



**SOMALIA CAPACITY ADVANCEMENT, LIVELIHOOD AND
ENTREPRENEURSHIP, THROUGH DIGITAL UPLIFT PROGRAM
(SCALED-UP)**

ADDITIONAL FINANCING

STAKEHOLDER ENGAGEMENT PLAN

NOVEMBER 2021

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1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) developed for the Additional Financing (AF) Somalia Capacity Advancement, Livelihood and Entrepreneurship, Through Digital Uplift Project (SCALED-UP).

The parent project is a US\$ 31 project funded by International Development Association (US\$ 18 million) and the Multi-Partner Fund (MPF) project (US\$ 13 million), effective since August 2019. The project is implemented in the Federal Republic of Somalia (FRS) including Federal Member States (FMS). The project aims to support progress towards increased access to basic digital financial and government services targeting entrepreneurship and employment, particularly for women. The project has three components, which are summarized below.

Additional Financing and Restructuring: On June 9, 2021, the World Bank Executive Board of Directors approved \$US70 million additional financing (AF) project, combined with a restructuring. The AF will aid the FGS in supporting resilient recovery of households and businesses affected by the COVID-19 pandemic. This AF project is a response to the request from the Federal Government of Somalia (FGS) to scale up parent project activities to enable FGS emergency response to the COVID-19 pandemic by: (i) expanding access to finance for Micro, Small and Medium Enterprises (MSMEs), and (ii) accelerating critical reforms and capacity building initiatives needed to underpin resilient recovery and safeguard sustainable livelihoods.

The AF activities are in line with the components of the parent SCALED-UP (P168115) Project. The AF project description, PDO, project components and sub-components, safeguards, fiduciary, and implementation arrangements remain materially unchanged, continuing to support progress toward increased access to basic digital financial and government services targeting entrepreneurship and employment, particularly for women. The AF activities will scale up the parent project's activities through scaling up Gargaraa's financing windows to mitigate MSMEs' liquidity shortages caused by the pandemic and by accelerating reforms and operationalizing digital infrastructure and platforms to enable the integrity and proper functioning of financial markets and digital financial systems. This will in turn help tackle the negative effects of the COVID-19 pandemic on Somali MSMEs and strengthen FGS' ability to build back better.

The AF also included a restructuring, featuring (a) updates to the Results Framework (RF) to reflect an updated assessment and scaling up of the parent project; (b) changes in disbursement arrangements to introduce performance-based conditions (PBCs) for activities that support the CBS given the growing capacity and the need to incentivize critical financial sector reforms, and scaled up and extended offering by Gargaara; (c) changes in disbursement projections; (d) changes to costs pursuant to the AF; (e) updated covenants; and (f) an extension of the project closing date by 30 months to December 31, 2025. The PDO remained unchanged and achievable.

This project uses the existing country systems and builds on the **foundations laid by predecessor projects' early successes i.e., SCORE (P152241) and ICT Sector Support (P152358) programs**. With financing from IDA's Pre-Arrears Clearance Grant (PACG) facility as well as the MPF, the project proposes to further support reforms associated with stabilizing core government functions that will help Somali communities overcome economic isolation.

1.1 PROJECT DESCRIPTION

The Project is to support progress toward increased access to basic digital financial and government services targeting entrepreneurship and employment, particularly for women. The achievement of this PDOs is measured by the achievement of the following indicators;

1. Number of people who have received their unique ID number, of which (%) are female;
2. Number of unique transactional accounts opened using a digital Customer Verification System (CVS) to enable electronic KYC (eKYC) protocols, of which (%) are female;
3. Number of MSME loans disbursed from Gargaara by Participating Retail Financial institutions, of which (%) are loans to women owned and managed businesses;

Number of firms that benefit from reformed business registration requirements, of which % are women owned firms.

The project objectives will be achieved through the following three components:

Under the parent project:

Component 1: Strengthening institutions

The project proposes to support FGS to enhance the environment for digital transactions and services.

- Subcomponent 1.1 Support to CBS: The subcomponent will provide technical and financial support to the CBS to strengthen critical systems for financial institutions regulations and supervision; and promoting efficient financial intermediation.
- Subcomponent 1.2: Support to FRC: This subcomponent will provide technical and financial support to the FRC to strengthen its operational capability and core systems needed for effective analysis and investigation of suspected cases of money laundering or financing of terrorism (ML/TF).
- Subcomponent 1.3: Support to MoCT and NCA: this will support activities that directly contribute to enhancing citizens' access to digital services and maximizing the development impact of ICT, including improving affordability and service quality, as well as enabling efficient, secure, and reliable digital transactions and innovation

- Subcomponent 1.4: Support to new ID Authority: The project will support the creation of a robust enabling environment and institutional framework for a digital ID system, which is expected to provide at least 1 million people with a biometrically supported unique ID number and will serve as a platform for financial access, digital payments, and delivery of Government, humanitarian, and private sector services.

Component 2: Enabling Financial and Digital Services

- Subcomponent 2.1: Financial intermediary financing for MSMEs: The project proposes to establish an Gargaara Company initially capitalized with US\$15 million to fulfil the project objective of increased access to finance for MSMEs supporting entrepreneurship and employment.
- Subcomponent 2.2: Digital ID services: The project proposes to support the registration of at least 1 million people to enable greater financial access and lay the groundwork for further scale-up of the system.
- Subcomponent 2.3: Government and retail payment services: The project proposes to finance the integration of the mobile money services into the payment switch, allowing for communication and integration between different retail payment service providers using interbank payment mechanisms.
- Subcomponent 2.4: e-Registration Services for SMEs: The project proposes to cover costs associated with supporting the MoCI to facilitate unique identification of legal entities through integrated online 'one-stop shop' business registration services.

Component 3: Project Management and Coordination:

The project will fund project coordination activities including provision of goods, consulting services, training, and operating costs of the Project Implementation Unit (PIU) to support project coordination, implementation, monitoring and evaluation (M&E), and management.

1.2 ADDITIONAL FINANCING

The project will retain the same component structure under the AF. Component 1 will continue to focus on strengthening institutions, and Component 2 will continue to support sustainable and digitally enabled mechanisms to increase individuals' and businesses' access to services. Component 3 will cover project management and coordination. The details of each component are outlined in the following paragraphs.

Component 1: Strengthening Institutions

- Subcomponent 1.1: Support to CBS: In light of the COVID-19 pandemic, the AF will scale up support to the CBS and provide strengthened incentives for the achievement of critical

financial sector reforms that safeguard financial stability and integrity and thus secure stable transmittal channels for international remittances, private capital, and ODA.

- Subcomponent 1.2: Support to FRC: The AF will finance additional activities related to the improvement and implementation of the AML/CFT regime and dissemination of results of the ongoing national risk assessment, requested by the FRC.
- Subcomponent 1.3: Support to Ministry of Communications and Technology (MoCT) and NCA the AF proposes to strengthen the enabling framework for digital service delivery, data management, and data safeguards, critical to supporting remote working and business continuity in the public sector in connection with the COVID-19 pandemic and future emergencies.
- Subcomponent 1.4: Support to Digital ID Authority: No AF is allocated under this subcomponent. TA support is already allocated under the parent project, which will cover support for the ID Authority's institutional setup and related capacity building, including legal and technical advisory support for the planning and early operationalization of the ID system.

Component 2: Enabling Financial and Digital Services

- Subcomponent 2.1: Financial Intermediary Financing for MSMEs (through Gargaara): the aims to accelerate the recovery of MSMEs from the impact of Somalia's multiple crises through the SCALE-UP of Gargaara's existing financing windows.
- Subcomponent 2.2: Digital ID Services: This subcomponent will fund the ID system's technical infrastructure, including components related to enrollment, secure identity management, credential issuance, and digital identity verification that are not otherwise financed through the FGS' bilateral agreement with the Government of Pakistan.
- Subcomponent 2.3. Government and Retail Payment Services: The AF will scale up investment in the foundational infrastructure and services that can warehouse and safeguard critical information systems, which can be shared across the Government to ensure more secure data management and exchange.
- Subcomponent 2.4: e-registration Services for SMEs: The AF will support the MoCI to sustain registration momentum related to the recent launch of the full functionality of the online BRS.

Component 3: Project Management and Coordination:

It is proposed that the project's management and coordination arrangements will be enhanced to ensure appropriate implementation of the AF. The AF will support a SCALE-UP of gender-sensitive programming, promoting compliance with good safeguards practices, improved stakeholder engagement (especially targeting women), and a strengthening of feedback loops to shore up early learning, adaptive, and iterative approaches to implementation.

1.3 STAKEHOLDER ENGAGEMENT PLAN

This document describes the Stakeholder Engagement Plan (SEP) of SCALED-UP AF. Stakeholder engagement refers to a process of sharing information and knowledge in a meaningful manner, seeking to understand and respond to the concerns of individuals potentially impacted or affected by the project in a transparent, inclusive and timely manner and building relationships based on trust.

The scope of the SEP covers the Project in its entirety (i.e., additional funding initiatives) in Somalia. As such, the SEP includes the various stakeholders positively, neutrally and adversely affected by AF.

The SEP is further developed within the applicable reference framework consisting of the regulatory framework, ESMF developed by the World Bank for the Ministry of Finance in January 2019 as part of SCALED-UP and the World Bank's Environmental and Social Safeguards.

This SEP is intended to be a 'live' document that is updated throughout the SCALED-UP AF lifecycle to document the implementation of community engagement, communication strategy and changing Project landscape. This SEP will be reviewed regularly by the Project Implementation Unit (PIU) and updated as relevant.

1.4 OBJECTIVES OF THE SEP

The main objectives of the SEP are:

- To provide stakeholders with a clear process for providing comment and raising grievances;
- To allow stakeholders the opportunity to raise comments/concerns anonymously through using the existing hotlines;
- To structure and manage the handling of comments, responses and grievances, and allow monitoring of effectiveness of the mechanism; and
- To ensure that comments, responses and grievances are handled in a fair and transparent manner in line with international best practice and WB expectations.

1.5 EFFECTIVE STAKEHOLDER ENGAGEMENT PRINCIPLES

Stakeholder Engagement will be free of manipulation, interference, intimidation and coercion, and conducted on the basis of timely, relevant understanding, accessible information and in a culturally appropriate format. It will involve interactions between identified group of people, providing them with an opportunity to raise concerns and opinions and ensuring the information provided is taken into consideration in decision making.

Effective stakeholder engagement develops a “social licence” to operate which depends on mutual trust, respect and transparent communication between the project and stakeholders. It therefore improves the project's decision-making and performance by managing risks, avoid conflict, enhance reputation and manage stakeholder expectations.

Stakeholder engagement is informed by a set of core values underpinning interactions with stakeholders. Common principles based in International Best Practice are:

- Transparency will be demonstrated when stakeholder concerns are acted upon in a timely, open and effective manner;
- Trust is achieved through open and meaningful dialogue that respects and uphold the stakeholders' values, opinions and beliefs;
- Integrity will occur when engagement is conducted in a manner the fosters mutual respect and trust;
- Respect will be created when rights, cultural beliefs, values and interests of stakeholders are recognized;
- Commitment will be demonstrated by the need to understand, engage and identify stakeholders is recognized and acted upon early; and
- Inclusiveness will be achieved when brad participation is encouraged and supported by providing appropriate participation opportunities.

