



MINISTRY OF FINANCE

FEDERAL GOVERNMENT OF SOMALIA

STAKEHOLDER ENGAGEMENT PLAN

THE PROPOSED NEW MINISTRY OF FINANCE HEADQUARTERS

MOGADISHU, BANAADIR, SOMALIA

ECONOMIC GOVERNANCE INSTITUTIONAL SUPPORT PROJECT

(EGISP)

01 September 2025



THE PROPOSED DEMOLITION AND CONSTRUCTION OF NEW MINISTRY OF FINANCE HEADQUARTERS LOCATED AT MOGADISHU, BANAADIR, SOMALIA, TO BE FUNDED UNDER THE ECONOMIC GOVERNANCE INSTITUTIONAL SUPPORT PROJECT (EGISP).

TITLE	DESCRIPTION	REVISION
Date	31 August 2025	00
Project Number	31371 - 634	
Project Title	Proposed Ministry of Finance Offices	
Document Title	Stakeholder Engagement Plan	
Category	Design & Supervision	
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Document reference	31371 - 634 - HQ - SEP-001	
Remarks	For Review and Approval	

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1. INTRODUCTION

The Federal Government of Somalia (FGS), through its Ministry of Finance (MoF), is undertaking a vital infrastructure development project aimed at ensuring staff safety, protecting public assets, and enhancing institutional effectiveness. The project involves demolishing the existing six-storey MoF office complex in Mogadishu and building a modern eight-storey facility on the same site to house the Ministry's executive, administrative, and operational functions. To achieve this, the Ministry has formally sought financial assistance from the African Development Bank (AfDB), including support for environmental and social safeguards compliance.

The current MoF building has deteriorated to a dangerous state, posing serious risks to staff and visitors. In recent months, four ceilings have collapsed across different floors, exposing badly corroded reinforcement bars and decayed concrete. Structural reviews have also highlighted widespread cracking, bulging slabs and severe water intrusion through the walls, as well as clear evidence of deep-seated instability. Additionally, a fire incident linked to faulty ceiling wiring further underscored the building's hazards. Following these concerns, the Ministry commissioned a structural integrity assessment, which confirmed the facility was unsafe for continued occupation. As a result, the building has been vacated, and preparation for demolition is underway.

Recognising these urgent risks, the Government of Somalia has prioritised the project to enhance public safety and institutional resilience. The Ministry of Finance, as the nation's main agency for fiscal governance, budget management, tax administration, and donor coordination, needs a secure and dependable workspace. Continued use of unsafe facilities jeopardises service delivery, harms staff welfare, compromises data security, and damages public confidence in governance. Building a new, modern office is therefore essential not only to ensure continuity of operations but also to symbolise Somalia's commitment to rebuilding strong and resilient state institutions.

The proposed project will affect various stakeholders within the designated project area. Therefore, this Stakeholder Engagement Plan (SEP) has been created to guide effective management of all stakeholders involved. This includes those directly impacted by demolition and construction activities and those with broader interests in the project. The SEP details engagement strategies for the preparation, demolition, construction, and operational phases of the new Ministry of Finance office building, ensuring inclusive participation, transparent communication, and timely resolution of concerns throughout the project's implementation.

1.1. Description of the proposed project

The proposed project includes demolishing the existing six-storey Ministry of Finance (MoF) headquarters building in Mogadishu, Somalia, and constructing a new eight-storey modern office complex on the same site. The current building has been deemed structurally unsafe and unfit for continued occupancy due to severe physical deterioration, such as collapsed ceilings, corroded reinforcement bars, cracked walls, water leaks, and electrical hazards. To prevent risks to staff and visitors, the structure has been vacated and is scheduled for complete removal demolition.

1.1.1. Project Objective

The goal of the project is to construct a new eight-storey building for the Ministry of Finance (MoF) of the Federal Government of Somalia (FGS) to replace the structurally unsafe existing building, ensuring a secure, efficient, and dignified workspace for staff and visitors while complying with environmental, social, and safety standards

1.1.2. Project Components

- i. **Executive Accommodation:** Provision of five executive suites, each comprising spacious offices, secretarial support areas with work pools, private lounges, kitchenette facilities, ensuite washrooms, and dedicated prayer rooms. These suites will support five senior Ministry officials executives.
- ii. **Privacy and Security Zoning:** Establish a clear spatial hierarchy from public to private areas, with executive zones receiving enhanced security measures. Features will include safe rooms, ballistic-rated construction elements, electronic access controls, and integrated surveillance systems.
- iii. **Departmental Offices:** Suitable workspaces for all Ministry departments, including open-plan areas, managerial suites, and support zones, ensuring consistency with the current organisational structure.
- iv. **Meeting and Conference Facilities:** Allocation of at least two formal conference rooms, designed for high-level meetings and official engagements.
- v. **Public Interface:** Ample public lounges and informal breakout spaces to accommodate visitors and foster a welcoming atmosphere. Civic atmosphere.
- vi. **Project-based accommodation:** flexible office spaces designed to host temporary teams working on ongoing government programmes or inter-ministerial collaborations projects.
- vii. **Public Amenities:** Sufficient public spaces for visitors.

1.1.3. Project Phases

Pre-Construction Phase

The pre-construction phase mainly involves detailed planning and preparatory activities required before physical works begin. This phase starts with finalising the architectural and structural designs, followed by obtaining necessary regulatory approvals, including the Environmental and Social Impact Assessment (ESIA) clearance, in accordance with Somali national regulations and the African Development Bank's safeguard requirements.

Construction Phase

The construction phase is divided into two key sub-phases: demolition of the existing building and construction of the new eight-storey facility.

Demolition Sub-Phase:

This sub-phase entails the safe and controlled demolition of the current six-storey Ministry of Finance building, which has been declared structurally unsound.

Construction Sub-Phase:

This will include excavation, foundation laying, erection of the structural framework and installation of the building envelope, such as walls, windows, roofing and doors. Internal works will involve electrical wiring, plumbing, HVAC systems, flooring, partitions, ceilings and interior finishes.

Post-Construction and Operational Phase

During this phase, all building systems, including electrical, plumbing, fire safety, and ICT, will undergo operational testing to ensure functionality and compliance with design standards. Final clean-up and decommissioning of temporary facilities will be carried out, and the site will be handed over to the Ministry of Finance. The building will then be occupied by Ministry staff, and the new office will become fully operational.

1.1.4. Implementation Arrangements

The overall responsibility for implementing the Stakeholder Engagement Plan (SEP) lies with the Ministry of Finance (MoF), which acts as the project's executing agency. To ensure effective delivery, a dedicated Project Implementation Unit (PIU) will be set up within the Ministry. The PIU will coordinate, oversee, and monitor all project activities, including stakeholder engagement, grievance redress, environmental and social risk management, and reporting.

The PIU will comprise both technical and administrative staff, including specialists in project management, procurement, environmental and social safeguards, monitoring and evaluation, and communications. The Environmental and Social Safeguards Officers within the PIU will be directly responsible for the day-to-day implementation of the SEP, ensuring that stakeholder consultations are inclusive, grievances are addressed promptly, and feedback is systematically integrated into project decision-making.

The PIU will regularly report to the senior management of the Ministry of Finance and to the African Development Bank (AfDB) on the progress of stakeholder engagement activities. It will also maintain close coordination with government institutions, development partners, civil society, and affected communities to ensure that all voices are included in the project's implementation.

Where necessary, the PIU will involve external consultants or partner organisations to support specific engagement activities, especially those working with vulnerable groups or requiring specialised expertise. A transparent system of roles, responsibilities, and accountability will be maintained to ensure transparency, inclusivity, and effectiveness in implementing the SEP throughout the project lifecycle.

1.2. Project Impact on stakeholders

The table below offers a detailed overview of the expected impacts of the project's various activities on different stakeholder groups. It also highlights the corresponding mitigation measures that will be implemented to minimise adverse effects and maximise positive outcomes throughout the project lifecycle.

Table 1: Project Impact on Stakeholders

Pre-Construction Phase				
Activities	Stakeholders Affected	Proximity of Stakeholders	Impacts (Both Positive & Negative)	Mitigation Measures
Community engagement and sensitization meetings	Ministry of Finance staff, Central Bank of Somalia staff, nearby government offices (Ministry of Planning, Ministry of Public Works), local community representatives, religious leaders, clan leaders, civil society groups, women and youth representatives, PWD associations	Adjacent government buildings, within Mogadishu	- Awareness creation on project scope and timelines - Concerns about noise, dust, and accessibility - Expectations on job opportunities	- Early consultations with stakeholders - Regular communication and disclosure of project details - Grievance redress mechanism in place
Disclosure of project design, schedule, and safety measures	Ministry of Finance staff, Central Bank staff, security agencies, and local administration, Consultants	Adjacent institutions	- Increased confidence in project transparency - Security concerns during demolition and construction	- Clear communication of timelines and activities - Coordination with security agencies for crowd and traffic management
Environmental and Social Impact Assessment (ESIA) disclosure	Ministry of Environment, Ministry of Public Works, NGOs, and affected communities, Of	National & local level	- Concerns on potential environmental impacts - Increased transparency and accountability	- Public disclosure of ESIA findings - Incorporation of feedback into project planning

Construction Phase				
Activities	Stakeholders Affected	Proximity of Stakeholders	Impacts (Both Positive & Negative)	Mitigation Measures
Construction of new building	Ministry of Finance staff, Central Bank staff, workers, nearby institutions, community	Adjacent government buildings & project site	• Employment opportunities for locals • Noise, dust, and vibration • Safety risks on-site	• Prioritise local hiring • Implement health & safety standards • Routine dust/noise control
Excavation	Contractor Construction workers Consultant PIU	Resident Resident Resident	Soil excavation leading to site disturbance	• Excavate only areas to be affected by facility. • Damp excess excavated materials to designated sites. • Restoration of excavated sites. • Landscaping after completion of construction. • Construction to be confined between 8:00 a.m. to 5:00 p.m.
Dust control	Construction workers Community Members Construction workers	Residents	Air quality; pollution from dust	• Sprinkle water to reduce dust. • Provide dusk mask to the contractor's staff. • Cover soil that is not of immediate use. Control works.

Construction Phase				
Activities	Stakeholders Affected	Proximity of Stakeholders	Impacts (Both Positive & Negative)	Mitigation Measures
Energy Utilization	Contractor Construction workers	Residents	Energy consumption	• Use standby generators. • Use energy-saving bulbs.
Drainage	Contractor Construction workers Community Members Consultant	Residents	Surface water run-off	• Storage and stockpiling materials on site should be away from drainage channels. • Trenches should be backfilled as soon as work on the trenches is complete.
Noise control	Contractor Construction workers Community Members	Residents	Noise and vibration; noise pollution	• Minimise noise arising from machines. • Provide personal protective gears.
Waste management	Contractors Construction workers Consultant	Resident Resident	Generated construction wastes; pollution reduction in aesthetics	• Prepare waste management plan. • Engage a licensed waste handler to properly handle, collect and dispose waste generated from construction site.

