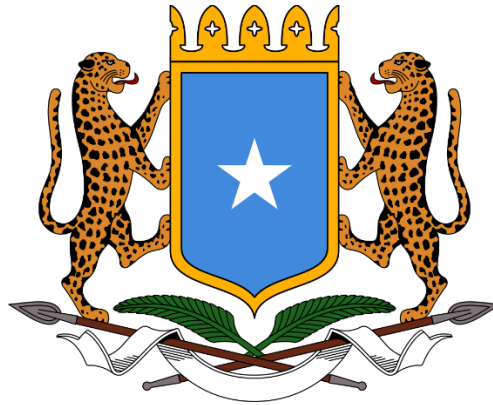


Draft SEP for SERP

FEDERAL REPUBLIC OF SOMALIA



MINISTRY OF FINANCE

STAKEHOLDER ENGAGEMENT PLAN

**SOMALIA ENHANCING PUBLIC RESOURCE
MANAGEMENT (SERP - P177298)**

February 07, 2022

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ABBREVIATIONS AND ACRONYMS

CBO	Community-based organization
CBS	Central Bank of Somalia
CIP	Capacity Injection project
CoC	Code of Conduct
CPF	Country Partnership Framework
CSC	Civil Service Commissions
CSO	Civil society organization
CSSP	Civil Service Support Project
DRM	Domestic Revenue Mobilization
EAFS	External Assistance Fiduciary Section
ESF	Environment and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environment and Social Standards
ESSP	Education Sector Strategic Plan
EU	European Union
FCDO	Foreign, Commonwealth and Development Office
FCV	Fragility, Conflict & Violence
FMIS	Financial Management Information Systems
GBV	Gender-based Violence
GM	Grievance Mechanism
GoSL	Government of Somaliland
GRC	Grievance Redress Committee
GRS	Grievance Redress System
GSS	Galmudug State of Somalia
HR	Human Resource
HSS	Hirshabelle State of Somalia
IGFF	Inter-governmental Fiscal Federalism Forum
ITAS	Integrated Tax Administration Automation
JSS	Jubbaland State of Somalia
LMP	Labour Management Procedures
LTO	Large Taxpayer Office
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MoF	Ministry of Finance
NGO	Non-governmental Organization
OAGs	Offices of Auditor Generals
OHS	Occupation health and safety
OIP	Other Interested Parties
P&G	Pay and Grade
PAI	Project Area of Influence
PBC	Performance Based Conditions
PCU	Project Coordination Unit
PDO	Project Development Objective
PFM	Public Finance Management
PIM	Public Investment Management
PREMIS	Public Resource Management in Somalia
PSM	Public Service Management
PSS	Puntland State of Somalia
PWDs	Persons with disabilities

SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SERP	Somalia Enhancing Public Resource Management
SL	Somaliland
SMP	Staff Monitored Programs
SWSS	SouthWest State of Somalia
TA	Technical Assistance
ToR	Terms of Reference
WBG	World Bank Group

1.0 INTRODUCTION

1.1 Background information

1. The 2012 Provisional Constitution of Somalia established a federal political structure, including a parliament, the Federal Government of Somalia (FGS) and the Federal States of Somalia (FMSs). Somalia has successfully undertaken two peaceful electoral processes at the federal level - in late 2012 and early 2017. Although much remains to be done to stabilize the country and secure a lasting political settlement, the sustained political, economic and institutional reforms undertaken supported by four consecutive Staff-Monitored Programs (SMPs), European Union (EU) and World Bank Group (WBG) financing, and extensive technical assistance, have succeeded in rebuilding core state capabilities.

3. The country's economy is rebounding from the "triple shock" that ravaged the country in 2020 and 2021: the COVID-19 pandemic; extreme flooding; and the locust infestation. Real GDP growth was projected at 2.3 percent in 2021. This growth momentum is expected to continue in the medium term and reach pre-COVID-19 levels of 3.2 percent in 2023.^[3] However, poverty remains widespread and deep. Somalia is one of the poorest countries in the world with a per capita gross domestic product (GDP) of US\$327. Nearly 71 percent of the population lives below the poverty line (US\$1.90 a day in purchasing power parity terms), and another 10 percent live close to the poverty line^[4]; a trend expected to continue in 2022 and 2023. Access to services is particularly limited for those living in rural areas, including nomads and internally displaced settlements, where poverty is deepest and markets, health clinics and schools are scarce. In addition, a significant group of non-poor are vulnerable to falling into poverty. About one third of the non-poor is within 20 percent from the poverty line. The Government's capacity to respond to these multiple crises is very limited.

4. The Somalia Country Partnership Framework's (CPF) first focus area is to "strengthen institutions to deliver services", with the three key objectives: (i) improve public finance management and institutional effectiveness; (ii) enhance resource sharing; and (iii) improve service delivery systems for more inclusive social services, especially of health and education. It aims to promote human development, boost economic recovery, strengthen governance, establish peace and security, and make politics more inclusive. Addressing these needs will require substantial financial resources, sound financial management systems, an increase in domestic resource mobilization, improved inter-governmental coordination between FGS and FMS, and a responsive citizen-centric state system. The proposed project will focus on 3 main areas: Public Finance Management (PFM); Domestic Revenue Mobilization (DRM); and Public Sector Management (PSM).

5. **Public Finance Management:** It is notable that significant effort has gone into strengthening the legal and regulatory framework in the FGS and FMS, but further enhancements of the PFM Acts and harmonization between FMS and FGS PFM Acts are critical to strengthen PFM. In December 2019, the FGS passed a modernized PFM Act, with supporting regulations still under development, and recently, so did all four south-central states. The PFM Act of Puntland is drafted and is in the process of being adopted. The new legal frameworks provide a strong impetus for improving PFM performance. They improve consistency in the budgeting process, encourage timely approval of the budget, strengthen transparency in public finances, and require timely reporting. However, there is an urgent need to develop a coherent set of high-quality PFM regulations to support the implementation of the PFM Acts. Further, there will be a need to define the roles and responsibilities of FMS in intergovernmental fiscal relations.

6. **Domestic Revenue Mobilization:** despite recent increases in domestic revenue, government revenues remain low in Somalia. In fiscal year 2020, the FGS's and FMS' consolidated tax collection accounted for 4.4 percent of the federation's GDP. Some of the key underlying causes of Somalia's low revenue to GDP ratio include: (i) strong heterogeneity of revenue collection and potential between the States; (ii) tax-policy and administration fragmentation across the FGS and FMS; and (iii) potential competition for taxation between the FGS, the FMS, communities and armed militias, which is the

reason why citizens and businesses pay much more than what is captured by official data.^[3] Revenue sharing and potential equalization of revenues between members of the federation will thus be critical to making the Federation of Somalia viable. The 2012 Provisional Constitution did not assign functions in terms of revenue and expenditure management, nor did it provide an elaborate and detailed framework for intergovernmental relations. There is a need to strengthen and harmonize the fragmented tax policy and administration across FGS and FMS in order to realize the full revenue potential.

7. Somalia's DRM institutions face multiple administrative constraints including the lack of modern organizational structure, staffing policies and plans, equipment, automation and information systems, as well as the absence of clearly defined processes. The work environment is challenging due to the lack of office space, computers, information and communications technology (ICT), as well as a means of local transportation. The processes are almost entirely manual. The taxpayer registry and the tax database until recently (2019) were on paper, thereby making it subject to mistakes and loss or manipulation of information. They are now linked to the WBG supported Somalia Financial Management Information System until the Integrated Tax Administration Automation System^[4] (ITAS) becomes available in FY2022. As such, the task of producing reliable tax statistics becomes very challenging. Tax payments are made directly to tax agents, including outside of the office.

8. **Public Sector Management:** Improving public service delivery and economic management requires not only a functioning PFM and DRM systems, but also the support of an effective civil service. As the various governments increase their domestic revenues, they will need to improve the capacity of their public sector for managing resources effectively and transparently for service delivery. While many of the necessary structures are in place, weak management and poor capacity of public sector institutions has become a bottleneck to development. A key challenge in the sector will be adopting an approach which takes into account the variable levels of progress in regard to establishment and management of public sector institutions while keeping a long-term focus on harmonization between FGS and FMS. As such, while broadly applicable, the sectoral context will differ in detail from FGS to the various FMS and Somaliland (SL).

9. Performance of central and line MDAs is hindered by low levels of capacity engendered by a lack of qualified applicants, inadequate recruitment processes, and a lack of professional development opportunities for existing staff. The shortage of qualified civil servants at the FGS and FMS undermines the ability of institutions to perform their roles. Furthermore, the foundational underpinnings of public sector institutions, such as human resource management laws, policies, regulations, and systems are absent, partially implemented, or lack harmonization. Policies and procedures related to salaries and pensions are incomplete or remain unimplemented due to budget constraints. Finally, the institutions themselves often lack the budget and basic facilities necessary to properly conduct operations. In particular, lack of stable funding for Civil Service Commissions (CSCs) results in the inability to advertise positions, lack of vehicles to conduct site visits, or delays in salary payments. The CSCs are also often housed in facilities that are rentals or are in need of repairs which adds to the level of insecurity under which they operate.

10. Despite the numerous challenges, the FGS and FMS have made significant headway towards public sector reforms that include transforming the civil service and strengthening institutions to improve performance of key government functions. A foundational milestone was completion of a human resource (HR) audit^[3] to confirm the number of civil servants registered on the payroll and to evaluate existing HR practices, procedures, controls, and strategies. Building on this, the national level CSC is working to standardize civil service laws across the country. Moreover, a number of policies for civil service management including recruitment, selection and placement, code of conduct (CoC), competency framework, staff retention, career management, and scheme of service framework have also been developed. On-going efforts are also underway to implement harmonized and merit-based approaches to recruitment.

11. The Somalia Enhancing Public Resource Management (SERP - P177298) project will also build on the success and lessons learned of development partner programs that have provided significant support, however many of which will close in the coming year. This includes the World Bank's CIP which is working to strengthen the capacity of FGS and PSS government institutions by placing skilled workers in select ministries, and the Civil Service Strengthening Project (CSSP) which supports basic functions for payroll, human resources, and policy management. In addition, the Foreign, Commonwealth and Development Office (FCDO) funded Public Resource Management in Somalia (PREMIS) supports development of the civil service in four FMS Galmudug State of Somalia (GSS), Hirshabelle State of Somalia (HSS), Jubbaland State of Somalia (JSS), and Southwest State of Somalia (SWSS). All three of these programs will end in 2022. The project will also closely coordinate with the World Bank's Somaliland CSSP II, which started in 2021 and will focus on strengthening basic functions for payroll, improving human resources and policy management, and establishing a pension system for civil servants.

1.2 SEP objectives

6. This Stakeholders Engagement Plan (SEP), which is a key requirement of the World Bank's Environment and Social Framework (ESF) is aimed at:

- i. Identifying and analyzing different stakeholders at different levels;
- ii. Planning engagement modalities through effective communication, consultations and disclosure;
- iii. Outlining platforms for stakeholders to influence decisions regarding the project;
- iv. Defining roles and responsibilities for the implementation of the SEP;
- v. Defining reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings;
- vi. Defining roles and responsibilities of different actors in implementing the Plan;
- vii. Elaborating the grievance redress mechanism (GM) for the project;
- viii. Outlining the dissemination of relevant project materials, including explanations of intended project benefits and, where appropriate, the setup of a project website; and
- ix. Documenting stakeholder consultations on proposed project design, environmental and social risks and impacts, mitigation measures, the proposed SEP, and draft environmental and social risk management instruments.

1.3 World Bank requirements for stakeholder engagement

7. This project is being prepared under the World Bank's 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.

8. Stakeholder engagement is an inclusive process conducted throughout the project lifecycle. Where properly designed and implemented, the SEP 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.

9. The ESS 10 defines the requirements for stakeholder engagement as follows:
 - i. Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them;
 - ii. Assess stakeholder interests and support for the project and enable stakeholders' views to be taken into account in project design;
 - iii. Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project lifecycle; and
 - iv. Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.

2.0 PROJECT DESCRIPTION

2.1 Project Development Objective (PDO)

12. Strengthen efficiency and transparency in public financial management, domestic resource mobilization, and public sector management across Somalia.

2.2 Project Components

13. The project supports strengthening efficiency and transparency in public financial management, domestic resource mobilization, and public sector management across Somalia through four components as summarized in Table 1.