1.6 WORLD BANK REQUIREMENTS ON STAKEHOLDER ENGAGEMENT

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

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

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

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

2 STAKEHOLDER ENGAGEMENT

2.1 STAKEHOLDER ENGAGEMENT PRINCIPLES

To ensure compliance with international best practices, the project will apply the following principles during stakeholder engagement.

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

2.2 STAKEHOLDER IDENTIFICATION

The first step in the stakeholder engagement process for the SCALED-UP AF is to identify the key stakeholders to be consulted and involved in the projects development phases at national and district levels. Stakeholders are institutions, groups of people or individuals who are affected or likely to be affected by the project and who may have an interest in the project. These stakeholders could be directly or indirectly affected and have potential to influence the projects implementation in a positive or negative way and might therefore need to express their concerns through various stakeholder forums. Stakeholders of the project grouped into the following category;

- Affected Parties;
- Other interested parties; and
- Disadvantaged/Vulnerable individuals and groups.

From the above, potential stakeholders for SCALED-UP AF may include but not limited to:

Affected parties:

- Business and farming communities;
- Banks and other financial institutions;
- Relevant National Department & Agencies (i.e. Ministries, CBS, etc);
- Marginalized and Disadvantaged People (include women, children, youth, people with disabilities, elderly, ethnic minorities);
- General public.

Other interested parties

- Security apparatus (e.g. police, military, private security service providers, etc)
- Local and International NGOs;
- Civil Society Organizations (CSOs);
- World Bank and institutional partners;

Marginalized & Disadvantaged People

- Refugees and internally displaced persons;
- Women group;
- Nomadic communities;
- People with disabilities;
- Ethnic minorities.

2.3 STAKEHOLDER MAPPING AND ANALYSIS

Stakeholder mapping is a process of examining the relative influence that different individual and groups have over a project as well as the influence of the project over them. The purpose of a stakeholder mapping is to

- Profile stakeholders identified and the nature of the stakes;
- Understand each group's specific issues, concerns as well as expectations from the project that each group retain; and
- Gauge their influence on the project.

Stakeholder analysis is the process of identification of key stakeholders, an assessment of their interests in the project and way in which these interests may affect the project. The reason for doing a stakeholder analysis is to identify who to inform and consult, who to build and nurture relationships with and what roles they should play and at which stage.

Based on this understanding, stakeholders are categorized as:

- **High Influence:** are those who are expected to have a high influence over the Project or are likely to be heavily impacted by the Project activities: they should thus be high up on the Project's priority list for engagement and consultation.

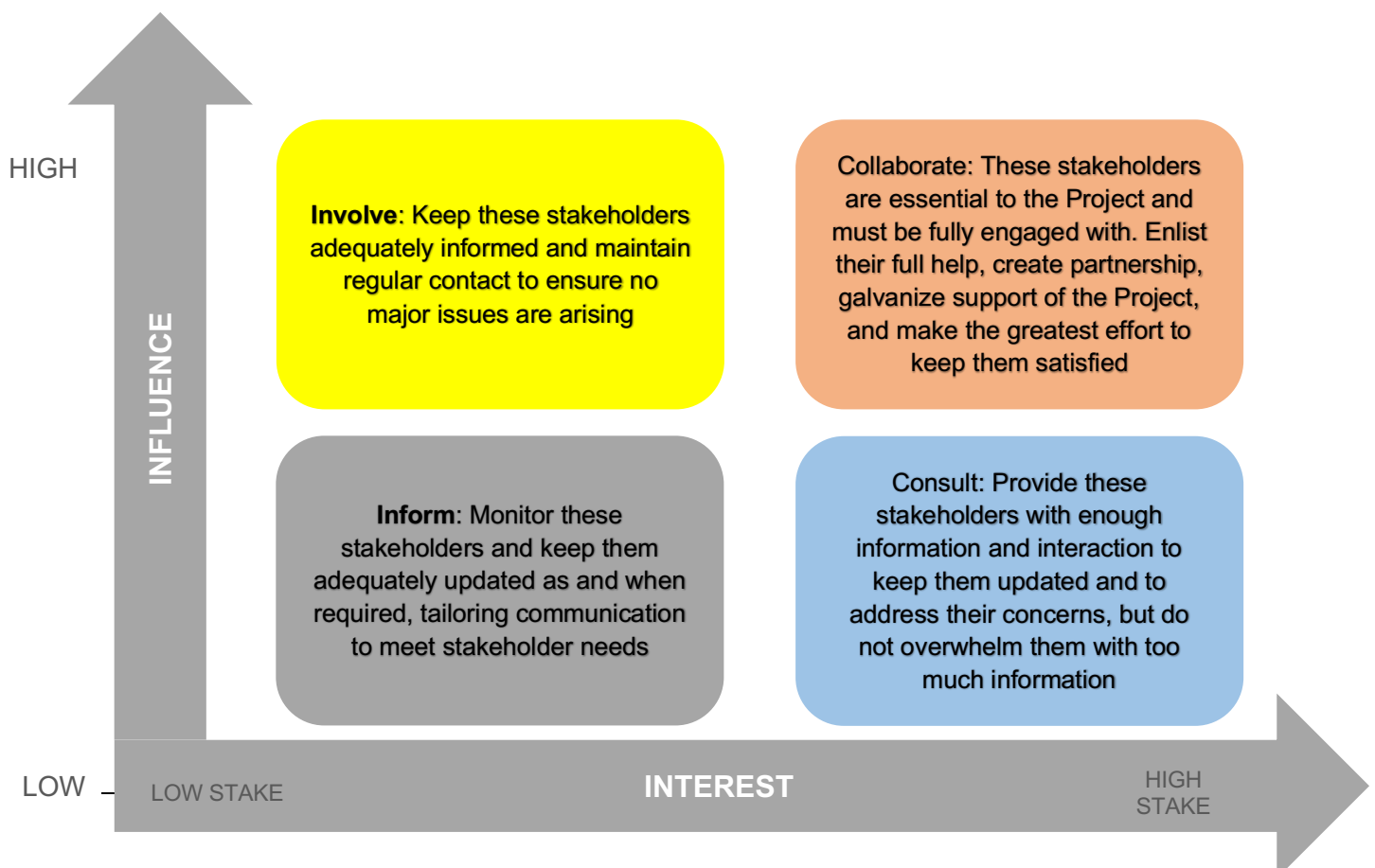
- **Medium Influence:** are those who are expected to have a moderate influence over the Project or even though they are to be impacted by the Project, such impact is deemed unlikely to be substantial: these stakeholders should thus be neither high nor low on the Project's engagement list.
- **Low Influence:** are those who are expected to have a minimal influence on the decision-making process or are to be minimally impacted by the Project: they should thus be low on the Project's engagement list.

Table below provides brief profiles of the various stakeholders in the project and their likely degree of influence

Stakeholder Category	Stakeholder Group	Magnitude of Impact/Influence	Stakeholder Significance
Community	Farming & Business communities	Impact of Project on Stakeholder: High Influence of Stakeholder on Project: High	High
	General public	Impact of Project on Stakeholder: High Influence of Stakeholder on Project: High	High
Financial Institutions Telecom companies	Banks & Money Transfer Businesses Internet providers	Impact of Project on Stakeholder: High Influence of Stakeholder on Project: High	High
Government Bodies	Ministry of Finance	Impact of Project on Stakeholder: High Influence of Stakeholder on Project: High	High
	Central Bank of Somalia	Impact of Project on Stakeholder: High Influence of Stakeholder on Project: High	High
	Ministry of Education	Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High	Low
	Ministry of Communication & Technology	Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High	Moderate

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Stakeholder Category	Stakeholder Group	Magnitude of Impact/Influence	Stakeholder Significance
	Directorate of the Environment	Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High	Low
NGOs	International & Local NGOs	Impact of Project on Stakeholder: Moderate Influence of Stakeholder on Project: High	High
	Community Based Organizations	Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High	High
Institutional Stakeholders	World Bank	Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High	High
Local Government Authorities	Municipal Councils	Impact of Project on Stakeholder: Small Influence of Stakeholder on Project: High	High



3 STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1 STAKEHOLDER ENGAGEMENT ACTIVITIES TO DATE

Stakeholder engagement activities were undertaken during the development of the Environmental and Social Management Framework in 2018 to support the initial design of SCALED UP. Consultations were undertaken with pre-identified major Project stakeholders. The discussions focused on the general scope of the Project and on (i) Project benefits; (ii) potential environmental, social and economic impacts; (iii) public expectations and (iv) feedback to refine the Project design/implementation.

No stakeholder activities have been undertaken for environmental and social impact anticipated from the additional financing of SCALED UP. The Project is planning stakeholder engagement activities thus this SEP will be updated accordingly.

4 STAKEHOLDER ENGAGEMENT PROGRAM

4.1 LEVEL OF ENGAGEMENT

The level of engagement that is appropriate is considered during the planning phase of the Project. This involves the assessment of the materiality of the subject matter of engagement. The figure below illustrates the level of engagement the various stakeholder mapped under 2.3 will be engaged during the Project implementation.



4.2 STAKEHOLDER ENGAGEMENT APPROACH

Choice of the engagement approach depend upon objectives, the required level of engagement, the timing of when engagement activities are intended to take place and the expected role of the stakeholder(s).

Stakeholder engagement methods will be participatory (two-way) and informative (one-way). This will facilitate the receipt of concerns, comments and suggestion as well as managing stakeholder expectations and conflicts.

The table below present the stakeholder engagement approach that will be implemented by the Project.

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Table 3-1: Stakeholder Engagement Approach

Target Stakeholder (organization, group or individual)	Message	Engagement Activity & Methodology	Responsibility	Timing	Follow-up strategy (plan for feedback for continued involvement)
Business communities Financial institutions	Project components Project objectives Project timelines Safeguard instruments implementation	One -to-one meetings meeting Vendor contracts Code of Conduct Grievance Procedure Phone call & Emails	Project Implementation Unit (PIU)	Very frequent (weekly)	Management meetings Oversight monitoring and inspections Vendor Evaluation
General public Rural communities Nomadic communities	Project components Project objectives Project timelines Project implementation partners	Outdoor & electronic media advertising Social Media Information boards Grievance Procedure Focus group discussion	Project Implementation Unit (PIU)	Frequent	Satisfaction surveys Oversight monitoring and inspections
Business community Small market traders Livestock traders	Project components Project timelines Project objectives Project implementation partners	Face to face meetings Outdoor & electronic media advertising Focus group discussion Grievance Procedure	Project Implementation Unit (PIU)	Frequent	Oversight monitoring and inspections Scheduled face to face meetings
Internally Displace People Vulnerable groups Women groups	Project timelines and objectives Project implementation partners	Face to face meetings Focus group discussion Grievance Procedure	Project Implementation Unit (PIU)	Very frequent	Scheduled face to face meetings

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Target Stakeholder (organization, group or individual)	Message	Engagement Activity & Methodology	Responsibility	Timing	Follow-up strategy (plan for feedback for continued involvement)
Regional & Federal Administrators Law enforcement	Security and safety Community mobilization and consultations Project progress	Face to face meetings Phone call Official Letter	Project Implementation Unit (PIU)	Frequent	Scheduled face to face meetings
Community & Clan Leaders Religious leaders	Community mobilization and consultation Exclusion risk Grievance management	Face to face meetings Phone call	Project Implementation Unit (PIU)	Frequent	Scheduled face to face meetings Scheduled face to face meetings
Local NGOs International NGOs Community Based Organizations (CBOs)	Community consultation and engagement Gender-based Violence Grievance management	Face to face meetings Phone call & Email Official Letter Workshops	Project Implementation Unit (PIU)	Very frequent	Scheduled face to face meetings Feedback questionnaire

The Project has developed tools (guides) for planned community consultations. The engagement will be carried in focused groups and interviews of key informants within the target project areas. Community consultations will be carried by PIU staff and the guides will provide instruction on preparation for the meetings and kinds of questions to be administered during the interviews and focused discussions

4.3 INCLUSIVENESS

It is particularly important to understand whether the Project may disproportionately impact marginalized or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project.

