an overview of the RCRF project. Mr. Suleiman talked about the main objective of the Stakeholder Engagement Consultation meeting which is to get feedback and input on the improvement of the social and environmental management framework, including the Stakeholder Engagement Plan (SEP), GBV risks mitigation measures, Labor Management Procedure (LMP), and Grievance Mechanism (GM).

Mohamed Ibrahim, Director General of the National Commission Civil Servants talked about Human Rights and the importance of the work environment in Somalia. He stressed the need for robust human resource management systems including protecting the rights of the workers and having strong performance measurement standards in the various government offices.

Ali Abdirahman Osman, Director of Public Health stated that in both Public and Private institutions violations and abuse of power against their employees occurs. He emphasized the need to strengthen gender units in ministries to be effective and promote grassroots engagement and that all employees have equal rights.

Batula Sheikh Ahmed, Chairperson of the Somali National Women Association. Miss Batula talked about the importance of this engagement meeting with different stakeholders including the Women's groups. She reiterated that Somali women are the backbone of society both socially and economically though they're under-represented in the national leadership and decision-making positions. As women, we can play a key role in the socio-economic development of society she said.

Faduma Abdi Ali, OPM Deputy Permanent Secretary, said that the Office of the Prime Minister has close coordination with the FGS Ministry of Finance and National Civil Service Commission and are committed to working to improve a conducive environment and conditions for the public civil servants. She stressed the need of having women-friendly offices by instituting separate washrooms and prayer areas for the female staff.

Some of the key highlights of the panel discussion and follow-up plenary discussions by the participants included:

Social and environmental risks: All projects have distinct risks in addition to the overall contextual risks that affect all the projects. Some of the risks include security risks, land ownership, and disputes, displacement/eviction and sexual exploitation, abuse and Harassment, Elite capture / Exclusion, Environmental degradation, and pollution. These risks are prevalent to the project beneficiaries, especially the women and children, whereby polluted resources are used for human consumption, including the soil, water, and air.

Environment: There is a need to have an overview of the environmental impact of a project and not just on the physical environment in all the phases of the project. The natural resource on land, sea, and air benefits the environment and its degradation can be detrimental to the environment and livelihoods. Local communities and other key stakeholders need to be included in the discussion of the environmental policies and regulations to manage the project activities and their adverse effect on the environment. It is important to undertake regular monitoring and corrective measures for any deviations from the planned regulations. Site selection for any project activities important to analyze the suitability and environmental protection; Environmental impact assessment to guide all the project activities prior to the engagement of the construction and other activities. Waste management and pollution control should be set in place.

Mitigation of social and environmental risks in Somalia: It is important for all project workers to understand the overall ESS (tools) and risk classification. Such measures include but are not limited to risk forecasting, mapping, and mitigation measures, including the signing of code of conducts by all the stakeholders, community feedback and GRC, security management framework, and plans. This can be achieved by creating awareness and sufficient information sharing on all the environmental and social risks to all stakeholders. Resettlement action plans for construction of infrastructure, the compensation plans for communities affected by the project, Occupational health services for all the project and project sites, and risk classification.

Stakeholder engagement: Stakeholder engagement helps bridge the gaps between the different stakeholders and information/experience sharing. Stakeholder mapping for the project includes the primary stakeholder (direct beneficiaries) and other stakeholders. Transparent and continuous communication with the stakeholders will strengthen their engagement in the project. This will be supported by a functioning and accessible grievance mechanism to enable stakeholders to always provide feedback. For beneficiaries, there should be clear beneficiary selection criteria to ensure inclusion and uniform distribution of resources to the most deserving persons.

Gender-Based violence risks mitigation: Awareness and information sharing/normalization of some harmful practices. Abuse of power / financial / resource otherwise for sexual favors in exchange for the services. Denial and mitigation measures for the prevention of SEAH should be in place. All projects must have a code of conduct signed, and it’s important that it’s complemented with the necessary legal support mechanisms and confidence that abuse will be investigated and actioned upon. There is a need to create ample referral pathways in addition to sharing information about the support provided by aid agencies and civil society. Agencies / Institutions should also put in place mechanisms to prevent any forms of abuse in the workplace. There should be prioritization of women's economic and social empowerment and bridging the gender gaps.

Other issues raised during the consultation include:

- Continuous capacity building of the project stakeholders to bolster the project quality and deliverables.
- Strong communication and information sharing in all the phases of the project. It’s noted by the participants that communication and sufficient information sharing can forestall misunderstanding, timely resolution of risks, and enhance functioning two-way communication.
- Use of mass media to share the activities of the projects with the wider public.
- Need for monitoring and accountability of project deliverables and implementation of the agreed policies, frameworks, and tools.