Table 1: Project components and subcomponents

Component	Subcomponent	Key activities
1. Public Financial Management	1.1 Support essential budget execution functions	(i) Strengthen the internal control environment and quality, comprehensiveness, and transparency of financial reporting (ii) Support the use of financial management information systems (FMISs) (iii) Strengthen procurement processes. (iv) Support external audit and parliamentary oversight on public expenditure
	1.2 Strengthen PFM for service delivery in the health and education sectors	Support stronger health and education service delivery by ensuring sustainable and efficient planning, budget allocations, cash forecasting and expenditure management in the FGS, PSS and JSS
	1.3 Support capacity building of PFM staff	Address immediate capacity needs while also aiming to institutionalize capacity building to reduce dependency on consultants
	1.4 Facilitate the harmonization of PFM systems between FGS and FMS	(i) Harmonize FGS's and FMSs' PFM Acts, Accounting, and Reporting (ii) Harmonize PFM staff competency framework and pay and grading system in collaboration with Component
	1.5 Improve budget preparation and transparency	(i) Support key budget preparation processes to improve budget credibility for states with significant domestic revenue (FGS, PSS, JSS and SL) (ii) Enhance budget transparency of the FMSs
	1.6 Strengthening Public Investment Management	Support potentially the FGS, PSS and other FMSs, and SL, in strengthening the institutional framework for enhanced decision-making in public investment management (PIM) and, at a higher level, contribute to sustainable levels of debt over the medium to long term.
2. Domestic Revenue Mobilization	2.1 Strengthening and harmonizing tax policy capacity	(i) Strengthening and harmonizing tax policy capacity (ii) Review of the FMSs tax laws (iii) FGS and FMSs consensus-building for alignment of their legal frameworks for which the Intergovernmental Fiscal Forums (IGFF) has already been established with support from the Bank's RCRF project.
	2.2 Strengthening and harmonizing inland revenue and selected customs administration systems and capacity	(i) Implementation and harmonization of taxpayer segmentation strategy e.g. large taxpayer office (LTO) (ii) Strengthening and harmonizing business process mappings and redesign processes to fit to the local context, and informed by the experiences of the FGS and PSS, which were supported under the DRM and PFM Project (iii) Strengthening and harmonizing the modernization and automation of the ITAS with a focus on a 'fit for purpose' (iv) Strengthening and harmonizing capacity building in close conjunction with Component 3

	2.3 Strengthening and harmonizing taxpayer education and facilitation	Support needs-based establishment of taxpayer orientation programs, taxpayer service charters, facilitation and grievance help desks, reports for proactive disclosure of revenue performance and forecasting, tax forums, and a revenue academy
3. Public Sector Institutions Management and Performance	3.1 Strengthening the Capacity and Performance of Central and Line Ministries, Departments, and Agencies building on the work of the PREMIS-PFM Project, CIP, and CSSP.	(i) Improvement of strategic staffing, informed by affordability (ii) Capacity development in Civil Service Commissions, MoFs, the OAGs, and selected priority MDAs. (iii) Support the improvement of the quality of staff through blended approaches in training including building a pipeline of future civil servants, strengthened performance management, and support to peer learning networks.
	3.2 Strengthening the implementation of workforce management policies.	(i) Human Resource Management Information Systems (HRMIS) that have been established in the FGS, FMSs, and SL. (ii) support Pensions. In GSS, HSS, JSS, and SWSS support will be for the development of related policy and legal frameworks (iii) Support the Pay and Grading (P&G) systems already being established in the FGS and PSS, while ensuring that P&G reforms are fiscally sustainable across all FMSs. (iv) Support labor market surveys in GSS, HSS, JSS, and SWSS to form the foundations for future reviews of their P&G systems (v) Support a review exercise of: (a) existing civil service management policies and regulations to identify any improvement needs; and (b) existing mechanisms for policy planning, development, oversight and coordination in GSS, HSS, JSS, and SWSS.
	3.3 Expansion of key government services to local governments in Somaliland.	Support SL to expand key government services to local districts, which may include the issuance certificates of good conduct, licensing (driving, trade), registration of properties, tax payments, and so on
4. Project Management, Coordination, and Support in Delivery	4.1 Project management	Support the management, coordination, and M&E for the three components.
	4.2 Results monitoring, which along with conducting day to day M&E and supporting government capacity will include a survey-based impact assessment.	

10. The proposed project rests on the premise that synergies and sustainable improvements can be achieved by taking a comprehensive approach to governance reforms. In this regard, the project design aims to explore in detail the interlink between PFM, DRM, and the public sector management. For instance, budget credibility sets the stage for strong PFM, and it rests heavily on improving DRM. Furthermore, improvements in the public sector are critical for sustainable reforms in DRM and PFM, while DRM and PFM create the fiscal space for improvements in the public sector.

11. **Beneficiaries:** The primary beneficiaries of the proposed project will be the government, civil servants and employees of the implementing ministries, departments and agencies in FGS, FMS and SL. The citizens will also benefit from improved service delivery, particularly in health and education, greater government responsiveness – facilitated through the Citizen Engagement Component – and on a broader scale, from an improved public administration.

2.3 Project risk rating

12. The overall risk rating for the project is High, with four high-level risks: political and governance, macroeconomic, fiduciary, and other (mainly comprising security risks). Technical design risks are Substantial. Risks include the broad geographic and technical scope of project activities. While

many benefits exist to taking an all of Somalia and comprehensive governance reform approach, it also comes with risks related to the dynamics between MDAs as well as the FGS, FMS, and SL.

13. Institutional capacity for implementation and sustainability risks are Substantial. Risks related to the capacity of the Government to implement activities, considering the institutional capacity of the implementing agencies, implementation arrangements, and M&E arrangements are substantial. The FGS, FMS and SL have commenced important public sector reforms. However, the public sector lacks skilled managerial and professional staff – the missing middle – while at the same time, it has been adding unskilled employees at the bottom of the pyramid. Therefore, the overall level of capacity in the public sector remains limited.

14. The environment risk rating is Substantial. This is mainly due to the anticipated construction of MoF headquarters at the Federal and State levels. The environmental risks associated with capacity building activities are low and mainly hinge on Occupational Health and Safety (OHS). The civil works activities will expose the workers and communities to additional environmental risks.

15. Environmental risks and impacts are also anticipated for activities conducted under component 2, which entail small to medium scale civil works, including rehabilitation and reconstruction of government infrastructure. These activities can generate adverse site-specific risks and impacts such as erosion and run-off during the construction phase, disposal and management of large amounts of excavated material generated from construction activities during the construction phase, occupational health and safety of workers both during the construction and operational phases, increased level of dust, noise and vibration from moving of construction vehicles and machinery, and community health and safety risk and pollution of surface and groundwater sources. More generally, the near complete lack of environmental legislation in Somalia, and the lack of capacity of the government to monitor and implement environmental risk mitigation and protection, and the inaccessibility of some of the geographical areas, pose significant risks.

16. The social risk rating is considered Substantial taking into account the following key social risks and impacts: (i) possible elite capture of project benefits; (ii) potential exclusion of disadvantaged and vulnerable groups in staff recruitment and training; (iii) labor risks including OHS and security risks, sexual harassment, and other forms of gender-based violence (GBV) that may occur in capacity building activities; and (iv) contextual risks of operating in a conflict zone and complex social context where effective and inclusive consultations, monitoring, and fostering effective citizen engagement and trusted grievance redress mechanism are challenging.

17. Project activities associated with key social risks and impacts are mainly connected to the low-to-medium-intensity civil work activities on reconstruction and rehabilitation of physical government infrastructure, which includes risks associated with labor rights and management; labor influx and associated risks such as GBV/SEAH; clash for resources and upsetting of delicate community dynamics; displacement impacts resulting from involuntary resettlement if any, and the use of cash transfers, an intervention susceptible to diversion and leakages. Further social risks and impacts are related to ensuring security for project operations including the protection of project workers, beneficiaries and project-affected persons. Harmful inward migration is likely to upset the delicate community dynamics caused by the project operating in a small number of sites and the systemic weakness as the capacity of the government to identify, understand and prevent adverse social impacts on the project is limited.

18. Stakeholder engagement risk is adjudged Substantial. This is mainly due to the nature of the proposed project, which involves coordination between several national, sub-national and MDA levels, complex management and reporting structures, the need to involve civil society and coordinate with donors. Risks related to stakeholders who might delay or halt activities and may affect successful project implementation and completion are substantial.

19. Other risks, including security are considered High. Insecurity poses a risk to human security (World Bank staff and client), project implementation and its sustainability. It can create limitations on access to the operating environment, which in turn poses additional project risks, creating challenges for project implementation and monitoring. Security costs can also significantly increase the overall cost of the project implementation and related reforms.

20. All social and environmental risk mitigation measures have and continue to be detailed in the appropriate ESF instruments, including the ESMF, the GBV/SEAH Action Plan, , the Stakeholder Engagement Plan, and the Security Management Framework and Security Management Plan.

2.4 Legislative and Policy Requirements

21. The Provisional Constitution of the Federal Republic of Somalia defines access to information as a right. Article 32 on Rights of Access to Information spells out that every person has the right of access to information held by the state; as well as every person has the right of access to any information that is held by another person which is required for the exercise or protection of any other just right.

22. The World Bank's Environment and Social Standard 10 sets out that a Borrower has to engage with stakeholders as an integral part of a Project's environmental and social assessment and project design and implementation. The nature, scope and frequency of the engagement should be proportional to the nature and scale of the Project. Consultations with stakeholders have to be meaningful and be based on stakeholder identification and analysis, plans on how to engage stakeholders, disclosure of information, actual consultations, as well as responses to stakeholder grievances, and reporting back to stakeholders¹.

¹ World Bank, Environmental and Social Framework. Setting Environmental and Social Standards for Investment Project Financing, August 2016.

3.0 PROJECT STAKEHOLDERS AND ENGAGEMENT PRINCIPLES

3.1 Project stakeholders

23. Project stakeholders are defined as individuals, groups or other entities with an interest in the project at different levels. Engagement with the project affected persons will be conducted during project planning, upon project effectiveness and sustained throughout project implementation and closure. For effective engagement, project stakeholders are categorized into three main groups, as described below.

- i. **Affected Parties:** persons, groups and other entities within the Project Area of Influence (PAI) that are impacted or likely to be impacted directly or indirectly, positively or adversely, by the project. Such stakeholders are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project and need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. This category of stakeholders may include the public, government officials, business entities and individual entrepreneurs who can benefit from employment/business opportunities, community-based organizations (CBOs), non-governmental organizations (NGOs) that advocate for transparency and government accountability, among others. *For this project, the direct beneficiaries include the MoF, staff in the various MDAs (PFM, DRM and PSM) and those in line ministries at both the national and state levels.*
- ii. **Other Interested Parties (OIP):** constitute individuals/groups/entities whose interests may be affected by the project and who have the potential to influence project outcomes. OIP may not experience direct impacts from the Project but they may consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Such stakeholders include CSOs and NGOs who may become project partners. Others include business owners and providers of services, goods and materials, who may be considered for the role of project's suppliers; mass media and associated interest groups. *The partners whose interests may be affected include development partners supporting the GoSL and state functioning (such as UN agencies), business companies and entities that may be involved in the provision of services for SERP including contractors and primary suppliers.*
- iii. **Vulnerable groups:** persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerability and that may require special efforts to ensure their equal representation in the project consultation and decision-making processes. *The vulnerable individuals and groups identified for this project include female employees, people with disabilities and those occupying low grades within the civil service.*

3.2 Identification of stakeholders

24. Different categories of people and institutions with an interest in the Project at different levels will need to be consulted and engaged in the project activities, as summarized in Table 2.

Table 2: Stakeholder description and areas of interest

Level	Stakeholders	Description
Directly or Indirectly Project-Affected Parties		
National	-Ministry of Finance (MoF), - Accountant General, - Directorate General of Revenue, - ICT Department Central Bank of Somalia, Attorney General's Office, Ministry of Health, Ministry of Education, OPM Auditor General's Office	- MoF will house PCU who will provide coordination support across line Ministries and key agencies; will be responsible for M&E, and will lead prioritization of activities; -MoF also houses all these other departments working with the SERP except for Central Bank. - Central Bank of Somalia (CBS) – project finances shall be channeled through CBS. - Attorney General's office will contribute to the legal frameworks of the project. - Ministry of Health and Min of Education will receive capacity building support; and will be consulted in regard to project activities under component 2 of the project. - OPM will provide overall strategic guidance to the PCU
Regional	FMS governments and line Ministries - FMS Ministries of Finance, Education and Health	- FMS MoFs, Health and Education will receive capacity building support, and will be consulted on project activities. - Other departments housed in the MoF will also receive support from the project (Accountant General's Office and the Revenue Department). - Independent institutions like offices of Auditor Generals from the FMSs will receive capacity building support.
Local District-Level Administrations	District Administrations in proposed locations	District Administrators are usually the authorities that handle day-to-day needs and grievances; community development, community consultations in case of civil works.
Other interested parties		
Contractors	Those who will be hired to construct the offices at the Federal and State levels	The contractors and staff will be subject to the national provisions on labour and World Bank's ESS2 with a focus on recruitment, remuneration and overall management of the workers.
Civil society Organizations	These include partners supporting the government efforts in the country	Civil servants play a key role of resource mobilization, capacity building and advocacy. The project team will identify and engage CSOs throughout the project lifecycle.
Development partners	IMF, FCDO, EU, NORAD, WB	Have been funding similar interventions at the MoF/CBS
People working/ managing similar projects or projects in the same sites	PFM, DRM, RCRF, PROFR, CSSP	Likely to coordinate with the project to share experiences.
Communities	The public	These are the direct beneficiaries of the performance of the civil servants. They will need to be consulted to gather information on their experience in accessing services and their suggestions on the areas that need strengthening/improvement
	Community leaders	With formal administration systems only developing and non-existent in some areas, community leaders including clan and religious leaders play a vital role in community entry and the attainment and social license to operate. This may be necessary for the civil works.
Media/ Strategic communication – Spotlight	Access to information	Ensure information about the project and importance is shared to all stakeholders including disadvantaged groups and that communication modes that are appropriate. On social media – use more targeted messaging on Facebook and twitter and bearers of the message should be known influencers with integrity and following.
Disadvantaged and vulnerable individuals and groups		
Civil servants	Female workers, persons with disabilities	These workers may be left out of the engagement activities unless concerted efforts are made to include them. They may also not fully benefit from the project benefits.

