

FEDERAL GOVERNMENT OF SOMALIA



MINISTRY OF LABOR & SOCIAL AFFAIRS (MOLSA)

**ENVIRONMENTAL AND SOCIAL MANAGEMENT
FRAMEWORK (ESMF)**

**SOMALIA SHOCK-RESPONSIVE SAFETY NET FOR HUMAN
CAPITAL PROJECT – (P181469)**

November 2023

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	Background Information	1
1.2	Project Components	1
1.3	Project Beneficiaries	4
1.4	Project Implementation Arrangements	4
1.5	Environment and Social Management Framework.....	4
1.6	Approach and Methodology.....	5
1.6.1	Literature Review.....	5
1.6.2	Preparation of ESMF	6
1.6.3	Stakeholder Consultations.....	6
2	DESCRIPTION OF ADMINISTRATIVE, LEGAL AND POLICY FRAMEWORKS	7
2.4.1	ESS1: Assessment and Management of Environmental and Social Risks and Impacts	13
2.4.2	ESS2: Labor and Working Conditions	14
2.4.3	ESS 3: Resource Efficiency and Pollution Prevention and Management	14
2.4.4	ESS4: Community Health and Safety	15
2.4.5	ESS10: Stakeholder Engagement and Information Disclosure	16
2.4.6	Legal Gap Analysis	16
3	Environmental and social baseline	22
3.1	Biophysical Baseline.....	22
3.2	Social Economic Baseline.....	24
4	Potential Environmental and Social RISKS and Mitigation Measures	31
5	INSTITUTIONAL ARRANGEMENTS FOR ESMF IMPLEMENTATION	38
5.1	Ministry of Labor and Social Services (MoLSA).....	38
5.2	World Food Program (WFP)	38
5.3	United Nations Children Fund	38
5.4	Capacity Development for Environmental and Social Management and Monitoring.....	39
5.5	Monitoring and Reporting.....	43
5.6	Resource and Budget.....	43
6	Grievance Redress Mechanisms.....	44
6.1	Grievances Process Overview	44
6.2	GRM Core Principles	45
6.3	GRM Value Chain	45
6.4	GBV/SEAH-related Grievance	46
6.5	WB’s Grievance Redress Service (GRS)	52
7	Stakeholder Engagement / Consultation and Disclosure	53
7.1	Overview.....	53
7.2	Stakeholder Inventory	53
8	APPENDICES	60

ESMF – SNHCP

List of Tables

Table 2-1: GAP analysis for WB and FGS (Somalia) / Somaliland Polices, Laws & regulations relevant to this ESMF	17
Table 4-1: Management of E-Wastes and Medical Wastes	31
Table 4-2: Management of Social Risks	33
Table 4-3: Management of Labor Related Risks	36
Table 5-1: Institutions and Their Roles	39
Table 5-2: Capacity Building and Training Plan	41
Table 5-3: Resource and Budget	43
Table 7-1: Stakeholders Inventory	54
Table 7-2: Other Interested Parties	55
Table 7-2: Summary of Stakeholder Consultations and their Outcomes	57

List of Figures

Figure 3-1: Map of Somalia: Source: <https://www.google.com/search?q=Somalia+Atlas+Map> 22

ABBREVIATIONS & ACRONYMS

AF	Additional Financing
AMISOM	African Mission in Somalia
CFC	Chlorofluorocarbon
CITES	Convention on International Trade against Endangered Species
CCEDAW	Convention on the Elimination of All forms of Discrimination against Women
CoCs	Code of Conduct
C-ESMP	Construction Environment and Social Management Plan
CIP	Capital Injection Project
CSSP	Civil Services Strengthening Project
CRF	Common Registration Form
GCF	Green Climate Fund
DRM	Domestic Revenue Mobilization
DSA	Detailed Site Assessment
DSI	Durable Solution Intervention
DMP	Dust Management Plan
GEF	Global Environment Facility
EHS	Environment Health and Safety
ESCP	Environment and Social Commitment Plan
EWARN	Early Warning and Response Network
E&S	Environment and Social
ESF	Environmental and Social Framework
ESSs	Environmental and Social Standards
ESIA	Environmental and Social Impact Assessments
ESMP	Environmental and Social Management Plans
FAO	Food and Agricultural Organization,
FGS	Federal Government of Somalia
FGM	Female Genital Mutilation
FMS	Federal Member States
FRS	Federal Republic of Somalia
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
GIIP	Good International Industry Practice
GDP	Gross Domestic Product
HIPC	Heavily indebted Poor Countries
HSMP	Health and Safety Management Plan
HRM	Human Resource Manage
HRMIS	Human Resource Management Information Systems
IDP	Internally Displaced Persons
ICR	Implementation Completion Report
IGFF	Intergovernmental Fiscal Forums

ESMF – SNHCP

ILO	International Labor Organization
INDC	Intended Nationally Determined Contribution
IUCN	International Union for Conservation of Nature
ICR	Implementation Completion Report
IT	Information Technology
ITAS	Integrated Tax Administration Automation System
IVA	Independent Verification Agent
JSS	Jubaland Somali State
LMP	Labor Management Procedures
LTO	Large Taxpayer Office
VMG	Vulnerable and Marginalized Groups
MDA	Ministry Departments and Agencies
MoERD	Ministry of Environment and Rural Development
MoF	Ministry of Finance
MoECC	Ministry of Environment and Climate Change
MoCI	Ministry of Commerce and Investment
NREN	National Research and Education Network
NTCs	National Technical Committees
OHS	Occupation Health and Safety
PAD	Project Appraisal Document
PIU's	Project Coordination Unit
PFM	Public Financial Management
PFMRAP	Public Financial Management Reform Action Plan
PDO	Project Development Objectives
PIM	Public Investment Management
PIM	Project Implementation Manual
PLWD	Persons Living With Disabilities
PPE	Personal Protective Equipment
PSM	Public Sector Management
PSC	Project Steering Committee
PSS	Puntland Somali State
PREMIS	Public Resources Management in Somalia
RCRF	Somalia Recurrent Cost and Reforms Financing Project
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SDM	Service Delivery Mechanism
SH	Sexual Harassment
SL	Somaliland
SNHCP	Safety Net for Human Capital Project
SRAMF	Security Risk Assessment Management Framework
SWS	South West Somalia

ESMF – SNHCP

TA	Technical Assistants
TPMA	Third Party Monitoring Agents
NPARF	National Public Administration Reform Strategy Framework
MoLSA	Ministry of Labor and Social Affairs
MoECC	Ministry of Environment and Climate Change
UNDSS	United Nations Department of Safety and Security
UNFCCC	UN Framework Convention on Climate Change
UNICEF	United Nations International Children Emergency Fund
UNDP	United Nations Development Program
UNHCR	United Nations High Commissioner for Refugees
USR	Unified Social Registry
VAC	Violence against Children
WASH	Water Sanitation and Hygiene
WFP	World Food Program

EXECUTIVE SUMMARY

PROJECT INFORMATION

The Baxnaano program was launched in late 2019 and is administered by the Ministry of Labor and Social Affairs (MoLSA) on behalf of the Federal Government of Somalia (FGS). Baxnaano provides support to poor and vulnerable beneficiaries through two windows: (i) Regular window – An unconditional cash transfer program which covers 200,000 chronically poor and vulnerable households (approximately 1.3 million individuals) with focus on households with children aged under five years, currently active in 25 districts across all Federal Member States (FMS) and Somaliland and (ii) Shock response window. The window is expected to support a total of 598,000 households (3.59 million individuals) with temporary emergency cash transfers, 338,000 drought affected households supported under Shock Responsive Safety Net for Human Capital Project (SNHCP) and 260,000 locust affected households supported under Shock Responsive Safety Net for Locust Response Project

A first Additional Financing (AF) approved on June 17, 2021, increased the duration of Baxnaano support for the same beneficiary cohort to ensure that efforts at improving human capital could be maintained. A second AF approved on June 22, 2022, supported a response to the urgent food security needs of poor and vulnerable populations affected by the prevailing drought crisis which began in late 2021. The Project comprises three components which finance (i) nutrition-linked unconditional cash transfers, (ii) delivery systems and institutional capacity building, and (iii) project management, monitoring and evaluation (M&E), and knowledge management. In this Af, component 4 will establish new pilot on Service Delivery Mechanism (SDM) and health and nutrition co-responsibility cash transfer (H&N Cct). This will intervention will be related to (i) Provision of income support to poor and vulnerable pregnant women and lactating mothers and young children contribution to their improved nutrition, (ii) Incentivize uptake of key health and nutrition services, (iii) to improve awareness on maternal and early child health and nutrition and promote behavioral change.