Construction Phase				
Activities	Stakeholders Affected	Proximity of Stakeholders	Impacts (Both Positive & Negative)	Mitigation Measures
	Mogadishu municipality			• skips and bins should be placed at campsite. • They should be adequately designed to prevent odours. • They should be emptied regularly
Foundation and structural works	Workers, MOF staff, Central Bank staff, nearby institutions	Project site & adjacent areas	• Noise, vibration • Risk of accidents • Limited access to certain areas	• Strict OHS protocols • Signage and barricades • Supervision by qualified engineers
Superstructure, roofing, and finishing works	Construction workers, MOF staff, Central Bank staff, nearby community	Project site	• Dust, noise, vibrations • Risk of falls and injuries • Temporary disruption to nearby offices	• PPE and safety harnesses • Restricted access zones • Dust and noise mitigation
Utilities installation (electricity, water, ICT)	Utility providers, MOF staff, nearby offices and community	Project site & surrounding buildings	• Temporary disruption of services • Safety risks during installation	• Advance notifications • Coordination with utility providers • Temporary alternative services
Procurement	Suppliers,	Regional & national	• Boost to the local economy	• Transparent procurement

Construction Phase				
Activities	Stakeholders Affected	Proximity of Stakeholders	Impacts (Both Positive & Negative)	Mitigation Measures
of materials and equipment	contractors, transporters, regulatory agencies		Increased traffic on access roads	Regulated transport scheduling
Security management during construction	Security agencies, MOF staff, Central Bank staff, surrounding community	Adjacent/within site	- Risks of unauthorised access - Safety/security threats	- Secure fencing around site - Controlled entry/exit - Coordination with police/security
Stakeholder progress updates	Ministry of Finance, Central Bank, neighbouring offices, civil society, media	Local & national	Enhanced transparency Increased trust	Regular meetings, press releases, and notices
Occupational health and safety	Consultant Contractor Construction workers	Resident Resident Resident Residents	Safety; occupational and community safety, accidents, injuries and insecurity	- Secure site by fencing off. - Have single entry point manned 24 hours. - Train all workers on safety, health and environment to create awareness.

Construction Phase				
Activities	Stakeholders Affected	Proximity of Stakeholders	Impacts (Both Positive & Negative)	Mitigation Measures
	Community Members PIU			- All construction workers should be advised on dangers associated with construction works. - Workers provided with personal protective equipment. - Install safety signage along work areas. - Trenches over 1.5 meters deep should be shielded against accidental entry by the public.
HIV/AIDS Awareness and Prevention	All construction workers, MOF & Central Bank staff, nearby communities, youth groups	Project site & surrounding communities	Risk of HIV transmission among workers and community due to labor influx and social interactions	- Conduct regular HIV/AIDS education and counselling sessions - Distribute informational materials - Provide access to testing and voluntary counselling - Engage community health services
GBV/SEA Risk Mitigation	All community members	Project site & surrounding communities	- Increased vulnerability of women and youth to sexual exploitation or harassment - Possible rise in GBV incidents and sexual harassment	- Implement GBV/SEA awareness and prevention training - Establish confidential reporting and referral mechanisms - Enforce a strict code of conduct for all workers - Ensure the presence of trained social officers or counsellors on site - Integrate provisions related to sexual harassment in the

Construction Phase				
Activities	Stakeholders Affected	Proximity of Stakeholders	Impacts (Both Positive & Negative)	Mitigation Measures
				employee COC • The Contractor shall require his employees, sub-contractors, and any personnel thereof engaged in construction works to individually sign and comply with a Code of Conduct with specific provisions on protection from sexual exploitation and abuse • The contractor will implement provisions that ensure that gender based violence at the community level is not triggered by the Project, • The contractor shall develop a specific plan for mitigating these known risks, e.g., sensitisation around gender-equitable approaches to compensation and employment, etc. • The contractor will ensure adequate referral mechanisms are in place if a case of GBV at the community level

Operation Phase				
Activities	Stakeholders Affected	Proximity of Stakeholders	Impacts (Both Positive & Negative)	Mitigation Measures
Handover and commissioning of new building	Ministry of Finance staff, Central Bank staff, government agencies, development partners(AFDB), public	Within the project area	- Improved working environment - Enhanced service delivery - Increased government prestige	- Proper handover process - Training of staff on facility use
Building operation and maintenance	MOF staff, facility management team, service providers, utility companies	On-site	- Improved efficiency in government operations - Need for sustainable energy and waste management	- Adoption of green building practices - Routine facility maintenance
Security and access control	Security agencies, MOF staff, visitors	On-site	- Safe working environment - Controlled access to sensitive areas	- Strong security systems - Access control procedures
Continuous stakeholder engagement	Public, development partners, community, CSOs	Local & national	- Improved trust and accountability - Strengthened institutional relationships	- Periodic consultations - Open communication channels

1.3. Stakeholder Engagement Plan

The purpose of this Stakeholder Engagement Plan (SEP) is to provide a clear framework for ensuring meaningful, inclusive, and transparent engagement with all stakeholders throughout the implementation of the Ministry of Finance (MoF) project. The SEP outlines the principles, timing, and methods for stakeholder consultations and information disclosure, ensuring stakeholders are well-informed, consulted, and able to participate in decision-making processes that affect them. This plan will guide engagement activities during all key phases of the MoF project implementation, including:

- Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs): Ensuring that environmental and social risks, impacts and mitigation measures are clearly communicated to and discussed with affected communities and other stakeholders.
- Project Implementation and Monitoring: Facilitating ongoing dialogue with stakeholders to strengthen accountability, promote feedback and enhance program ownership.

The SEP emphasises inclusivity by engaging a wide range of stakeholders; however, in the case of the proposed demolition and construction of the Ministry of Finance (MoF) offices, the stakeholder engagement process was carefully adapted to suit the specific project context. As the project site is situated within a protected government precinct and is surrounded solely by other ministries and government institutions, the engagement process rightly focused on institutional stakeholders rather than residential communities.

The stakeholder engagement sessions brought together a diverse group of both internal and external participants drawn from the MoF and the surrounding government institutions. These included technical officers, planners, environmental and social safeguards focal persons, safety specialists, gender and youth engagement officers, and security liaisons. Engagement with these stakeholders was critical, as they represent the primary actors who will be directly or indirectly impacted by project activities such as construction works, environmental management, occupational health and safety measures, and institutional coordination.

Although residential communities were not directly involved because of the project's location, the SEP remains rooted in inclusivity principles. Special attention was paid to ensuring that vulnerable or cross-cutting issues such as gender, youth, occupational safety and environmental sustainability were addressed during consultations. This was achieved through the active participation of designated gender officers, youth engagement representatives, and environmental focal points, whose roles ensured that the perspectives of underrepresented groups were incorporated into project planning decision-making.

Through this SEP, the MoF seeks to:

1. Promote transparency and accountability in the management and execution of the project.
2. Build trust and foster strong working relationships between the Ministry and its stakeholders.
3. Strengthen social acceptance, ownership and sustainability of the project.

4. Ensure compliance with national legal frameworks, African Development Bank (AfDB) requirements and international best practices on stakeholder engagement.

1.3.1. SEP Objective

Overall Objective

The overarching objective of this SEP is to establish a structured program for stakeholder engagement, incorporating public information disclosure and consultation across all phases of the project cycle. It sets out the approach through which the Ministry of Finance (MoF), as the implementing agency, will communicate with stakeholders and provides a clear mechanism for individuals and groups to raise concerns, share feedback, or submit complaints regarding the project and its related activities. Particular attention is given to ensuring that vulnerable groups and those at risk of exclusion are meaningfully engaged and able to access the benefits of the project.

Specific Objective

This Stakeholder Engagement Plan (SEP), which is a key requirement under the African Development Bank's Environmental and Social Safeguards, is designed to:

- i. Identify and analyse the various stakeholders affected by, or with an interest in, the demolition of the old Ministry of Finance (MoF) office building and the construction of the new facility;
- ii. Plan appropriate engagement modalities through effective communication, consultations and information disclosure at all stages of the project;
- iii. Provide platforms for stakeholders to contribute to and influence key decisions relating to the project's design, environmental and social risk management, and implementation processes;
- iv. Define clear roles and responsibilities for the implementation of this SEP by the MoF and its partners;
- v. Establish reporting and monitoring measures to assess the effectiveness of stakeholder engagement and ensure periodic review and updates of the SEP based on monitoring findings;
- vi. Clarify the roles and responsibilities of different institutions, project teams, and actors in carrying out the Plan;
- vii. Develop and operationalise a grievance redress mechanism (GRM) to enable stakeholders to raise concerns, complaints, or suggestions regarding the project;
- viii. Outline strategies for the dissemination of project information, including details of intended project benefits, mitigation measures, and—where appropriate—the establishment of a dedicated project information platform or website; and
- ix. Document stakeholder consultations on the proposed project design, environmental and social risks and impacts, mitigation measures, the draft SEP, and other environmental and social risk management instruments prepared for the project.

To achieve the objectives of this SEP, the Ministry of Finance (MoF) commits to:

- i. Ensure regular, timely, accessible and appropriate dissemination of project information to all stakeholder groups.
- ii. Conduct transparent and well-structured consultations, with adequate prior notification, clear disclosure of objectives, agreed methods of engagement, proper documentation, and follow-up actions.
- iii. Guarantee that consultations are socially inclusive, with meaningful participation from women, youth, persons with disabilities, the elderly and other vulnerable groups.
- iv. Provide platforms for stakeholders to share advice, concerns and inputs into project design and implementation.
- v. Incorporate stakeholder feedback into project activities and communicate back to stakeholders how their views have been considered.
- vi. Foster a two-way dialogue that allows for the exchange of information, listening, and the resolution of concerns promptly.
- vii. Promoting constructive agreements and partnerships through the identification of areas for cooperation and the pursuit of good-faith negotiations.
- viii. Reporting regularly and in a structured manner to all stakeholders, using communication approaches that are appropriate and accessible to affected communities.
- ix. Establishing and maintaining adequate institutional capacity, clearly defined responsibilities and effective systems to ensure the SEP is fully implemented throughout the project lifecycle.

1.4. Approach and methodology

1.4.1. Stakeholder Engagement Methodology

As part of the preparation of the Stakeholder Engagement Plan (SEP) for the proposed demolition and reconstruction of the Ministry of Finance (MoF) Headquarters, consultations were conducted with a broad range of institutional stakeholders. These included technical officers from the MoF, representatives from neighbouring government ministries, planners, environmental and social safeguards focal persons, safety specialists, and gender and youth engagement officers.

The preparatory consultations for the demolition and reconstruction of the Ministry of Finance Headquarters aimed to identify and engage key institutional stakeholders, understand their roles and responsibilities, and gather their perspectives on the planned works. These discussions focused on evaluating potential positive and negative impacts within the government precinct, particularly concerning safety, security, environmental management, and institutional operations, while also collecting technical advice and feedback to guide the project's design, sequencing, and implementation in a way that minimises disruption and enhances efficiency.

The engagement process established a collaborative forum where stakeholders could share priorities, raise concerns, and suggest mitigation measures. The discussions also ensured that cross-cutting considerations such as occupational health and safety, gender inclusion, youth participation, and environmental sustainability were incorporated into project planning and the Environmental and Social Impact Assessment (ESIA).

Moving forward, stakeholder engagement will remain an ongoing and adaptable process throughout the project cycle. A range of engagement techniques, including structured technical

meetings, workshops, focus group discussions with specialised departments, key informant interviews, and official circulars or memos, will be utilised to maintain transparency, enhance institutional collaboration, and ensure that all relevant actors are kept informed and actively involved in project decision-making.