3.3 Stakeholder engagement principles

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

- i. *Openness and life-cycle approach*: public consultations for the project will continue during the whole project lifecycle from preparation through implementation to closure. Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation.
- ii. *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.
- iii. *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 civil servants in low grades, female workers and those with disabilities.

4. SUMMARY STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1 Consultations prior to the development of this SEP

26. The project team held several meetings leading up to the development of the various instruments including this SEP, the ESMF and LMP.

27. The engagements and consultations on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant Government Ministries and implementing agencies as summarized below (the minutes are attached in Annex 1).

28. The SERP project identification mission between the Bank and FGS and FMSs took place from September 20th to October 07th, 2021. During these discussions, the project was referred to as "Whole of Somalia Governance Project." During this mission the FGS and FMSs were asked to prepare Powerpoint presentations on the three sectors of development (PFM, DRM and PSM) which were the focus and main components of the proposed project. In these presentations by FGS and each of the five FMSs, they were asked to list three things for each of the component:

- A brief outline of the achievements in the particular reform area;
- Reform priorities going forward; and
- Challenges to be addressed by the reform priorities.

29. The need for support with office space at the Federal and State levels was presented and discussed during the meeting.

30. A second mission, which was considered the project preparation mission, took place from December 8-20, 2021. By this mission, the project was officially titled Somalia Enhancing Public Resource Management (SERP - P177298). The meeting was attended by the key stakeholders including representatives of the MoF, Ministry of Planning, Ministry of Labor, National Civil Service Commission and FMs Civil Service Commission. During this mission the concept note for the project was shared and discussions held between the Bank and the various government stakeholders about the project development goals. This was another instance where some of the FMSs, the OAG and NCSC reminded the Bank of their priority of getting help with the construction of office spaces.

31. Between January 20th and 31st 2022, a form was shared with several implementing partners to capture various aspects of the project of relevant to the SEP. Eight (8) institutions/agencies responded to the questionnaire: (i) Galmudug State of Somalia, Dhusamareb; (ii) Galmudug Civil Service Commission; (iii) Hirshabeelle Civil Service Commission; (iv) Jubbaland Civil Service Commission; (v) Auditor General Puntland State; (vi) PIU for SERP; (vii) South West Civil Service; and Office of the Auditor General, Somalia. The responses are summarized in Table 3.

Table 3: Key issues drawn from the questionnaire for implementing partners

Theme	Key issues for consideration
Key themes	Responses
Perception about the project and its implementation	How relevant is this intervention? What problems do you foresee it solving? -This intervention will strengthen the efficiency and transparency of the public sector management, address immediate capacity needs of the public sector workforces and improve public service delivery -The project will allow the Civil Service to have office buildings What social risks can this project cause/exacerbate? How can these risks be prevented/mitigated? -Although 5 of the 7 respondents noted there are no social risks expected from the project, the Puntland respondent noted that gender may be an issue whereby most of the people that will benefit from the project will be males who are the majority in civil service

	What lessons have you learnt from the other donor funded projects that can be used to inform the planned project? -To have agreed and approved workplans between the government and the WB -To build and hire a team of competent staff with proven track record of their past work -Secondment of staff to projects has not been successful in the past -Delayed procurement and slow implementation -The need to use local instead of international consultants to ease the knowledge transfer since it is easier for the staff to interact and receive knowledge and skills from the local consultants -Planned Bank support missions during each year help with the steering the project to ensure results are achieved in the agreed timelines What are the major obstacles or impediments to the success of this project? How can these challenges/risks be mitigated? -A major obstacle is the lack of an effective steering committee -Covid-19 is still an issue facing the entire world and this might hinder in-person consultation and interviews for planned staff and consultant positions -Lack of a workplan with clear milestones and timelines for each task to be completed by whom and when -Lack of clear coordination and channels of communication for submitting required instruments -Lack of qualified staff -The design of the project could also create its own obstacles as there can be some political tensions between the FGS and FMS which could hinder the success of the project -World Bank bureaucracy whereby the request process, especially for procurement items, can take forever which may have a negative impact on the successful implementation of the project Challenges Mitigation -Competitive selection processes or retention of the previous advisors attached to the CSC offices -Build a team of proven track records of their past work-related experience -Develop and use a work plan with clear milestones -Empower the role of steering committees -Train the staff and provide remuneration and allowances -Strengthen the coordination between the World Bank and the project team to ensure seamless implementation of interventions
Exclusion during project implementation	What is the risk of exclusion either in consultations or benefits (i.e. the exclusion is specific cadre of staff, gender or those in certain districts) during project implementation? How can these be overcome? -Gender discrimination is a potential risk because of the nature of civil service that is male dominated What is the risk of creating tension among different groups and/or cadres of workers? -This could happen when the staff paid by the government get less salary and benefits than the staff paid by the project. This could be resolved by putting a Pay Scale Policy in place. Besides discrimination, what are other causes of exclusion in the civil service at the federal and state levels? -Sometimes there may be conflict of interest during civil service recruitment process -Political influence and pressure to recommend job opportunities for their friends and people who believe their ideologies -Cultural perceptions, limited or lack of policies such as diversity and inclusion in workplaces, country's political dynamics and power sharing strategies could affect recruitment in the civil service -Imposter syndrome – which is a personal challenge that is faced by many people in general and has to be overcome to allow people to apply for the positions advertised
Stakeholder engagement	How best could civil servants be effectively engaged in this project? -Share with them the project key milestones to familiarize themselves -They should be assigned a participative role in the project -Conduct two-day training for project induction -Project focal points and HR advisors in the field should show commitment and adjust their TORs to contain some clauses that reflect effective engagements with the civil servants How do we ensure that we capture the voices of all civil servants and other key stakeholders in consultations?

	-Through the development of project evaluation feedback that captures how they feel towards the project delivery and its implementation and make recommendations for future improvements -Conduct site visits -Create and deploy questionnaires to capture their views -Develop project feedback mechanisms that capture how the civil servants feel about the project delivery and its implementations and made reconitions for future improvements How can the project draw in civil society organizations and development partners that involved in civil service reforms? -Hold consultative meetings and focus group discussions -Hold a big launching ceremony to inform them that the CSC is in the forefront of civil service reforms through the support of WB SERP project -All tenders for civil service reforms to be publicly advertised and awarded through a competitive process -Get support from the Office of the Auditor General How can the citizenry (public) be effectively involved in the planning and implementation of the project? -Hold public forums and debates to ensure communication between the relevant stakeholders such as the CSOs, government and the project team/donors share and contribute their ideas towards the project from planning to implementation -Job opportunities – during construction of the offices those who can work for wage will benefit from the project -Prepare and share project summary reports How best can the project be communicated to the different stakeholders? -Hold a big launch ceremony to inform them that the CSC is in the forefront of civil service reforms through the support of WB SERP project -Fix billboards around the public spaces where citizens can easily see and read -Focal points and HR advisers to attend coordination and humanitarian meetings both at the FGS/FMS government levels -Hold face-to-face meetings with leaders of the MDAs (while adhering to Covid-19 protocols)
Labor-related risks	What labor risks can this project cause/exacerbate? If so, how can this be overcome and mitigated? Some of the foreseeable labour risks include: ○ Lack of health cover ○ Poor wages or financial insecurity ○ Absence of legal protection ○ Unlimited working hours ○ Poor working conditions ○ Insecurity at the workplace ○ Health hazards What are your views regarding compliance with Somalia labor laws, e.g. child labor, pay and working conditions and fairness in recruitment, promotion and dismissal of workers? If so, how can these risks be prevented/mitigated? -The compliance of Somalia labour laws is very low both in the public and private institutions Mitigation measures -Both governments and private institutions to enforce relevant labour laws including the World Bank requirements What is the status of workers' unions in Somalia and what risks do you foresee in labor movements? -There is a Federation of Somali Trade Unions whose mission is protect and promote the rights, well-being and the interests of all workers in Somalia in just, democratic, peaceful and prosperous nation of Somalia by enhancing quality of life and improving the income and other working as well as living conditions of all workers. Unfortunately, many workers do not know about this Union -There will be no welfare for workers -Low productivity of the workers and service delivery

	-Poor legislative framework will continue to exist -No new innovations for amendments and proposals for changes in the polices What is the risk of exclusion practices of recruitment processes by the contractors that will be hired to build the offices? -There will be no risk of exclusion practices of recruitment processes by the contractors that will be hired to build the offices since they are private businesses with their own governing principles (the reliability and quality will lead to choose the most suitable one) What is the risk of SEA/H in the project and what mitigation measures do you propose? -There will be no risk of SEA/H in the project delivery and management
Security issues and conflicts	Have there been any security-related incidents, local conflict in the country in the last 6 months? -There were security-related incidents in the last 6 months, Al Shabab Militants has been a threat to the government operations in some states -No security incidents reported in Jubbaland and Puntland over the last 6 months What are some of the key security threats to the workers in the country (at the national, state and district levels)? -Al-shabab Militants have been a threat to the government operations at the national, state and district levels -Sometimes workers face security threats based on clan sensitivity -Some workers have been killed due to holding senior positions -There is security threat to key government workers at the national level, as well as targeted government meetings, especially in Mogadishu which is central to Federal institutions. The threat is less imminent at the state level as well as the districts in the entire country, apart from Mogadishu Banadir area Are there any armed groups, if so, how do they relate to recent incidents? -The Al Shabab Militants who are armed groups, relate to the recent incidents by disrupting all government operations and killing any persons affiliated with the government How would security protocols for workers be enhanced at all levels? -The government could engage with the Al Shabab Militants if there is mutual agreement -Create awareness and sensitization of the communities to support the government project -Security teams should have knowledge, skills and training to enhance their abilities -Support community policing
Gender-based violence (GBV)	What risks do female workers face at their workplaces? -Lack of promotion opportunities and motivation -Women are not treated as equal to men in some workplaces -Women may face sexual harassment in some areas -Absence of female leaders in most of the workplaces -Some women may have their own special problems such as family problems What are the potential GBV/SEAH risks of the proposed project (including construction, etc.)? No response on this particular question indicating the need to sensitize the teams on GBV/SEAH What are the reporting channels for GBV/SEAH-related cases in your organization/agency/Ministry/Department? What is the level of confidentiality? -Generally, there are no written and clear reporting channels for GBV/SEAH-related cases, however induction and orientation are conducted for all recruited staff about employee conduct and disciplinary regulations and instructions -In Jubbaland, there is a system that is used manage SEAH reports: ○ Get the survivor immediate medical attention ○ In cases of sexual abuse, demand that a Post Exposure Prophylaxis (PEP) test be administered at the hospital within 72 hours ○ Take the survivor to the police station and file a report with as much detail as possible ○ The level of confidentiality is very high in our institution. We Keep records in a secure location at all times. We Do not include identifying information on records. All files can only be identified by a number or code, and not by an individual's name

	How has the Government been responding to GBV? What provisions of law/ policy guide the civil service on GBV/SEA/SH? -The government responds to GBV and all related abuses -One of the CSCs reported that it does not have a specific policy on GBV but works closely with the ministry of gender and human right and refer such cases for them to handle, albeit they have not experienced cases related to GBV at the workplace In your view, what is the possibility that project workers or security forces would likely cause GBV/SEAH? -There may be such cases of GBV/SEAH during the project delivery but so far we have not seen it yet.
Occupational health and safety	What is the risk of project workers likely to witness violence that will cause injuries and death? -The construction of offices can cause injuries if proper and safe protocols are not put in place. The project will ensure this is in place What is your view of regarding the capacity of the government (federal and state) to protect its workers from infectious diseases e.g. Covid-19? -This minimal case that can be mitigated and the governments are able to respond easily at all times -The state has no capacity to protect workers from Covid-19 however in Jubbaland, it was reported that the government at both levels have the capacity to protect and ensure Covid-19 guidelines are adhered to at work at project sites including wearing masks, keeping social distance and getting Covid-19 vaccine (this will be made mandatory)
Grievance mechanism (GM)	What is your view of the civil service complaints handling process? What are the key limitations? How can this be redressed? - The civil service complaints handling process is well captured and emphasized in detail in the Civil Service regulation -The key limitation is that most workers are not familiar with grievance mechanism procedures that are in place and therefore there is a need to hold sensitization workshops so that they informed about the right procedures Which channels would beneficiaries feel most comfortable raising complaints with? -Beneficiaries feel comfortable raising complaints but corruption is number 1 among them How can information on GM be effectively communicated to the key stakeholders? -To draft a wide policy for Grievance Mechanism that can be submitted to the stakeholders -To have face to face meetings with them and share CSC regulations that clearly indicates the GM.
Monitoring of the SEP	What indicators do you consider important for monitoring the SEP? -Determining the effectiveness of the planned activities -The number of facilities/offices the project will support -The proportion of Civil Servants that will benefit the project/intervention -Frequency of the coordination meeting with project stakeholders -Number of stakeholder and WB meetings -Number of GBV cases reported and resolved by the stakeholders -Number of labour discrimination cases reported and resolved How should information on the project progress be shared with the beneficiaries? -Through steering committee meetings, teams meeting remotely where necessary, CSC website of the CSC and Emails What channels would be most effective for communicating on the SEP and the project generally? -Radio, TV, social media, Emails, meeting minutes and sharing monthly or quarterly reports
Recommendations	What are your recommendations to minimize the social risks of the proposed project? -To be very keen on any activities with potential social risks and respond swiftly to reported cases -Recruit environmental and social experts for the project What are the most important problems to avoid during the implementation of the project?