The Federal Government of Somalia (FGS) has requested third additional financing that will serve two key purposes to respond to urgent crisis needs. First, the AF draws upon US\$ 60 million in CRW “last resort financing” to provide emergency cash transfers to 145,000 drought affected poor and vulnerable households. SNHCP aims to provide support to a total of 338,000 drought affected households of which existing financing support was available for 193,000 households which have already received or are in process of receiving ECTs. This AF will provide support to the remaining 145,000 drought affected households and enable the project to achieve its target. Second, a restructuring will invest in key building blocks for resilience to future crises: expanding the Unified Social Registry (USR) nationwide and investing in health and nutrition as well as economic inclusion interventions in urban areas

THE ESF FRAMEWORK AND THIS EMSF

The principal objective of this Environment and Social Management Framework (ESMF) is to assess and mitigate potential Environmental and Social (E&S) risks and impacts of the Project as per the requirements of the World Bank’s Environmental and Social Framework (ESF)¹ as well as the regulations established by the FGS. Specifically, the ESMF will help the FGS, Federal Member State (FMS), Somaliland and partners to:

- i. Assess the potential Environment and Social E&S risks and impacts of the Shock Responsive Safety Net for Human Capital Project and propose appropriate and effective mitigation measures;
- ii. Establish procedures for screening of Environmental and Social risks, as well as recommend steps for review, approval, and implementation of activities;
- iii. Specify appropriate roles and responsibilities of the Ministry of Labor and Social Affairs (MoLSA), and its partners including World Food Program (WFP), United Nations Children Fund (UNICEF) and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities;
- iv. Identify the training and capacity building needed by the agencies and partners of the Federal Government of Somalia (FGS) to successfully implement the provisions of the Environment and Social Management Framework (ESMF)
- v. Outline the mechanism for public consultations and disclosure of project documents as well as redress of possible grievances; and
- vi. Establish the budget requirements for implementation of the ESMF and the related instruments, which are specified in this ESMF.

ESMF METHODOLOGY

This ESMF was prepared in accordance with standard procedures for environmental and social assessment including World Bank Environmental and Social Standards (ESSs), other relevant international environmental and social assessment regulations and guidelines, and the Somali environmental assessment guidelines. This entailed literature review including;

- i. Shock Responsive Safety Net for Human Capital Project, Project Paper April 19, 2022
- ii. Additional Financing Appraisal Environmental and Social Review Summary, May 5, 2022
- iii. Shock Responsive Safety Net for Human Capital Project, Stakeholder Engagement Plan (SEP), Updated September 2023

¹ The Environmental and Social Framework (ESF) enables the World Bank and Borrowers to better manage environmental and social risks of projects and to improve development outcomes. The ESF offers broad and systematic coverage of environmental and social risks. It makes important advances in areas such as transparency, non-discrimination, public participation, and accountability—including expanded roles for grievance mechanisms. More details on this Framework is available at <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>.

ESMF – SNHCP

- iv. Shock Responsive Safety Net for Human Capital Project, Social Management Plan (SMP), Updated March 2023
- v. Shock Responsive Safety Net for Human Capital Project, Security Risk Management Review
- vi. Shock Responsive Safety Net for Human Capital Project; Security Risk Management (SRM) Gap Analysis,
- vii. Environmental and Social Management Framework Somalia COVID-19 Emergency Vaccination Project (P176956)
- viii. World Bank Environmental, Health, and Safety General Guidelines 2007

ENVIRONMENT AND SOCIAL RISKS

Safety Net for Human Capital Project (SNHCP) environmental risk have been rated as minimal. However, the project may generate minimal e-wastes from computers and communication gadgets purchased under Component 1. Further, under component 4 health and nutrition co-responsibility cash transfer has been provided under 3rd Additional Financing, it is envisaged that the that this support will incentivize uptake of health and nutrition services ultimately attracting health outlets among benefiting communities, the health outlets will be associated with hazardous medical wastes as cumulative impacts that require safe disposal.

Component 1 holds substantial risks for the human population. Given that the project will be implemented in areas of fragility due to endemic poverty, acute drought and protracted conflict and insecurity, directly accessing vulnerable beneficiaries will require careful planning. The risks are related to; Conflict and insecurity, Exclusion of vulnerable groups from benefiting from the project, Selection of beneficiaries' challenges, Gender Based Violence risks, Systemic Weakness, Difficulty monitoring project performance and Elite or Clan capture of project

IMPLEMENTATION ARRANGEMENTS

MoLSA would be the primary institutional home for the SNHCP and responsible for project implementation. The SNHCP would be implemented through MoLSA's existing structures, supported by the PIU, as described in Component 3. The Social Protection section of MoLSA would be responsible for the day-to-day management of the project and will report to the Minister of Labor and Social Affairs.

A Project Implementation Unit (PIU) will be created within the Social Protection (SP) Department of MoLSA and will be responsible for the day-to-day management and monitoring of the project. The PIU at the federal level will be established as soon as possible following project effectiveness. The PIU at MoLSA will comprise the key staff including; Project Manager, Communications Officer, Operations Officer, Safeguards Officer, MIS Officer, A Grievance Redress Mechanisms

ESMF – SNHCP

(GRM) and social risk management officer, An M&E officer, Procurement officer and finance officer

Further, Implementation of Component 1 is supported by WFP who was contracted by MoLSA under a service contract arrangement to deliver nutrition-linked cash transfer. To enhance the visibility of the role of FGS in delivering assistance to its people, WFP will make clear that this is a government project through its sensitization and communication to communities and the general public. Additionally, the World Food Programme (WFP) and the United Nations Children’s Fund (UNICEF), has been supporting MoLSA to build internal capacity and develop its own delivery systems, to enable transitioning to direct implementation by MoLSA.

CAPACITY DEVELOPMENT FOR ESMF

SNHCP Component 3: Project Management, Monitoring and Evaluation, and Knowledge Management, this component will support PIU establishment at the federal level at MoLSA during the first year. Subsequently, separate antenna PIUs or focal points would be created in the member states in consultation and agreement with the governments of member states. The component will also finance the salary of PIU staff and the purchase of IT equipment and office furniture, as well as the operating cost. The ESMF provision on capacity enhancement of the environmental and Social Standards skills and competencies of the projects will be expensed under this component. This ESMF provides that PIU staff will be trained and capacity built on provisions of Environment and Social Commitment Plan (ESCP), ESMF, Sexual Exploitation and Harassment and Gender Based Violence (SEAH/GBV Response and Prevention Plan, Labor Management Plan, Security Risks Assessment Management Framework (SRAMF), Grievance Redress Mechanism GRM

RESOURCE AND BUDGET

Budget components include remuneration for the PIU’s Environment and Social (E&S) specialists A GRM and social risk management officer and Gender Based Violence (GBV) specialist who are hired under the project to monitor and implement provisions of the ESMF. Additional budget components include; implementing agency safeguards capacity development activities; a training program for all relevant entities to implement their E&S responsibilities, Security Risk Assessment Management Framework (SRAMF), Updated Stakeholder Engagement Plan, Labor Management Procedures, and GBV Action and annual reviews. The ESMF estimates USD 270,000 to implement ESMF provisions.

GRIEVANCE REDRESS MECHANISM

The World Bank ESSs require that Bank-supported projects facilitate mechanisms that address concerns and grievances that arise in connection with a project. The ESS also require that a separate grievance mechanism for project workers to raise workplace concerns, including workplace sexual harassment, in line with the provisions of ESS2 be provided. ESS10 on

ESMF – SNHCP

Stakeholder Engagement and Information Disclosure states that project-affected parties should have a grievance mechanism that allows stakeholders to raise issues and grievances in a timely manner, and to allow PIU to respond and manage such grievances. The Project GRM provided for SNHCP will facilitate the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project.

STAKEHOLDER ENGAGEMENT

The engagements and consultation on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including; Ministry of Labour and Social Affairs, United Nations World Food Programme (WFP), Ministry of Finance, Ministry of Labour & Social Affairs (MoLSA), Ministry of Planning and Economic Development, United Nations World Food Programme (WFP), United Nations Children’s Fund (UNICEF), United Nations Food and Agricultural Organization, (FAO). The consultations happened from June 2019 to September 2023 as detailed in the Stakeholder Engagement Plan prepared for the project. The issues raised and concerns expressed including possible mechanisms of addressing these issues and concerns are summarized in Table 7.2 of this ESMF.