A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable individuals in public consultations and other engagement forums established by the Project. People's vulnerability may stem from their place origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups). Vulnerable or marginalized individuals or groups can thus be:

- Female-headed households, who may be impaired from accessing information because they are disproportionally impacted by poverty, access to resources or lack of voice in the community, or because they have limited time to participate because of their activities and various commitments, but could be adversely impacted by Project due to literacy levels;
- Elderly people, who may be impaired from accessing information, maybe because they are incapacitated to read, to hear or to walk, or because they live alone and at a distance that prevent them from accessing information available online;
- Ethnic minorities households whose values, land or culture may be directly or indirectly affected by the Project.

Vulnerable or disadvantaged individuals or groups may thus be typically limited in getting access to disclosure or participatory activities linked to the Project.

Most vulnerable and marginalized groups may not be able to raise their concerns nor understand benefits of the project. An approach to understanding their views is therefore necessary to identify who they are, limitations to their participation in the project, how they better access and understand information, their preferred time and means of communication.

The principles of FPIC will be applied in ensuring an inclusive process of engagement with vulnerable groups of people is applied for SCALED UP AP Projects and Sub-Projects.

4.3.1 *Engaging Vulnerable and Marginalized Group*

The Project will implement measures to ensure that vulnerable and marginalized groups have equal opportunity to project benefits. This will include ensuring that they are involved in consultations on implementation strategy. In addition, efforts will be made to ensure they are not excluded by the Project in accessing critical services.

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

The participation of vulnerable and marginalized groups in the project design, planning and implementation will largely determine the extent to which inclusiveness will be achieved. Where adverse impacts are likely to occur from the Project, the PIU will carry out prior and informed consultations with vulnerable and marginalized communities. The primary objectives will be to:

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

Consultations amongst the vulnerable and marginalized groups will be carried out broadly in two stages. First, during planning stage, PIU will arrange for consultations with community leaders, representatives of vulnerable and marginalized groups about the need for, and the probable positive and negative impacts associated with the project activities. Secondly, during the roll-out of the Project activities, consultations will be conducted to ascertain how the vulnerable groups in general perceive proposed interventions and gather any inputs/feedback they might offer for better outcomes, which would inform the project delivery.

The PIU and Implementing partners will:

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

The following measure will be implemented during the implementation stage of the project to ensure the objective of inclusion are achieved:

- Provision of an effective mechanism for monitoring implementation of the Inclusion Plan;
- Development of accountability mechanisms to ensure the planned benefits of the project are received by marginalized and vulnerable individuals and groups;
- Involve suitably experienced CBOs/NGOs to reach out and involve marginalized and vulnerable people;
- Ensuring appropriate budgetary allocation of resources for the Inclusion Plan;
- Provision of technical assistance for sustaining the activities addressing the needs of the marginalized and marginalized; and
- Ensure that marginalized and vulnerable groups' traditional social organizations, cultural heritage, traditional political and community organizations are protected.

5 INFORMATION DISCLOSURE

Project information will be packaged and shared with key stakeholders using suitable and appropriate methods. PIU will be responsible for ensuring that the information disclosed to stakeholders is done in a timely manner. Feedback received will be incorporated in the Project documentation to ensure they are robust and inclusive. Table below present a summary of information disclosure by the project

This SEP is a living document and may be modified and updated with new information and suggestion from stakeholders.

Table 4-1: Information during project cycle

Information to be disclosed	Methodology	Target stakeholder	Responsibility
Appraisal Phase			
Disclosure of Project documents (ESMF, SEP, GRM, etc)	Website – World Bank & Ministry of Finance Stakeholder Meetings	All key stakeholders	PIU
Implementation Phase			
Disclosure of Project documents i.e., ESMF, Stakeholder Engagement Framework, Security Management Plan, LMP, GBV Action Plan, etc	• Websites - CBS and WBG • Stakeholder Meetings • Town hall meetings • Progress reports • Emails	All key stakeholders	WBG Team PIU Ministry of Finance Implementing partners
Project Schedule with key activities	• Town hall meetings • Press releases • Stakeholder meetings • Progress reports	Implementing partners General public State and District Administrators	WBG Team PIU CBS
List of Contractors	• Websites – WBG & Ministry of Finance • Press releases • Print & electronic media (Newspaper advert, radio)	Implementing partners	PIU Ministry of Finance

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Information to be disclosed	Methodology	Target stakeholder	Responsibility
Update on project progress	• TV/Radio spots/activations and announcements • Print materials (newsletter, flyers, etc.) • Social Media (Facebook, twitter) • Project progress reports • Town hall meetings • Websites (World Bank, Ministry of Finance)		PIU/CBS
Complaints/Grievance	• Progress reports • Stakeholder engagement meetings • External Grievance Register and Complaint Forms	Business community Local community Vulnerable & Marginalized groups	PIU Social Safeguard Specialist
Stakeholder Engagement Activities	• TV/Radio spots/activations and announcements • Bulk SMS • Town hall meetings • Social Media (Facebook, twitter) • Email	All key stakeholders	Social Safeguard Specialist PIU Coordinator

6 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 RESOURCES

Resources will be devoted to managing and implementing the Stakeholder Engagement Framework, in particular, in terms of people, budget and channels maintained to communicate by all parties to the Project

6.2 RESPONSIBILITIES

The PIU has direct and overall responsibility for the implementation and regular update of this Stakeholder Engagement Framework, including the undertaking and supervising of engagement with all stakeholders in relation to the Project, and draws upon the available internal resources to ensure that the planned activities are conducted effectively and to the appropriate standard. The responsible persons within the PIU will coordinate the disclosure of Project information; public consultation activities and the management of the Grievance Redress Mechanism

7 GRIEVANCE REDRESS MECHANISM (GRM)

7.1 PRINCIPLES OF GRM

A Grievance Redress Mechanism receives and facilitates resolution of affected stakeholders' concerns and grievances related to the Project's environmental and social performance. The GRM process should be disclosed publicly and available during the operation phases of the Project, and to be used by all affected stakeholders, Project implementing partners and contractors.

Stakeholders will be informed about the GRM during the stakeholder consultation and disclosure activities. The mechanism will be communicated and made available to all stakeholders and in particular to both genders and vulnerable groups.

Grievances should be received, recorded/ documented and addressed in a manner that is easily accessible, culturally appropriate and understandable to affected stakeholder. Where feasible and suitable for the Project, the grievance mechanism may utilize existing formal and informal grievance mechanisms, that will support the Project-specific proposed arrangements. The Project dedicated personnel on handling grievances will be consistent, experienced and qualified to do so.

Concerns will be addressed promptly, using a transparent process that is readily accessible to all segments of the affected stakeholders and at no cost to them and with no retribution. Grievances received and responses provided will be reported back to the community periodically.

The Project dedicated personnel will be experienced and/or trained to seek solutions to complaints in a collaborative manner with the involvement of the affected stakeholders, taking into consideration customary and traditional methods of dispute resolution, and not impeding access to existing judicial or administrative mechanism available in the country for resolution of disputes. The mechanism includes a redress aspect so that those who feel their complaint has not been addressed in a manner they find satisfactory can have recourse to an external body for reconsideration of their case.

The Project will provide an option for anonymous grievances, including for worker grievances whereby identity can be protected from any repercussions.

7.2 GRM PROCESS

Presently SCALED UP implements a standalone GRM procedure that incorporates key elements of GRM process from receipt of grievance to resolution including tracking of grievances. GRM process also includes GRM focal point(s) (Appointed personnel and Grievance Management Committee) and GRM monitoring (documenting, logging grievance received and addressed).

8 MONITORING AND REPORTING

8.1 MONITORING

Monitoring the stakeholder engagement activities is important to ensure that consultation and disclosure efforts are effective and in particular that stakeholders have been meaningfully consulted throughout the process. Monitoring also allows the Project to improve its strategies by using information acquired from the monitoring activities. The Project will monitor the stakeholder engagement activities and in particular:

- The implementation of the SEF
- The effectiveness of the engagement process in managing impacts and expectations by tracking responses received from engagement activities;
- Consultations and disclosure activities conducted with stakeholders; and
- All grievances received and resolved whether anonymous or non-anonymous.

Performance will be evaluated bi-annually by tracking:

- Place and time of formal engagement events and level of participation by specific stakeholder categories and groups;
- Numbers and type of grievance and the nature and timing of their resolution;
- Materials disseminated i.e., type, frequency and location;
- Number of comments by issue/ topic and type of stakeholders, and details of feedback provided; and
- Community attitudes and perceptions towards the Project based on media reports and stakeholder feedback.

8.2 REPORTING

The Project Implementation Unit (PIU) will develop regular reports (typically quarterly) which will typically be required by the World Bank and the Ministry of Finance. The reports will present all activities, including stakeholder engagement activities, for the period and summarise the issues. The report and its annexes will also detail the measures taken to address the issues, timeline of responses, as well as corrective and mitigation measures to address grievances and analysis of trends.

Data reported on will include the following activities:

- information distribution of disclosure materials;
- public announcements and engagement of media;
- disclosure and consultation meetings; and
- collection and incorporation of comments and feedback.

ANNEXES

ANNEX A: SUMMERY OF PUBLIC CONSULTATION

Public Consultation And Stakeholder Engagement

On July 11 to 12/2021 A Public Consultation and Stakeholder Workshop for the Additional Financing (AF) of the SCALED-UP Project was held at Jazeera Hotel in Mogadishu.

The objective of the Public Consultation Workshop was to introduce and explain to the stakeholders the purpose of the AF requirement for the parent SCALED-UP project.

The workshop was attended by 120 stakeholders. It was opened by the Director General of the Federal Ministry of Finance and followed by other senior heads of government, private and non-governmental organizations.