	-Miscommunication -To undermine the recommendations of the government leaders and their advisers -Not having a clear work plan with timeline -Consultants and contractor's payment delay -Not conducting state level launch ceremonies for this project What suggestions do you have regarding how the project team should implement the project? -Prepare yearly workplans with key milestone to be achieved and with flexible adaptability -Establish a Steering Committee to mitigate risks and for easy coordination of the activities -Reduce bureaucracy of getting approvals such no objection letters when activities need to be conducted -Implement the project in timely manner to allow the public to enjoy the benefits -Stay Focused on the Main Goal of the project -Improve Project Planning and Quality -Stay in touch with the project stakeholders -Regular communication with the project stakeholders -Prioritize project main Tasks
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4.2 Stakeholder engagement matrix

32. Table 4 presents the planned key stakeholder engagement activities to be implemented during the project preparation stage through to implementation and closure.

Table 4: Consultation matrix for stakeholders

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Beneficiaries		
Screening of the proposed project and subprojects	PCU consultants, Social Specialists and other stakeholders	• MoF (Federal and FMS) • Affected groups (civil servants)	• Public announcements • Face-to-face meetings (adhering to government guidelines on COVID-19) • Virtual meetings using Webex/Skype/zoom	Identification of concerns on project impacts, feedback from would-be affected persons
In-depth assessment of risks and benefits	PCU, project consultants Social Specialists, NGOs/CBOs and Other knowledgeable persons	• Would-be affected individuals and groups • Key informants	• Formal/informal interviews • Group discussions • Discussions on specific impacts, alternatives, and Mitigation measures, etc.	More concrete views of project impacts and feedback on possible alternative mitigation and development measures
Implementation	PCU Social Specialists -Consultants -NGOs/CBOs	• Individuals and groups of civil servants • Other stakeholders	• Implementation • Monitoring	Quick resolution of issues
Monitoring and Evaluation	- PCU Social Specialists -Consultants -NGOs & CBOs	Disadvantaged individuals and groups	Formal participation in review and monitoring activities	Identification and resolution of Implementation issues

4.3 Summary of stakeholders' needs, methods, tools and techniques of engagement

33. A precautionary approach will be taken to the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, in light of the current COVID-19 situation:

- i. Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings in the open air if weather permits;
- ii. If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;
- iii. Diversify means of communication and rely more on social media and online channels (Facebook is a popular platform for local radio stations for example who stream content). Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- iv. Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders and allow them to provide their feedback and suggestions;
- v. Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- vi. Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders; and
- vii. Identify trusted local CSO, local/clan-based organizations, CBOs and similar actors who can act as intermediaries for information dissemination and stakeholder engagement; engage with them on an ongoing basis. Different communication packages and engagement platforms for different stakeholders will be developed based on the stakeholder identification above.

34. In line with the above precautionary approach, different engagement methods are proposed and cover different needs of the stakeholders as illustrated in Table 5.

Table 5: Plan for stakeholder engagement of the different groups

Level	Stakeholders	Description
Directly or Indirectly Project-Affected Parties		
National	-Ministry of Finance (MoF) -Auditor General - Accounting General - Directorate General of Revenue - ICT Department - Central Bank of Somalia - Attorney General's Office - Ministry of Health - Ministry of Education - Office of the Prime Minister (OPM)	- MoF will house PCU who will provide coordination support across line Ministries and key agencies; will be responsible for M&E, and will lead prioritization of activities; -MoF also houses other departments working with the SERP such as Auditor General, Accounting General, ICT, Revenue Department. - Central Bank of Somalia (CBS) – project finances shall be channeled through CBS. - Attorney General's office will contribute to the legal frameworks of the project. - Ministry of Health and Ministry of Education will receive capacity building support; and will be consulted in regards to project activities under component 2 of the project. - OPM will provide overall strategic guidance to the PCU
Regional	FMS governments and line Ministries (FMS Ministry of Finance and Health and Education)	FMS Ministries for Finance, Health and Education will receive capacity building support, and will be consulted on project activities.

		Other departments housed in the MoF will also receive support from the project (Auditor General's Office, Revenue Department)
Local District-Level Administrations	District Administrations in proposed locations	District Administrators are usually the authorities that handle day-to-day needs and grievances; community development, community consultations in case of civil works.
Other interested parties		
Contractors/Primary Suppliers	Those who will be hired to construct the offices at the Federal and State levels	The contractors and staff will be subject to the national provisions on labour and World Bank's ESS2 with a focus on recruitment, remuneration and overall management of the workers.
Civil society Organizations	These include partners supporting the government efforts in the country. E.g. UNIDO, UNDP	Civil servants play a key role of resource mobilization, capacity building and advocacy. The project team will identify and engage CSOs throughout the project lifecycle.
Development partners	IMF, FCDO, EU, NORAD, WB	Have been funding similar interventions at the MoF/CBS
People working/ managing similar projects or projects in the same sites	PFM, DRM, RCRF, PROFR, CSSP	Likely to coordinate with the project to share experiences.
Communities	The public	These are the direct beneficiaries of the performance of the civil servants. They will need to be consulted to gather information on their experience in accessing services and their suggestions on the areas that need strengthening/improvement
	Community leaders	With formal administration systems only developing and non-existent in some areas, community leaders including clan and religious leaders play a vital role in community entry and the attainment and social license to operate. This may be necessary for the civil works.
Media/ Strategic communication – Spotlight	Access to information	Ensure information about the project and importance is shared to all stakeholders including disadvantaged groups and that communication modes that are appropriate. On social media – use more targeted messaging on Facebook and twitter and bearers of the message should be known influencers with integrity and following.
Disadvantaged and vulnerable individuals and groups		
Civil servants	Female workers, persons with disabilities	These workers may be left out of the engagement activities unless concerted efforts are made to include them. They may also not fully benefit from the project benefits. Establish grievance mechanism and SEA plan to
Disadvantaged and vulnerable community members	Women	There are gender-specific protection and inclusion concerns particularly among displaced populations. Given the protracted conflict situation, there are serious GBV concerns across Somalia.
	Youth	Being the largest demographic in Somalia and facing significant vulnerability owing to the country context, the effects of crisis and shocks disproportionately impact the youth. This calls for their targeted inclusion and involvement in the project activities through consultations and information disclosures.
	Minority groups	Key minority groups in the project locations are Bantu (15% of the total Somali population; small scale farmers and laborers); Bajuni (0,2% of Somali population); Galgale/Samale (0,2% of Somalia population, pastoral); Midgan or Gaboye (0,5% of Somali population).
	Persons with disability	Persons with disabilities are particularly marginalized in Somalia. There is a lack of data on disability in Somalia, but it is

		presumed that it is higher than the global average (15%), given the protracted conflict situation, ⁷ and that persons with disabilities are more likely to be excluded from participation and benefitting from public services.
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4.4 Proposed strategy for information disclosure

35. The Government will ensure that information to be disclosed at the federal, regional and local/district levels:

- i. Is accurate, up-to-date and easily accessible;
- ii. Emphasizes shared values;
- iii. Articulates the principle and rationale for the various strategies being used by the project at the different levels;
- iv. Includes an indicative timeline and phasing of the project activities (more so where construction will be done);
- v. Includes explanation of measures that will be used in the selection of contractors, workers on the sites and how the effects on the public and communities will be minimized; and
- vi. Includes information on where people can go for more information, ask questions, channel their complaints and grievances, and provide feedback (and contact persons as appropriate).

36. Other key considerations will include:

- i. Over time, based on feedback received through the GM and other channels, information disclosed should also answer frequently asked questions by the public and the different concerns raised by stakeholders;
- ii. During implementation, the Communication Officer will monitor social media regularly for any misinformation about the project and craft responses to be disseminated by the Social Safeguards Specialist and Communication Officer; and
- iii. If the engagement of security or military personnel is considered for any aspect of the project, ensure that a communication strategy is in place to inform stakeholders of their involvement and the possibility of raising concerns and grievances on their conduct through the GM.

4.5 Stakeholder engagement plan

37. The project team will prepare and disclose documents based on the schedule provided in Table 6. Updated versions of the various instruments will be developed as necessary and disclosed.

Table 6: Project information disclosure

Stakeholder Engagement Plan			
Project stage	Target stakeholders	Information to be disclosed	Methods and timing proposed
Before bidding process	Directly affected ministries at the federal and state levels	Technical details of the project.	Public and individual meetings during the preparation of the project documents.
	MDAs and other agencies directly engaged in the delivery of some aspects of the project	The ESF instruments including the ESMF SEAH Prevention and Response Plan, LMP and the SEP.	Disclosure of written information - widespread Radio, TV (in parts of the country), social media, mobile phone.
		Awareness-raising on the GM.	Brochures/flyers translated in Somali.
		ESMF, ESMP, LMP, SEAH Prevention and Response Plan and SEP disclosures.	Face-to-face meetings: separate meetings specifically to people and groups directly affected by the project. Grievance mechanism.

	Other interested parties including development partners, CSOs, media, etc.	Technical details of the project. Compliance with national regulations and collaboration with relevant programs.	Social Media Public and individual meetings during the preparation of the project. Disclosure of written information - Brochures, posters, flyers, websites (Social Media Communication) – translated in Somali.
	Disadvantaged and vulnerable groups including IDPs, persons with disabilities, and minority groups and their representatives.	Awareness raising in the GM Site-specific ESMPs including SEAH Prevention and Response Plan, LMP and SEP. ESMF, ESMP, LMP, SEP disclosures.	Meetings with group representatives and members of the groups as necessary. Separate meetings specifically to affected disadvantaged and vulnerable groups and individuals. Grievance mechanism.
Project Implementation	Key stakeholders (listed above)	Area/subproject specific ESMPs including plans for implementation of SEP, ESMF, SEAH Prevention and Response Plan, and LMP.	WB and MoF website. FMS and regional consultation meetings and community consultation meetings with all groups including disadvantaged and vulnerable group representatives.
Annual reports	Key stakeholders and project beneficiaries at FGS and FMS level including disadvantaged and vulnerable groups.	Annual report on progress and lessons learnt, complaints resolution and feedback.	MoF website, FGS and FMS stakeholder consultation meetings.

4.6 Proposed strategy to incorporate the views of disadvantaged and vulnerable groups

38. The project will carry out targeted stakeholder engagement with vulnerable and disadvantaged groups and individuals to understand their concerns/needs in terms of accessing information, services, and any other challenges they face at home, at workplaces and in public offices. Groups working with or those representing voices of minority and disadvantaged individuals, including CSOs, CBOs and activists will be consulted in the respective areas of operation. Special attention will be paid to engage with women as intermediaries. The details of strategies that will be adopted to effectively engage and communicate to vulnerable and disadvantaged individuals and groups will be considered during project implementation. The project will promote inclusion of disadvantaged and vulnerable groups and individuals by ensuring their involvement in consultations in the subproject design and the development of the ESMPs.

39. The participation of disadvantaged and vulnerable groups in the selection, design and implementation of project activities will largely determine the success and sustainability of the project investments. Where adverse impacts are likely, the PCU and the State PMUs will undertake consultations with the likely affected civil servants and communities and those who work with and/or are knowledgeable of the local development issues and concerns. The primary objectives will be to:

- i. Understand the operational structures in the respective project sites;
- ii. Identifying CSOs, community groups and activists working with the disadvantaged and vulnerable individuals and groups;
- iii. Seek input/feedback to avoid or minimize the potential adverse impacts associated with the planned interventions;
- iv. Identify socially and culturally appropriate impact mitigation measures; and

- v. Implement targeted actions to ensure accommodation and inclusion of the vulnerable and disadvantaged individuals and groups.