1 INTRODUCTION

1.1 Background Information

The Baxnaano program was launched in late 2019 and is administered by the Ministry of Labor and Social Affairs (MoLSA) on behalf of the Federal Government of Somalia (FGS). Baxnaano provides support to poor and vulnerable beneficiaries through two windows: (i) Regular window – An unconditional cash transfer program which covers 200,000 chronically poor and vulnerable households (approximately 1.3 million individuals) with focus on households with children aged under five years, currently active in 25 districts across all Federal Member States (FMS) and Somaliland and (ii) Shock response window – The window is expected to support a total of 598,000 households (3.59 million individuals) with temporary emergency cash transfers, 338,000 drought affected households supported under Shock Responsive Safety Net for Human Capital Project (SNHCP) and 260,000 locust affected households supported under Shock Responsive Safety Net for Locust Response Project

A first additional Financing (AF) approved on June 17, 2021, increased the duration of Baxnaano support for the same beneficiary cohort to ensure that efforts at improving human capital could be maintained. A second AF approved on June 22, 2022, supported a response to the urgent food security needs of poor and vulnerable populations affected by the prevailing drought crisis which began in late 2021. The Federal Government of Somalia (FGS) has requested third additional financing that will serve two key purposes to respond to urgent crisis needs. First, the AF draws upon US\$ 60 million in CRW “last resort financing” to provide emergency cash transfers to 145,000 drought affected poor and vulnerable households. Shock Responsive Safety Net for Human Capital Project (SNHCP) aims to provide support to a total of 338,000 drought affected households of which existing financing support was available for 193,000 households which have already received or are in process of receiving ECTs. This additional Financing (AF) will provide support to the remaining 145,000 drought affected households and enable the project to achieve its target. Second, a restructuring will invest in key building blocks for resilience to future crises: expanding the Unified Social Registry (USR) nationwide and investing in health and nutrition as well as economic inclusion interventions in urban areas

1.2 Project Components

The SNHCP will support three components, to be implemented over a three-year period. The components are (a) Nutrition-linked Unconditional Cash Transfers; (b) Delivery Systems and Institutional Capacity Building; and (c) Project Management, Monitoring and Evaluation, and Knowledge Management.

Component 1: Nutrition-linked Unconditional Cash Transfers

This component would provide unconditional cash transfers to households that are chronically poor and vulnerable to drought and malnutrition and link them to complementary nutritional support programs. The objectives of the component are to (a) support households to strengthen their resilience and avoid negative coping mechanisms (for example, selling off existing household assets) to meet escalating needs because of the drought in the short term and (b) promote human capital investment in the medium to long term by linking beneficiary households to complementary nutrition services (where they exist) and continuing to smooth consumption gaps through predictable and reliable provision of cash transfer, even after drought risks are no longer present.

\

Around 200,000 beneficiary households (approximately 1.2 million individuals) with children under five years will receive a monthly payment of US\$20 delivered quarterly, initially for one year. Component 1 has supported 198,164 (99 percent as of April 30, 2023) of 200,000 households under Baxnaano ‘regular’ receiving quarterly cash transfers up till June 30, 2024. In addition, 303,820 drought affected households (90 percent as of as of May 2, 2023) of the program target of 338,000 households have already been identified, screened, and verified to receive emergency cash transfers under the Baxnaano shock response window to cope with the impacts of the protracted natural disaster. Of these, 193,000 households have already received emergency cash transfers.

Component 2: Delivery Systems and Institutional Capacity Building

Component 2 would establish the key building blocks of a SP delivery system, advance policy development, and strengthen institutional capacity of relevant government ministries to manage and implement it. The objective of the component is to build capacity of the FGS/MoLSA to gradually take over full management and implementation of a safety net program and lay the foundation for a more comprehensive Social Protection system in Somalia.

The component will provide policy support; Technical Assistance (TA) for the development of safety net delivery systems, which include a social registry, Management Information System (MIS), operational procedures for registration, enrolment, targeting, grievance redress, payment delivery, monitoring, community outreach and information campaigns; and capacity-building activities. Component 2 is implemented under an Agreement for Delivery of Outputs between MoLSA and UNICEF. The development of a USR, Baxnaano management information system (MIS), and the overall delivery mechanism, which are the key building blocks of such a system, are well advanced.

Component 3: Project Management, Monitoring and Evaluation, and Knowledge Management

Component 3 would establish a Project Implementation Unit (PIU), strengthen MoLSA's coordination arrangements, promote learning and knowledge management through robust M&E, and

support the design of a pilot productive safety net activity targeted at youth. Specifically, the PIU would be established at the federal level at MoLSA during the first year. Subsequently, separate antenna PIUs or focal points would be created in each of the member states. Focus would also be given to strengthening MoLSA's coordination arrangements within other ministries and stakeholders at the federal level, and between the federal level and the member states at the local level. Component 3 has financed the Project Implementation Unit (PIU) within MoLSA and helps strengthen horizontal coordination with other line ministries as well as between FGS and FMS.

Component 4 (Household Registration in the USR) finances the expansion of the USR by registering households not yet included in the database using its Common Registration Form (CRF). The first and second rounds of surveys have been completed with the target of adding a total of around 250,000 households' data into the database, which combined with the ongoing registration under SNLRP would expand the database to around 780,000 households.

In this third additional financing, component 4 will establish new pilot on service delivery mechanism (SDM) and health and nutrition co-responsibility cash transfer (H&N Cct). Including health and nutrition as well as economic inclusion interventions for beneficiaries is an essential step to increase beneficiaries' resilience to future shocks. MoLSA has proposed that the urban expansion test direct implementation modalities, a Health and Nutrition Co-Responsibility Cash Transfer and an Economic Inclusion intervention instead of the Unconditional Cash Transfer. This will likely necessitate a reallocation of funds allocated for the urban expansion from Component 1 to Component 3. This will allow the government to test strategic models which may allow for a future evolution of Baxnaano to a full-fledged national government managed Social Protection platform.

This will intervention will be related to (i) Provision of income support to ppor and vulnerable pregnant women and lactating mothers and young children contribution to their improved nutrition, (ii) Incentivize uptake of key health and nutrition services, (iii) to improve awareness on maternal and early child health and nutrition and promote behavioral change.

1.3 Project Beneficiaries

44. The SNHCP is expected to target 200,000 poor and vulnerable households (approximately 1.2 million individuals) across the FMS with nutrition-linked cash transfers. Targeting of beneficiaries will be conducted in three stages: (a) selection of districts initial 25 benefiting districts, (b) selection of communities in the targeted districts, and (c) selection of households in the identified communities based on the household eligibility criteria through a community-based targeting (CBT) approach.

A first AF (P176368) approved on June 17, 2021, increased the duration of Baxnaano support for the same beneficiary cohort to ensure that efforts at improving human capital could be maintained. A second AF (P178730 approved on June 22, 2022, supported a response to the urgent food security needs of poor and vulnerable populations affected by the prevailing drought crisis which began in late 2021, further increased the duration of Baxnaano support for the enrolled beneficiary cohort, and provided support to expand Baxnaano support to beneficiaries in urban areas with a focus on Banadir Regional Administration

1.4 Project Implementation Arrangements

MoLSA would be the primary institutional home for the SNHCP and responsible for project implementation. The SNHCP would be implemented through MoLSA's existing structures, supported by the PIU, as described in Component 3. The Social Protection section of MoLSA would be responsible for the day-to-day management of the project and will report to the Minister of Labor and Social Affairs

Further, Implementation of Component 1 is supported by WFP who was contracted by MoLSA under a service contract arrangement to deliver nutrition-linked cash transfer. To enhance the visibility of the role of FGS in delivering assistance to its people, WFP will make clear that this is a government project through its sensitization and communication to communities and the general public. Additionally, the World Food Programme (WFP) and the United Nations Children's Fund (UNICEF), has been supporting MoLSA to build internal capacity and develop its own delivery systems, to enable transitioning to direct implementation by MoLSA.

1.5 Environment and Social Management Framework

The objective of the ESMF is to provide a framework for effective management of the environmental and social issues and the impacts that are likely to emerge during implementation of Shock Responsive Safety Net for Human Capital Project (SNHCP-P181469). The ESMF will identify potential risks and impacts and mitigation measures as per the World Bank's Environmental and Social Framework. The ESMF also includes standalone sub plans including; Labor Management Procedures (LMP), Sexual Exploitation, Abuse and Harassment Prevention

ESMF – SNHCP

Plan (SEAH), Stakeholder Engagement Plan (SEP) Updated, Project Grievance Redress Mechanisms (GRMs) and separate Security Risks Assessment Management Framework (SRAMF).

The principal objective of the ESMF is to assess and mitigate potential environmental and social (E&S) risks and impacts of the Project as per the requirements of the World Bank’s Environmental and Social Framework (ESF)² as well as the regulations established by the FGS. Specifically, the ESMF will help the FGS, FMS, Somaliland and partners to:

- i. Assess the potential Environment and Social E&S risks and impacts of the Shock Responsive Safety Net for Human Capital Project and propose appropriate and effective mitigation measures;
- ii. Establish procedures for screening of Environmental and Social risks, as well as recommend steps for review, approval, and implementation of activities;
- iii. Specify appropriate roles and responsibilities of the Ministry of Labor and Social Affairs (MoLSA), and its partners including World Food Program (WFP), United Nations Children Fund (UNICEF) and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities;
- iv. Identify the training and capacity building needed by the agencies and partners of the Federal Government of Somalia (FGS) to successfully implement the provisions of the Environment and Social Management Framework (ESMF)
- v. Outline the mechanism for public consultations and disclosure of project documents as well as redress of possible grievances; and
- vi. Establish the budget requirements for implementation of the ESMF and the related instruments, which are specified in this ESMF.