- Effective and functioning grievance mechanisms that are accessible to all parties and professionals to ensure confidential treatment of sensitive cases like gender-based violence. Functionality and promptness of the responses will motivate parties to utilize the GM with confidence.
- circumventing political inference through transparency in project activities and engagement of the layers of the governance.
- Documentation and knowledge management for learning and experience sharing.
- Strengthening gender units in ministries to be effective and grassroots engagement.

Some of the specific risks and proposed mitigation measures include.

Environmental and Social Risks	Mitigation measures
Lack of or inadequate public participation.	- Ensure that measures are put in place to identify and reach the disadvantaged groups and rural populations with project information in a timely manner - Identify and equip local leaders with information on the project. - Hold meetings with the beneficiary communities and other stakeholders to update on the project and respond to any - communal concerns. - Ensure all the stakeholders agree on the project's deliverables and what their roles are and Engage stakeholders throughout the process (in problem-solving, reviewing new requirements, and creating lists of lessons learned). - Conduct monitoring, reporting, and coordination mechanisms on the environmental and social performance of the project against the ESS system. - Develop an ESCP and implement all measures. - Strengthening Institutions for Sustainability.
Lack of waste disposal management.	- Prepare and implement Waste Management Plan. - Establish Code of conducts (CoC) to be followed by all stakeholders and workers that will include penal action in case of violation of the guidelines.
There is existing sexual harassment in the workplace but mostly unreported	- Provide more awareness-raising on key Government officials and make sure all project workers must sign the Code of Conduct
There are limited separate female washrooms in the Workplace	- Separate toilets should be prepared for females.
Lack of different types of pollution prevention.	- Prepare Pollution Management strategies. - Ensure that the construction design adopted enabling environment.
Possible loss of cultural heritage during construction works.	- Project staff to ensure that contractors carefully follow the protocols and procedures to protect cultural heritage and development of cultural heritage mitigation plans.

Lessons learned:
It was an opportunity for all other World Bank Project teams to share the experiences and lessons learned in the Panel discussions organized by RCRF. There was good cross-learning and rich examples that made all the participants understand the handling of different Environmental and Social Risks.

RCRF is a leading project on Social and Environmental safeguards instruments, it is possible to use the existing GM structure and other relevant policies that are put in place for the implementation of other projects in Somalia.

S/N	Participant's Name	Title	Institution
Representatives from Government Institutions			
1.	Suleiman Sheikh Umar	Director-General	FGS-MOF
2.	Abdulkadir Suleiman	RCRF Project Coordinator	FGS-MOF
3.	Ayan Said Tukale	RCRF GBV Expert	FGS-MOF
4.	Fadumo Abdi Ali	OPM Deputy PS	FGS-OPM
5.	Ali Abdirahman Osman	Director of Public Health	FGS-MOH
6.	Abdullahi Abdihakim Ismail	RCRF Health Focal Person	FGS-MOH
7.	Abdisalam Abdullahi Mohamud	RCRF Community Health Coordinator	FGS-MOH
8.	Mohamed Ibrahim Abdikarim	Director-General	NCSC
9.	Dr Mahad Mohamed	RCRF Education Coordinator	MOECHE
10.	Abdinasir Sheikh Mire	GM Specialist	MOSLA
11.	Asad Abukar Ali	Human Rights Focal Person	MOHADM
12.	Mohamed Hussein Mad	Accountant	MOF
13.	Abdisamad Abdullahi	IGFF Secretariat	FGS-MOF
14.	Abdiwahab Omer Jama	IGFF Secretariat	FGS-MOF
15.	Abdirahman Mohamed Adan	RCRF Communication Specialist	FGS-MOF
16.	Hussein Hassan Bunow	Project Manager	SWS-MOF
17.	Abdifatah Samaale	Deputy Minister of Education	SWS-MOE
18.	Sadia Mohamed Warsame	TOT Galmudug	Galmudug-MOH
19.	Abdirizak Mohamed Hussein	EAFS Officer	FGS-MOF
20.	Ismail Hassan Ahmed	Finance Assistant	MOECHE
21.	Abdirahman Hassan	Procurement	MOECHE
22.	Abdullahi Abdirahman	FM Specialist	FGS-MOF
23.	Abdi Hassan Fidow	Coordination Unit	FGS-MOF
24.	Ali Aden Hassan	Program Officer	FGS-MOF
25.	Salma Osman Gure	PMT/CHC	PL-MOH
Representatives from UN and International Organizations			
26.	Fardowsa Abdi Mohamud	Protection and Human Rights Office	UNSOM
27.	Mohamed Mursal Abdi	Gender and Youth Program Specialist	UNFPA
28.	Hawa Ali Warsame	Head Nurse	UNSOS
29.	Ahmed Abdirahman Omar	Associate Director	World Vision
30.	Sayid Ali	Area Manager	NRC
31.	Maryan Abdi Khalif	Area Coordinator	SIHA Network
Representatives from Civil Society and Local NGO			
32.	Ahmed Dini Hassan	Operation Manager	SPL
33.	Batula Sheikh Ahmed	Chair Lady SNWA	Women Rep
34.	Halima Moalim Abikar	Chair Lady of	Tawakal Org
35.	Aisha Abdikarim Hassan	Protection Coordinator	HINNA
36.	Iqra Mohamed Osman	Finance Officer	WARDI
37.	Asha Ahmed	M &E Officer	SPL
38.	Xabibo Ali Abukar	Deputy Chair	Women Group
39.	Suldano Ahmed Mohamed	Director	Women group
40.	Halawi Sheikh Dahir	Chair Lady	BAWDO org
41.	Abdinasir Aden Osman	Project Manager	GREDO
42.	Hussein Ali Moallim	Program Officer	SMCAN
Representatives from Other World Bank Projects			
43.	Amina Nor Mohamed	Social Safeguard Specialist- Damal Cafimad	FGS-MOH
44.	Mohamed Nor Haji	Environmental Specialist- Damal Cafimad	FGS-MOH
45.	Nor Ali Mohamud	PCU Coordinator-Damal Cafimad	FGS-MOH
46.	Halima Farah	GM -Somali Crisis Recovery Project SCRP	FGS-MOF
47.	Khadra Abdirahman	Communication Specialist- Damal Cafimad	FGS-MOH
48.	Fadwo Hassan Jimale	GBV Specialist-Damal Cafimad	FGS-MOH
49.	Mohamud Ali Salad	Environmental Specialist-SEHCP	MOE MOCHE
50.	Abdirahman Omar Warsame	Contract Management Specialist- Damal Cafimad	FGS-MOH
51.	Abukar Sayid Ali	Social Specialist-Scaled Up Project	FGS-MOF