40. Consultations will be carried out broadly in two stages. First, prior to the commencement of any project activity, the implementing agency will arrange for consultations with those people and agencies directly affected about the need for, and the probable positive and negative impacts associated with the project activities as part of the development of the ESMPs. Second, there will be continuous stakeholder engagement that will ensure the active involvement of the key stakeholders as part of the contractors' SEP and monitoring activities.

41. The implementing entities will:

- i. Facilitate broad participation of disadvantaged and vulnerable individuals and groups with adequate gender and generational representation and CBOs;
- ii. Provide the disadvantaged and vulnerable individuals and groups with all relevant information about the project including on potential adverse impacts;
- iii. Ensure communication methods are appropriate given the low level of literacy and communication challenges for PWDs;
- iv. Organize and conduct the consultations in forms that ensure free expression of their views and preferences;
- v. Document details of all consultation meetings with disadvantaged and vulnerable individuals and groups on their perceptions towards the project activities and the associated impacts, especially the adverse ones;
- vi. Share any input/feedback offered by the target populations; and
- vii. Provide an account of the conditions agreed with the people consulted.

42. To help ensure that the process does not marginalize disadvantaged and vulnerable groups, representation for these groups will be required in the grievance committee (GC) tasked to resolve grievances/complaints at the local/district level. The following issues will be addressed during the implementation stage of the project:

- i. Provision of an effective mechanism for monitoring implementation of the project activities by the PCU and PMTs, social safeguards team and contractors;
- ii. Involve suitably experienced CBOs/NGOs to address the disadvantaged and vulnerable individuals and groups through developing and implementing targeted action plans that are issue focused (e.g. on recruitment of women and PWDs by contractors);
- iii. Ensure appropriate budgetary allocation of resources for the contractors' ESMPs; and
- iv. Provision of technical assistance for sustaining the activities focused on the needs of the disadvantaged and vulnerable individuals and groups.

4.7 Reporting back to stakeholders

43. Stakeholders will be kept informed through regular meetings and dissemination of information through other means as the project develops, including reporting on project environmental and social performance and implementation of the SEP and grievance mechanism on bi-annual basis.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Resources

44. The senior social safeguard specialists, embedded in the PCU at MoF-FGS, will be in charge of stakeholder engagement activities, together with the communication officer. There will be a social specialist assigned to each PMU at the state level. The social specialists will work together to ensure that the SEP is fully implemented. Table 7 presents a tentative budget for implementing the SEP.

Table 7:² Estimated budget for implementing the SEP

Stakeholder Engagement Activities	Timeline	Q-ty/per years (months)	Unit Cost, USD per year	No. of years	Total cost (USD)
Training of all staff and contractors on GM	Before sub-project implementation	Per year	5,000	1 year	5,000
Annual stakeholder consultation and feedback meeting (one in each FMS and FGS)	Before sub-project implementation	Once a year	12,000	3 years	96,000
FM radio press conferences and call ins (one per year at FGS and FMS levels)	Before sub-project implementation	Once a year	50,000	3 years	150,000
Communication materials (leaflets, posters on project and GM, GM forms, registers in Somali)	Before sub-project implementation	Per year	50,000	3 years	150,000
Monitoring visits by FMS social officers	Once component activities start	Per quarter	10,000	3 years	60,000
Annual stakeholder feedback survey (call Centre) as part of TPM survey	End of the year	Per year			N/A
Subtotal					461,000
Contingency 5%					23,050
Total					484,050

5.2 Project Management Structure, functions and responsibilities

45. A Project Coordination Unit (PCU) will be established in the Ministry of Finance and will coordinate implementation at and between the FGS and FMS. The PCU will be led by a project coordinator and will be responsible for: (i) coordination between components and FGS/FMS; (ii) monitoring and evaluation of project activities; and (iii) the dual role of implementing components 1 and 2 on PFM and DRM, respectively, at the FGS level. In this role, the PCU will be responsible for: (i) provision of guidance and support to implementing agencies at FGS and FMS as needed; (ii) FGS level procurement for PFM and DRM (iii) FMS level procurement above a threshold or where harmonization takes precedence. The PCU will include a FM specialist assigned from the EAFS and

²Does not include general communication, or staffing including social specialists, behavioral change communication specialists and GM focal points which will be included in PCU and contractors' contracts.

TA for procurement and M&E. Subject matter specialists for PFM, DRM, and PSM along with TA for E&S, gender, and communications will be included as necessary.

46. The FGS implementation will be led by a PFM manager and DRM manager based out of the PCU and a PSM manager based out of a PSM Project Implementation Unit (PCU) housed in the OPM. Each manager will be responsible for implementation and coordination with FMS for their respective components. They will be supported by focal points for implementation appointed from relevant departments (e.g., OAG, MoF, MoL, CSC, etc.), however in the case of the DRM component, the DRM advisor will act as focal point. Each manager will also be part of the PCU and report to the Project Coordinator. In addition, the PFM Project Manager will report to the Accountant General, the DRM Manager to the Director General of Revenue, and the PSM Manager to the Permanent Secretary of the OPM. The PSM PCU will also include TA for procurement and M&E and be responsible for PSM related procurement activities.

47. In addition to the above, each FMS will house its own FMS Project Management Unit (PMU) in its respective Ministry of Finance. The FMS PMUs will be responsible for coordinating and monitoring implementation for their respective governments across all three components. Each PMU will be led by a project manager. The project manager will report to the project coordinator in the PCU and their respective FMS Ministers/DGs/ Civil Service Commissioners or Offices of the President (e.g., in the case of PSM for PSS). The PMUs will also include subject matter advisors in PFM/DRM/PSM as needed. In addition, focal points for implementation will be assigned from relevant implementing agencies (e.g., OAG, MoF, MoL, CSC, etc.). In addition, TA related to procurement and M&E will be included as the PMUs will independently manage their procurement activities up to a threshold based on procurement capacity and if harmonization is not a factor. Finally, FM support will be provided from the respective EAFS of each FMS. PMUs will closely coordinate with PREMIS advisors.

48. Table 8 outlines responsible implementing agencies by component. Focal points from the below departments and their internal units/offices will be appointed to work with the relevant component manager in the PCU, PSM PCU, and FMS PMU.

Table 8: Responsible MDAs by Component

Component	Responsible implementing agencies at FGS and FMS levels
Component 1: Public Financial Management	• MoF Office of the Accountant General • MoF Budget Department • MoF Accountant General's Office • MoF Public Procurement Department • Office of the Auditor General • Ministry of Planning
Component 2: DRM	• Directorate General of Revenue • Customs Department • Inland Revenue Department • Ministry of Planning
Component 3: PSM	• Office of the Prime Minister • Ministry of Labor and Social Affairs • National Civil Service Commission • Ministry of Planning

49. Implementation arrangements for SL will remain separate from the above, but will partially mirror them where appropriate, and use existing structures where available. Accordingly, project steering in SL will be handled by the PFM Joint Steering Committee (PFM-JSC), which is chaired by the Minister of Finance, meets quarterly, and includes representatives from relevant MDAs. The PFM-JSC leverages its convening power to resolve issues at the cabinet level and is responsible providing strategic guidance and ensuring cohesion and coordination of the various components. In addition, the project will be covered by the PFM Technical Committee (PFM-TC), which is chaired by the Director

General of the Ministry of Finance, attended by the directors of the relevant offices, and meets monthly. The PFM-TC will be responsible for providing technical guidance for meeting the component objectives and ensuring cohesion and coordination of the various components.

50. The SEP will be implemented and monitored by the PCU. The direct responsibility of its implementation will be designated to the Social Safeguards Specialist within the FGS MoF. The Social Safeguards and Communication Specialists will work with other ministry-level and state-level social safeguards officers to ensure that lessons are learnt from other projects, that the objectives of the plans are met and with the appropriate allocation of the necessary resources for its implementation. Adequate budget for stakeholder engagement will be allocated from the overall project cost, which will include cost for organizing meetings, workshops and training, hiring of staff, field visits, translation and printing of relevant materials, and operating GMs.

51. Reports on stakeholder engagement and a summary of grievances will be received by the PCU Senior Social Specialist and implementing partners every three months.

6.0 GRIEVANCE MECHANISM

6.1 Requirements for GM

52. Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project³. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances’⁴. This Project GM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SERP provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance mechanisms (GM) for the SERP.

53. As per World Bank standards, the GM operates in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines (see GBV/SEAH and Child Protection Prevention and Response Plan). It also operates in addition to specific workers’ grievance redress mechanisms, which are laid out in the LMP.

54. The GM are designed to capture the high potential for conflict in Somalia. There is concern that there may be disagreements over local level planning and implementation processes. Furthermore, the project itself may cause grievances, or existing community and inter-community tensions may play out through the project. The source of grievances in relation to project implementation can also sometimes be the very nature local governance or power distribution itself. It will therefore be key in the fragile environment of Somalia to ensure that grievances and perceived injustices are handled by the project, and that the project aides mitigating general conflict stresses by channeling grievances that occur between people, groups, government actors and beneficiaries and project staff, NGOs, CSOs or contractors/suppliers. Aggrieved parties need to be able to refer to institutions, instruments, methods and processes by which a resolution to a grievance is sought and provided. The GM provides an effective avenue for expressing concerns, providing redress, and allowing for general feedback from community members.

55. The GM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

56. The project risk rating is Substantial and there is potential that the project may have some unintended consequences, e.g., risk of further exacerbating existing exclusion patterns or tensions between groups who feel they are under/misrepresented and undermine trust between citizens and government if transparency, equity and appropriate citizen engagement is not fostered. The GM to be developed for the project will enable the effective resolution of any grievances of the project stakeholders, including civil servants and communities where the health services will be provided. The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM will:

³Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labour Management Plan (LMP). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV prevention and response action plan, which will be defined in a separate GBV/SEAH and Child Protection Risks Action Plan.

⁴ World Bank, Environmental and Social Framework, 2018, p. 131.

- i. Provide an effective avenue for aggrieved persons/entities to express their concerns and secure redress for issues/complaints caused by the project activities;
- ii. Promote a mutually constructive relationship among community members, PAPs, the FGS and FMS MoF and the World Bank.;
- iii. Prevent and address community concerns;
- iv. Assist larger processes that create positive social change; and
- v. Identify early and resolve issues that would lead to judicial proceedings.

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

- i. Fairness of contracting;
- ii. Fraud or corruption issues;
- iii. Inclusion/exclusion;
- iv. Inadequate consultation;
- v. Negative social and environmental impacts;
- vi. Payment related complaints;
- vii. Quality of service issues;
- viii. Poor use of funds;
- ix. Workers' rights;
- x. GBV/SEAH;
- xi. Forced or child labour; and
- xii. Threats to personal or communal safety.

58. The FGS MoF PCU will initially brief all its staff, and the staff of the line ministries at FMS level, on the GM procedures and formats to be used including the reporting and resolution processes. A public awareness campaign will be conducted to inform all communities and staff on the mechanism. A one-pager will be developed providing summary details on the GM, while a poster and leaflet will be produced for ease of reference. Various mediums will be used to sensitize the communities on the project GM including social media and FM radio to reach out to communities at the different project locations, including call-ins with panels including community and government representatives. The radio stations will be strategically selected to reach different groups within project target communities. The GM details will also be published on FGS MoF website indicating a phone number, email address and physical address for further information. The GM will be represented in simple visual formats as well as in Somali dialects, as needed.

6.2 Project GM implementation steps

6.2.1 GM Value Chain

Step 1: Grievance receipt and processing

59. Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

60. Means of Filing a Grievance: There are four distinct means, at least two of which must be made available at the project locality for people to file a grievance.

- i. *A phone number for a hotline operator:* The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator is available from 8.00am to 5.00pm every day through a toll-free number. The hotline operator is set up and managed by the PCU. Any concerned party can call the hotline number and file a grievance with the Project. Hotline Operators will respond in Somali or English. The Hotline Operator will register the grievance in the grievance log (see below). The Hotline

Operator will be initially trained by the PCU in a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to GBV/SEAH related grievances; d) workers' GM; and e) SERP project components. After providing first appropriate responses to the complainant, and registering the grievance, the Hotline Operator will transfer the grievance to the relevant IP responsible for the grievance-related activity.

- ii. *A help desk* must be set up by the respective relevant department during the implementation of sub-project activities. They should be manned by assigned staff, in close coordination with local authorities. At the help desk, Project affected persons can inquire about information in relation to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk. The staff manning the desk will register the grievance in a GM log. The staff will be trained in a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to GBV/SEAH related grievances; and d) workers' GM. The help desk can be open at hours decided on by the relevant department, which must be clearly indicated in a public space, and the Help Desk must be set up at a public space easily accessible and in close proximity of the sub-project activities. The PCU will train relevant assigned staff on the GM procedures, including the implementation of Help Desks.
- iii. *Relevant assigned personnel* available in each project site will be required to accept formal grievances and ensure that avenues for lodging grievances are accessible to the public and all PAPs. The first point of contact for all potential grievances from community members may be the contractor, implementing agency or the local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance. Each relevant staff or local government official will be trained by the PCU or implementing agency in: a) the registration of a grievance; b) the interaction with complainants; c) appropriate responses to GBV/SEAH related grievances; and d) workers' GM. Each relevant department will appoint a focal person for the GM during project activities. This focal person will be trained by the PCU and will be in direct contact with the PCU for any assistance.
- iv. *A suggestion box* must be installed at the nearest local administration office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing. Suggestion Boxes are installed at the closest official administration office in the sub project area. Boxes are clearly marked as SERP-related feedback and grievance mechanism. The relevant department in the respective area is responsible for the setup and management of the box. The GM focal person will man the box and hold the key. The box has to have writing to indicate the frequency at which the Box is emptied.