1.6 Approach and Methodology

1.6.1 Literature Review

The main documents that were reviewed during preparation of the ESMF are listed below.

- i. Shock Responsive Safety Net for Human Capital Project, Project Paper April 19, 2022
- ii. Additional Financing Appraisal Environmental and Social Review Summary, May 5, 2022
- iii. Shock Responsive Safety Net for Human Capital Project, Stakeholder Engagement Plan (SEP), Updated September 2023
- iv. Shock Responsive Safety Net for Human Capital Project, Social Management Plan (SMP), Updated March 2023

² The Environmental and Social Framework (ESF) enables the World Bank and Borrowers to better manage environmental and social risks of projects and to improve development outcomes. The ESF offers broad and systematic coverage of environmental and social risks. It makes important advances in areas such as transparency, non-discrimination, public participation, and accountability—including expanded roles for grievance mechanisms. More details on this Framework is available at <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>.

ESMF – SNHCP

- v. Shock Responsive Safety Net for Human Capital Project, Security Risk Management Review
- vi. Shock Responsive Safety Net for Human Capital Project, Security Risk Management (SRM) Gap Analysis,
- vii. Environmental and Social Management Framework Somalia COVID-19 Emergency Vaccination Project (P176956)
- viii. World Bank Environmental, Health, and Safety General Guidelines 2007

1.6.2 Preparation of ESMF

Preparation of the ESMF included the following stages:

- i. Review of relevant Federal Government of Somalia (FGS) and Federal Member States (FMS) Legal, Policy and Institutional frameworks
- ii. Identification of positive and negative environmental and social impacts of the proposed project components.
- iii. Identification of applicable environmental and social mitigation measures;
- iv. Preparation of tools and templates to be used during screening, assessing and mitigating environment and social risks.
- v. Formulation of applicable environmental and social management and monitoring plans.

1.6.3 Stakeholder Consultations

The engagements and consultation on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including; Ministry of Labour and Social Affairs, United Nations World Food Programme (WFP), Ministry of Finance, Ministry of Labour & Social Affairs (MoLSA), Ministry of Planning and Economic Development, United Nations World Food Programme (WFP), United Nations Children’s Fund (UNICEF), United Nations Food and Agricultural Organization, (FAO). The consultations happened from June 2019 to September 2023 as detailed in the Stakeholder Engagement Plan prepared for the project. The issues raised and concerns expressed including possible mechanisms of addressing these issues and concerns are summarized in Table 7.2 of this ESMF.

2 DESCRIPTION OF ADMINISTRATIVE, LEGAL AND POLICY FRAMEWORKS

2.1 National Regulatory and Policy Framework

2.1.1 *The Provisional Constitution of the Federal Republic of Somalia*

The key legal instrument for the management of environmental and social risks in Somalia is the *Provisional Constitution*, and especially Article 25 (“Environment”), Article 43 (“Land”), Article 44 (“Natural Resources”) and Article 45 (“Environment”). Article 25 of the Constitution states that “[every Somali] has the right to an environment that is not harmful to their health and well-being, and to be protected from pollution and harmful materials.” The article proceeds to declare that “[every Somali] has the right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of these natural resources.”

Article 45 (in Chapter 3 – “Land, Property and Environment”) exhorts “all people in ... Somalia” to “participate in the development, execution, management, conservation and protection of the natural resources and environment.” Article 43, on its part, provides guidelines on environmental and social risk management that can be observed. However, there is a dearth of sufficient environmental or social safeguards in terms of legislated and or drafted regulations. The Article also affirms that the federal government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem.

Additionally, Article 12 of the Constitution addresses issues of application of fundamental rights. Further, the Provisional Constitution has made commitments on women’s empowerment and gender mainstreaming. Article 15 (1, 2, 4) together with Article 24(5) of the Constitution provides for the protection of women against all forms of violence and provides for protection from sexual abuse, segregation, and discrimination. Article 15 prohibits Female Genital Mutilation (FGM).

Article 11 (1) together with sub article (3) respectively provides that all citizens have equal rights regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall have equal rights and duties before the law, and that the State must not discriminate against any person on the basis of age, race, colour, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth. Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose, while Article 24 (5) prohibits sexual abuse in the workplace. The Puntland Sexual Offences Act 2016 prohibits sexual harassment.

Article 24 – Labor Relations: Every person has the right to fair labor relations. All workers, particularly women, have a special right of protection from sexual abuse, segregation and

ESMF – SNHCP

discrimination in the workplace. And, every labor law and practice shall comply with gender equality in the workplace.

Article 111J – The Office of the Ombudsman: The office is protected against interference from any other person or entity. As such, independence, integrity and effective service delivery are also maintained. The Ombudsman shall: (i) Investigate complaints against government workers regarding: allegations/ outright violations concerning basic rights and freedom, abuse of power, unfair behavior, mercilessness, lack of clemency, indiscipline or disrespect, corruptive act, illegal behavior, or those that could lead to mischief or injustice; (ii) Investigate complaints in relation to the activities of the Public Service Commission and other administrative institutions of the government, including defense and police forces that could lead to unequal services, unfair recruitment, or administration; (iii) Take appropriate steps to rectify or change items mentioned in earlier clauses through a fair, and appropriate process of consultations and sacrifices among the people concerned; (iv) Report on the complaints and issues raised and submit to the head of the offender; (v) Forward cases to the Attorney General and bring them before a court, as appropriate.

2.1.2 Legislation and Policies on the Environment and Social Sectors

Somalia National Environment Policy: The Somali Cabinet, on February 13, 2020, approved the National Environmental Policy. The stated goal of environmental policy is to improve the health and quality of life of the Somali people. The development of this policy was backstopped by the Global Environment Facility (GEF) and the United Nations Development Program (UNDP). This is the first time that an environmental policy has been developed and taken to Cabinet level for approval, since the collapse of the previous central administration in 1991.

In November 2020, an *Environmental Impact Assessment Bill* was approved by the Somali cabinet and sent to parliament for ratification. The Directorate is also the operational focal point for multilateral environmental agreements and funds, such as GEF, and Green Climate Fund (GCF). It is also tasked with conducting Sectoral Environmental Assessments, Environmental Impact Assessments (EIAs) and EAs, although at present there is no enabling legislation or regulations in place, other than the aforementioned Impact Assessment Bill.

Environmental and Social Impact Assessment Regulations of 2021 (draft). The Somali authorities have since moved to give effect to the aforementioned Environmental Assessment Bill of 2020. As of March 2021, the Directorate of Environment and Climate Change has published draft environmental and social impact assessment (ESIA) regulations. These regulations will need to be adhered to by the contractors working for the COVID-19 Project.

Occupational Safety and Health. Legislation on OSH in Somalia is limited, with the labor code known as Act No. 31 of 2004: Private Sector Act³ as the main reference on OHS issues. This law

³ Referred to in Somali as “Wax ka Bedelka iyo Kaabista Xeerka Shaqaalaha Rayidka (Xeer Lam 32/2004)”

ESMF – SNHCP

addresses hours of work, holidays and rest periods, employees' pay and emoluments, contracts, recruitment procedures, etc., but does not directly address OHS concerns. Instead, the Labor Code establishes the general rights, duties and responsibilities of the parties of labor relations, as well as conditions for ensuring the safety and health of workers.

The revised *draft Somalia Labor Code*⁴ has more emphasis on OSH requirements. It makes the Director of OSH responsible for the registration of hazards and risks, regulation and supervision of all workplaces and monitoring or enforcing compliance with the Labor Code and any other labor law to the extent that they regulate safety, health and welfare in the workplaces. Part VI of the Revised Draft Labor Code covers the administration of occupational accidents, injury and disease provisions at workplace, employer's general duties towards to OSH, insurance requirements, employees' general duties, medical support, compensations, offenses, and penalties, etc.

The Labor Code covers protection against risks to workers, notification procedures in occupational accidents, medical requirements at site and conveyance of injured workers to hospitals, among others. Below is the list of relevant provisions of the Labor Code with regard to OHS.

2.1.3 The Somali Labor Code

The *Labor Code of 1972* stipulates that all employment contracts must include provisions on: a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent Labor Inspector for pre-approval. With regards to OHS standards, the employer is obligated to provide adequate measures for health and safety, protecting staff against related risks, including provision of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.

The Code further stipulates that workers have the right to submit complaints and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory with regard to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week. Some work is considered dangerous and unhealthy, and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weights or working at night. More details on the labor code are provided in the updated LMP for this Project.

The Labor Code further forbids work for children below the age of 12 but allows employment of children between the ages of 12-15, but employment has to be compatible with proper protection, health and the moral of children. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of

⁴ Under development in a process that includes the International Labor Organisation

association. Workers are allowed to join trade unions. Further, the Labor Code stipulates the right to equal pay for the same work and women are entitled to 14 weeks of maternity leave at half pay.