1.4.2. Procedure for Stakeholder Engagement

For the demolition and reconstruction of the Ministry of Finance (MoF) Headquarters, the choice of consultation techniques will be guided by the purpose of the engagement, the nature of the stakeholder group, and the need to adopt methods that are contextually and institutionally appropriate. Before any engagement activity takes place, the following steps will be observed:

- Develop standardised briefing materials and “question-and-answer” guides customised for different categories of stakeholders, reflecting issues commonly raised in past consultations.
- Coordinate with the Project Implementation Unit, consultants, and contractors to plan and design engagement activities.
- Define and agree on the roles and responsibilities of all parties involved in the consultation process.
- Identify the individuals, groups, or institutions that will participate in the engagement exercise.
- Determine the most suitable methods for engagement and information disclosure, ensuring that the language, format, and timing are appropriate to the audience.
- Select appropriate venues and schedules for engagement sessions to ensure accessibility and minimal disruption to institutional operations.
- Establish mechanisms to encourage and, where necessary, ensure stakeholder attendance at meetings or workshops.
- Put in place clear and accessible feedback mechanisms to capture, document, and respond to stakeholder inputs.

1.4.3. Engagement Methods and Techniques

Table 2: Engagement Methods and Techniques

Engagement Method	Application / Relevance to MoF Project
Correspondence (Phone, Emails, Official Letters, Memos)	Distribute project information to MoF staff, neighbouring ministries, regulatory agencies, consultants, AFDB and contractors; also used for meeting invitations and follow-ups.
One-on-One Meetings	Facilitate direct discussions with senior officials, technical officers and safeguards focal persons to capture views, concerns, contractors and technical inputs confidentially.
Formal Meetings / Workshops	Structured forums to present project information, ESIA findings, mitigation measures and construction timelines to institutional

Engagement Method	Application / Relevance to MoF Project
	stakeholders; allow feedback, brainstorming and recommendations.
Focus Group Discussions (FGDs)	Used with targeted groups such as environmental and social safeguards officers, gender focal persons, safety and security specialists, community representatives, and planners to address specific issues in detail.
Surveys / Key Informant Interviews	Collect specific opinions, technical inputs and baseline data from institutional stakeholders (e.g., facility managers, safety officers, regulators).
Website and Online Platforms	Use MoF's official website, email lists and virtual platforms (e.g., Zoom, Teams) to disseminate project updates, ESIA summaries and reports and meeting schedules.
Public / Community Meetings	used to present project information to large groups of stakeholders, particularly neighbouring residents who may be affected. These meetings provide an opportunity for participants to share their views and opinions, fostering dialogue and ensuring that concerns are heard. They help build constructive relationships with the communities, with special attention to those who are vulnerable or disadvantaged. Non-technical information is distributed to ensure accessibility, and discussions, comments and questions are carefully recorded for follow-up and integration into project planning and mitigation measures.
Direct Communication with PAPs (Land/Crops/Assets)	Is adapted to communicate with internal departments or units responsible for shared facilities, property, or infrastructure within the precinct.
Radio / Print Announcements	Disseminate project information to large audiences and illiterate stakeholders Inform stakeholders about consultation forums
Mass Social Media Campaigns	official government social media channels (e.g., MoF Twitter/X, Facebook, WhatsApp groups) can be used to share updates and ensure timely information dissemination to institutional stakeholders.

1.5. Stakeholder Engagement Guiding Principles

The project will follow the following guiding principles to ensure meaningful, transparent, and inclusive stakeholder engagement throughout. The demolition and reconstruction of its headquarters:

1. Inclusivity and Equity
 - Engage all relevant stakeholders, including institutional actors, contractors, consultants and neighbouring residents potentially affected by construction.
 - Give particular attention to vulnerable or disadvantaged groups, ensuring their concerns are heard and addressed.
2. Transparency and Accountability
 - Provide timely, accurate and accessible information regarding project objectives, impacts, mitigation measures, and timelines.
 - Maintain clear records of all consultations, feedback and responses to demonstrate accountability.
3. Early and Continuous Engagement
 - Engage stakeholders from the earliest stages of project planning and continue throughout construction and operational phases.
 - Ensure engagement is iterative, allowing feedback to inform design, mitigation measures, and implementation.
4. Respect for Local Context and Cultural Sensitivity
 - Adapt engagement methods to the institutional and community context, respecting organisational protocols, local norms and cultural practices.
 - Use language, formats and communication channels appropriate to each stakeholder group.
5. Participation and Collaboration
 - Promote active participation, providing stakeholders with opportunities to contribute to project decisions, share insights and suggest improvements.
 - Foster collaborative relationships that build trust and mutual understanding.
6. Responsiveness and Feedback
 - Establish clear mechanisms for stakeholders to raise concerns, grievances, or suggestions.
 - Respond promptly to feedback and communicate how inputs have influenced project planning and mitigation measures.
7. Sustainability and Capacity Building
 - Strengthen the capacity of stakeholders, particularly internal staff and affected communities, to engage effectively in project planning and monitoring.
 - Encourage knowledge sharing to support sustainable project outcomes.
 - Integration with Environmental and Social Management
 - Ensure that engagement aligns with the Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP)
 - Use stakeholder inputs to inform risk mitigation, compliance and continuous improvement.

2. LEGAL AND REGULATORY FRAMEWORK

The stakeholder engagement process for the demolition and reconstruction of the Ministry of Finance (MoF) Headquarters is guided by a comprehensive legal and regulatory framework that encompasses national legislation, policies, and international standards. This framework ensures that all project activities adhere to Somalia's Constitution, relevant laws, and established policies on public participation, access to information, and environmental and social safeguards.

In Somalia, the Provisional Constitution (2012) provides the foundation for citizen participation, guaranteeing rights to engage in public affairs, access information, and freely express opinions. Sector-specific legislation, including the Environmental Protection and Management Act (2024), the Environmental and Social Impact Assessment Regulations (2024), the Access to Information Act (2016), and the Public Participation Policy (2023), sets out requirements for consultation, information disclosure, and protection of affected stakeholders.

In addition to national requirements, the project will adhere to the African Development Bank's Integrated Safeguards System (ISS), which guides environmental and social standards, including stakeholder engagement, disclosure of project information and grievance management. Compliance with the AfDB ISS ensures that engagement processes are aligned with internationally recognised best practices, promoting transparency, inclusivity, accountability and effective risk management throughout the project lifecycle.

Table 3: Policies and Legislation

Policy, Legal & Institutional Framework	Relevance	Application to MoF Headquarters Project
Provisional Constitution of the Federal Republic of Somalia (2012)	Guarantees the right to participate in public affairs and access information.	Ensures inclusive engagement with all stakeholders, including government entities and the public.
Article 22: Right of Political Participation	Affirms every citizen's right to participate in public affairs.	Mandates public participation in the project's planning and implementation phases.
Article 32: Right of Access to Information	Grants citizens the right to access information held by public bodies.	Requires MoF to provide transparent and accessible project information to stakeholders.
Article 33: Freedom of Expression	Protects the freedom of expression of all participants.	Facilitates open dialogue during stakeholder consultations and feedback sessions.
Environmental Protection and Management Act (2024)	Establishes guidelines for environmental protection and social impact assessments.	Guides the integration of environmental and social considerations into the project planning and execution.
Environmental and Social Impact Assessment (ESIA) Regulations (2024)	Specifies procedures for conducting ESIA and engaging stakeholders.	Directs MoF to conduct thorough environmental and social assessments with stakeholder involvement.
Access to Information Act	Provides citizens with the right to seek information from public	Obliges MoF to disclose project-related information to the public and

Policy, Legal & Institutional Framework	Relevance	Application to MoF Headquarters Project
Provisional Constitution of the Federal Republic of Somalia (2012)	Guarantees the right to participate in public affairs and access information.	Ensures inclusive engagement with all stakeholders, including government entities and the public.
Article 22: Right of Political Participation	Affirms every citizen's right to participate in public affairs.	Mandates public participation in the project's planning and implementation phases.
Article 32: Right of Access to Information	Grants citizens the right to access information held by public bodies.	Requires MoF to provide transparent and accessible project information to stakeholders.
Article 33: Freedom of Expression	Protects the freedom of expression of all participants.	Facilitates open dialogue during stakeholder consultations and feedback sessions.
(2016)	bodies.	stakeholders.
Public Participation Policy (2023)	Outlines the framework for public participation in governance and development projects.	Directs MoF to implement structured and inclusive public participation processes throughout the project lifecycle.

International Standards

Table 4: African Development Bank ISS, 2013

Operational Safeguard (OS)	Relevance / Key Requirements	Application to MoF Headquarters Project
OS1: Environmental and Social Assessment	Requires identification, assessment, and management of potential environmental and social risks and impacts of a project. Ensure that projects do not cause adverse environmental or social harm. Requires preparation of an ESIA, ESMP, and mitigation measures. - Supports informed decision-making and continuous monitoring.	Conduct a comprehensive ESIA before demolition and reconstruction, assessing impacts such as dust, noise, vibration, safety hazards, and temporary disruption to MoF staff or neighbouring ministries. Develop and implement an Environmental and Social Management Plan (ESMP) outlining mitigation, monitoring, and reporting mechanisms. Monitor compliance with environmental and social standards throughout construction.
OS7: Rights of Vulnerable Groups	Ensures identification and protection of vulnerable or disadvantaged groups affected by the project. Requires meaningful consultation, participation, and consideration of their specific needs. Promotes equity and non-discrimination.	Identify any vulnerable groups potentially affected, including differently-abled staff, women, or service providers impacted by construction. Ensure these groups are included in stakeholder engagement activities and that mitigation measures address their concerns. Incorporate accessibility, safety, and communication needs into project planning.
OS10: Stakeholder Engagement and Information Disclosure	Requires preparation and implementation of a Stakeholder Engagement Plan (SEP). Mandates meaningful consultation and timely disclosure of relevant project information. Establishes mechanisms for stakeholder feedback, grievance management and continuous communication. Ensures transparency, inclusivity, and accountability throughout the project lifecycle.	Develop and implement a SEP for MoF demolition and reconstruction, targeting institutional stakeholders (MoF staff, neighbouring ministries, regulatory authorities), contractors, consultants, and affected communities. Provide timely, accessible, and culturally appropriate project information, including ESIA and ESMP findings. Establish feedback mechanisms and grievance channels to address concerns promptly. Maintain records of consultations, comments, and resolutions to inform project planning and compliance reporting.

3. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1. Pre-Construction Public Consultation and Disclosure Road Map

Prior surveys and consultations were carried out to gain a comprehensive understanding of the perspectives, needs and expectations of various stakeholders, including institutional actors and nearby communities potentially affected by the project. These consultations informed all stages of project planning and design, particularly during the preparation of the Environmental and Social Impact Assessment (ESIA). Engagement with stakeholders began during the scoping phase and has continued throughout the development of the ESIA, with the process designed to extend through the construction and operational phases of the project.

This Stakeholder Engagement Plan (SEP) recognises that consultation is a continuous and adaptive process. For the MoF headquarters project, engagement activities will be conducted with MoF staff, neighbouring ministries, Public Works, contractors and affected community members. The consultation process includes structured activities such as stakeholder identification, information sharing, focused meetings, community briefings, and feedback mechanisms, ensuring that concerns are addressed and stakeholder input is systematically incorporated throughout the project lifecycle.