61. Details of grievance logged: While grievances can be submitted anonymously, the more information is made available, the better the Project can respond to the grievances, investigate the matter where necessary, or provide feedback to the aggrieved party. The minimum information that should be made available is the following (except for SGBV/SEAH cases, which follow a different process as described in Box 1 below).

Box 1: Information to be captured in the GM log	
1) Name of complainant	
2) Information on whether the identity of the complainant should remain confidential or can be made available where necessary	
3) Contact details: physical address, telephone number, email address	
4) Details of the grievance:	

- What happened - Where did it happen - Parties involved - Time when it happened - Description of the case - Supporting documents if available.	
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62. Submission of incomplete information for a grievance may not allow a case to be investigated or may delay investigations.

63. Confidentiality: All grievance recipients and anyone handling the GBV/SEAH related grievances must maintain absolute confidentiality relevant to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to lifesaving services should be sought; b) if the survivor is a child and there are concerns for the child's health and safety. The survivors need to be informed about these exceptions.

64. Informed Consent: The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up.

65. Asking for Consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or relevant agencies), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent.

66. Where possible, the consent form can be used (in cases of direct person-to-person reporting). By signing this form survivor can formally agree (or disagree) with the further processing of the case. The form will clearly state how information will be used, stored and disseminated.

67. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on.

68. In the case of children, informed consent is normally requested from a parent or legal guardian and the children. In cases where the parent or legal guardian is the perpetrator, no such consent is required and the child will be referred to the appropriate services.

69. Severe Incident (an incident that caused significant adverse effect on the environment, the affected communities, the public or workers, e.g. fatality, GBV, forced or child labor): If severe incidents are reported through the described GM pathway, the GM Operator needs to report the case within 24 hours to the PCU with copy to the World Bank following informed agreement by the survivor.

70. Third party reports: In case of any reports of third parties on GBV/SEAH – related grievances to the SERP's GM, the grievance recipient will register the case. The case will then be passed to the GM focal point, who will make contact with the survivor, or an advocate that was appointed by the survivor, and will a) request for informed consent from the survivor to follow-up on the case; and b) offer any available referral services. In case the survivor does not provide consent for the case to proceed, the SERP has to close the case.

Step 2: Sort and Process

71. All registered grievances will be transferred to the GM Focal Point at the respective department at state or national level – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GM focal point will categorize the complaint according the table above (section on 'Categorization

of Grievance'). Worker-related grievances will be handed over to a workers' GM (see below). Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the relevant department has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GM operators and relevant project staff (see further below).

72. For grievances handled under the general Project GM, the GM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

73. The GM Focal Point will also transfer the grievance information into a more comprehensive grievance register. All relevant departments must maintain a grievance register. The format should be similar for ease of reporting to the PCU (see Step 5).

74. Where a relevant department has an existing GM in place, the GM will be assessed by the PCU as for its compliance with the SERP GM and streamlining requested where necessary. The PCU will maintain a central grievance register for the logging, management and monitoring of grievances. Where IPs wish for complainants to remain confidential, they only have to share the nature of the case and the outcome/resolution with the PCU.

75. It is likely that at the local level, IPs will use books to maintain a record of grievances. The information will then be migrated to a digital platform at IP headquarters or when reported to the PCU. The GM will then be linked to the Project MIS. All cases will be treated confidentially.

76. Incident Reporting: Severe incidents: will be reported by the IP - within 24 - to the PCU and the World Bank. All staff involved and relevant departments will be trained in the detection of 'incidents' and in how to report an incident, including severe incidents.

Step 3: Acknowledgement and Follow-Up

77. The respective relevant department will decide whether a grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio-political structures and will therefore be able to recommend to the GM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

78. At all times, the GM Focal Point will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Table 9: Typology of cases and the recommended actions

Type of Case	Actions Required	Response Required
Straight-forward cases with little anticipated complications	Minimal checks and consultations	-Acknowledge reception of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if need be, and communicate outcomes and next steps based on outcomes - 1-3 days

Cases that require some minimal processes	delete misleading information, collect information, analyze existing information, prepare communication materials to disclose delayed information, clarify existing information, and correct misleading information	- Acknowledge reception of the grievance, detail the steps to follow, and provide the appropriate practical timelines - 7 -14 days
Cases that requires investigation	access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches	- Acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response - 14 to 21 days
Cases that require escalation	Transfer case to relevant higher level	- Acknowledge reception of the grievance,

79. All feedback is documented and categorized for reporting and/ or follow-up as necessary.

Step 4: Verify, Investigate and Act

80. The GM Focal Point will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redress action and plan.

Verification

- Check for eligibility (objectively based on set standards and criteria) of complaint in terms of relevance to the project. Refer to the SERP PAD, POM, EMSF, ESMPs/ESIAs, sub-project agreements or other documentation to determine the validity of the grievance.
- Escalate outright grievances that require high level interventions within the relevant department.
- Refer outright grievances that are outside the IP jurisdiction (e.g. refer to PCU or relevant external institution).

81. Once eligibility is determined, the IP will categorize the complaint into the categories presented in Table 10.

Table 10: Complaints management

Grievance category (questions, comments and suggestions)	Required Action Acknowledgement / Clarification
Complaints and concerns which do not require formal investigation	Grievances should be handled and resolved by the immediate manager within the GM structure, e.g. the GM Focal Point or a dedicated staff. The relevant department should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.
Complaints and concerns that involve allegations that require investigation or interventions of a different kind	As appropriate, conduct verification, negotiation, mediation or arbitration, coordination with respective authorities, decision-making, escalation to judicial or administrative institutions, proposed solutions, implementation of agreed actions, etc. The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.

82. Investigation

- GM Focal Point to appoint an independent investigator (Safeguards Experts, Professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation.
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos).

- iii. Collect and preserve evidence.
 - iv. Analyze to establish facts and compile a report.
83. Grievance Action Plan
- i. Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction.
 - ii. Undertake mutually agreed follow-actions.
 - iii. Update of complainant relevant department GM team.
 - iv. Provide users with a grievance redress status update and outcome at each stage of redress, update the relevant team on grievance redress across the GM value chain.

Step 5: Monitor, Evaluate and Provide Feedback

84. The GM Focal Point will provide feedback to GM users and the public at large about:
- i. results of investigations;
 - ii. actions taken;
 - iii. why GM is important;
 - iv. enhance the visibility of the GM among beneficiaries; and
 - v. increase in users' trust in the GM.
85. The relevant department will report on its GM to the PCU on a monthly basis. Monthly reporting to the PCU should provide information on the grievance and how it was handled as well as all information from the grievance register. However, it can omit the names of the aggrieved parties where necessary.
86. The PCU will undertake the following monitoring actions:
- i. develop indicators for monitoring the steps of GM value chain;
 - ii. track grievances and assess the extent to which progress is being made to resolve them;
 - iii. conduct a stakeholder satisfaction survey for the GM services;
 - iv. conduct analysis on the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact;
 - v. provide a report on grievance redress actions pertaining to the steps of GM value chain.
87. The PCU will evaluate the GM by:
- i. analyzing grievance data to reveal trends and patterns,
 - ii. sharing GM analysis in management meetings; and
 - iii. taking corrective action on project implementation approaches to address the grievance.

6.3 GBV/SEAH

88. This Project assumes a strictly survivor-centered approach to GBV/SEAH cases. A survivor centered approach aims to create a supportive environment in which a survivor's rights are respected and in which s/he is treated with dignity and respect. The approach helps to promote a survivor's recovery and his/her ability to identify and express needs and wishes, as well as to reinforce his/her capacity to make decisions about possible interventions⁵. Key of the survivor-centered approach is that no steps can be taken without the survivor's informed consent.

89. All entities reporting on GBV/SEAH-related cases will ensure that reports do not contain any information with the potential of identifying survivors (including names of survivors, families and perpetrators). Furthermore, the grievance recipient needs to provide ongoing feedback to the survivor throughout the process. After conclusion of any investigation, the survivor must be informed first to

⁵Global Protection Cluster, Guidelines for Integrating Gender Based Violence Interventions in Humanitarian Action.

determine whether the perpetrator can be informed and proposed sanctions against the perpetrator can be taken.

90. The PCU GBV and Gender Specialist will be the key focal point for management of such grievances and concerns and will work closely with respective GBV Specialist counterparts or assigned personnel at the relevant departments in the implementation of the GBV/SEAH Action Plan, which contains all information on the GBV/SEAH referral system.

6.3.1 Management of GBV/SEAH reports

91. Given the sensitive nature of GBV complaints, the GM provides different ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEAH-related grievances. No grievance uptake mechanism cannot reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of GBV/SEAH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GM. This will allow protect the survivor-centered approach from mandatory reporting.

92. The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor’s informed consent – report the case to one of the SERP’s formal grievance recipients. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

93. Cases of GBV/SEAH can be reported through the general Project GM – any project staff, staff manning help desks, through the suggestion box, or through the GM Hotline Operator. In addition, the PCU GBV Specialist will man a dedicated SMS, email address and phone number, through which cases can be reported directly to the PCU.

94. The grievance recipient will be responsible for the recording and registration of the complaint. A GM operator cannot reject a GBV/SEAH complaint. At the same time, however, the project can only respond to a GBV/SEAH complaint if it is directed into the designated GM channels. All potential first recipients of GBV/SEAH cases will be trained in the guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint.

95. Once a case has been taken in by a GM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the SERP GBV Specialist. The GBV Specialist will first ensure that the survivor has been provided with all necessary GBV referral services and will ensure that the survivor is in safety.

96. Where the GBV/SEAH grievance was allegedly committed by an SERP project worker, the grievance will be reported to the respective employing agency (relevant department, sub-contractor, PCU, government agency). The PCU GBV Specialist will follow up and determine jointly with the GM Focal Point of the respective partner the likelihood that the allegation is related to the SERP. The GBV Specialist will follow up and ensure that the violation of the Code of Conduct is handled appropriately, e.g. the worker is removed from his or her position and employment is ended (in the case of UN agencies, SEA processes are strictly followed). The responsibility to implement any disciplinary action lies with the employer of the perpetrator, in accordance with local labor legislation, the employment contract, and the code of conduct. The GBV Specialist will report back to the survivor on any step undertaken and the results.

97. Where the survivor has opted to take a formal legal route with the case, the PCU GBV Specialist will ensure that the survivor has all the support required to file a case at court. The GM process will still proceed with the survivors’ consent.

98. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GM’s remit to conduct investigations, to make any

announcements, or to judge the veracity of an allegation. The GM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.

99. Since this Project assumes a fully survivor-centered approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered access to referral services and the GM operator or grievance recipient should note that the survivor did not wish for the case to be pursued, and the case is considered solved.

100. Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions; and appropriate actions have been taken against the perpetrator according to SEA mechanisms; b) the service provider has initiated accountability proceedings with the survivor's consent.

101. If the survivor does not want to launch a complaint with the employer, the case is closed. If the complaint proceeds, the case is reviewed by GBV Specialist in the PCU and a course of action is agreed on with the respective IP/employer. The alleged perpetrator's employer takes agreed-on disciplinary action. Once the action is deemed appropriate by the GBV Specialist, the case is recorded as closed.

102. Beneficiaries and communities should generally be encouraged to report all GBV/SEAH cases through the dedicated GBV/SEAH referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information.

103. The GM Operator, and all other GM case recipients (staff manning Help Desks, and local personnel) will ensure appropriate responses vis-à-vis the complainant/survivor by 1) providing a safe caring environment and respect the confidentiality and wishes of the survivor; 2) If survivor agrees, obtain informed consent and make referrals, 3) provide reliable and comprehensive information on the available services and support to survivors of GBV.

6.3.2 Referral process for GBV/SEAH

104. Referrals are a process through which the survivor gets in touch with professionals and institutions regarding her case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient will instantly provide the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient will provide allowances. Referral services are provided even in cases, where the survivor opts to not pursue the case through the GM or through legal channels. See SEAH Prevention and Response Plan and ESMF for further details on referral services. The GBV/SEA Action plan should list available referral services in the different SERP Project areas. This list will be continuously kept up to date by the SERP GBV Specialist, updates will be provided on a regular basis to all GM recipients. The grievance recipient explains to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor will be informed about his or her right to place limitations on the type of information they want shared. The survivor's consent must be documented.

6.3.3 Managing GBV/SEAH data

105. All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

106. Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor. If the survivor does not wish to file a formal complaint,

referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded and the case will be considered closed.