The *Somali Penal Code of 1962* criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that ‘carnal intercourse’ and ‘acts of lust committed with violence’ are punishable with 5-15 years and 1-5 years of imprisonment, respectively. Abduction for the purpose of lust or marriage is prohibited under Art 401. The *Family Code of 1975* sets the minimum age for marriage at 18 years for males and females. Females between the age of 16 and 18 can marry with their guardian’s consent. Marriage is based on equal rights and duties.

2.1.4 Legislation and Policies for the Health Sector

Somalia also developed Immunization Policy 2020 – which provides strategic guidance on vaccine quality, target population, administration of vaccines, ensuring safe injections, immunization service delivery strategies, cold chain and vaccine management, roles and responsibilities of health workers and vaccinators, social mobilization, immunization data management, among others.

The *National Health Sector Strategic Plan (HSSP-II 2017-2021)*: The Strategy is based on nine building blocks. It prioritizes governance and leadership, followed by human resources, services delivery, health financing, pharmaceuticals and medical technology, health intelligence and information system, social determinants of health, emergency preparedness and response, and health infrastructure. The project will also apply the strategic guidance of the third phase of the health sector strategic plan (HSSP-III 2022-2026).

The HSSP II takes a pragmatic approach to the provision of Essential Package of Health Services (EPHS) including community-based health services across the FMS/BRAs and Regions of Somalia. However, implementation is limited to some regions; due to funding limitations and insecurity. The package is largely implemented by NGOs with emergency support from humanitarian partners. It is also continuously updated, with the priority to consolidate and scale-up essential health services in all areas, where access and security permits.

The plan provides a framework for future health programs to work within, expanding access to quality services, encouraging better targeting of disease specific programs, in coordination with government’s strategic priorities, and more effective use of external support. The HSSP-II has set a target of developing and/or adopting the following health sector policy and legal frameworks by 2021: Public Health Act; Drug Policy – already developed and endorsed; Drug Act – the draft bill has been submitted to the parliament – pending for approval; Health Policy – the last one developed was in 2014; Health Regulatory Framework: National Health Professional Act was developed and signed by the President – currently in force; WATSAN and Environmental Health Policy and Strategy – this has been developed and endorsed; as well as Community Health Strategy, which was developed in 2015.

ESMF – SNHCP

Although poorly managed at the national level, the FMoH is currently revising the EPHS, with the aim of delivering health services through a five-tiered system: National/Regional hospitals; Referral Health Centers; Health Centers, Primary Health Units; and community-based health workers. Most services comprise of basic PHC and outpatient services and cater to women and children. Public sector service points are often managed, financed and at least partially staffed by employees of international and/or national NGOs and community-based organizations (CBOs).

2.2 Institutional Capacity for Environmental Management in FGS

The institutional basis for improving the management of environmental risks in projects in Somalia is being established. The Environmental Management and Coordination Bill is currently being reviewed by the Somali Parliament. The House of the People approved the Bill in March 2023 and further reviews by the Senate are expected in May 2023, during the next parliamentary session. Once enacted, the Environmental Management and Coordination Act is expected to improve environmental governance and intergovernmental cooperation, as well as lay a foundation for undertaking environmental and social impact assessments in the country. The procedures for environmental and social impact assessments have already been elaborated in regulations that have been issued by the Ministry of Environment and Climate Change (MoECC).

The MoECC has commenced negotiations with departments and ministries in charge of the environment from the various Federal Member States, with a view of sharing responsibilities for managing environmental issues, including licensing procedures for development projects. Furthermore, an institutional capacity and structural assessment of the MoECC is underway with the support of the World Bank and the United Nations Environment Program. The statutory mandate for national environmental management in lies with the Ministry of Environment and Climate Change (MoECC). It is mandated to draft relevant policies and legislation, including establishing of the Environmental Quality Standards, and Sectoral Environmental Assessments, Environmental Impact Assessments (EIA).

Laws on environmental governance in South West Somalia (SWS), Jubaland and Hirshabelle are at infancy stages and environmental impact assessment capacity are nascent. Environmental decision-making arrangements includes the FGS signing international conventions, and parliament approving Environmental Acts and Laws. However, necessary laws have not been formulated yet.

Ministries have passed regulations on Environmental and Social Impact Assessments (ESIAs). The State Ministries of Environment are to be consulted before any infrastructure activities in their respective state with potential environmental and social risks and impacts. The Ministries are mandated to supervise all matters relating to the environment. They are mandated to review and approve ESIAs and RAPs. Some States, such as South West State and Jubaland, have Land Authorities, which are responsible for land adjudication matters. For the project implementation, this project will rely fully on World Bank ESS.

2.3 World Bank Environmental, Health, and Safety General Guidelines

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. The General EHS Guidelines are organized as summarized in Box below.

Environmental	<ul style="list-style-type: none"> • Air Emissions and Ambient Air Quality • Energy Conservation • Wastewater and Ambient Water Quality • Water Conservation • Hazardous Materials Management • Waste Management • Noise • Contaminated Land
Occupational Health and Safety	<ul style="list-style-type: none"> • General Facility Design and Operation • Communication and Training • Physical Hazards • Chemical Hazards • Biological Hazards • Radiological Hazards • Personal Protective Equipment (PPE) • Special Hazard Environments • Monitoring
Community Health and Safety	<ul style="list-style-type: none"> • Water Quality and Availability • Structural Safety of Project Infrastructure • Life and Fire Safety (L&FS) • Traffic Safety • Transport of Hazardous Materials • Disease Prevention • Emergency Preparedness and Response
Construction and Decommissioning	<ul style="list-style-type: none"> • Environment • Occupational Health & Safety • Community Health & Safety

These General EHS Guidelines will be applied in addition to other guidelines as discussed in this chapter with the aim of mitigation various environmental and social impacts that area likely to be triggered by the Project.

2.4 World Bank Environmental and Social Standards (ESS)

The World Bank's Environmental and Social Framework (ESF) requires the Bank and Borrowers to better manage environmental and social risks and impacts of projects and to improve development outcomes. SNHCP is therefore subject to the World Bank ESF requirement. 8 of the 10 Environmental and Social Standards (ESSs) apply to the project. The ESS applicable to the project are

2.4.1 ESS1: Assessment and Management of Environmental and Social Risks and Impacts

The Project is expected to have moderate environmental risks and moderate social risks and impacts. For environment, there are Moderate risks related to generation of e-waste. In this third additional financing, component 4 will establish new pilot on service delivery mechanism (SDM) and health and nutrition co-responsibility cash transfer (H&N Cct), these could be associated with medical wastes which require to be managed in a proper manner because of hazardous nature of such wastes.

Key social risks relate to exclusion of the target population and particularly poor, vulnerable and minority women from project benefits and remoteness and other security risks that restrict access to areas in Somalia for effective stakeholder engagement, community participation and grievance redress. This is further exacerbated by security risks which pose a risk to project workers and beneficiary communities. All these make effective stakeholder engagement and community participation very challenging hence heightening the risk of exclusion. As such, the challenges of ensuring project benefits reach vulnerable community members (such as minorities, people with disabilities, or widows) project are amplified. This also includes risks related to data protection.

These risks have been mitigated largely through the partnership with WFP for the delivery of cash using mobile money. WFP has strong procedures and arrangements in place to identify and manage data protection and insecurity risks. Further, the selection of the original project locations where the AF will operate only included relatively stable and accessible area. The use of mobile money also helps to mitigate risks related to payment delivery as well as possible capture of cash assistance.

In addition, robust community participation and sustained information dissemination helps provide another layer of risk mitigation. The WFP guidelines for community participation (adapted by the Project) in targeting uses a community driven process for identifying vulnerable people at risk of exclusion. To monitor the application and effectiveness of the targeting process WFP carries out its own monitoring or uses a monitoring contractor as needed.

ESMF – SNHCP

There are risks that contextual gender dynamics can be restrictive for women leading to exacerbation of GBV and SEA/SH where registration for cash transfers is exchanged for sexual favors with systemic weakness making it difficult to effectively respond to these risks and impacts. In mitigation, the existing operation has an already established and adequate Grievance Redress Mechanism (GRM) and other mechanisms to respond to GBV incidents due to project activities. In addition, WFP's established systems and capacities will continue to be utilized to mitigate risks related to systemic weaknesses, including on monitoring of implementation of mitigation measures, while MoLSA continues to strengthen its safeguards capacities. The use of mobile payment platforms significantly protects beneficiaries from exposure to SEA-H and security risks. This is further addressed by faithful application of the targeting criteria and periodic evaluation of intrahousehold dynamics including in Somalia seeking to better observe and understand this effect. In addition, WFP has developed a robust and multitiered monitoring system including a hotline for anonymous reports. Where offenders are individuals, they are dismissed, or where the problem is systemic, contracts with implementing partners may be terminated and the matter is addressed with local authorities. The small amount of the cash transfer (\$20 per month) is also seen as a mitigation measure for this effect.