This Public Consultation and Stakeholder Engagement workshop report provides the key discussions, contributions and recommendations from the participants. The participants of the workshop included the following:

- SCALED-UP Project Steering Committee members
- Women owners of MSMEs, NGOs, CBOs, Youth and VMGs,
- Solar Energy Associations and International Development Partners
- Government Institutions that included: MoF, MoIFAR, MoCI, MPTT, CBS, FRC, NCA, a new dedicated DADSOM - ID Authority and FMS
- Gargaara Company, Banks and Other Financial Institutions

The Agenda of the Workshop

- Overview of the AF SCALED-UP project
- Overview of the E&S instruments and approval procedures
- Presentations
- Discussions
- Survey Collection of Key Areas of Engagement
- Q & A

The Objectives of the AF SCALED-UP Public and Stakeholder Consultation Workshop

The main objective of the AF SCALED-UP is to support progress towards increased access to basic digital financial and government services targeting entrepreneurship and employment, particularly for VMGs, Youth and Women as follows:

- The AF aims to leverage the parent project's platform on institution strengthening,
- Enhance service delivery to enable MSMEs gain access to finance,

- Support Women/VMGs access financial transaction accounts, and;
- Support many Somali residents obtain unique ID numbers.

The Objectives for the Consultation and Stakeholder Engagement Workshop

- Generate a good understanding of the project;
- Enhance ownership of the project by local leadership and the community;
- Understand people's and agency's expectations about the project;
- Understand and characterize potential environmental, social and economic impacts of the project;
- Advance the benefits that may accrue from the project; and
- Enable the public and stakeholders to provide views, hence participating in or refining project designs and implementations.

AF SCALED-UP PIU (MoF) Acknowledgement

The welcome statements from the MoF PIU acting coordinator have highlighted that the AF SCALED-UP workshop could not have been held without the funding support from the World Bank. He has acknowledged that the participants are grateful for their support in making this workshop successful.

Public Consultation and SE Workshop Overview

The Federal Government of Somalia has received AF assistance from the World Bank (WB) to implement and financially enhance the parent project for Somalia Capacity Advancement, Livelihoods and Entrepreneurship through Digital Uplift Program (SCALE-UP). This Stakeholder Engagement responds to World Bank requirements under ESS10 of engaging effectively with individuals, groups, communities and other stakeholders who might be directly or indirectly affected by activities to be taken up as part of the AF SCALED-UP Project throughout the project cycle. It also provides meaningful consultation, access to information and grievance redress through the life of project.

The AF is closely aligned with the parent project's structure and components with no new safeguards triggered. The project components, implementation arrangements, and target beneficiaries remain unchanged. The existing implementing institutions arrangement, environmental and safeguard, and financial reporting mechanisms in place will continue to ensure sound implementation. In addition, the AF has extended the closing date of the parent SCALED-UP implementation activities to December 31 2025

AF SCALED-UP Project Components

The AF project components and subcomponents remain unchanged from the parent SCALED-UP (P168115) project components. The AF project description, PDO, project components and sub-components, environmental and safeguards, fiduciary, and implementation arrangements will remain materially unchanged. This will be continuing to support progress toward increased access to basic digital financial and government services targeting entrepreneurship and employment, particularly for women and VMGs.

These project components are as follows:

Component 1: Strengthening Institutions

The project supports FGS to enhance the environment for digital transactions and services. As such, the project would provide technical assistance to strengthen institutions that are key to ensuring healthy provision of targeted financial and government services i.e. CBS, FRC, MTPP/ NCA, and the ID authority. With clear policies and specific strategies, plans and roadmaps, these policymakers and regulators will help increase contestability of markets, and support reconfiguration of the financial and digital communications sector to improve service delivery, while mitigating AML/CFT risks. These institutions represent the key public-sector agencies of the financial and digital services sectors in Somalia.

Component 2: Enabling Financial and Digital Services

The parent SCALED-UP project has established financial institutions (i.e Gargaara and Banks). Accordingly, the AF will support the development of sustainable and digitally enabled mechanisms for expanding access to financial and digital services to mitigate COVID-19 impacts on communities and businesses.

Component 3: Project Management and Coordination

The AF project will fund project coordination activities including provision of goods, consulting services, training, and operating costs of the Project Implementation Unit (PIU) to support project coordination, implementation and management. AS such, the AF will enable the PIU to recruit additional management staff for project support.

Project Beneficiaries

Direct beneficiaries of the project will be the residents of Somalia, especially female owners of MSMEs, who will benefit from more formalization and growth in economic participation. Other beneficiaries of this project will be FGS institutions that are key to delivery of targeted financial and digital services. These include the MoF, MoIFAR, MoCI, MoCT, CBS, FRC, NCA, a new dedicated

DADSOM - ID Authority, FMS and the newly created MSME Financing Facility (Gargaara). Banks and nonbank financial institutions participating Financing of the MSMEs.

STATEMENTS AND PRESENTATIONS



During the meeting, Mr. Abdimajid Omar, Acting PIU coordinator moderated the sessions and welcomed to stage the MoF Director General (DG) and Chairman of the Public Steering Committee (PSC) Mr. Saleiman S. Umar. He together with PIU E&S specialist welcomed the guests and had a separate meeting with FMS, senior Government Officials and the Business Communities.

The meeting was mainly discussions regarding the challenges and the benefits for the implementation of the AF SCALED-UP project.

Opening Remarks by Mr. Saleiman S. Umar, the Director General of Ministry of Finance and the Chairman of the Project Steering Committee:



Public consultation and stakeholder engagement workshop commenced with the welcome speech by Mr. Suleiman the Director General of the Ministry of Finance and the Chairman of the (PSC) for the AF SCALED-UP project. He told the participants that he sincerely hopes that they will enjoy the two days of the public consultation and stakeholder engagement workshop of the AF SCALED-UP project. He continued to say that he is very excited to see this large gathering from various government ministries, private and non-governmental organizations that are here to attend this event.

He reminded the participants that before the COVID-19 pandemic, Somalia's economy was on an upward trajectory, recovering from the devastating 2016/17 drought and subsequent hardship associated with the unceasing impact of flooding. However, since the year 2020 COVID-19 pandemic has triggered a deep economic and health crisis in Somalia that could have a long-lasting impact on the livelihood of the population. Due to wide spread of the pandemic, our economy, which is driven mainly by the private sector, is exposed to increased business vulnerabilities, interruption of supply chains, decreased capital and venture inflows, diminished access to financing and limited remittances from abroad. He emphasized that the pandemic is pushing the economy into contraction and consequently will deepen poverty in coming years.

The DG stated that due to a COVID-19 response and recovery operation, on May 2020 the FGS has requested the international donor communities through the WB an additional financing AF for

the parent SCALED-UP project in order to financially enhance its existing activities. The requested AF has been expeditiously approved by the WB board of directors. He once again reiterated that the objective of the AF SCALED-UP is to leverage the parent project's platform on institution strengthening and enhancing service delivery to enable micro, small and medium enterprises (MSMEs), women, youth and VMGs gain access to finance, financial transaction accounts and obtain unique ID numbers.

He lauded that the approved AF will improve the parent project activities to ensure continuity and effectiveness of the response to Covid-19 pandemic. He requested the participants to take advantage of the business opportunity provided by the AF SCALED-UP project. Again, he underlined that AF SCALED-UP project will assist women and VMGs business owners to (a) expand access to finance for their small and medium enterprises and (b) accelerate critical reform and capacity-building initiatives needed to underpin resilient recovery and safeguard sustainable livelihoods, particularly among women, youth and VMGs owned businesses.

Finally, he encouraged women, the youth and VMGs to capitalize the AF and apply the MSMEs AF SCALED-UP loan to help tackle the negative impacts of the Covid-19 pandemic and strengthen their ability to improve the livelihood of their family. He also persuaded the participants to involve the consultation activities, discussions to raise their concerns and get their views and feedback on the potential economic, social and environmental risks of the project.

Statement by Mr Abdiaziz Ibrahim, Director General of Ministry of Commerce, deputy Chairman of project steering committee:



Mr. Abdiaziz, at the project stakeholders meeting emphasized the importance of cooperation of government institutions, FMS and SMEs for implementing the AF SCALED-UP project. In his statement, he stated that MoCI implemented one stop shop system (online business registration system) which enables business owners to easily get Business Licenses and Certificate of Incorporation. He indicated that the system will reach out all federal member state and encourage business owner to use the newly registration system established by MoCI, FGS.

Statement by Muhumed Hussein, Social Safeguard Consultant, World Bank:



Muhumed, gave an overview of the Bank's programmatic investments in Somalia focusing on the importance of this project to the economic rebuilding of the country and the importance of the different components of the project. Also, focused on the Environmental and Social Framework (ESF) which supports the world bank and borrowers to manage the environment and social

risks. He added that ESF were meant to support the project strengthen its delivery while reducing the risks of the project through planning and having for effective risk mitigation measures. He outlined the different ESSs and instruments while explaining the ESF broadly coverage in areas such as conducting public consultation, social inclusion, grievance redress, accountability and transparency, and the ultimate goal is to protect environment and social from any harm and risks. He thanks the PU for convening an inclusive team for the stakeholder engagement and urged the participants to actively participate in the discussions.

Presentation by Proff. Osman Ibrahim Abdullahi, environment and social safeguard expert, SCALED-UP PIU, Ministry of Finance:

Prof. Osman Ibrahim, E&S PIU consultant delivered a presentation for the “AF SCALED-UP ENVIRONMENTAL AND SOCIAL SAFEGUARD MANAGEMENT WORKSHOP”. The E&S consultant has provided a broad range of World Bank Environmental and Social Framework (ESF) policies, their objectives and implementation requirements. He also emphasized the WB’s commitment to sustainable development through a set of Environmental and Social Standards that are designed to support borrower’s subprojects with the aim of ending extreme poverty, promoting shared prosperity and reducing the risks of social and business impacts of Covid-19 pandemic.



Apart from all WB ESS policies, the consultant has highlighted and stressed to the participants the relevant WB ESS policies to the AF SCALED-UP project. These relevant WB ESS policies are as follows:

- ✓ ESS 1: Assessment and Management of Environmental and Social Risks and Impacts
- ✓ ESS 2: Labour and Working Conditions
- ✓ ESS 4: Community Health and Safety
- ✓ ESS 9: Financial Intermediation
- ✓ ESS 10: Stakeholder Engagement and Information Disclosure

In addition, topics for E&S Public Consultation Workshop Presentation Included the Following:

- ✓ AF SCALED-UP Project Development Objectives
- ✓ Overview of the WB Environmental and Safeguard (E&S) Policies and Guidelines
- ✓ WB Environmental and Social Framework (ESF)
- ✓ WB OP “Safeguard (SG)” Policies/WB “E&S Standards (ESS)
- ✓ WB Environmental Health, and Safety Guidelines (EHS)/WB General EHS Guidelines/Occupational Health and Safety Guidelines (OHS)

- ✓ Environmental and Social Management Plan (ESMP)/E&S Monitoring and Mitigation Plan/E&S Screening, Categorization and Approvals of Subprojects Application Procedures
- ✓ Institutions Roles and Responsibilities/WB Requirements and Recommendations for FIs/Environmental and Social Management Systems (ESMS)
- ✓ Gender Consideration within the project/Grievance Redress Mechanism (GRM)/GBV

The entire E&S workshop documents presented is attached to this report and it will be published on the WB and MoF websites.

The E&S consultant further underlined the need for the FGS to expedite the development of a comprehensive and final environmental and social policies, regulations and guidelines for positive economic growth and social development needs.