Table 5: Public consultation road map

Phase	Key Activities	Stakeholders to Engage	Methods / Tools	Timing / Duration	Responsible Party
Phase 1: Stakeholder Identification & Preliminary Consultation / Scoping	Categorise and identify all relevant stakeholders Preliminary consultation with National and Local Institutions Identify key project constraints	MoF departments Neighbouring ministries Public Works Local administration (if nearby communities are affected)	One-on-one meetings Emails / official correspondence Institutional workshops	Project initiation / pre-ESIA	Project Implementation Unit (PIU) / Consultants
Phase 2: Information Distribution & Introductory Meetings	Distribute preliminary ESIA information Conduct introductory meetings to present	MoF technical staff Neighbouring ministries Local authorities, Facility	Emails / official letters Introductory workshops Presentations	Pre-ESIA submission	PIU / Environmental & Social Consultants

Phase	Key Activities	Stakeholders to Engage	Methods / Tools	Timing / Duration	Responsible Party
	project objectives	managers			
Phase 3: Impact Identification & Development of Mitigation Measures	Hold meetings with local administration in affected areas Conduct community meetings (if nearby residents may be affected) Consult with potentially affected persons	MoF staff, Contractors, Neighbouring ministries Potentially affected residents/service providers Vulnerable groups	- Focus Group Discussions (FGDs) Public community meetings One-on-one consultations	During ESIA preparation	PIU / Consultants / Local Administration
Phase 4: Disclosure of Draft ESIA (45 days after ESIA submission)	Submit draft ESIA report to Public Works Circulate report to lead agencies - Review and incorporate feedback. Collect additional comments	Public Works Lead agencies, MoF and project technical staff	Official correspondence Stakeholder workshops Written feedback collection	45 days post-ESIA draft submission	PIU / Environmental & Social Consultants
Phase 5: Disclosure of ESIA Study	Submit final ESIA study report to Public	Public Works MoF Regulatory agencies	Online disclosure Official correspondence Workshops/briefin	60 days post-ESIA submission	PIU / Public Works / Implementing

Phase	Key Activities	Stakeholders to Engage	Methods / Tools	Timing / Duration	Responsible Party
Report (60 days after ESIA submission)	Works. Circulate to agencies Review and incorporate comments Disclose final report on implementing agencies' websites	Contractors	gs		Agencies
Phase 6: Ongoing Consultation During Construction and Operation	Maintain regular communication and updates on project progress. Address emerging concerns or grievances Monitor mitigation measures	MoF staff, Contractors, Neighbouring ministries, Affected residents/service providers, Vulnerable groups	Progress briefings, Emails / WhatsApp / intranet updates, On-site meetings, Grievance mechanism	Throughout construction and early operation	PIU / Contractors / Environmental & Social Officers / MoF Communication Officer

3.2. Stakeholder Identification and Previous Consultations

Before preparing this Stakeholder Engagement Plan (SEP) for the MoF headquarters demolition and reconstruction project, several consultations were conducted to identify key stakeholders, understand their concerns, and collect input to guide project planning and design. These consultations targeted both institutional stakeholders and potentially affected parties within the government precinct, including neighbouring ministries, MoF departments, contractors, Public Works, and local authorities.

A summary of the stakeholder engagement activities is provided below, highlighting stakeholder categories, dates, locations/venues, engagement methods, objectives, number of participants with attention to gender representation, and key outcomes:

Table 6: Summary of previous consultation

Designation / Role	Engagement Type	Concerns Raised / Feedback	Remarks	Date
MoF Urban Development Liaison (Municipality link)	MoF Stakeholder Meeting	Welcomed the project as aligned with Mogadishu's urban planning framework. Anticipates the project will enhance institutional delivery. Stressed the importance of minimal disruption to city services.	Noted	11 May 2025
MoF Urban Planner	Internal Technical Meeting	Confirmed alignment with the urban development master plan. Suggested inclusion of green buffers and emphasized integrated traffic/access design.	Noted	11 May 2025
Environmental Focal Officer (MoF / Environment Ministry liaison)	Environmental Safeguards Briefing	Raised dust and noise pollution risks. Recommended continuous environmental monitoring, safe waste disposal, and PPE use.	Noted	11 May 2025
Community Outreach Coordinator – MoF	Site Engagement Activity	Stressed engaging nearby residents to build support. Recommended prioritizing youth and women for job opportunities. Raised temporary access restriction risks.	Noted	12 May 2025
Local Resident Liaison – MoF	Community Consultations	Concerned about local employment opportunities. Raised safety issues for residents adjacent to the demolition zone.	Noted	12 May 2025
District Coordination Officer – MoF	MoF Community Interface	Asked about relocation of essential services during works. Suggested incorporating public-use facilities	Noted	12 May

Designation / Role	Engagement Type	Concerns Raised / Feedback	Remarks	Date
	Session	(e.g., waiting shelters) into new design. Raised noise/vibration concerns.		2025
OHS Specialist – Ministry of Labour (consulted for MoF)	Technical Safety Session	Emphasized need for safety training and occupational hazard controls. Recommended routine inspection by public health officers.	Noted	11 May 2025
Women's Engagement Officer – MoF	Gender Inclusion Consultation	Welcomed the project. Advocated for women's participation in catering and cleaning. Requested better sanitation facilities during and post-construction.	Noted	12 May 2025
Youth Representative – MoF Programs	Youth Engagement Session	Pushed for youth training and on-site skilling. Requested transparency in recruitment to ensure fairness.	Noted	12 May 2025
Security Liaison Officer – MoF	Security Risk Briefing	Warned of potential security threats (theft, sabotage). Recommended fencing, surveillance, local police coordination, and emergency drills.	Noted	11 May 2025
MoF Staff Representative	Internal Staff Consultation	Expressed safety concerns for staff near construction zones. Called for regular updates and continuity of services. Supported the project's long-term benefits. Requested temporary relocation during peak demolition.	Noted	12 May 2025

Table 7: Summary of stakeholders' engagement response

Concern Raised	ESIA Consultant Response	MoF Representative Response	Design Consultant Response
Risk of dust and noise pollution during demolition and construction	Dust suppression (e.g., regular water spraying) and noise monitoring measures will be included in the Environmental and Social Management Plan (ESMP)	MoF will ensure contractors implement mitigation measures and conduct routine inspections	Soundproof barriers and phased construction planning will be considered to minimize disturbance
Involvement of local communities in the project	Community engagement will continue through information sharing, grievance redress, and sensitization meetings	MoF commits to recruiting at least 60% of unskilled labour from local residents	Local participation will be prioritized in both construction and support services
Occupational health and safety risks	ESMP will include strict OHS measures: PPE, site signage, first aid stations, and regular safety drills	MoF will enforce contractor compliance with national OHS regulations	Site layout will include emergency exits, fire assembly points, and access for medical response
Livelihood impact on street vendors and nearby informal businesses	Baseline socio-economic surveys will identify affected persons; if needed, compensation/support measures will be triggered	MoF will coordinate with the District Authority to manage temporary disruptions	Construction staging will minimize access blockages and disruptions
Increased traffic congestion around the MoF site	A traffic management plan will be developed as part of the ESMP	MoF will work with Mogadishu Municipality to schedule works during off-peak hours	Construction design includes clear access and exit points, temporary signage, and pedestrian safety zones
Concerns over structural vibration impacts on nearby buildings	Vibration monitoring will be conducted, and heavy demolition equipment will be controlled	MoF will communicate clearly with affected building owners and provide remedies if damages occur	Demolition methods will be selected to reduce vibrations (e.g., phased/manual over full-mechanical demolition)
Poor information flow during the project	A communication plan is included in the SEP, and updates will be provided regularly	MoF will assign a Public Information Officer to liaise with the public and media	Visual boards, flyers, and digital infographics will be used to communicate project phases
Inclusion of	Gender-sensitive hiring	MoF will require	Design of facilities will

Concern Raised	ESIA Consultant Response	MoF Representative Response	Design Consultant Response
women and youth in employment	strategies will be incorporated in the ESMP	contractors to submit inclusive employment plans	consider gender-sensitive sanitation and rest areas
Concerns about public facilities and green areas in the design	Community recommendations will be integrated into ESIA addendum reports	MoF is committed to a dignified, accessible, and user-friendly public building	Final design includes landscaping, green zones, disability access, and potential public toilets
Security threats to workers, equipment, and the public	A Security Management Plan will be included in the ESMP, incorporating perimeter fencing, 24/7 surveillance, access controls, and emergency protocols	MoF will coordinate with local security agencies to ensure adequate protection of the site	The building and site will feature controlled access points, CCTV integration, security lighting, and fencing

4. STAKEHOLDERS ANALYSIS

Stakeholder analysis identifies all relevant parties, assesses their level of influence and interest, and guides the engagement strategy to ensure concerns are addressed and project objectives are achieved. For the MoF headquarters project, stakeholders have been grouped into primary, secondary, and tertiary categories based on their proximity to the project, potential impact, and role in decision-making.

4.1. Project Stakeholders

Project stakeholders are defined as individuals, groups, or other entities who are impacted or likely to be impacted, directly or indirectly, positively or negatively, by the project (also known as affected parties and other interested parties). They include individuals or groups whose interests may be affected by the project(s) and who have the potential to influence the project outcomes in any way. For effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

A. Affected Parties

Persons, groups and other entities within the Project area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. These will include, among others:

- Ministry of Finance staff and leadership, who will experience workplace relocation, operational disruption and safety concerns.
- Contractors, subcontractors, and construction workers, who face occupational health and safety risks during project work.
- Central Bank staff and other government workers in adjacent buildings, who may be affected by noise, vibration, dust, and restricted access.
- Nearby service providers and businesses (shops, canteens, transport operators), who may face temporary disruption or loss of livelihood opportunities.
- The general public and visitors accessing government services in the project area, who may face restricted access and inconveniences.

B. Other Interested Parties

Individuals, groups, and entities who may not face direct impacts from the Project(s) but consider or perceive their interests as being affected by the project(s) and/or who could influence the project(s) and its implementation process in some way. These will include, among others:

- African Development Bank (AfDB): Providing financing, oversight, and ensuring compliance with environmental and social standards.
- Project consultants (design, supervision, environmental and social studies, monitoring), who provide technical input, guidance, and independent monitoring.
- Mogadishu Municipality (Benadir Regional Administration): Responsible for urban planning approvals, permits, and regulation enforcement.
- Ministry of Public Works, Ministry of Environment and Climate Change, and Ministry of Labor and Social Affairs: Oversight on infrastructure development, environmental compliance, and labor rights protection.
- Civil society organizations and professional associations: Advocating for transparency, accountability, labor rights, and environmental protection.
- Community and social organisations (residents' associations, advocacy groups), which can help facilitate community engagement and feedback.
- International organisations and development partners active in governance and infrastructure, who can support synergies, technical support, and policy alignment.

4.2. Identification of Stakeholders

The demolition and rebuilding of the Ministry of Finance (MoF) Headquarters in Mogadishu will involve a wide range of stakeholders who are either directly impacted by the project or have an interest in its successful delivery. These stakeholders operate at various levels: government, institutional, community, and development partners, and will require structured consultation and engagement throughout the project cycle.