2.4.2 ESS2: Labor and Working Conditions

ESS2 Labor and Working Conditions Project applies to direct project workers, contracted workers including WFP contracted WFP partners (mainly NGOs) and primary supply workers. To ensure recruitment and management of labour on the Project is in accordance with ESS2, the LMP is currently under implementation. The LMP ensures that both the PIU and the contracted primary suppliers observe safety and health at work and promote fair treatment, non-discrimination and equal opportunity for project workers including vulnerable workers such as women, persons with disabilities, the elderly and youth as appropriate.

The LMP also lays down provisions for the prevention of all forms of forced labor and child labor and to provide project workers with accessible means to raise workplace concerns. Project workers grievances are handled using a separate mechanism via the GRM/Social Risk Management Specialist at the MoLSA PIU. The GRM is also adapted to uptake complaints and grievances related to GBV and SEA/SH from project workers.

2.4.3 ESS 3: Resource Efficiency and Pollution Prevention and Management

While Component 3, will generate some e-waste through the purchase of computers for the FGS, the amount produced is likely to be minimal, further minimal medical wastes could be associated with health and nutrition co-responsibility proposed under third AF under component 4. The Project will ensure that any e-waste generated from project funding is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers in the country or in

neighbouring countries as applicable. Procedures for collection, sorting and recycling have been detailed in the Project Operations Manual (POM).

2.4.4 ESS4: Community Health and Safety

Key risks and impacts for community health and safety relate to GBV and SEA/SH and security, risks during the occasional project outreach activities. The targeting of women and children as beneficiaries necessitates the management of GBV risks. The exchange of sexual favors for registration or transfer of funds, or spousal abuse, are key risks. To mitigate these risk the Project has developed and is implementing measures and actions to assess and manage such risks. The GBV Action Plan included in the SMP includes measures for minimizing GBV and SEA/SH including outreach to local communities.

Conflict and insecurity remain persistent challenges in Somalia and have, in the past, impeded delivery of drought relief services. Somalia is currently in a period of unusually high political turbulence, revolving around management of parliamentary and presidential elections. This is in the context of widespread security uncertainties and geographical control of parts of the country by militias of different provenance. Ensuring security for project operations amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the drought, will remain a significant challenge.

This general insecurity may impact both the Project workers and beneficiaries. In mitigation, the Project will continue to operate in relatively permissive parts of the country, with security of operations and access to site for monitoring and supervision key criteria in the selection of districts for support. Further, the choice of WFP as key implementing partners provides the Project access to the United Nations Department of Safety and Security (UNDSS) and local capacity for identifying and managing security threats to operations. UNDSS provides overarching security for all UN agencies. Moreover, the WFP agreements with service providers contain a contractual obligation for the service provider and any contracted security to uphold humanitarian principles such as “do no harm” and to protect beneficiaries (from violence, exploitation and abuse). They also contain an obligation to ensure the security of their own personnel or workers by implementing appropriate risk prevention and mitigation strategies to reduce the likelihood of a harmful event occurring and to mitigate the impact of a security event if it were to occur. WFP’s Safe Distribution Guidelines outline their requirements and provide training to contracted entities in their use.

The SecMP under the SMP is in place, further as part of Third AF, a Security Risk Assessment Management Framework (SRAMF) has been prepared. The instruments outlines measures for screening and assessment of the deployment of armed security, guided by principles of proportionality and good international industry practice, and by applicable law and rules of conduct, training, equipping, and monitoring of such security workers. They also assigns responsibility for

ESMF – SNHCP

security planning and evacuation procedures, pre and post distribution security measures, and training and coordination with the FGS.

2.4.5 ESS10: Stakeholder Engagement and Information Disclosure

The updated SEP details (i) stakeholder identification and analysis; (ii) planning for stakeholder engagement; (iii) consultations and disclosures; (iv) communication and sensitization campaigns; (v) participatory citizen engagements and, (vi) grievance redressal systems. Stakeholders consulted for the AF are Ministry of Finance, MoLSA, Ministry of Planning and Economic Development, WFP, UNICEF, Food and Agriculture Organization (FAO) and other development partners. The Project has also been consulting with female beneficiaries, female non-beneficiaries in the Project area, alternate caregivers, beneficiary households, male community members, adjacent communities, and Vulnerable Members of the community (widows, disabled, single women) including minorities, local leaders and local government.

The existing GRM would continue. The GRM makes use of a WFP hotline where complaints are registered and a mechanism for follow up and redress is recorded and reported. Complaints are classified according to their risk level (high, medium, low and residual risk) and are captured in a WFP online case management software. In case of reports of conflict of interest, abuse of power or harassment by project staff, cases are escalated through the Risk Management and Compliance Officer. Reports of sexual exploitation and sexual harassment will be referred to WFP SEA/SH focal points who have appropriate response pathways in place. The hotline covers all WFP operations in Somalia and as such will resolve complaints about WFP staff, contractors, sub-contractors, and anyone else associated with their operations. The SEP also draws upon on the experience and expertise of the contracted cooperating partners who have a sound understanding of the local context and have existing implementing systems.

2.4.6 Legal Gap Analysis

Table 2-1 below summarizes a comparison focusing on the World Bank Environment and Social Standards relevant to the project and gaps identified in existing FGS laws and regulation

Table 2-1: GAP analysis for WB and FGS (Somalia) / Somaliland Polices, Laws & regulations relevant to this ESMF

ESF Objectives	National Laws and Requirements	Gaps	Recommended Actions
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts			
<p>Objectives of ESS 1 are:</p> <p>To identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs.</p> <p>To adopt a mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigated; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.</p> <p>To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project.</p> <p>To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate.</p> <p>To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.</p>	<p>Provisional Constitution of the Federal Republic of Somalia. Article 12 of the Constitution addresses public assets and natural resources.</p> <p>Article 12 of the Constitution of Somaliland addresses Public Assets, Natural Resources and Indigenous Production with the following key provision. The land is a public property commonly owned by the nation, and the state is responsible for it.</p> <p>2. The care and safeguarding of property, endowments and public assets is the responsibility of the state and all citizens; and shall be determined by law.</p> <p>4: Every person shall have the duty to care for, protect and save the environment</p> <p>Article 43 provides guidelines on environmental and social safeguards that can be observed.</p>	<p>National Environmental Policy which was approved by the Cabinet on February 13, 2020.</p> <p>The National Environmental Act has been drafted and was approved by the Cabinet on 12 May 2022 28 November 26, 2020 and recently approved (March 8) by the Lower House of Parliament.</p> <p>ESIAs are now a requirement under the Somalia Environmental and Social Impact Regulations of 2022.</p>	<p>This ESMF lays out a screening process of all sub projects and activities in order to assess whether activities require environmental and social assessments.</p> <p>In the case of SNHCP, procedures for management of potential e-wastes and medical wastes have been annexed to this report</p>
ESS 2: Labor and Working Conditions			
<p>The Objectives of ESS 2 are:</p> <p>To promote safety and health at work.</p>	<p>Provisional Constitution of the Federal Republic of Somalia. Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labor for any purpose.</p>	<p>Although currently in force, the Labor Code (1972) is being reviewed to bring it in line with the Provisional Constitution and International Labor Organization</p>	<p>The Project will fully comply with WB ESS 2. This is set out in the LMP (See LMP presented separately as part of the ESMF)</p>

<p>To promote the fair treatment, non-discrimination and equal opportunity of project workers.</p> <p>To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</p> <p>To prevent the use of all forms of forced labor and child labor.</p> <p>To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.</p> <p>To provide project workers with accessible means to raise workplace concerns.</p>	<p>The Labor Code of Somalia (Law Number 65, adopted in 1972) governs all aspects of labor and working conditions, covering the contract of employment, terms and condition, remuneration, and occupational health and safety, trade unions, establishing labor authorities, and maternity leave</p> <p>Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labor law and practice shall comply with gender equality in the work place</p> <p>The Labor Code of 1972. The employer is obligated to provide adequate measures for health & safety protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances</p>	<p>(ILO) conventions that are in force in Somalia</p> <p>The Federal Ministry of Labor and Social Affairs is currently reviewing the Labor Code (1972) with support from the ILO. The revised draft Labor Code was finalized in a workshop in February 2019 by representatives from various Federal ministries, all Federal Member States, employers, workers, and academia. It currently awaits Parliamentary approval. The Labor Code (1972) continues to be applicable until the revised code becomes the law</p>	<p>The LMP spells out a workers' grievance redress mechanism; and the GBV Action Plan provides referral pathways for cases of GBV</p> <p>The Project will apply occupational health and safety management system that is consistent with the WBG General Environmental Health and Safety Guidelines (EHSGs) on Occupational Health and Safety</p>
<p>ESS 3: Resource Efficiency and Pollution Prevention and Management</p>			