Finally, the E&S consultant has assured the public consultation and stakeholder workshop participants that the PIU will endeavor to continue E&S capacity building training and awareness programs throughout the life cycle of the AF SCALED-UP project.

Statement by Mrs. Shamsa Abdi Yusuf, Financial institution analyst, Gargaara Company:



Mrs. Shamsa, provided an overview of Gargaara Company and its operations. The duties and responsibilities of Gargaara is to boost access of financial services. She continued to say that Gargaara will closely work with the financial institutions to facilitate the AF SCALED-UP loans for Micro Small and Medium Enterprises. She encouraged, the Entrepreneurs, Solar companies, farmers, fishers and especially women and female owners of MSMEs to take advantage of AF financing opportunities.

Statement by Ahmed Abdirahman Omar, Associate Director: Advocacy & External Engagement | World Vision International/ SomRep delivered the presentation on Women Business Access to Finances: A Case of Somaliland Experience By OXFAM Under SomRep in Somaliland:



Mr. Ahmed, shared a study conducted by OXFAM with SomRep. He mentioned that women business owners are facing challenges such as lack of male guarantor and lack of financial service and products designed for women. He appreciated the efforts of the government of Somalia, World bank for creating financial facility entity known as Gargaara company. He recommended the government to coordinate with banks, donors and NGOs to design and provide soft loan products

or micro credit schemes tailored at women managed businesses (flexible terms for women, IDPs and poor).

<https://reliefweb.int/report/somalia/women-business-access-finance-somaliland-research-report-enso>

Statement by Mahdi Ubax, Vulnerable community, Mogadishu, Somalia



Mr. Mahdi, indicated the needs of vulnerable people, and the challenges facing the VGS in terms of accessing financial service. He mentioned that their personal circumstances are especially receptive to disadvantage, particularly when a bank, government offices and other communities are not acting with appropriate levels of care. He requested government, financial institutions, business community to be considerate and support the needs of vulnerable groups by providing exceptional services to them.

Finally, he thanks the PIU SCALED-UP for giving them this opportunity to share/contribute their view on social and environmental risks. He hopes the project will give especial care and business opportunities to vulnerable people.

Questions and Responses

To enable and develop an effective stakeholder consultation engagement, the project team requested key stakeholders to provide comments/responses with questions regarding to the implementation of the AF SCALED-UP project. The following are the questions asked by the participants and their responses.

Questions	Responses
1. What are the potential risks from implementing this project?	The expeditors of the project are exposed to great security risk due to lack of strong government presence in all regions of Somalia. The Gargaara financing mechanism poses serval threats. In terms of micro lending, the beneficiaries (MSME'S) may fail to repay on time as physical risk occur unpredictably and often such as floods affect and locusts consume and destroying. Furthermore vulnerable groups e.g. IDPs, marginalized people and women do not have access to financing because of the rigid requirements to

	access loans as well as the productive sectors being dominated by . There is also the fear of mismanagement in the process of lending which excludes some segments of society and is unjust in the distribution of loans A mitigation for this could be to set-up a monitoring committee that regularly supervise the tasks to be carried out by Gargaara, the banks, and the beneficiaries, to ensure that the financing is reaching the intended beneficiaries. Inability of the beneficiaries to adopt or implement environmental regulations of the project due to ignorance towards concepts such as preservatives. Furthermore without a clear understanding of guidelines on environmental protection the likelihood of environmental hazards will increase. To mitigate against this is to formulate a risk identification and assessment that can be used to avoid the cause of risks.
2. What measures should be put in place to ensure that the identified risks are addressed and mitigated?	Availability of adequate SEP budget is another key factor if the project wants to be more sustainable. More engagement with stakeholders of the project and eventually the measuring the progress the project has made. The security risks can be mitigated by keeping the lending information of the beneficiary classified. Also, the project staff should be vigilant and be provided with security while visiting and monitoring sites.
3. What measures should be put in place to specifically address vulnerable, marginalized and minority groups (pastoralists, nomadic populations, persons with disabilities,	Ministry of Finance should have strictly administered the steps of preventing from any possible risks to the environment and arrange workshops for the beneficiaries ahead of time of the project in order to teach them and ensure to safeguard the environment.

etc.) and people in marginalized areas (remote, poor rural and urban areas)?	There is a challenging of social exclusion during the implementation of particular projects. Therefore, to identify a set of criteria to determine who is excluded and mechanisms to track progress, assess the impact of measures undertaken to promote inclusion and ultimately ensure that no one is left behind. Preliminary stakeholder consultative meeting especially vulnerable, marginalized and minority groups will be crucial for the smooth running and implementation of the project. Public consultation suggested to consider the following: ✓ To reduce the conditions of the banks for the vulnerable and marginalized people, and to deal with them in a special way, and MoF should regularly follow-up the circumstances concerning them. ✓ To reduce the percentage of repayment in order to encourage. ✓ To establish special channels to send their concerns. ✓ To approach unions and inform the benefits of the project and how it is developing their livelihood. ✓ To adapt a survey of collecting the data to learn how the rural people can benefit from the project.
4. What should be done to ensure that Vulnerable Marginalized Groups (VMG) children are retained in school? What would be project linkage to the safety net project in the country?	Somalia's vulnerable population groups have high exposure to risk and lacks access to public and private sector safety nets. Improving the capacity that involved in the education sector to administer the project is highly recommended. This could be established via a steering committee to spearhead and ensure the all VGM children are retained in their designated school and consider sponsoring this child as part of its Corporate Social Responsibility (CSR). The meeting recommended:

	✓ To build a free-of-charge schools for VMG children, where the children of poor can get proper education, and to ensure the quality of the education, and to give their teachers a training. ✓ To increase the number of schools run by the government. ✓ To build technical schools for the special needs children, where they can get useful skills for their future. ✓ MoF and World Bank work together on coordination with the existing schools to provide VMGs vocational training.
5. How should the disclosure of existing grievance redress mechanism (GRM) and feedback be made more effective in order to reach all stakeholders? What other structures/systems are operational in the country for seeking grievance redress?	The establishment of Grievance Resolution Committee (GRC) independent from Gargaara and the banks could be a valuable way to preserve the integrity of the project. The project stakeholders comprise of local community representative, including the competent authority representative, Local government representative at village and cell levels, beneficiary and supervisor representatives. If the mentioned bodies do not reach a mutual GRM, then the case will be referred to competent law enforcing agencies in the country. Proper supervision by the implementing agencies and concerned bodies are helpful for GRM. Other grievances are more sensitive especially when they are about land boundaries, or misunderstandings between affected households and the beneficiary regarding access arrangements, properties accidentally damaged by construction activities, accidents on sites among others. All these grievances and claims must be resolved as soon as they are received and adopt grievances redress mechanism based on the policies of MoF. Most grievance do not reach upper management level, so creating hotline numbers, website, mobile

	application to make all grievances easier to everyone and available for the public. Also, using open door policy for the society is helpful and allow stakeholders to use any means easily accessible to their voice up and file their concerns and complaints a grievance form. After registration of the complaint, an investigation will be carried out by the committee members to verify its authenticity. Thereafter a resolution approach will be selected based on the findings. The decisions of the action to be taken will be communicated to all involved parties mainly in written form and awareness training sessions on the GRM.
6. What experiences and lessons have you learnt in the implementation of similar interventions (especially those funded by development partners)?	The lessons learnt from implementation of similar projects are: ✓ Public participation and popularizing the project through social media platform is key and ensuring that people are aware of the existence of the project. ✓ Slow project progress due to the mismatch of reality on the ground and ambitious project goals and expectations ✓ Failure of early clarifications of the roles and the responsibilities of all engaged bodies in the SEP. ✓ Inadequate implementation skills. ✓ The little limited of stakeholder engagement. ✓ Lack of accountability.
7. What other stakeholders do we need to consult?	The key stakeholders to be consulted and involved in the projects development are: ✓ The ministry of National Planning and other relevant line-ministries ✓ Local community ✓ Civil societies ✓ Local NGOs

	✓ Employees ✓ Private owned companies ✓ Competitors ✓ Vulnerable groups and IDPs. ✓ Environmental experts.
8. What is the most effective way to hold consultations with project beneficiaries, share information and get feedback in the context of COVID-19?	Due to the COVID-19 ICT solutions have been widely adapted as a suitable alternative to physical meeting, this allows increase of participants. Prevention measures of social distance should be applied and use telecommunication, or live event via teleconference i.e. Zoom, Webex etc, or meeting with specific number of people and door to door discussion during the stakeholder consultation. Forming social media platform or set the national TV and radio programs for the project is also useful.
9. What other issues should be considered by the MoF in implementing this project?	Ministry of Finance should observe in order to implement this project: ✓ Project feasibility study considerations. ✓ Recruitment of skilled human resources. ✓ Setting the project structures and roles.

Additional Comments and Key Concerns Raised

- ✓ How do banks reach people who are unaware of the loans of Gargaara Company?
- ✓ Where the people can get information about Gargaara Company?
- ✓ Is there any debt forgiveness system for the project?
- ✓ Stakeholders suggested to make a time extension for borrowers if the beneficiary would not return the debt the agreed time due to the circumstance such as floods or locust infestation occurred in the farm.
- ✓ Strengthen solar supply groups that can be used for irrigation for which will be benefited beneficiaries.
- ✓ The workshop also proposed to arrange a consultative meeting with different stakeholders to have some further discussions to reduce the associated risks as much as much possible.
- ✓ Needs of a national ID for citizens and the participants suggested to it to be introduced soon.

- ✓ The participants welcomed the online business registration for MSMEs and FMS requested to expand the implementation to all FMSs.

Closing Statements

The program was wrapped up with closing remarks by Mr. Abimajid, PIU acting coordinator. He was thankful to all participants for their willingness and openness to contribute to the discussions, share their experiences, valued suggestions and ideas with AF SCALED-UP stakeholders. He finally reiterated that the relationship, solidarity and the space for networking created through this engagement will continue to exist and that we will all rally around ensuring that the objectives of the AF SCALED-UP are fulfilled.