Table 8: List of Identified Stakeholders

Stakeholder Group	Interest / Concerns	Influence on Project	Engagement Approach / Strategy	Priority
MoF Departments & Staff	Safety during demolition, continuity of operations, access to offices, and participation in planning	High-level decision-makers and direct beneficiaries	One-on-one meetings, internal consultations, workshops, regular updates via email and briefings	High
Neighbouring Ministries / Government Agencies	Disruption to institutional services, access, noise and traffic	High – can affect project approvals and coordination	Group workshops, formal meetings, written communications, and coordination committees	High
Public Works / Regulatory Authorities	Compliance with construction, environmental and safety regulations	High- can approve permits and enforce standards	Formal meetings, technical briefings, email correspondence	High

Stakeholder Group	Interest / Concerns	Influence on Project	Engagement Approach / Strategy	Priority
Contractors & Project Implementation Unit	Efficient construction, safety of workers, adherence to ESMP	High – responsible for project execution	Site meetings, technical workshops, ESMP orientation sessions	High
Consultants (Design, ESIA, Technical)	Project quality, adherence to technical standards, timely delivery, ESMP compliance	High- provide technical guidance and design inputs	Technical briefings, design workshops, review meetings, and reporting sessions	High
Local Residents / Communities near Project Site	Safety, noise, dust, temporary access restrictions, livelihood disruptions	Medium- can influence public perception and social license	Community meetings, briefings, grievance mechanisms, flyers/notice boards	Medium
Security Agencies / Police	Safety and protection of workers, public and equipment	High -can enforce site security and emergency response	Coordination meetings, security briefings, and integration into the Security Management Plan	High
Youth and Women Representatives	Job opportunities, skills training, participation in project-related activities	Medium — important for social inclusion and community support	Targeted focus groups, youth/women engagement sessions, and employment planning	Medium
MoF Environmental Focal Officer	Environmental compliance, dust/noise control, waste management	High – advises on environmental safeguards	Technical briefings, ESMP consultations, routine inspections	High
OHS Specialists / Labour Ministry	Worker safety, compliance with national OHS standards	Highly enforces safety regulations	Technical workshops, safety audits and site inspections	High
African Development Bank (AfDB)	Compliance with AfDB Environmental & Social Safeguards (ISS), funding oversight, project monitoring	High — provides financing, sets safeguard standards, approves ESMP	Regular reporting, review meetings, written updates, and site visits	High

4.3. Vulnerable and Marginalised Groups

The demolition and reconstruction of the Ministry of Finance (MoF) Headquarters will inevitably impact a wide range of stakeholders, including groups that may be disproportionately affected or further disadvantaged due to their vulnerable status. These groups might encounter barriers to participation, limited access to information, or increased social and economic risks linked to the

project. Therefore, it is essential to implement special engagement measures to guarantee their meaningful inclusion in consultation and decision-making processes. The following vulnerable and marginalised groups have been identified:

Women — particularly female staff within the MoF, female workers in nearby facilities, and women from the surrounding community who may face livelihood disruptions, safety risks, or exclusion from certain activities and decision-making. Youth – including young workers, job seekers, and students in the surrounding area who may be affected by temporary displacement of services or safety hazards.

Persons with Disabilities (PWDs) – staff, service users, or community members with physical or sensory impairments who may encounter difficulties in accessing alternative offices or participating in consultation processes. Poor and Unemployed Persons – particularly informal workers, vendors and small-scale business operators near the MoF building who rely on the daily flow of government staff and clients for income.

Child-Headed Households – young people who rely on access to government services and social safety nets, and who may be disproportionately affected by disruptions. Widows and Female-Headed Households – who may depend on government support or small-scale business activities around the construction site survival.

Minority or marginalised groups – such as ethnic or clan minorities and displaced populations in Mogadishu, who often face systemic exclusion and may have limited channels to voice their concerns. If additional vulnerable groups are identified during project implementation, their specific needs will also be considered and reflected in the Stakeholder Engagement Plan (SEP).

Engagement with vulnerable and marginalised groups will begin early and be culturally sensitive, accessible, and inclusive, ensuring their concerns are properly captured. Where necessary, separate and tailored consultations will be conducted to ensure their full participation and equal representation in decisions related to the MoF Headquarters project.

Table 9: Vulnerable groups identified

Vulnerable Group	Description in MoF Project Context	Special Considerations for Engagement
Women	Female MoF staff, women in the surrounding community, and female vendors relying on MoF area for livelihoods.	Ensure meetings are held at convenient times; provide women-only consultation spaces; use gender-sensitive facilitation.
Youth	Young workers, job seekers, students and casual labourers in/around the MoF compound.	Use youth-friendly communication channels (social media, posters); involve youth leaders; emphasise opportunities for local jobs.
Persons with Disabilities (PWDs)	MoF staff, clients, or nearby residents with physical or sensory impairments.	Provide accessible venues; offer sign language interpretation; distribute materials in accessible formats.
Poor &	Informal workers, street	Use community forums and local leaders to

Vulnerable Group	Description in MoF Project Context	Special Considerations for Engagement
Unemployed Persons	vendors and small businesses depend on daily traffic around MoF offices.	reach them, explain potential livelihood impacts and mitigation measures.
Child-Headed Families	Young persons dependent on government social protection programs or services are affected by relocation.	Conduct separate, child-sensitive consultations; work with social service agencies to safeguard their welfare.
Widows & Female-Headed Households	Women with sole responsibility for household income and care, often reliant on MoF services or area markets.	Provide targeted outreach through women's associations and community groups; ensure safety concerns are addressed.
Minority or Marginalised Groups	Ethnic or clan minorities, IDPs, and displaced persons in Mogadishu face systemic exclusion.	Engage trusted community leaders/representatives; use local languages; create safe space for participation.

5. STAKEHOLDER ENGAGEMENT PLAN

5.1. Engagement Methods and Tools

The Stakeholder Engagement Plan for the MOF Headquarters project will ensure that structured consultations are carried out with all relevant parties before works begin, throughout the implementation phase, and, where needed, after completion. The engagement process will offer an opportunity for stakeholders to share their concerns, ideas, and feedback regarding the project.

Whenever possible, consultations will be conducted through face-to-face meetings within the affected areas, government institutions, and beneficiary communities in Mogadishu. The Project Implementation Unit (PIU) at the Ministry of Finance will appoint a responsible officer for stakeholder engagement, who will coordinate activities such as:

- Disseminating accurate and timely project information,
- Collecting stakeholder feedback,
- Organising consultation forums,
- Ensuring the proper functioning of the Grievance Redress Mechanism (GRM) at both the project site and the MOF offices.

Stakeholders will also have access to multiple channels, such as dedicated phone lines, emails, notice boards at the MOF compound, and official government websites, to obtain project updates or submit inquiries, feedback, and grievances throughout the project lifecycle.

All stakeholder consultations will be properly documented. Records will include meeting minutes, signed attendance sheets with participants' contact details, and photographic evidence where feasible. Engagement will continue actively during the construction phase, with careful recording of environmental and social concerns, issues related to land use or displacement, livelihood impacts, and any complaints received. These will be addressed promptly through follow-up actions.

The project will guarantee that all engagement and information-sharing activities are inclusive, transparent, and culturally appropriate. Special measures will be implemented to ensure the participation of vulnerable groups, including women, persons with disabilities, the elderly, and youth, so they are not excluded from consultations and can benefit fairly from the project.

Furthermore, community level consultations conducted through the Mogadishu Municipality and local administration offices will follow clear guidelines and use standardised reporting formats provided by the PIU. All records will be securely kept at the project site office and the Ministry of Finance for accountability and reference.

Power matrix

High Power, High Interest (Manage Closely):

These stakeholders are key decision-makers and influencers whose support is critical to the project's success. They require close, active partnership and regular, detailed engagement to align their expectations with project goals and secure their ongoing commitment.

High Power, Low Interest (Keep Satisfied):

This group holds significant authority but is less engaged with the project's day-to-day outcomes. The strategy is to provide them with concise, high-level updates to maintain their satisfaction and prevent opposition. Careful management is essential to ensure their power is not used negatively should they become displeased.

Low Power, High Interest (Keep Informed):

These stakeholders are directly impacted by the project and have a strong interest in its outcomes. They should be proactively consulted and provided with clear, timely information to address concerns, gather feedback, and ensure they feel heard, thereby preventing issues from arising.

Low Power, Low Interest (Monitor):

This category requires minimal effort. They are monitored periodically with general updates to ensure their status remains unchanged. The goal is to efficiently track their position without dedicating. The power matrix diagram below shows the different approaches for the segregated stakeholders.



Figure 1: Stakeholder Power matrix

Successful project implementation requires engaging a wide array of affected and interested parties. The table below identifies these key stakeholders and analyses their roles, interests, influence and specific needs to inform a targeted engagement strategy.

Table 10: Summary of stakeholder identification

Stakeholder	Role	Interest	Influence	Mandate	Preferred Notification Method	Specific Needs
Ministry of Finance (MOF)	Project owner & beneficiary	High - project will improve institutional capacity	Very High - decision-making authority	Oversee financial management and project implementation	Official letters, meetings, reports	Timely updates, technical reports, and compliance with AfDB conditions
Mogadishu Municipality (Benadir Regional Administration)	Local government authority	High - land use, planning, and urban management	High - authority over municipal services and approvals	Provide permits, enforce municipal by-laws, ensure infrastructure linkages	Formal meetings, notices, joint committees	Inclusion in planning, mitigation of traffic & service disruptions
African Development Bank (AfDB)	Financier & technical partner	High - ensuring safeguards compliance and project success	Very High - funding power	Financing, monitoring, and safeguard compliance	Official reports, structured reviews, emails	Strict adherence to ESIA/ESMP, safeguard compliance, timely reporting
Ministry of Public Works & Reconstruction	Regulatory authority on construction	Medium - ensuring compliance with standards	High - can approve/stop works	Approve building codes, standards, and supervise public works	Technical workshops, formal approvals	Compliance with building codes and quality standards
Ministry of Environment & Climate Change	Regulator of environmental issues	Medium - concern for ESIA & impacts	High - authority on environmental permits	Approve EIA/ESMP, enforce mitigation	Letters, technical consultations	Environmental management, waste handling, green building

Stakeholder	Role	Interest	Influence	Mandate	Preferred Notification Method	Specific Needs
						integration
Community Members near MOF Site	Neighbors & users of surrounding space	High – concerned about noise, dust, safety	Low – limited decision-making	Right to safe environment and protection from impacts	Community meetings, posters, local radio	Safety assurances, dust/noise mitigation, job opportunities
Civil Society Organizations (CSOs/NGOs)	Advocates for community rights & environment	High – advocate for PAPs, workers, and environment	Medium – influence through advocacy	Monitor compliance with social and environmental standards	Public forums, reports, emails	Transparent information, grievance redress, participation in monitoring
Contractors & Consultants	Implementers & supervisors of works	High – successful delivery of project	High – directly manage works & quality	Execute project as per designs, safeguard compliance	Progress meetings, contractual communication	Clear TORs, safeguard compliance guidance, timely payments
Youth Groups	Beneficiaries & workforce	Medium – employment opportunities	Low – limited institutional influence	Represent young people in community	Social media, community forums	Employment opportunities, skills training
Women's Groups	Advocates for gender equity & beneficiaries	High – protection from risks, inclusion	Low – advocacy power	Promote gender equality & social protection	Community dialogue, women forums	Safe working environment, gender-sensitive employment
Persons with Disabilities (PWDs)	Vulnerable group	High – need accessibility &	Low – weak decision power	Rights-based inclusion in development	Focus groups, disability forums	Accessible infrastructure, inclusive participation

Stakeholder	Role	Interest	Influence	Mandate	Preferred Notification Method	Specific Needs
		inclusion		t		n
Religious & Clan Leaders	Opinion leaders	Medium – guardians of social norms	Medium – strong social influence	Guide communities, ensure acceptance	Consultations, dialogue sessions	Transparency, cultural sensitivity
Media Outlets	Information dissemination	Medium – reporting project progress	Medium – shape public opinion	Inform public on development projects	Press releases, radio/TV briefings	Timely, accurate information

5.2. Engagement with Disadvantaged and Vulnerable Groups

For the MoF Headquarters demolition and construction project, meaningful engagement with disadvantaged and vulnerable groups will be prioritised throughout the project lifecycle. The views of these groups will be incorporated at all stages of project implementation using communication methods appropriate to their needs.