107. If the survivor provides informed consent, the grievance recipient should inform the GBV Focal Point and the GBV Specialist at the PCU. The GBV Specialist at the PCU will inform the World Bank. The report will be on the anonymized incident as soon as it becomes known to the PCU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the SERP; the survivor's age and sex' and whether the survivor was referred to other services.

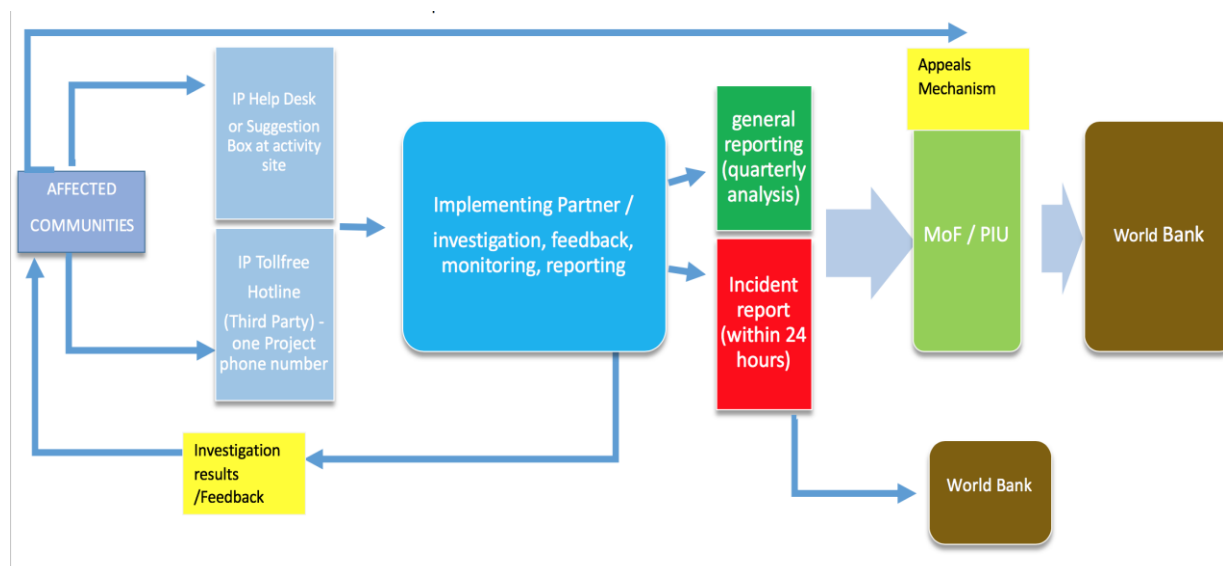


Figure 1: SERP Grievance Redress Mechanisms Flowchart

6.3.4 World Bank's Grievance Service

108. **World Bank Somalia Office:** If no satisfactory resolution of complaints has been received from the NPCU, complaints can be raised with the World Bank Kenya office on somaliaalert@worldbank.org. **World Bank's Grievance Redress Service:** Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level GMs or the WB's Grievance Redress Service (GRS). For more information: <http://www.worldbank.org/grs>, email: grievances@worldbank.org or address letters to:

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

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

6.4 Interim Grievance Mechanisms

110. Pending the establishment of the project GM, the office of the PCU will be responsible for managing project-related complaints. The Social Safeguards Specialist will receive all complaints and channel them to the relevant offices for redress. The Specialists contacts will be shared with the key stakeholders to ensure that they know who to talk to. Once the GM system is fully established and running, information on the GM focal points and guidance on how to channel complaints will be shared broadly and at all levels.

ANNEXES

Annex 1: List of participants during Virtual Preparation Mission (Dec 8th to 16th, 2021)

Federal Government of Somalia				
Ministry of Finance				
SN	Name	Designation	Email Address	Tel. No.
1.	Mr. Suleiman Sheikh Umar	Director General	dalkasom@gmail.com; dg@mof.gov.so	
2.	Mr. Ahmed Mohamed	Project Coordinator, DRM, PFM	ahmed.eco33@gmail.com	+44-7840054648
3.	Mr. Hassan Dirie	Project Coordinator, Somalia Capacity Injection Project	Hassan.d@opm.gov.so ; hadirie@gmail.com	
4.	Mr. Ismail Aweis	Procurement Director	ismailaweis1@gmail.com	+252-616673839
5.	Mr. Samuel Akani	Procurement TA	samuelakani31@gmail.com	+252-619235407
6.	Ms. Leila Mohamed	M&E T.A, DRMPFM	leilamohdd@gmail.com	
7.	Abdisalan Fidow	Secretary, PFMRCU	abdisalamfidow@gmail.com	
	DRM TEAM			
1.	DG Jafar Ahmed	DG Inland Revenue	jahmed.revenue@gmail.com	
2.	Mr. Maxamed Osso	DRM Supervisor	maxamedosso@gmail.com	
3.	Mr. Najibullah Nur Isak	Head of DRM	najiibsheekh@gmail.com	+252-613844460
4.	Mr. Mohamed Aden Abdi	Head of TPU	soomane11@gmail.com	
5.	Ms. Ayan Isse	Deputy TPU	afraxbajmas@gmail.com	
6.	Mr. Abdurahman Ahmed Afrah	Head of Audit	aryanaser10@gmail.com	
	Accountant General Team:			
1.	Ms. Fatuma Osman Farah	Accountant General	fatumina.farah@gmail.com	
2.	Mr. Abdirisak Abukar	Deputy Accountant General	axsan08@gmail.com	+254-713716211
3.	Mr. Mohamed Hussein	Treasury Director	misse2021@gmail.com	
4.	Mr. Adam A. Adam	SFMIS Director	aadancade15@gmail.com	+252-615861070
5.	Mr. Abdirizak Jimale	Head of Cash Management Unit	jimale19@gmail.com	+252-615556609
6.	Ms. Anab Sabriye	Accounting FM TA	anab.sabriye@gmail.com	+252-615794956
7.	Mr. Robert Ojala	PFM Reforms Expert	robert_otala@yahoo.com	+254-740642888
Office of the Prime Minister				
SN	Name	Designation	Email Address	Tel. No.
1.	Mr. Mohamed Dahir	Senior Economic Advisor	mdfarah90@gmail.com	
2.	Mr. Mohamed Bare	Senior Economic Advisor and Economic Pillar Coordinator	mohamed.barre@opm.gov.so	
Ministry of Labour and Social Affairs				
SN	Name	Designation	Email Address	Tel. No.

1	Mr. Abdullahi Mohamed Ali	Director General	sultanjanale@gmail.com; dg@molsa.gov.so	
Ministry of Planning, Investment and Economic Development				
SN	Name	Designation	Email Address	Tel. No.
1.	Mr. Abdulkadir Aden	Director General	Abdikadira21@gmail.com; abdikadir.a@mop.gov.so	
National Civil Service Commission				
SN	Name	Designation	Email Address	Tel. No.
1.	Mr. Hassan Abshirow Mohamed	Chairman	somalia_ncsc@hotmail.com	
2.	Mr. Mohamed Ibrahim Abdikarim	Director General	directorgeneral.ncsc.so@gmail.com; tusbaxle2014@gmail.com	
Office of the Auditor General				
SN	Name	Designation	Email Address	Tel. No.
1.	Mr. Mohamed Ali	Auditor General	oag@oag.gov.so, mafgoi1@gmail.com; oag@oag.gov.so	+252-619568678
2.	Ms. Hannan Nur	Special Assistant to AG	hannan.nur@oag.gov.so	+252-614699529
3.	Mr. Omar Nur Ali	Director of Treasury	omar.ali@oag.gov.so	+252-616437490
4.	Mr. Adan Sabriye	Treasury Officer	adan.sabriye@oag.gov.so	+252-615794952
5.	Mr. Stephen Emasu	Senior Audit Expert	Stephen.Emasu@adamsmithinternational.com	+256-752710810
6.	Mr. Abdirahman A. Sugaal	Junior Audit Expert	sugaal56@gmail.com	+252-615553196
7.	Mr. Galleyr Macalin	Communications & Reporting T.A	galleyr.macalin@oag.gov.so	+252-619606093
8.	Ms. Hamedia Amir	Relations Coordinator Advisor	hamedia.amir@oag.gov.so	+252-617540055
9.	Mrs. Kowsar Osman	Administrative Officer	kowsar.osman@oag.gov.so	+97470429021
Puntland State of Somalia				
Ministry of Finance				
SN	Name	Designation	Email Address	Tel. No.
1	Omar Hassan Fiqi	Deputy Minister of Finance	Omar.fiqi@mof.plstate.so	+252906797970
2	Omar Salah Adam	Accountant General	ag@mof.plstate.so	+252907794000
3	Abdulkadir Ali Jama	Acting DG	keenadiid@mof.plstate.so	+252906796792
4	Abshir Mohamed Abshir	Deputy Director General for revenue	abshirdhagawel@gmail.com	+252907793715
5	Abdisamed Awad Osman	Budget Director	Abdisamed.awad@gmail.com	+252907794148
6	Ahmed Abdi Mohamed	Internal Audit Director	Cagey@mof.plstate.so	+252907725210
7	Abdulkadir Ahmed Hashi	DRMPFM Coordinator	hashi@mof.plstate.so	+252907793297
8	Hassan Mohamed Esse	Procurement Specialist DRMPFM	esse@mof.plstate.so	+252907864571
9	Ahmed Salah Burale	FMIS/ICT Head	aburale@mof.plstate.so	+252907724401
10	Liban Bedel	FMIS TA	Liban.beddel@gmail.com	+252906154244
11	Basel AlBishtawi	PLFMIS Developer	bbishtawi@gmail.com	+971506560375
12	Osman Mohamud Ali	PFM Legal Framework and Financial Specialist	Osali007@hotmail.com	+252907790716
13	Michael Parry	Consultant PFM Professionalization	Michael.parry@michaelparry.com	+447525763381

14	Ruqia Mohamed	Communication Specialist DRMPFM	Mohamed.ruqia@gmail.com	+252907794325
15	Mona Assayr	M & E Assistant	muno@mof.plstate.so	+252907768281
Office of the President				
SN	Name	Designation	Email Address	Tel. No.
1	Mr. Mohamed Abdirishid Ali	Chief of Staff	dg.oop@plstate.so	+25290-779-2202
2	Mr. Mohamed A. Mohamed	Project Coordinator	mamohamed.oop@plstate.so	+25290-6794281
3	Mr. Yussuf H. Dahir	Procurement Specialist	yussuf.cip@plstate.so	+25290-6794282
4	Mr. Ahmed D. Mohamed	FM Specialist	ahmed.cip@plstate.so	+25290-6794283
5	Miss Naima A. Mohamed	Communication Specialist	naima.cip@plstate.so	+25290-6794286
6	Mr. Mohamud S. Nur	M&E Specialist	mohamud.cip@plstate.so	+25290-7795484
Ministry of Labour, Youth and Sports				
SN	Name	Designation	Email Address	Tel. No.
1	H.E Fardowsa Osman Egal	State Minister	st.minister.molys@plstate.so	+25290-695-6570
2	Mr. Jama Hassan Abdille	Director General	dg.molys@plstate.so	+25290-7770027
3	Miss Barni Isse Ahmed	Director of Employment and HR	barni.cise@gmail.com	+25290-7720563
4	Mr. Mohamud Abdi Omar	Director of Adm and Fin	mshire70@gmail.com	+25290-7743565
5	Mr. Abdiweli Mohamed Yusuf	Director of Policy and Planning	abdiwali.yusu@gmail.com	+25290-7799437
6	Mr. Burhan Abdulkadir Mohamed	Director Legal Affairs	burhaan099@gmail.com	+25290-7766889
Ministry of Planning and International Development				
SN	Name	Designation	Email Address	Tel. No.
1	Mr. Sharmarke Hassan Ali	Director General	mopic@plstate.so	+25290-7726722
Puntland Civil Service Commission				
SN	Name	Designation	Email Address	Tel. No.
1	Mr. Mustafa Said Shaba	Chairman	shabacmus@gmail.com	+25290-726-4776
2	Mr. Dahir Yusuf Mohamed	Director of HR	dahir.y.mohamed@gmail.com	+25290-7746559
Office of the Auditor General				
SN	Name	Designation	Email Address	Tel. No.
1	Abdirizak Omar Farah	Auditor General	Hdhawrka@gmail.com	+2527797074
2	Anders Pilskog	Legal Expert Office of the Auditor General	anders@pilskog.no	+4799699990
3	Yusuf Mohamud Mohamed	Internal Audit Officer	Yuusuf49@gmail.com	+252907753149
4	Bashir Mohamed Warsame	Audit Specialist for Office of the Auditor General	bashkamohamed@gmail.com	+252907798155
Galmudug State of Somalia				
Ministry of Finance				
SN	Name	Designation	Email Address	Tel. No.
1.	Farhan Ali Mohamud	Minister	farahanmohamoud@gmail.com	+252-615- 552221