Survey Collection of Key Areas of Engagement

BACKGROUND INFORMATION		
Name of the Ministry/Organization/Community	Ministry of Commerce and Industry FGS	
Department	Administration	
Position	Director general	
Name of the Respondent *(Optional)	Abdiaziz Ibrahim Adan	
Physical location	State	Mogadishu
	District	Wardhigley
	Location/Zone	Mohamoud Harbi Road, Behind National Theatre

KEY AREAS OF ENGAGEMENT	
1. Identify the Key stakeholders that we need to consult?	Ministry of youth, Ministry of Women, The MSME sector
2. What are the potential risks envisioned in implementing this project? And how can we resolve them?	Security threat on the implementers of the project
3. What measures should the project put in place to address vulnerable, marginalized and minority groups? Pastoralists, rural poor, IDPs, urban poor?	A specific percentage needs to be preserved for this groups in activities of the project in terms of project benefits i.e employment opportunities. They should also be invited to participate in the engagement forums
How should grievances related to this project be handled?	Grievance should be received and investigated and legal actions taken against individuals who will be found guilty
4. How should cases related to GBV/SEAH be addressed under this project?	A gender officer/office need to be set up to receive grievances and complaints related to GBV/SEAH

SOMALIA CAPACITY ADVANCEMENT LIVELIHOOD AND ENTERPRENUERSHIP THROUGH DIGITAL UPLIFT PROGRAM ADDITIONAL FINANCING (P174769)

	An email where victims of GBS/SEAH will share their grievances will be greatly important in addressing such issues.
5. What is the most effective way to share information and get feedback on the planned project?	Setting up an email list of stakeholders where regular messages are shared with and feedback on the same would be most appropriate. However quarterly and bi annual stakeholder engagement forums will also work well, since people give feedback when on face to face as opposed to responding via emails.
6. Which other intervention is being implemented in the digital and financial sector in the country?	MoCI is currently undertaking a Somali Trade Information portal (STIP) where information relating to investment in the country can be accessed from the website.
7. How is the country managing the COVID-19 situation within the financial sector and government services?	Reducing the number of staff at offices to essential ones to reduce crowding at workplaces and those present to adhering to the Ministry of health guidelines
8. What experiences and lessons have you learnt in implementing similar interventions (especially those funded by the World Bank)?	Public participation and Corporate Social Responsibilities(CSR) plays key role in popularizing the project
9. What other insights/ideas would you like to share on the project and stakeholders to be considered?	N/A

BACKGROUND INFORMATION

Name of the Ministry/Organization/Community	BRCIS Consortium	
Department		
Position	Programme Manager	
Name of the Respondent *(Optional)	Alison Plouffe	
Physical location	State	All
	District	
	Location/Zone	

KEY AREAS OF ENGAGEMENT

1. Identify the Key stakeholders that we need to consult?	Somali Financial Institutions (mobile phone operators/micro-finance institutions, and banks)
	Media (sharing of information through radio/commercial/social media)
	Savings Groups (specifically female led)
	BRCiS supported Micro Enterprises

SOMALIA CAPACITY ADVANCEMENT LIVELIHOOD AND ENTERPRENUERSHIP THROUGH DIGITAL UPLIFT PROGRAM ADDITIONAL FINANCING (P174769)

2. What are the potential risks envisioned in implementing this project? And how can we resolve them?	Defaulting on loans given the instability of certain FMSs COVID 19 Low risk appetite of financial institutions (need better relationship building between FIs and the community) KYC 'Know Your Customer' – major block to finance – need for ID cards for unbankable populations
3. What measures should the project put in place to address vulnerable, marginalized and minority groups? Pastoralists, rural poor, IDPs, urban poor?	Access to civil documentation for vulnerable populations Community engagement between populations and financial institutions (trust building) Access to information – many communities don't know about financial institutions and financial institutions often dismiss vulnerable populations as too risky to invest in
4. How should grievances related to this project be handled?	Unified complaints response feedback mechanism – hand out a single hotline number for direct beneficiaries Social Media accounts where people can air grievances
5. How should cases related to GBV/SEAH be addressed under this project?	Robust referral pathway should be drafted as this project does not specifically do case management Training financial service actors with regards to sensitization (do no harm) Trainings with PIU partners to ensure that there is a do no harm approach
6. What is the most effective way to share information and get feedback on the planned project?	Joint coordination meetings held on a monthly or quarterly basis Community and financial service can be informed through information campaigns via social media or radio Outreach to schools such as TVET or Universities
7. Which other intervention is being implemented in the digital and financial sector in the country?	Community savings groups – creation of demand for financial services

SOMALIA CAPACITY ADVANCEMENT LIVELIHOOD AND ENTERPRENUERSHIP THROUGH DIGITAL UPLIFT PROGRAM ADDITIONAL FINANCING (P174769)

	Mobile money payments could be grown like in neighboring countries
8. How is the country managing the COVID-19 situation within the financial sector and government services?	Further need for information around vaccine hesitancy
	Further information around 3 rd and 4 th wave of potential Delta variant
	Impact on HH economies and need for government social safety nets in face of contingency such pandemics
9. What experiences and lessons have you learnt in implementing similar interventions (especially those funded by the World Bank)?	Lack of information and linkages between financial institutions and the private sector and the vulnerable populations that BRCiS support through the World Bank and the PIU.
10. What other insights/ideas would you like to share on the project and stakeholders to be considered?	After reviewing the pamphlet that was distributed, BRCiS believes it could play a role in facilitating important linkages between larger financial systems and digital platforms and the vulnerable communities that this project would like to target.

BACKGROUND INFORMATION		
Name of the Ministry/Organization/Community	World Vision International – Somalia Office	
Department	Somali Resilience Program - SomRep	
Position	Regional Program Coordinator – Southern Somalia	
Name of the Respondent *(Optional)	Daniel Kanyerere	
Physical location	State	South West State
	District	Baidoa
	Location/Zone	Bay

KEY AREAS OF ENGAGEMENT	
1. Identify the Key stakeholders that we need to consult?	International NGOs - BRICs, SomRep, CARE, Save the Children, OXFAM, DRC,
	Private Sector: Banks in Somalia (Dahabshilli, Premier, IBS), SomRep support Mindimo MFI – Baidoa and Dollow District Bank
	Local NGOs
	Chamber of Commerce - State
	Potential Clients – SMEs, VSLA members, Producer Associations

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2. What are the potential risks envisioned in implementing this project? And how can we resolve them?	Default/embezzlement of funds, most vulnerable like women left out as they are considered not credit worth, lack of/limited regulatory policy framework to guide players in this, mentality govt loans are free and should be paid back, high/exploitative interest rates, Bank's refusal to give loans to vulnerable like women because they Lack of IDs and Guarantor Possible mitigations measure: For Vulnerable groups – govt to provide IDs and Policies and advocate to banks to accept women, Channel loans through groups like VSLAs where group trust and cohesion becomes a surety/guarantor to check any default Ensure low interest rate on the loan Put in place policies and regulatory framework to guide the administration of the loan and the lender and borrower relation Before loan disbursement – there heavy and intensive training on borrowers Look at Individual loans for bigger borrowers
3. What measures should the project put in place to address vulnerable, marginalized and minority groups? Pastoralists, rural poor, IDPs, urban poor?	<u>Deliberate targeting of this category of beneficiaries</u> Heavy and intensive training on business management Form groups – self selection after heavy sensitization and training provided as SomRep do in VSLAs – this help to bring mindset change from depended to having the confidence of “I can do this for my family livelihood) NGOs/consortium working with these groups of people can be coopted to provide the training/organizations depending on the targeted locations Provide loans with low interest rates Since most do not have IDs, NGOs or govt can provide the surety Vet and use LNGOs and INGOs who genuinely work to support the poor most of whom are under this category to support/facilitate organization and training of these people. (Screen out agencies who may want If Banks will lend to these people, they should create within their bank a training department to support these would be beneficiaries
4. How should grievances related to this project be handled?	Establish a hot line where clients can call to if they have any issues

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	Have multilayered committee to handle the grievances depending on gravity...consider a) Committee at Beneficiary Group level c) Committee at State level and another at Project Level at Federal
5. How should cases related to GBV/SEAH be addressed under this project?	First there should sensitization about GBV/SEAH as an integral part of the project and clearly articulate possible forms this would manifest in course of program All this would be each one's responsibility, consider recruiting the GBV/SEAH Focal Point at the lowest level of the project to be incharge of this Form GBV/SEAH Committee at project level to be trained by the Focal Point. The Committee as part of society/clients groups can easily monitor how GBV/SEAH issues are playing among beneficiary community. They can see if to handle them or refer to right channels to address these Religious Leaders and Village Chiefs should be part of higher committee where these issues can be referred for resolution There is need for govt to put in place reinforce laws and penalties against culprits
6. What is the most effective way to share information and get feedback on the planned project?	Establish the Beneficiary Feedback response mechanism. like telephone line where clients/people can report. Use of Participatory Monitoring Evaluation Reflection and Learning (PMERL) where the project should at on set develop Annual or multi-year Activity plans with stakeholders/clients. Then quarterly implementation plans can be developed to guide implelemntation. At end of each quarter relevant cleints/stakeholders can be invited to meeting to review..what worked and whay, what did not work and why? Lessons learnt and next steps to be taken to overcome challenges The project can also consider holding annual learning event where different stakeholders are invited and success/challenges and project performance is presented. Media could be invited to cover such events.
7. Which other intervention is being implemented in the digital and financial sector in the country?	SomRep has promoted and supported co-financing of community project. SomRep conducts participatory community Assessment using some tools under Gender, Climate Vulnerability Capacity Analysis (GCVCA). Through this, community

	develop Community Action Adaptation Plans (CAAPs) which has priority projects for example Shallow well establishment. Using a digital platform developed by Shaqodoon (a local NGO), the project is uploaded to this for each community and then each community as individuals send money using mobile Phone electronic transfer (EVC) which goes straight to the platform, those in diaspora are also mobilized to send money direct to this platform. This platform can be accessed and monitored by all parties to see how is coming in. After a give threshold is raised then SomRep provides match funding to work on project. This was done in Xudur, Qansadhere under EU funded grant
8. How is the country managing the COVID-19 situation within the financial sector and government services?	Following the outbreak of Covid 19, SomRep put in place business continuity plans. This was to ensure activities continue while embracing Covid-19 awareness and prevention measure among beneficiaries and staff involved in economic development activities (VSLAs, Livestock marketing Associations, Producer groups. Some measure used included the following: -Spacing Out Contributions: Limited number of meeting, shifted the making monthly contributions physically to mobile money transfer - Venue management – use venue with wide space to avoid congestion - Handwashing: during meetings - Social distancing observed during gatherings - Face masks – used during meetings - Shortening Training period Another initiative SomRep through her sister project – Somali Resilience Innovation Lab (SomRIL) developed Covid 19 Public Health Messages translated in Somali to help raings awareness about the diseases. https://youtu.be/oBtNgB0MikE; https://responseinnovationlab.com/somalia-covid-19/
9. What experiences and lessons have you learnt in implementing similar interventions (especially those funded by the World Bank)?	Have not implemented World Bank initiatives. However, the following are some of the key lessons: - Making the project has strong mobilization and training component for beneficiaries - Ensure you have a well-articulated Monitoring plan - Regular and frequent follow up to clients to monitor performance in order to timely detect any threats that would undermine performance and lead to defaulting (Strong Loan servicing component) - When people know this is government loan, they have mentality they can default and go away without any penalty.