Information about consultations will be provided in advance, and venues and schedules will be selected in consultation with local community leaders who possess detailed knowledge of the stakeholders' context. Focus group discussions, one-on-one interviews and other participatory methods will be employed to facilitate inclusive engagement. Consideration will be given to mobility, literacy and other physical or social constraints; for instance, consultations may be conducted at convenient locations, including door-to-door interviews, or within local institutions such as schools or community centres.

Identified vulnerable groups include youths, women, individuals with low literacy levels, and persons with disabilities who may otherwise be excluded from consultations. Engagement with these groups will involve specific measures to enable their full participation, ensuring that their awareness of and input into project decisions are at par with other stakeholders.

Measures to facilitate inclusive participation will be tailored to the specific needs of the stakeholders and may include:

- Translation of project materials into appropriate languages
- Provision of sign language interpretation or large-print materials
- Accessibility of venues for persons with disabilities
- Culturally appropriate engagement methods
- Scheduling small, focused meetings to create a comfortable environment for raising questions or concerns

Vulnerable groups will be engaged early in the project and involved meaningfully throughout. Where necessary, separate consultations will be organised to ensure that women, youths, and other disadvantaged groups can participate fully and that their concerns are properly considered.

The engagement strategy will be consistently adjusted to stay accessible, culturally suitable, and responsive to the needs of these groups, thereby ensuring fair participation in project-related decision-making.

Table 11: Summary of vulnerable group needs

Community Stakeholder Groups	Key Characteristics	Language Needs	Preferred Notification	Specific Needs
Women	Primary caregivers, limited time, cultural mobility restrictions	Local language, simple explanations	SMS, community notice boards, word-of-mouth via local leaders	Consultations at convenient times, small-group sessions, culturally sensitive engagement, and childcare support if needed
Youths	Students or early-career adults, limited experience in formal decision-making	Local language, visual aids	Social media, community youth groups, notice boards	Focus group discussions, interactive methods, accessible locations, flexible timing after school/work hours
Persons with Disabilities (PWDs)	Physical or sensory impairments, mobility barriers	Sign language, braille, simplified written materials	Direct phone calls, community leaders, NGOs working with PWDs	Accessible venues, ramps, assistive devices, sign language interpreters, and door-to-door consultations if required
Individuals with Low Literacy Levels	May struggle to read written notices	Local language, pictorial materials	Verbal announcements via local leaders, radio, and community meetings	Visual aids, oral briefings, and short and clear information sessions
Elderly / Senior Community Members	Reduced mobility may feel excluded from formal processes	Local language	Word-of-mouth via community leaders	Consultations at accessible locations, shorter sessions, and one-on-one

Community Stakeholder Groups	Key Characteristics	Language Needs	Preferred Notification	Specific Needs
				interviews if needed
Local Community Leaders / Clan Elders	Influence decision-making, represent community interests	Local language	Direct phone calls, meetings	Engagement prior to community consultations, support in mobilizing others, culturally respectful communication

5.3. Proposed Strategy for Consultation

A comprehensive and inclusive consultation strategy will be implemented to ensure that all stakeholders are fully informed about the MoF Headquarters demolition and construction project and are provided with meaningful opportunities to participate. The strategy will employ a variety of methods to disclose information and engage stakeholders, allowing them to understand potential risks, impacts, and opportunities associated with the project.

The project team will ensure that stakeholders receive clear and accessible information about:

Project Overview: The purpose, scope, scale, and nature of the demolition and construction activities.

Timeline: The anticipated duration of key project activities and milestones.

Potential Impacts: Likely social, environmental, and economic impacts on the local community, alongside proposed mitigation measures to minimize adverse effects.

Stakeholder Engagement Process: The procedures through which stakeholders can actively participate in consultations, share input, and raise concerns.

Access to Information: Locations, both physical and digital, where project documentation and supporting studies can be reviewed.

Public Consultation Details: The schedule, venues, and methods for upcoming meetings, including clear instructions on how stakeholders will be notified and how meeting outcomes will be summarised and reported.

Grievance Mechanism: The process for raising concerns or complaints, and the methods through which these will be addressed in a timely and transparent manner.

To facilitate broad access to information and stakeholder feedback:

A dedicated section will be established on the websites of implementing agencies where stakeholders can submit comments, questions, or observations regarding the project and its related studies and assessments.

During public meetings and consultations, designated rapporteurs will record feedback and inputs in real-time. Stakeholders will also have the option to note their own minutes of proceedings and share these with the rapporteurs to ensure accuracy and transparency.

Particular focus will be placed on vulnerable and disadvantaged groups, ensuring consultations are accessible, culturally suitable, and held at convenient locations and times to encourage maximum participation.

Target Stakeholders	Topic(s) of Engagement	Means of Communication	Project Activity	Timing / Frequency	Responsibilities
Ministry of Finance Staff	Project overview, timelines, roles, safety measures	Email, official memos, internal meetings, workshops	Planning, coordination, site preparation	Quarterly briefings and as-needed updates	Project Manager, MoF Liaison Officer
Local Community / Residents	Construction schedule, expected disruptions, noise, dust, traffic management	Community meetings, notice boards, SMS alerts, social media	Demolition, construction, utility relocation	Monthly or as significant milestones occur	Community Liaison Officer, Contractor
Vulnerable Groups (Women, Youths, PWDs, Low-literacy individuals)	Access, inclusion, consultation on impacts, grievance redress	FGDs, one-on-one interviews, pictorial/visual materials, door-to-door	All project stages	At project initiation and periodically during critical phases	Social Development Officer, Community Liaison Officer
Local Leaders / Clan Elders	Community mobilization, conflict resolution, project impacts	Meetings, phone calls, workshops	All project stages	At project initiation and before major works	Community Liaison Officer, Project Manager
Contractors & Subcontractors	Health & safety protocols, quality standards, environmental management	Training sessions, toolbox talks, emails, site notices	Construction and demolition	Weekly or as needed	Site Supervisor, Safety Officer

Target Stakeholders	Topic(s) of Engagement	Means of Communication	Project Activity	Timing / Frequency	Responsibilities
Regulatory Authorities / Government Agencies	Compliance with regulations, reporting, approvals	Official letters, meetings, email updates	Project initiation, environmental compliance monitoring	As required per regulatory timeline	Project Manager, Compliance Officer
General Public	Project awareness, grievance redress, feedback	Public notices, website updates, media releases	All project stages	Bi-annually or as needed	Communication Officer, Project Manager
AFDB (Funding Institution)	Project performance, compliance, ESIA review, reporting	Emails, formal reports, virtual meetings, site visits	All project stages	Quarterly reporting and as required	Project Manager, MoF Liaison Officer
Project Consultant(s)	Technical design, construction supervision, monitoring & evaluation	Emails, formal reports, site meetings, workshops	Design, construction, quality assurance, ESIA monitoring	Throughout design and construction phases	Project Manager, Consultant Lead

Table 12: Stakeholder engagement methods and tools

5.4. Proposed Strategy for Information Disclosure

The information disclosure strategy for the MoF Headquarters demolition and construction project will be designed to reach stakeholders at both national and local levels, ensuring transparency and accessibility throughout the project lifecycle.

Various communication methods will be employed to share project information and updates, including:

Public Consultations: Community barazas, meetings, and Focus Group Discussions (FGDs) will be organised where feasible to directly engage stakeholders.

Traditional media: To reach a wider audience, local radio stations, television broadcasts, and public notice boards will be utilised.

Direct Communication: One-on-one interviews by phone or in person will be held with community representatives, local leaders, and other stakeholder groups with particular interests.

Digital Platforms: A central repository of all disclosed project information will be maintained on the MoF project website. Key documents—including project summaries, ESIA reports, and updates—

will be made publicly accessible online. Stakeholders will be able to download or view information conveniently, ensuring wide access.

Print and social media: Brochures, flyers, newsletters, and social media platforms will be used to supplement other communication methods and reach stakeholders who may not access digital portals.

Local Administration Offices: Hard copies of project information, including safeguard documents, will be made available at all relevant local government offices to ensure accessibility for stakeholders who prefer or require physical documents.

The strategy will ensure that all stakeholders, including MoF staff, contractors, local communities, vulnerable groups and the general public, receive timely, accurate and understandable information regarding:

- The purpose, scope, and scale of the project
- Project timelines and phases
- Potential risks, impacts, and proposed mitigation measures
- Opportunities for participation and consultation
- Procedures for submitting comments, questions, or grievances

Table 13: Information disclosure

Project Stage	Information to be Disclosed	Proposed Methods	Timetables / Locations	Target Stakeholders	Percentage Reached	Responsibility
Project Initiation / Planning	Project purpose, scope, scale, and expected timelines	Public meetings, emails, official memos, website updates	MoF offices, project website, community halls	MoF staff, local leaders, regulatory authorities	80–90%	Project Manager, MoF Liaison Officer
Design / Pre-construction	Proposed demolition and construction plans, ESIA summary, mitigation measures	FGDs, public notices, local radio, social media, printed brochures	Community centers, local radio stations, MoF website	Local community, vulnerable groups, general public	70–80%	Social Development Officer, Communication Officer

Project Stage	Information to be Disclosed	Proposed Methods	Timetables / Locations	Target Stakeholders	Percentage Reached	Responsibility
Construction / Implementation	Construction schedules, safety measures, expected disruptions, grievance mechanisms	Notice boards, SMS alerts, door-to-door visits, toolbox talks, meetings	Project site, community centers, local administration offices	Local community, contractors, PWDs, women, youth	80–90%	Community Liaison Officer, Contractor, Safety Officer
Monitoring / Supervision	Progress updates, compliance reports, risk mitigation, environmental performance	Reports, website updates, stakeholder briefings, emails	MoF offices, project website, stakeholder meetings	MoF staff, AFDB, regulatory authorities, community representatives	70–85%	Project Manager, Consultant Lead, Compliance Officer
Project Completion / Handover	Final project report, lessons learned, completed mitigation measures	Public meeting, website publication, press release	MoF Headquarters, project website, local media	All stakeholders, the general public, and regulatory authorities	90–100%	Project Manager, Communication Officer, MoF Liaison Officer

5.5. Review of Comments and Report Back System

An effective way to report back to stakeholders on their feedback, comments and grievances is vital for successful stakeholder engagement. For the MoF Headquarters demolition and construction project, all stakeholder inputs will be systematically recorded, tracked and addressed to ensure transparency and responsiveness throughout the project lifecycle.

The project team will maintain a Stakeholder Engagement, Feedback and Grievance Register, capturing all inputs received from various engagement activities. Urgent issues and grievances requiring immediate attention will be promptly escalated to the relevant project implementation unit to ensure timely resolution.