52.	Ahmed H Mohamed	M&E -Scaled Up Project	FGS-MOF
53.	Amina Arale	Gender and GBV Specialist-SURP Project	FGS-MPWR
54.	Abdiqani Muse Farah	Stakeholder Engagement Officer-SCRP	FGS-MOF
55.	Muna Ali Abdullahi	GBV Specialist-SEHCP	MOECHE
Representatives from Universities			
56.	Abdimalik Khalif Ahmed	Social Work	City University
57.	Osman Muse Mohamed	Social Work	City University
58.	Salma Suleiman Mohamed	Social Work	City University
59.	Muhumed Hussein	Social Safeguard Specialist	World Bank
60.	Liban Abdi Mohamud	FM Specialist	FGS-MOF

Closing:
Mr. Abdulkadir Suleiman, RCRF Project Coordinator officially closed the meeting. In his closing remarks, the coordinator thanked all participants for their valuable contributions and has officially closed the meeting and wished such productive meetings to continue moving forward.

Annexes:

Annex I: List of Participants
Annex II: Meeting Agenda
Annex III: Meeting Photos

ANNEX 2: COMPLAINTS FORM (to be translated into Somali)

1. Complainant's Details

Full name or Reference number (if confidentiality requested):

____

Male/Female

Mobile ____

Email ____

District____

Relationship to the project

____

Age (in years): ____

2. Which institution or officer/person are you complaining about? Ministry/department/agency/company/group/person

____

____

____

3. Have you reported this matter to any other public institution/ public official?

☐ Yes ☐ No

4. If yes, which one?

____

____

5. Has this matter been the subject of court proceedings?

☐ YES ☐ NO

6. Please give a brief summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

____

____

____

____

7. What action would you want to be taken?

____

____

____

____

Signature __________________________________

Date ______________________________________

ANNEX 3: COMPLAINTS LOG

Date	Name and contact of complainant (or reference number if anonymous)	Staff/ institution complained against	Nature of complaint/ service issue, e.g. delay	Type of cause – physical human (e.g. inefficient officers, slow, unresponsive) or organization (e.g. policies, procedures, regulations)	Remedy granted	Corrective/ preventive action to be taken	Feedback given to complainant and agreement given

ANNEX 4: COMPLAINTS REPORTING TEMPLATE

District: **Position:** **Name:**

3 month period (start and end dates)	No. of complaints received	Main mode complaint lodged	No. of complaints resolved	No. of complaints pending	Duration taken to resolve, e.g. spot resolution, 1 day, 7 days, 14 days, 1 month, quarterly, annual	Recommendations for system improvement

ANNEX 5: REFERENCES

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World Bank (n.d.) How to Notes: Feedback Matters: Designing Effective Grievance Mechanisms for Bank-Financed Projects Part 1: the Theory of Grievance Redress,
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