10. What other insights/ideas would you like to share on the project and stakeholders to be considered?	For this to be effective, make there is deliberate effort to ensure a balance between relevant design of policies and appropriate interventions. With the private sector as a driving force in economic development, how can their expertise be harnessed in this project to support the poor in doing business. Poor people should be brought up the ladder with support by private sector in a win-win situation than exploiting them (design pro-poor & Private sector engagement strategies reinforced and monitored by government to protect the poor. MSMEs will require hands on support. Need to develop and establish business incubation services that will nature MSMEs into established and successful enterprses. The need for proper road infrastructure to support SMSE Security improvement
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Photos in Public Consultations



List of Meeting Attendees

Participant List			
No	Name	Gender	Institution
01	Saleiman Umar	M	MoF
02	Abdiaziz Ibrahim Adan	M	MoCI
03	Mohamed Abdi Mohamed	M	CBS
04	Omar Mohamed	M	FRC
05	Abdullahi Guled Ibrahim	M	MoCT
06	Zakaria Ali	M	SCALED-UP PIU MoF
07	Osman Abdullahi Ibrahim	M	SCALED-UP PIU MoF
08	Abdimajid Omar	M	SCALED-UP PIU MoF
09	Abdullahi Mohamed	M	NCA
10	Abdi Dahir	M	MoCI
11	Yasin Abdinasir	M	MoCI
12	Aidarus Ibrahim	M	FRC
13	Farah Abdi Mohamed	M	FRC
14	Naima Hassan Dimbil	F	NCA
15	Ahmed Muhudin Oon	M	MoF
16	Ahmed M. Omar	M	MoCI
17	Shamso Abdi	F	Gargaara
18	Aisha Ismail	F	Gargaara
19	Hussein Abukar	M	MoCI – Hirshabelle
20	Ibrahim Mohamed	M	NCA
21	Ibrahim Adan Ali	M	MoCI – Southwest
22	Mohamed Ahmed	M	MoCI – Hirshabelle
23	Noordin Ali Mohamed	M	MoCI
24	Mahdi Daud	M	CBS
25	Abukar Sayid Ali	M	SCALED-UP PIU MoF
26	Abdullahi Tahlil	M	AG Office
27	Abdullahi A. Mohamed	M	MoCI
28	Abdukadir Said Dahir	M	MoCI – Puntland
29	Abdullahi Mursal	M	MoCI – Puntland
30	Ali Sheikh Mohamed	M	AG Office
31	Ayanle Hussein	M	MoCI – Jubaland
32	Mubarak Farah	M	MoCI – Jubaland
33	Mohamed Abdullahi	M	CBS
34	Khalid Abdullahi	M	NCA
35	Mohamed Nor Abdi	M	MoCI
36	Mohamed Bile	M	MoT
37	Zakaria Sharif	M	MoT
38	Ismail Omar Alas	M	MoPIED
39	Ahmed Ali Hassan	M	MoCI
40	Mohamed Ahmed	M	CBS
41	Nabil Abdulkadir	M	BRA
42	Abdullahi Mohamed	M	BRA
43	Muhumed Hussein	M	WB
44	Warsame Shidley	M	Nomad Translations
45	Hassan Turyare	M	Tusmo Travel
46	Abukar Mohamed	M	Hilaal Agro
47	Mohamed Hussein	M	Fisher
48	Abukar Ahmed	M	SKY Logistics
49	Abdifatah Ali	M	Digital Shelter
50	Macow Mohamed	M	Danan Media

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51	Jafar Mohamed Ali	M	Goobjoog TV Media
52	Najma Mohamed Geddi	F	Somali business Women association
53	Bashir Nur Abdulle	M	Dhaxalreeb Research
54	Mohamed Okash	M	SIMAD University
55	Abdimajid Adan	M	Daruro Air Travel
56	Bashir Mohamed	M	Dalsan Power
57	Ali Yare Mohamed	M	Dalsan Power
58	Khadija Abdi Hassan	F	IBS Bank
59	Abdirahman Shuib Adow	M	Vulnerable Group
60	Naima Ahmed Abdi	F	Somali business Women association
61	Fadumo Sheikh Ali	F	Gabyow Agriculture Company
62	Zahra Mohamed Adan	F	Zaar Fashion
63	Farhia Muhudin Mohamed	F	Business Owner
64	Ayan Ilyas Ahmed	F	Business Owner
65	Najmo Mohamed Muhudin	F	Somali business Women association
66	Nadar Xute Muhudin	F	MHGGY Female Union
67	Fardowso Abdirahman Ali	F	MHGGY Female Union
68	Abdinur Sufi	M	SOGEA (Solar Energy Association)
69	Suleqa Abdi Mohamed	F	Somnur Solar energy
70	Mohamed Ashraf	M	Astan TV Media
71	Ali Dhiblawe Alasow	M	Local Government
72	Isaq Hersi Malin	M	Goobjoog TV Media
73	Abdiwahab Isaq	M	SIMAD University
74	Abdifatah Abdullahi	M	Sahal Telecom (Internet Provider)
75	Ardo Abdulkadir Mohamed	F	MHGGY
76	Aisha Abdi	F	Vulnerable Group
77	Bakar Abdi	M	Student
78	Abdirahim Abukar	M	Amal Bank
79	Mohamed Haji	M	Somnur Solar Energy
80	Abdullahi Nor	M	Premier Bank
81	Mohamed Abdirahim	M	Premier Bank
82	Rahma Mohamed	F	City University
83	Ali Salah	M	SITE
84	Shamsa Abdullahi	F	IBS Bank
85	Abdullahi Barre	M	Dahardher Agriculture
86	Abdisalam Ahmed	M	Energy Sector
87	Alison Plouffe	F	NRC – BRCIS
88	Abdishakur Shidane	M	Bixi IT
89	Abdifatah Hassan	M	Digital Shelter
90	Ahmed Mohamed	M	Digital Shelter
91	Abdiwahab Elmi	M	IBS Bank
92	Mahdi Abshir Omar	M	Vulnerable Group
93	Abukar Ali Jama	M	Target Agro
94	Ali Farah	M	Eco-Hub
95	Ahmed Abdiwahab	M	SomReP Consortium
96	Abdalla Qudde	M	Somali Optical Network
97	Hassan Hussein	M	Save the Children
98	Dahir Gedi	M	Save the Children
99	Ismail Abdullahi Ali	M	IITA Institution
100	Abdifatah Abdullahi	M	Sahal Telecom (Internet Provider)
101	Mohamed Abdulkadir	M	PIU
102	Sadia Abdulkadir Adan	F	PIU
103	Osman Ibrahim	M	Isma Production
104	Abdiaziz Mohamed Nur	M	Amal Bank

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105	Omar Abdullahi	M	RedSea Technology
106	M. Khaire	M	Media
107	Abdalla Maye	M	Solar Energy
108	Eng. Yusuf Nur Hayow	M	Elnur Electric Service
109	Nur Abdulkadir Hassan	M	Tamarso
110	Hafso Khalif Omar	F	Nation FM Media
111	Sharmarke Abdulkadir	M	Tamarso
112	Abdullahi T. Aden	M	Premier Certified Accounting
113	Said Ahmed Ikar	M	Infinite Networking Tech
114	Sahal Ali Mohamed	M	Infinite Networking Tech
115	Fardowso Abdirahman	F	Women Entrepreneurs Association

ANNEX B: ESTABLISHED GRIEVANCE REDRESS MECHANISM

Introduction

The Federal Government of Somalia has received financial assistance from the World Bank (WB) to implement the Somalia Capacity Enhancement, Livelihoods and Entrepreneurship through Digital Uplift Program (SCALED-UP). The SCALED-UP project is to provide financial intermediary institutions financing through a MSME Fund for on-lending to Micro, Small and Medium Enterprises (MSMEs) in the productive and service sectors including energy and agriculture sectors, especially those led by women and Vulnerable Groups (VGs). This will increase opportunities for jobs and livelihoods, poverty reduction and inclusive growth for women and the VGs.

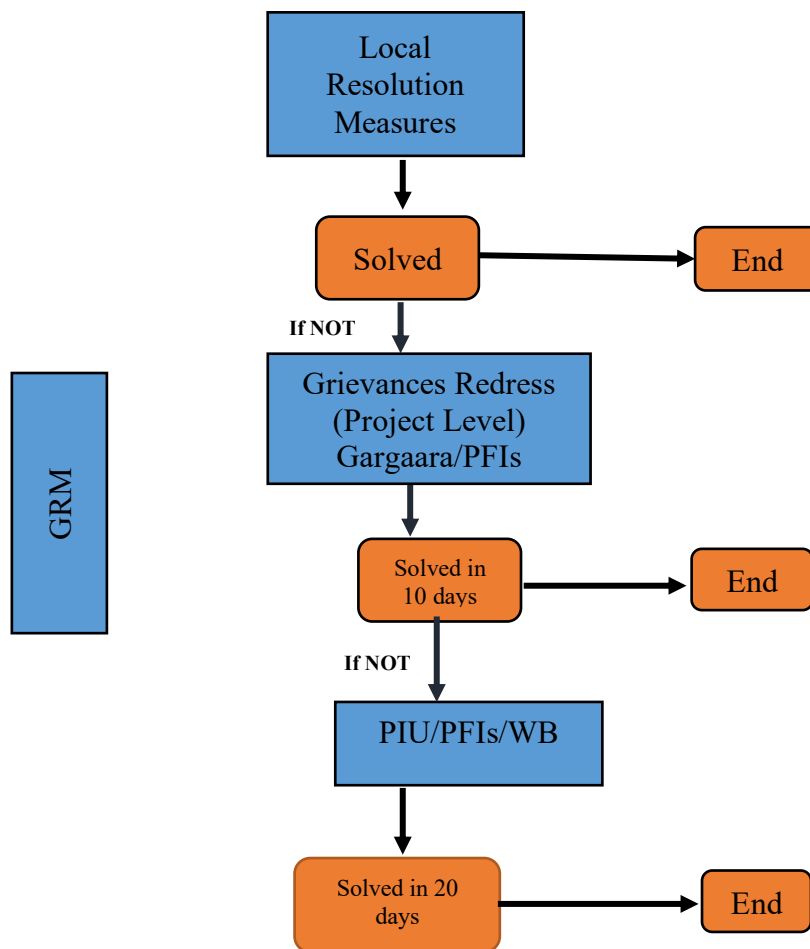
The parent report for the SCALED-UP project requires that project activities are compliant with the relevant requirements of national policies, regulations and legislations as well as the World Bank's Operational Policies (OP) and Environmental and Social Framework (ESF) Policies and Procedures. It sets out the principles, rules, guidelines and procedures required to assess the environmental and social impacts, carry out risk mitigation measures and monitoring and evaluation to ensure that environment and social aspects of the project are duly considered.

The PIU under the Ministry of Finance (MOF) is the executing agency of the SCALED-UP Project. It has recruited environmental and safeguard (E&S) consultant to implement SCALED-UP environmental and safeguard compliance activities. The PIU E&S consultant will be responsible for the handling of complaints such as Grievance Redress Mechanism (GRM), Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA).

In order to ensure transparency and accountability the PIU has established a Grievance Redress Mechanism (GRM) to enable Project Affected Persons (PAPs) to communicate their concerns regarding the SCALED-UP project. More specifically, the GRM details the procedures that communities and individuals, who believe they are adversely affected by the Project or a specific subproject, can use to submit their complaints. Further, it will also detail the procedures to be used by the PIU and their implementing partners, to systematically register, track, investigate and promptly resolve complaints (see grievance resolution & registration forms). A rigorous training, awareness program and capacity building workshop regarding GRM/GBV/SEA and all the other E&S issues has been presented by the E&S consultant prior and will continue to be presented during project implementation. Currently, a through E&S training and workshop is scheduled for the selected Banks, Gargaara and PIU members.

Where an individual has a grievance with regard to a specific sub-project she or he, should, in the first instance, be encouraged to make use of existing local-level structures such as local district or beneficiaries to try to resolve quickly any concerns or grievances related to project development and implementation otherwise to follow GRM system as shown in **Figure 1 below**.