To facilitate stakeholder input, multiple channels will be made available:

Comment Boxes: Installed at MoF offices, project site offices, and other strategic locations for stakeholders to submit feedback easily.

Feedback Forms: Provided during public meetings, consultations, and Focus Group Discussions (FGDs).

Digital Channels: Stakeholders can submit comments and suggestions through official MoF social media pages, the project website, official email addresses, or a dedicated information telephone line.

All feedback will be collected and analysed by the project Safeguards and Social Development Team to identify key issues, trends, suggestions, and stakeholder aspirations. The analysis will inform project decision-making and ensure stakeholder concerns are incorporated into project implementation.

Reporting and Follow-Up:

During the Planning and Pre-Construction Phases, a comprehensive Stakeholder Engagement Report will be produced at each consultation milestone. Each report will include:

- Number and type of stakeholder consultations conducted
- Methods of engagement used
- Key issues raised by stakeholders
- Grievances received and details of how they were resolved

During the Construction Phase, Stakeholder Engagement Reports will be produced every month.

Reports will be submitted to the MoF Project Manager within 14 working days of each consultation or reporting period. Identified issues and grievances will be systematically addressed through the relevant project management mechanisms and mitigation plans.

Furthermore, FAQs and other project information materials will be regularly updated to reflect project progress, key stakeholder concerns, and any changes resulting from consultations or information disclosure activities. This ensures stakeholders remain informed, engaged, and confident that their inputs are valued and acted upon.

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT

This section outlines the technical and financial resources required for the effective implementation of the Stakeholder Engagement Plan (SEP) across all phases of the MoF Headquarters demolition and construction project.

6.1. Roles of different teams in the Implementation of SEP

The table below presents the roles and responsibilities of different teams involved in the implementation of the Stakeholder Engagement Plan (SEP), ensuring effective coordination and accountability

Table 14: Roles in the implementation of the SEP

Task / Activity	Team / Entity	Roles in Implementation
Overall project oversight and funding compliance	AFDB	Provide funding, review and approve SEP, monitor compliance with environmental and social safeguards, offer technical guidance on stakeholder engagement, and ensure accountability of implementing agencies.
Overall SEP implementation	Ministry of Finance (MoF)	Lead and coordinate all SEP activities, allocate financial and human resources, ensure stakeholder consultations are conducted, monitor SEP progress, and report to AFDB.
Project planning and design consultations	Project Consultant(s)	Support MoF in designing engagement strategies, preparing stakeholder mapping, drafting consultation materials, facilitating technical briefings, and providing input on grievance mechanisms.
Community and stakeholder engagement	Community Liaison / Social Development Officer	Organise and conduct FGDs, public meetings, door-to-door consultations, and outreach to vulnerable groups; ensure inclusive participation; document stakeholder feedback.
Construction and site-level engagement	Contractors & Subcontractors	Implement site-specific engagement activities, provide safety and environmental briefings, respond to on-site concerns, and coordinate with the Community Liaison Officer.
Grievance management	MoF Safeguards / Social Team	Maintain the Stakeholder Feedback and Grievance Register, respond to stakeholder concerns, escalate urgent issues, monitor resolution, and update reports to AFDB.

Task / Activity	Team / Entity	Roles in Implementation
Information disclosure	Communication Officer / MoF	Disseminate project information via website, social media, public notices, brochures, and local media; update FAQs and ensure information is accessible to all stakeholder groups.
Monitoring and reporting	MoF Project Manager / Consultant Lead	Compile monthly and milestone SEP reports, analyse stakeholder feedback trends, ensure mitigation measures are implemented, and submit reports to AFDB and other relevant authorities.

The team responsible for implementing the SEPs at each project level will be composed of the officers listed in Table 14, all of whom meet the required qualifications and competencies specified below.

6.2. Team Qualification

The table below outlines the qualifications and expertise required of members responsible for implementing the Stakeholder Engagement Plan (SEP) at various project levels. It ensures that the right skills are in place for effective engagement and grievance management.

Table 15: Team Qualifications for SEP Implementation

Officer	Required Qualifications & Competencies
Civil Engineer	Bachelor's degree in Civil Engineering or related field. Strong understanding of infrastructure planning, construction oversight, and project implementation. Proficient in project management software and general computer applications.
Architect	Bachelor's degree in Architecture. Skilled in building design, spatial planning, and construction coordination. Familiar with relevant building codes, design software (e.g., AutoCAD, Revit), and project implementation processes.
Quantity Surveyor	Bachelor's degree in Quantity Surveying or Construction Management. Experienced in cost estimation, budgeting, procurement support, and financial monitoring of construction projects. Proficient in relevant software and project reporting.
Sociologist / Community Development Specialist	Bachelor's degree in Sociology, Community Development, Development Studies, or related field. Experience in community engagement, participatory approaches, and inclusion of vulnerable groups. Computer literate.
Environmental Officer	Bachelor's degree in Environmental Science or Environmental Engineering. Registered with relevant professional body. Skilled in environmental assessments, mitigation planning, and monitoring. Computer literate.
Communications Officer	Bachelor's degree in Mass Communication, Journalism, or Public Relations. Skilled in stakeholder engagement, public information dissemination, and media management. Computer literate.
Procurement Officer	Bachelor's degree in Business Administration, Supply Chain Management, or equivalent. Experienced in public procurement processes, contract management, and resource planning. Computer literate.
Accountant / Finance Officer	Bachelor's degree in Commerce, Accounting, or Finance. Competent in financial management, reporting, and project budget oversight. Computer literate.
Legal Officer	Bachelor's degree in Law. Skilled in contract review, regulatory compliance, and legal advisory for project implementation. Computer literate.
Monitoring & Evaluation Officer	Bachelor's degree in Monitoring & Evaluation, Planning, Business, or related field. Experienced in designing M&E frameworks, data collection, and project performance reporting. Computer literate.

6.3. Financial Resources

The stakeholder engagement activities for the MoF Headquarters project address a variety of issues, some of which may overlap with other project components and budgets. To promote transparency and accountability, the MoF has prepared a project-specific SEP budget that details the costed activities, their frequency, and includes project management costs for the Grievance Redress Mechanism (GRM) implementation.

The SEP budget ensures that all stakeholder engagement activities, such as consultations, focus group discussions, public meetings, information disclosure, and grievance management, are adequately funded and resourced.

The MoF will review the SEP annually to determine whether updates are required, including any changes to stakeholder classification, engagement methods, or the frequency of activities. Should adjustments be necessary, the SEP and its budget will be updated accordingly to reflect the revised needs and priorities.

Table 16: SEP Budget

Stakeholder Engagement Activities	Quantity	Unit Cost (USD)	Total Cost (USD)	Remarks
Stakeholder Mapping & Analysis	2	1,200	2,400	Identification and classification of stakeholders; updated annually
Public Consultations / Barazas	4	1,800	7,200	Quarterly engagement with communities, vulnerable groups, and leaders
Focus Group Discussions (FGDs)	2	1,500	3,000	Targeted discussions with women, youth, PWDs, and other vulnerable groups
Information Disclosure	12	150	1,800	Printing brochures, flyers, website updates, social media posts
Grievance Redress Mechanism (GRM)	1	3,500	3,500	Continuous management of grievance boxes, hotline, email, and complaint tracking
Workshops & Training	2	3,200	6,400	Capacity building for staff and contractors on engagement and GRM
Monitoring & Reporting	12	250	3,000	Preparation of stakeholder engagement reports; monthly during construction
Contingency	1	700	700	Reserved for unforeseen stakeholder engagement activities

Stakeholder Engagement Activities	Quantity	Unit Cost (USD)	Total Cost (USD)	Remarks
Total (USD)			25,000	

7. GRIEVANCE REDRESS MECHANISM

7.1. Introduction

The purpose of the Grievance Redress Mechanism (GRM) is to provide a clear, accessible, and transparent process for addressing complaints or concerns from stakeholders, including project-affected persons (PAPs), workers, and the general public, arising from the demolition, construction, and operation of the MoF project. The GRM aims to resolve grievances promptly and fairly, minimising negative impacts and enhancing trust between the project and its stakeholders.

7.2. Objectives of the GRM

- To ensure timely and fair resolution of complaints.
- To promote transparency and accountability in project implementation.
- To prevent conflicts and improve relationships with the local community and other stakeholders.
- To document and track complaints, responses and resolutions effectively.

7.3. Principles Guiding the GRM

- **Accessibility:** The mechanism will be easily accessible to all stakeholders regardless of literacy level, gender, age, or disability.
- **Transparency:** Procedures and responsibilities will be well-communicated.
- **Confidentiality:** Complainants' identities and personal data will be protected.
- **Responsiveness:** All grievances will be acknowledged within 3 working days and resolved within a stipulated timeline.
- **Non-retaliation:** Complainants will be protected from any form of retaliation for submitting grievances.

7.4. Major Role of the Grievance Committee

The primary role of the Grievance Committee is to receive and review ethical complaints and arbitration requests. Upon initial assessment, the committee determines whether the issues raised warrant a formal hearing. If so, it facilitates a fair resolution process or escalates the matter to higher administrative levels as appropriate. Throughout the project period, the committee ensures a consistent and transparent flow of communication with all relevant stakeholders.

A dedicated Grievance Redress Committee will be formed, comprising:

- Project Implementation Unit (PIU) Representative (Chair)
- MoF Representative

- Community Representative (local elder or leader)
- Women/Youth Representative
- Environmental & Social Safeguards Officer
- Contractor Representative (if relevant)

7.5. Role of the Grievance Mechanism

The grievance mechanism plays a vital role in ensuring transparency, accountability, and community trust throughout the project. Its key responsibilities include:

Establishing an Accessible Process: Develop a clear and culturally appropriate procedure for receiving, recording and addressing complaints. The process must be easily understood and accessible to all members of the affected communities, including vulnerable groups.

Community Awareness: Inform affected communities about the existence, purpose, and function of the grievance mechanism during the stakeholder engagement process.

Collaborative Resolution: Encourage a participatory approach by involving affected communities in identifying and implementing appropriate solutions to grievances.

Risk-Based Scaling: Design and scale the mechanism according to the potential risks and adverse impacts associated with the project.

Timely and Transparent Resolution: Address complaints promptly using a transparent and easily navigable process. The mechanism should be available at no cost to complainants and must ensure protection from retaliation.

Inclusive Participation: Guarantee the meaningful participation of both genders and ensure the inclusion of vulnerable and marginalized groups.

Respect for Traditional Practices: Incorporate customary and traditional dispute resolution practices where relevant and appropriate.

Dedicated Personnel: Appoint qualified and experienced staff within the project team to manage the grievance process effectively, ensuring consistency and responsiveness.

Escalation and Redress: Establish a clear appeals or redress pathway for grievances not satisfactorily resolved, allowing for referral to an independent or external body.

Documentation and Reporting: Maintain accurate records of all grievances received, actions taken, and resolutions provided. Provide regular feedback to the community and generate periodic reports highlighting recurring issues and systemic concerns identified through the mechanism.