2.	Abdiazizi Mohamud Hussein	Budget Director	abdiaziz.husein@galmudugmof.so	+252-615-556910
3.	Said Gelle	Revenue Director	geelle000@gmail.com	+252-615-914491
4.	Nur Ali Wehliye	Eafis Director	nor.wehliye@galmudugmof.so	+252-615-104600
5.	Abdinasir Abdullahi Said	RCRF Project Manager.	abdinasir.mahadalle@gmail.com	+252-615-427171
6.	Hussein Mohamud Mohamed	Senior PFM Adviser.	hussein.mohamudmohamed@adamsmithinternational.com	+254-720336688
7.	Abdullahi Hassan Mohamed	Revenue/PFM Adviser.	abdullahi.hassanmohamed@adamsmithinternational.com	+252-617-537755
Ministry of Labour and Social Affairs				
SN	Name	Designation	Email Address	Tel. No.
1.	H.E Yaye Xiish	Minister	xyiish@autlook.com	
Ministry of Planning, Investment and Economic Development				
SN	Name	Designation	Email Address	Tel. No.
1	Abdinasir Geelle Elmi	Minister	Geelle16@gmail.com	+252616777555
2	Abdullahi Omar Aden	Director-General	Abdullsakiin@gmail.com	+252617121999
National Civil Service Commission				
SN	Name	Designation	Email Address	Tel. No.
1.	Amina Mohamed Farah	CSC Commissioner	amina.farah@galmudugcsc.so	+252615419160
2.	Ahmed Mohamed Abdi	CSC Recruitment Director	ahmed.tireless@galmudugcsc.so	+252615594351
3.	Abdirizak Hersi Mohamud	CSC Policy Director	aloog96@gmail.com	+252615723221
4.	Warsame Muhumed Abdi	CSC HR Adviser	warsamemuhumed@gmail.com	+252617819361
Office of the Auditor General				
SN	Name	Designation	Email Address	Tel. No.
1.	Hashi Osman Mohamed	Auditor General Galmudug	Hashi.mohamed@galmudugoag.so	+252-615575400
2.	Hashim Abass Sharif	External Audit Officer	Hashim.sharif@galmudugoag.so	+252-619016952
Hirshabelle State of Somalia				
Ministry of Finance				
SN	Name	Designation	Email Address	Tel. No.
1	H.E Mohamed Mohamud Abdulle	Minister of Finance	Mohamedabdulle1@gmail.com	
2	Salad Mohamed Nur	Budget Director	Salad.nur@hirshabellemof.so	+252 615497987
3	Hassan Ahmed Tohob	Treasury Director	Hassan.Tohob@hirshabellemof.so	+252 615552139
4	MahammedAbdi Hussein	PFM Advisor	mahammed.abdihussein@premis.so	+252619308343
Ministry of Labour and Social Affairs				
SN	Name	Designation	Email Address	Tel. No.
1.	Mohamud Sheikh Ali Salaad	Minister	Maxamuud1576@gmail.com	+252-615571576
2.	Salah Mohamed Osmaan	Coordinator	-	+252-615711202
Ministry of Planning, Investment and Economic Development				
SN	Name	Designation	Email Address	Tel. No.

1.	H.E Saadaq Salad Warsame	Minister	saadaqsw@gmail.com	
2.	Mr. Abdullahi Mohamed Hassan	Director General	dhagacade657@gmail.com	
National Civil Service Commission				
SN	Name	Designation	Email Address	Tel. No.
1.	Mohamed Mo'allim Omar Meyre	Commissioner	maxamad.cumar@hirshabellecsc.so	+252616754358
2.	Bashir Mahamud Hassan	Director General	Bashir.hassan@hirshabellecsc.so	+252617743717
Office of the Auditor General				
SN	Name	Designation	Email Address	Tel. No.
1.	Abdullahi Abdi Barise	Auditor General	Barise2010@gmail.com	
2.	Marian Mohamud Omar	Deputy Auditor General	marian.omar@hirshabelleoag.so	
3.	Abdirizak Mohamed Yousuf	Audit Manager	abdirizak.yussuf@hirshabelleoag.so	
Jubbaland State of Somalia				
Ministry of Finance				
SN	Name	Designation	Email Address	Tel. No.
1.	Hussein Hirsi Ahmed	Minister	hhirsi@gmail.com	+252-617933000
2.	Mohamed Kamil Yusuf	Director General	Mohamed.kamil@jubbalandmof.so	+252-613333993
3.	Aden Mohamed Hudle	Revenue Director	aden.hudle@jubbalandmof.so	+252-616837647
4.	Faisal Mudey Hassan	EAFS Director	Faisal.mudey@jubbalandmof.so	+252-616821453
5.	Mohamud Abdi Ahmed	Treasury Director	Mohamud.ahmed@jubbalandmof.so	+252-619106074
6.	Yussuf Abdi Abullaahi	Budget Director	yussuf.abdullahi@jubbalandmof.so	+252-618493183
Ministry of Labour and Social Affairs				
SN	Name	Designation	Email Address	Tel. No.
1.	Mohamed Ahmed Ali	Minister	mole@jubalandstate.so	+252-612117407
2.	Ibrahim Mohamed Qoshow	Deputy Minister	deputyminister-mole@jubalandstate.so	+252-615953407
3.	Ali Deibii Farah	Director General	dg-mole@jubalandstate.so	+252-619696300
Ministry of Planning, Investment and Economic Development				
SN	Name	Designation	Email Address	Tel. No.
1.	Dr Mursal Mohamed Khaliif	Minister	mopic@jubalandstate.so	+252-613309333
2.	Mohamed Osman Jama	Deputy minister	Deputyminister-mopic@jubalandstate.so	+252-615595489
3.	Abdi Mohamed	Director General	Dg-mopic@jubalandstate.so	+252-612035312
4.	Osman Hassan Abdi	Technical advisor	Tadvisor.mopic@jubalandstate.so	+252-617496878
National Civil Service Commission				
SN	Name	Designation	Email Address	Tel. No.
1	Siyat Ibrahim Mohamed	Jubaland Civil Service Commissioner	Jcsc-commissioner@jubalandstate.so	+252-616619019
2.	Ahmed Mohamed Abukar	Deputy Commissioner	Ahmed.jcscdeputy@jubalandstate.so	+252-617304000
3.	Yunis Ali Sheegow	Deputy Commissioner	Yunis-jcscdeputy@jubalandstate.so	+252-619578819
4.	Sadik Abdi Khalif	Secretary General	Jcscsecretarygeneral@gmail.com	+252-612992849
Office of the Auditor General				

SN	Name	Designation	Email Address	Tel. No.
1.	Adam Ali Mohamed	Audit Manager/Acting Auditor general	Adam.mohamed@jubbalandoag.so	+252-612292219
2.	Mohamud Ali Samow	Office Secretary	Mohamed.samow@jubbalandoag.so	+252-615197979
South West State of Somalia				
Ministry of Finance				
SN	Name	Designation	Email Address	Tel. No.
1.	H.E Ahmed Mohamed Hussein	Minister	ahmey1987@gmail.com	
2.	Abdullahi Daahur Hussein	Revenue Director	Abdalla@mofswss.so	+252-619400784
3.	Kadar Ahmed Mohamed	Treasury Director	Kadar@mofswss.so	+252-615569472
4.	Abdiaziz Mo'alim Hussein	Budget Director	Abdiaziz@mofswss.so	+252-615581816
5.	Mohamud Mohamed Hassan	EAFS Director	Mohamud@mofswss.so	+252-615682701
Ministry of Labour and Social Affairs				
SN	Name	Designation	Email Address	Tel. No.
1.	H.E Cabdiqadir Cumar Cabdullahi (Baasto)	Minister	baasto1979@gmail.com	
Ministry of Planning, Investment and Economic Development				
SN	Name	Designation	Email Address	Tel. No.
1	Isaak Mohamud Mursal	Director General	isackfanax@gmail.com	0615545202
National Civil Service Commission				
SN	Name	Designation	Email Address	Tel. No.
1	Sharmarke Mohamed Kulow	Civil Service Commissioner	commissioner@southwestcsc.so	0615522133
2	Abdi Farah Abdikadir	Civil Service Advisor	abdifarahak@gmail.com	0616422553
Office of the Auditor General				
SN	Name	Designation	Email Address	Tel. No.
1	Omar Ahmed Hassan	Auditor General	Omar.hassan@southwestoag.so	+252615391518
2	Muhyadin Ali Abdinoor	Audit Manager	Muhyadin.ali@southwestoag.so	+252615897704

Annex 2: Consultation information collection tool**SOMALIA ENHANCING PUBLIC RESOURCE MANAGEMENT PROJECT****STAKEHOLDER CONSULTATION FORM****1. Introduction**

The Federal Government of Somalia is seeking financial support from the World Bank to implement a project that seeks to enhance public resource management at the federal and state levels. This project is aimed at supporting the government to strengthen efficiency and transparency in public financial management (PFM), domestic resource mobilization (DRM), and public sector management (PSM) across Somalia. The key project activities will include: (i) capacity building for staff engaged in the three key areas of PFM, DRM and PSM; (ii) address immediate capacity needs while also aiming to institutionalize capacity building to reduce dependency on consultants; (iii) capacity building of the offices to deliver on the various functions including taxpayer orientation programs, taxpayer service charters, facilitation and grievance help desks, reports for proactive disclosure of revenue performance and forecasting, tax forums, and a revenue academy; and (iv) construction of offices at the federal and state headquarters.

The Government is requesting your organization/agency to respond to the questions below to help it develop an appropriate stakeholder engagement plan (SEP) for the project. The information provided by your organization/agency will only be used for the purposes of inform the SEP. If you have any questions, please contact: Mr. Ahmed Mohamed on: (+252) 618900336, ahmed.eco33@gmail.com.

2. Data collection tool

Theme	Key issues for consideration
Name, position and organization	
Key themes	Questions
Perception about the project and its implementation	• How relevant is this intervention? What problems do you foresee it solving? • What social risks can this project cause/exacerbate? How can these risks be prevented/mitigated? • What lessons have you learnt from the other donor funded projects that can be used to inform the planned project? • What are the major obstacles or impediments to the success of this project? How can these challenges/risks be mitigated?
Exclusion during project implementation	• What is the risk of exclusion either in consultations or benefits (i.e. the exclusion is specific cadre of staff, gender or those in certain districts) during project implementation? How can these be overcome? • What is the risk of creating tension among different groups and/or cadres of workers? • Besides discrimination, what are other causes of exclusion in the civil service at the federal and state levels?
Stakeholder engagement	• How best could civil servants be effectively engaged in this project? • How do we ensure that we capture the voices of all civil servants and other key stakeholders in consultations? • How can the project draw in civil society organizations and development partners that involved in civil service reforms? • How can the citizenry (public) be effectively involved in the planning and implementation of the project? • How best can the project be communicated to the different stakeholders?

Labor-related risks	• What labor risks can this project cause/exacerbate? If so, how can this be overcome and mitigated? • What are your views regarding compliance with Somalia labor laws, e.g. child labor, pay and working conditions and fairness in recruitment, promotion and dismissal of workers? If so, how can these risks be prevented/mitigated? • What is the status of workers' unions in Somalia and what risks do you foresee in labor movements? • What is the risk of exclusion practices of recruitment processes by the contractors that will be hired to build the offices? • What is the risk of SEA/H in the project and what mitigation measures do you propose?
Security issues and conflicts	• Have there been any security-related incidents, local conflict in the country in the last 6 months? • What are some of the key security threats to the workers in the country (at the national, state and district levels)? • Are there any armed groups, if so, how do they relate to recent incidents? • How would security protocols for workers be enhanced at all levels?
Gender-based violence (GBV)	• What risks do female workers face at their workplaces? • What are the potential risks of the proposed project (including construction, etc.)? • What are the reporting channels for GBV/SEAH-related cases in your organization/agency/Ministry/Department? What is the level of confidentiality? • How has the Government been responding to GBV? What provisions of law/ policy guide the civil service on GBV/SEA/SH? • In your view, what is the possibility that project workers or security forces would likely cause GBV/SEAH?
Occupational health and safety	• What is the risk of project workers likely to witness violence that will cause injuries and death? • What is your view of regarding the capacity of the government (federal and state) to protect its workers from infectious diseases e.g. Covid-19?
Grievance mechanism (GM)	• What is your view of the civil service complaints handling process? What are the key limitations? How can this be redressed? • Which channels would beneficiaries feel most comfortable raising the following complaints with: • Discrimination? • Corruption? • Cases of abuse among workers? • Cases of abuse of public by civil servants? • Discrimination in the provision of services? • How can information on GM be effectively communicated to the key stakeholders?
Monitoring of the SEP	• What indicators do you consider important for monitoring the SEP? • How should information on the project progress be shared with the beneficiaries? • What channels would be most effective for communicating on the SEP and the project generally?
Recommendations	• What are your recommendations to minimize the social risks of the proposed project? • What are the most important problems to avoid during the implementation of the project? • What suggestions do you have regarding how the project team should implement the project?
Any other comments	