<p>The Objectives of ESS 3 are:</p> <p>To promote the sustainable use of resources, including energy, water and raw materials.</p> <p>To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.</p> <p>To avoid or minimize project-related emissions of short and long-lived climate pollutants.</p> <p>To avoid or minimize generation of hazardous and non-hazardous waste.</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia.</u> Somalia passed its Provisional Constitution in 2012. Article 12 of the Constitution addresses public assets and natural resources.</p> <p>Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials.</p> <p>Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation</p> <p>Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem</p>	<p>Laws in support of the Constitution are still not available. Implementation of the laws and Constitution may be hampered due to the weak justice system. However the country has drafted strategies and action plans such as the Somalia’s National Biodiversity Strategy And Action Plan (NBSAP), 2015, The strategy aims to establish understanding of drivers of biodiversity degradation, many of which are shared with climate vulnerability, and to devise response measures</p>	<p>The Project will promote the sustainable use of resources and avoid or minimize adverse impacts on human health according to the Constitution and the WB’s ESS3.</p> <p>Detailed procedures on management of E-wastes and Medical wastes are annexed to this ESMF</p>
<p>ESS 4: Community Health and Safety</p>			

<p>The Objectives of ESS 4 are:</p> <p>To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.</p> <p>To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.</p> <p>To have in place effective measures to address emergency events.</p> <p>To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p> <p>To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure,</p>	<p><u>The Somali Penal Code of 1962.</u></p> <p>The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that ‘carnal intercourse’ and ‘acts of lust omitted with violence’ are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the purpose of lust or marriage is prohibited under Art 401.</p> <p>Art 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Article 33 provides that when a superior officer orders the commission of an offence both the perpetrator and his superior will be liable</p>	<p>The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and gender based violence</p> <p>Furthermore, in practice however it has been documented that women complaining about a rape may find themselves trapped by the Article 426 prohibition against adultery that makes no exception for the case of rape.</p> <p>In practice provisions under Art 39(i) offer little more than theoretical protection</p>	<p>Although the Project aims to improve the lives of previously affected communities, it needs to be ensured that Project activities do not pose any unintended negative consequences on communities, for example through increased GBV incidents. A GBV/SEAH Response Plan will be prepared, consulted upon, approved and implemented. The Project will also implement a Security Management Plan, and activity-specific ESMPs as required according to the level of social and environmental risks.</p>
<p>ESS 10: Stakeholder Engagement and Information Disclosure</p>			
<p>The Objectives of ESS 10 are:</p> <p>To establish a systematic approach to Stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.</p> <p>To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance.</p> <p>To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.</p> <p>To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely,</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia.</u></p> <p>Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information</p>	<p>The law on the right 20 public access to information currently only exists as a draft</p>	<p>The Project will implement stakeholder consultations throughout the lifetime of the project, as per the SNHCP and Information Disclosure provisions in the SEP/ESS 10</p> <p>The PIU at MoLSA will ensure that a grievance mechanism for the project is in place, in accordance with ESS10 as early as possible in project development to address concerns from project affected persons</p>

<p>understandable, accessible and appropriate manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.</p>			
--	--	--	--

3 ENVIRONMENTAL AND SOCIAL BASELINE

3.1 Biophysical Baseline

Location: Somalia is located in the Horn of Africa where it lies between latitudes 2°S and 12°N, and longitudes 41° and 52°E. The country is bordered by Djibouti to the northwest, Kenya to the southwest, the Gulf of Aden to the north, Indian Ocean to the east, and Ethiopia to the west. Somalia has an area of 637,655 km² and a coastline of 3,300 km, the longest in mainland Africa, 1,300 km of which is on the Gulf of Aden and the other 2,000 km on the Indian Ocean. The country stretches for almost 1,550 km from north to south as shown in **Figure 3-1** below.

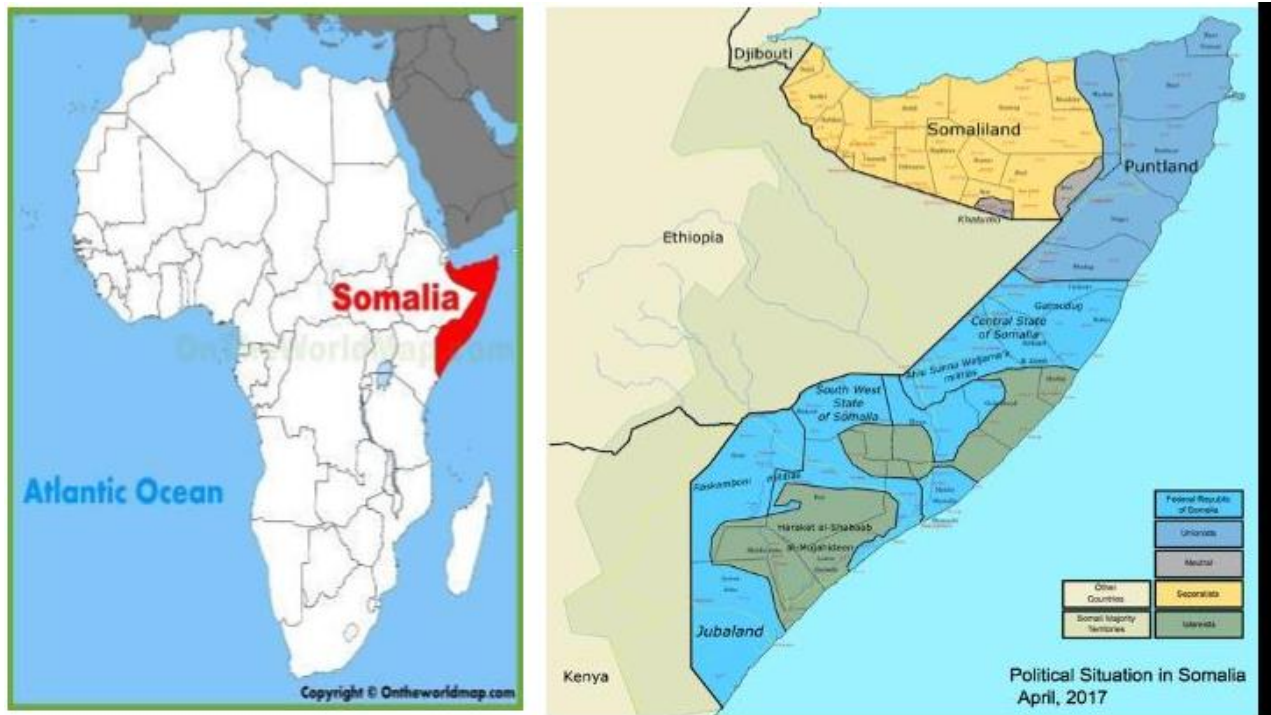


Figure 3-1: Map of Somalia: Source: <https://www.google.com/search?q=Somalia+Atlas+Map>

Climate Change: Climate is the primary determinant for Somali life. Climate projections for Somalia generally show that Somalia will experience higher average air temperatures and more frequent “very hot” days until 2080. Depending on the Representative Concentration Pathways scenario adopted, temperature in Somalia may rise between 1.4–1.9 °C by 2030, 1.5–2.3 °C by 2050 and 1.4 –3.4 °C by 2080 compared to pre-industrial levels, with coastal regions being less affected than the rest of the country. The annual number of very hot days (with daily maximum temperature above 35 °C) is projected to increase with high certainty all over Somalia, with central Somalia being particularly affected. Higher exposure to heatwaves will very likely lead to an increase in heat-related mortality for livestock. Heatwaves will also impact the Somali economy, and projected sea-level rise threatens the livelihoods of coastal communities, including those in the capital Mogadishu.

Lower-certainty projections show that precipitation over Somalia may increase in the long run (until 2080). There is no firm agreement on how strong and reliable this trend will be, but there is likelihood of high inter-annual variability in the amount of precipitation, with both wetter and drier years. The lower-certainty projections for precipitation, water availability, crop yields, ecosystems and floods point to, generally, increased levels of water availability for productive use potentially in agriculture and livestock sub-sectors, although the converse happening is a possibility. The IPCC Fifth Assessment report indicated that an increase in temperature of 0.8-1°C has already been observed in East Africa (including Somalia) with projected increase of 2 to 3°C by 2065. The IPCC report also notes that there is a probability of increase in precipitation for the larger East Africa region by 20 to 30 percent increase. There are, however, questions on the effectiveness of this enhanced level of precipitation, especially for agriculture and livestock husbandry, given the higher-level certainties of increase in temperatures, meaning that any gains in rainfall may be offset through evaporation.

Disaster Vulnerability: Somalia has been ranked as one of the most vulnerable countries and least prepared to deal with the effects climate change. Rainfall totals during the first half of the April to June *Gu* season are some of the highest on the 1981-2017 record, equivalent to between 130 and over 200 percent of average. The heavy rainfall marks the end of prolonged drought across much of the country and is supporting crop development and the regeneration of pasture and water resources. However, the heavy rainfall and subsequent flooding has also led to fatalities, massive displacement, and damage to infrastructure and cropland. Needs are expected to increase in displacement sites and riverine areas in the near term.