7.6. GRM Process Flow

Table 17: GRM process

Step	Action	Responsible Party	Timeline
1	Submission of grievance by affected person (oral, written, via phone, SMS, WhatsApp, email, or drop box at site)	Complainant	Ongoing
2	Grievance recorded in the Grievance Register (date, name, contact, nature of complaint)	Site Grievance Officer (part of PIU)	Within 1–2 working days
3	Acknowledgement of receipt of grievance to complainant	Grievance Officer / PIU	Within 3 working days
4	Assessment and investigation (field visits, stakeholder meetings, document review if necessary)	PIU, Contractor, Social Safeguards Officer	Within 7–10 working days
5	Response/Resolution provided to complainant (with written feedback or meeting)	PIU, MoF, Local Authority (if needed)	Within 15 working days
6	Complainant feedback and closure if grievance is resolved	Complainant & PIU	Within 2 working days of resolution
7	Escalation if unresolved to Grievance Redress Committee or external mediation (e.g. MoF Legal Unit or court)	PIU, MoF GRM Committee	As needed

7.7. Potential Grievance Categories

The GRM will handle:

- Dust, noise, vibration, waste, or pollution-related complaints
- Safety concerns (worker or public safety)
- Land use or access restrictions
- labour and employment grievances
- Gender-based violence or harassment (with referral to confidential GBV response services)
- Delays or miscommunication regarding project information
- Any other adverse effects or community concerns

7.8. Monitoring and Reporting

To ensure transparency, accountability and effectiveness of the Grievance Redress Mechanism (GRM), a structured monitoring and reporting framework will be implemented by the Project Implementation Unit (PIU), supported by the Environmental and Social Safeguards Officer.

7.9. Grievance Register

A **Grievance Register** will be maintained at the project site and PIU office. It will be updated continuously and will include:

- **Date of Complaint:** The day the grievance was received, which helps monitor response time and ensure timelines are met.
- **Complainant Identity:** Name and contact information (if the complainant choose to disclose their identity). Anonymous grievances will also be logged.
- **Nature of Grievance:** A clear, concise description of the issue, including whether it is environmental (e.g., noise, air quality), social (e.g., labour concerns, displacement), safety-related, or gender-based.
- **Steps Taken:** Details of the actions taken to address the grievance, including meetings held, site visits conducted, or mediation efforts initiated.
- **Responsible Officer/Party:** The person or entity assigned to resolve the complaint (e.g., Safeguards Officer, Contractor, MoF official).
- **Resolution Status:** Whether the complaint is:

- Resolved and closed,
 - In progress (under investigation or awaiting feedback), or
 - Escalated to the Grievance Redress Committee (GRC) or legal recourse.
- **Timeframe:** Record of how long it took to resolve or escalate the issue.

7.10. Monthly Monitoring Reports

The PIU, through the Environmental and Social Safeguards Officer, will generate **monthly grievance reports**. These will include:

- Summary of grievances received and their categorization.
- Resolved and unresolved cases.
- Key trends (e.g., repeated complaints on waste management or labour conditions).
- Recommendations for proactive mitigation measures.
- Action points and follow-ups for unresolved or systemic grievances.

These reports will be shared with:

- The Ministry of Finance (MoF),
- Relevant local authorities (municipality or regional offices),
- Development partners (if applicable),
- Stakeholder forums or community liaison representatives (if appropriate for public disclosure).

7.11. Continuous Improvement

By analyzing grievance trends over time, the PIU and project partners will identify:

- Gaps in communication or stakeholder engagement.
- Recurring technical or operational issues.
- Potential policy or procedural weaknesses.

This analysis will inform ongoing improvements in project design, stakeholder engagement strategy, environmental and social mitigation, and overall risk management.

7.12. Appeals and Legal Recourse

Despite the project's commitment to resolving grievances amicably and at the community level, some complaints may remain unresolved to the satisfaction of the complainant. To ensure justice, equity, and access to higher levels of redress, the following escalation channels are available:

1. Appeal to the Ministry of Finance or an Independent Mediator

If a complainant is dissatisfied with the resolution provided by the PIU or Grievance Redress Committee (GRC), they have the right to:

- File a **formal written appeal** to the Office of the Director General or the Public Complaints Division of the Ministry of Finance.
- Request an **independent mediator or ombudsperson** (where available) to facilitate dialogue between parties and propose a neutral resolution.

Appeals to the MoF will be logged, tracked and responded to within a defined period (normally 15 working days).

2. Legal Recourse through Somalia's Judiciary

As a final step, the complainant may seek redress through Somalia's **formal legal system**. This may involve:

- Filing a case with a competent court of law (e.g., local civil court or administrative tribunal).
- Engaging legal aid or community-based legal advisors if necessary.
- Requesting legal intervention in cases involving human rights violations, land disputes, labour violations, or gender-based violence.

8. MONITORING AND REPORTING

Stakeholder engagement monitoring involves systematically collecting data, assessing engagement effectiveness, and using insights to improve strategies and approaches for meaningful stakeholder interaction. For the MoF Headquarters demolition and construction project, this responsibility will rest with the MoF Project Team in collaboration with stakeholders at all project levels.

Monitoring ensures compliance with the project's Stakeholder Engagement Plan (SEP) and other environmental and social safeguards, including the effective application of the Grievance Redress Mechanism (GRM). It assesses both the quality and impact of engagement activities, ensuring that stakeholder concerns are identified, addressed, and incorporated into project decision-making.

The project will conduct **quarterly reviews** of SEP implementation and other safeguards instruments to evaluate progress, identify gaps, and inform timely adjustments. Monitoring reports on environmental and social (E&S) performance will serve as key tools for tracking effectiveness, guiding adaptive management, and supporting transparent communication with stakeholders. Throughout this process, the MoF Project Team will lead coordination with relevant stakeholders to ensure that engagement remains inclusive, responsive, and aligned with best practice standards.

8.1. Monitoring and Evaluation

The MoF Headquarters demolition and construction project will maintain a **comprehensive record system** capturing all stakeholder engagement activities, including public consultations, information disclosure, and grievances. This system will be **kept up-to-date and available for review** by the public upon request, promoting accountability and transparency throughout the project lifecycle.

The MoF Project Team will conduct **regular assessments** of stakeholder engagement to measure the effectiveness and inclusivity of project interactions. Key evaluation indicators will include, but are not limited to:

- **Grievance Tracking:** The total number of grievances received, timeliness of responses, and the outcomes of actions taken to resolve issues.
- **Stakeholder Involvement:** The degree of participation by all stakeholders, including project-affected individuals, with data broken down by gender, age, and vulnerability status.
- **Safety Monitoring:** Documentation of any incidents, accidents, or safety concerns arising during engagement activities or project implementation.
- **Female Participation:** The number of women participating in focus groups, workshops, and public meetings.
- **Community Representation:** Engagement of men and women from underserved or marginalised communities in FGDs, workshops, and public forums.
- **Information Dissemination:** Volume and types of communication materials produced and distributed in local languages, particularly targeting underserved areas.

Through continuous monitoring and evaluation, the MoF Project Team will identify areas for improvement, adapt engagement approaches, and ensure that all stakeholder groups—including vulnerable and marginalised populations are effectively involved in project decision-making and implementation.

8.2. REPORTING

The Project Team(s) will consistently compile and share key information regarding the status of the project with stakeholders, tailored to their specific information needs. This will include updates on project implementation progress, actions taken in response to commitments made to stakeholders, and any new or revised information since the previous report. By providing timely and relevant updates, the project team ensures that stakeholders remain well-informed, engaged, and able to participate meaningfully throughout the project lifecycle.

Table 18: Methods and frequency of reporting to stakeholders

Report Type	Frequency	Content Focus	Responsible Party
Quarterly SEP Report	Every 3 months	Summary of all stakeholder engagement activities, grievances, information disclosure, and key observations	MoF Project Team / SEP Coordinator
Monthly Engagement Update	Monthly	Snapshot of engagement activities, attendance, and grievances for ongoing monitoring	Community Liaison Officer / Social Development Officer
Incident / Grievance Report	As required	Details of specific grievances or incidents, actions taken, and resolution status	MoF Safeguards Team
Annual SEP Review	Annually	Comprehensive evaluation of SEP implementation, lessons learned, and adaptive management recommendations	MoF Project Team / Consultant Lead

8.3. Stakeholder Monitoring Plan

A detailed Stakeholder Monitoring Plan will be established to ensure effective implementation of the Stakeholder Engagement Plan (SEP) throughout the project lifecycle. This plan will identify key stakeholders, define their roles, and specify the appropriate methods and frequency of engagement for each stakeholder group.

Continuous monitoring will be carried out to track the progress of engagement activities, assess compliance with the SEP, and evaluate the effectiveness of stakeholder participation. Challenges encountered, lessons learned, and any required adjustments or corrective actions will be systematically documented.

The findings from monitoring activities will be made readily available to stakeholders for review and feedback, primarily at the project level, to ensure transparency, accountability, and an inclusive engagement process.

Table 19: Stakeholders Monitoring Plan

Stakeholder Group	Engagement Activity	Frequency / Timing	Indicators	Data Collection Method	Responsible Officer	Follow-up / Corrective Action
Project-Affected Communities	Public consultations, FGDs	Quarterly	Number of participants, inclusion of vulnerable groups	Attendance sheets, meeting minutes, feedback forms	Community Liaison Officer	Address concerns through GRM, update SEP
Women and Youth Groups	Workshops, FGDs	Bi-annual	Participation rate, issues raised, gender-disaggregated data	Surveys, focus group reports	Social Development Officer	Incorporate feedback into project planning
Persons with Disabilities (PWDs)	Targeted consultations, one-on-one interviews	Quarterly	Participation, accessibility of venues, satisfaction level	Attendance sheets, interviews, feedback forms	Community Liaison Officer	Implement accessibility improvements, follow-up actions
Local Leaders / Clan Elders	Meetings, briefings	Quarterly	Number of consultations, concerns raised, follow-up actions	Minutes of meetings, feedback logs	Project Manager / Liaison Officer	Communicate responses to stakeholders, document in reports
Ministry Staff / Government Agencies	Briefings, progress updates	Monthly	Timeliness of updates, issues raised	Email records, meeting notes	SEP Coordinator	Adjust engagement strategies based on feedback
Contractors / Consultants	Site-level stakeholder engagement	Ongoing	Compliance with SEP, number of incidents, grievances received	Reports, site visit logs	MoF Safeguards Team	Implement corrective measures, report to MoF Project Team

Stakeholder Group	Engagement Activity	Frequency / Timing	Indicators	Data Collection Method	Responsible Officer	Follow-up / Corrective Action
General Public / Media	Information disclosure, newsletters, website updates	Monthly	Number of materials disseminated, public queries	Website analytics, distribution logs	Communication Officer	Respond to queries, update materials as needed

Proposed SEP Timelines

The following table outlines the proposed timeline for implementing the Stakeholder Engagement Plan (SEP) for the MoF Headquarters demolition and construction project. The schedule is indicative and may be adjusted to accommodate the evolving needs and dynamics of the project during implementation.

Table 20: Stakeholders Monitoring Plan

Activity	Responsibility	Timing / Frequency
Training of stakeholders on SEP and Grievance Redress Mechanism (GRM)	MoF Project Implementation Team (PIT)	1 month before commencement of construction works
Community engagement outreach meetings, workshops, and project/GRM updates	MoF Environmental / Social Safeguards Team	Quarterly
Awareness creation and progress reporting meetings with project-affected persons and beneficiary communities	MoF Environmental / Social Safeguards Team / Supervising Consultants	Monthly
Stakeholder satisfaction and feedback surveys	MoF Project Management Team / Consultants	Annually



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