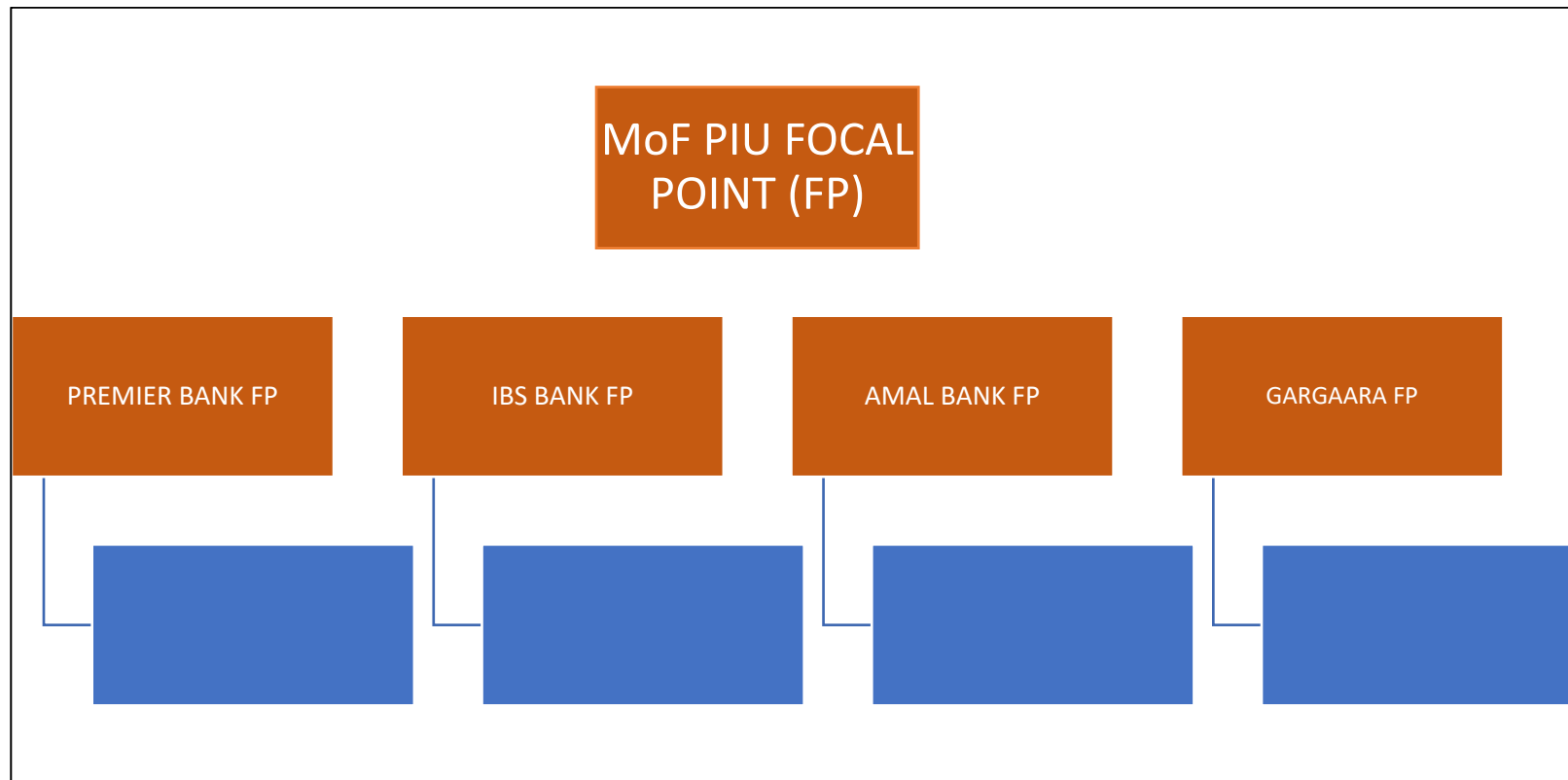
FIGURE 1. Schematic Grievance Redress Mechanism



If NOT
If still unresolved, APs may choose to
exercise their right under Somali law to
refer the matter to a court of law.

ZV

GRIEVANCE REDRESS COMMITTEE (GRC) MEMBERS



PIU ACCESS POINTS

Telephone Number: +252-614783624
MoF Grievance Box
MoF PIU Help Desk
Email address: scaledupsd@piu.mof.gov.so

AWARENESS OF GRM

RADIO STATIONS: Risaala, Mustaqbal, Radio Mogadishu

<https://www.radiomuqdisho.net/wargalin-habka-gudbinta-cabashada-mashruuca-scaled-up-ee-wasaaradda-maaliyadda-xfs/>

SOCIAL MEDIA: MoF

Twitter:<https://twitter.com/scoremof1/status/1267080871229751301>

NEWS PAPERS: Xogdoon

NOTICE BOARDS: Implementing Partners, Communiyt Groups, Ministry of Commerce, MoF, Chamber of Commerce

DATA BASE TOOLS

A) Grievance and Resolution Form

NAME OF COMPLAINANT	
PAP ID NUMBER	
TELEPHONE NUMBER	
DISTRICT	
DATE	

NATURE OF GRIEVANCE OR COMPLAINT

SUMMARY OF FOLLOW-UP DISCUSSION

NAME OF PERSON CONTACTED:

TITLE:

--

SUMMARY OF CONCILIATION SESSION DISCUSSION

DATE:

Was agreement reached on the

1)YES:	2) NO:
--------	--------

 issues?

PROVIDE DETAILS OF AGREEMENT/POINTS OF DISAGREEMENT

Date of Conciliation/ Review Session: _____

Was Filer Present? (Please tick one) Yes No.....

Was field verification of complaint conducted? Yes No.....

Findings of field investigation:

.....

.....

.....

.....

.....

Complainant/Filer Name

.....

If not complainant, position/ relationship to

filer.....

Signature.....

Date:.....

Conciliator Name and Signature.....

Date:.....

Independent Observer Name and Signature.....

Date:.....

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B) Grievance Register

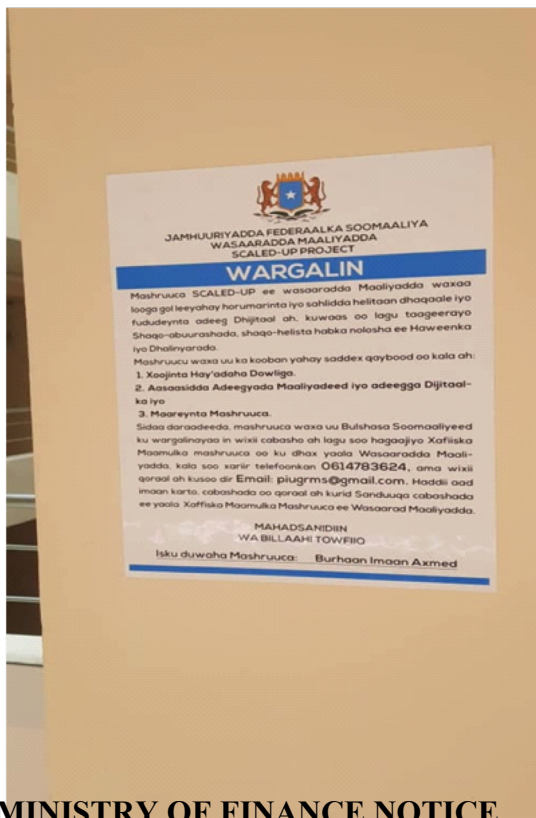
Sub-Project Name	Name of the complainant	Mode of Reporting	Date Received	Summary of grievance	Outcome and date	Date Solved	Current Status of case

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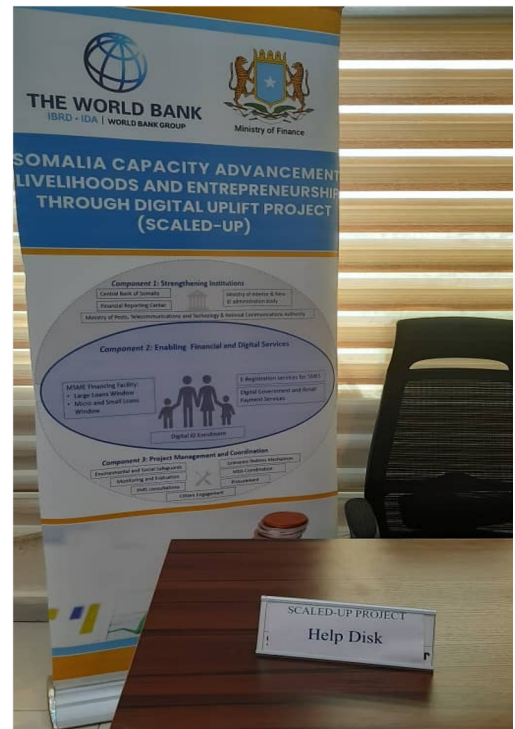
Notice Boards & Complaint Boxes



**MINISTRY OF FINANCE
COMPLAINT BOX**



MINISTRY OF FINANCE NOTICE



**MINISTRY OF FINANCE HELP
DESK**



**MINISTRY OF COMMERCE:
BUSINESS LICENSING
DEPARMENT**

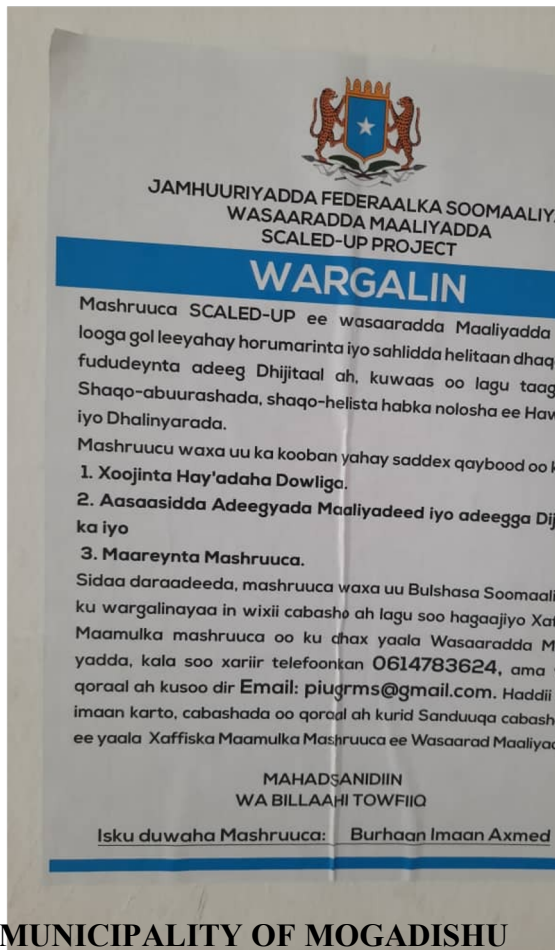


GARGAARA OFFICE COMPLAINT BOX



SOMALI NATIONAL WOMEN

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MUNICIPALITY OF MOGADISHU



SOMALI NATIONAL CHAMBER OF COMMERCE



MINORITY BENAADIRI COMMUNITY CENTRE