Topography: Somalia's terrain is mostly flat. The Guban plains that parallel the Gulf of Aden coast rise inward towards the rugged Karkaar mountain ranges whose elevation is between 1,800 meters and 2,407 metres above sea at Shimber Berris, the country's highest point⁵. Southward the mountains descend to the Ogo, an elevated plateau of broken mountain terrain and shallow plateau valleys. The Ogo gradually slopes toward the Indian Ocean and in central Somalia constitutes the Mudug Plain. At the eastern part of the plateau lies the Nugaal valley which has extensive network of intermittent seasonal watercourses. The western part of the Ogo slopes gently southward and gradually merges into the Haud region.

Soils and Geology: Key formations in Somalia include alluvium from the Pleistocene to Holocene period whose general characteristic show Older Pleistocene alluvial sediments and recent alluvium including sandy clay with lenses of sand and fine gravel to coarse gravels and boulders. In some parts are fine sands forming dunes and red soils and calcerites. Quaternary unconsolidated sediments are mostly found in the southern coast and the riverine areas of Southern Somalia. The North Eastern part of the country is dominated by tertiary sedimentary from the Eocene period. Mudug Formation in which the middle part of the Beledweyne-Galkayo Corridor is found comprises of marly and biogenic limestones, calcarenites and sandstones

Hydrology: Rivers Juba and Shabele are the main sources of surface water in Somalia as illustrated in **Figure 3-2** below. These two perennial rivers originate from the Ethiopian highlands in the north and flow southwards towards the Indian Ocean. The Juba-Shabelle basin, has a total area of 810 427 billion square meters, of which one third each is in Ethiopia, Kenya, and Somalia. The mean annual runoff at the border between Ethiopia and Somalia is 5.9 BCM for the Juba River at Luuq and 2.3 BCM for the Shabelle River at Beledweyne (AfDB, 2010 & FAO, 2005).

The Juba and the Shabelle, generate fertile floodplains, sustain essential agriculture and crop production, and supply Mogadishu with water. Ethiopia, Kenya and Somalia share the Juba–Shabelle river basin, with Somalia being the lower riparian. Both rivers emerge in the Ethiopian highlands and are Somalia’s only perennial rivers. Given the lack of rainfall in the downstream areas, these two rivers are highly dependent on precipitation in the Ethiopian highlands. The low rainfall downstream and also high evaporation and water withdrawal are reasons why both rivers lose discharge on their descent to the Indian Ocean. Increased dam building activities in Ethiopia affect the river system further⁵.

3.2 Social Economic Baseline

Population: The last official census of Somalia was in 1975, when the population was estimated at 3.2 million people. 2015 populations estimate by Food and Agricultural Organization (FAO) show a total population of 10,787,000 comprised of 6,388,000 (59%) rural and 4,399,000 (41%) urban⁶ Current estimates from the World Bank shows a total population of 14, 742,523⁷. At least 70 per cent of Somalia’s population is under the age of 30⁸.

Economic Profile: Somalia’s economy is largely consumption-based and dominated by agriculture, while it is also supported by remittances and large aid flows. Remittances and aid flows are estimated at USD 1.4 billion a year, which represents 29 per cent of Somalia’s GDP in 2018. Agriculture plays a key role by constituting 75 per cent of GDP, and 93 per cent of total exports. Other sectors driving growth are construction, telecommunications and money transfer services⁹.

⁵ Somalia Water and Land Information Management (SWALIM) and Food and Agriculture Organization of the United Nations (FAO), ‘The Juba and Shabelle rivers and their importance to Somalia’, 2016.

⁶ <http://www.fao.org/nr/water/aquastat/data/query/index.html?lang=en>

⁷ <https://data.worldbank.org/country/somalia>

⁸ <https://www.unicef.org/somalia/education.html>

⁹ Government of the Federal Republic of Somalia and the World Bank, Somalia. 2019 Flood Impact and Needs Assessment, February 2020, p. 18

Continued conflict and frequent natural disaster have contributed to significant poverty in Somalia. About 69 per cent of Somalis live below the poverty line. Poverty is thereby most acute among children youth, and IDPs, as well as persons living in rural areas¹⁰.

Somalia scores very low on UNDP's Human Development Index. Although it has not been ranked for a few years, different indicators reveal low scores. For example, life expectancy at birth lies at 57.1 years with a global average of 56 years¹¹ in low human development countries¹²; and the mortality rate under the age of 5 lies at 127 per 1000 live births¹³, while the global average is 39. Somalia's economy is built on pastoralism in which nearly 50% of the community participates (World Banks, 2006). Historical data from the 1980's shows agriculture generating 66% of the GDP and Livestock and livestock products accounting for 51% of the GDP (World Bank, 2006). The manufacturing sector generating less than 5% of the economy. Current figures from the World Bank¹⁴ shows the country's 2017 GDP as 7.369 billion USD. The country's economy is projected to grow at a rate of 3%-4%.

The food security situation has been worsened by the civil war and statelessness, and recurrent droughts, as farmers have lost access to agricultural inputs and services formerly provided by the state. The private sector has responded to a degree, but the lack of regulation might have led to misuse, and poor-quality control. While industry can provide an increasingly important contribution to economic growth, it will be, for the foreseeable future, second to pastoralism and agriculture.

Governance: The Provisional Constitution of Somalia established the Federal Government of Somalia as well as the legal framework for the formation of Federal Member States (FMS). The latter have a degree of autonomy over regional affairs and maintain their own police and security forces. Somalia is currently divided into six FMS, namely South West State of Somalia, Somaliland, Puntland, Jubaland, Hirshabelle and Galmudug. The Provisional Constitutions (Article 48) also acknowledges the local governments in Somalia, although levels of administration, fiscal autonomy and other issues still need to be determined. At the local government level, States are divided into administrative regions, which in turn are divided into districts. The Federal Parliament has the mandate to select the autonomous regional states. Legislature in 2014 established the Boundary and Federalization Commission for this purpose. States are further divided into Districts and Zones.

¹⁰ Government of the Federal Republic of Somalia and the World Bank, Somalia 2020, p. 18.

¹¹ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

¹² UNDP, Human Development Report 2019, p.38

¹³ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

¹⁴ <https://data.worldbank.org/indicator/NY.GDP.MKTP.CD>

Somalia has recovered from a long period of conflict and lawlessness and the country is now in the process of building public institutions. Many policies and laws being developed are geared towards the betterment of the socio-economic environment. Somalia has adopted federalism and currently comprises of five active Member States which are also building their government institutions. The country's security situation is poor with insurgents having control of many areas in the South of the country. These insurgents continue to spread insecurity, especially in Mogadishu, through suicide bombers. The country is developing its military capacity and aims to take over the provision of security in some parts of the country from African Union Mission in Somalia (AMISOM)

Displacement: At the end of 2018, Somalia had 2.6 million Internally Displaced Persons IDPs, due to both, disaster and conflict. Conflict and violence had thereby triggered 578,000 new displacements; and disasters 547,000¹⁵. During the famine in 2017, people dependent on livestock and agriculture had to abandon their rural homes to find new opportunities in urban areas. Drought conditions are contributing to already pronounced rates of acute and protracted displacement. More than 278,000 people have been displaced in March alone within Somalia due to the drought, bringing the total number to approximately 585,630 since December 2016¹⁶

Security and Conflict: Somalia has had a long history of civil war, which followed the Siad Barre regime that ended in 1991. Clan-based militias turned the country into chaos and prevented an effective central government for a long time. A Transitional Federal Government was formed in the early 2000s, which was succeeded by the internationally recognized Federal Government of Somalia, which was formed under Hassan Sheik as a President. In 2012, after the adoption of the Provisional Constitution, the first internationally recognized Federal Government of Somalia (FGS) came into power following more than two decades of civil war and transitional governance arrangements. With the new President, the federal state building process commenced¹⁷ under the framework of the distinct peacebuilding and state building goals of the New Deal/Compact, which was signed in September 2013. However, the last years have been dominated by political infights and clan-related tensions, including in the establishment of the FMS. This has worsened the security situation in Somalia significantly.

There is significant conflict at different levels in Somalia. Some insecurity stems from clan competition, which goes back into history and historical movements and power distribution. Often it is combined with localized competition over resources, for example over land or water sources.

¹⁵ Internal Displacement Monitoring Center, the Ripple Effect. Economic Impacts of Internal Displacement. Case Studies in Eswatini, Ethiopia, Kenya and Somalia, Thematic Series, January 2020, p. 30.

¹⁶ UNHCR, UN Habitat, IOM, JIRA and Local Ministries of Interior, IOM and The World Bank, 2017

¹⁷ Under the Federal Government of Somalia (FGS), the state level governments are Puntland State of Somalia, Jubaland State of Somalia, and two interim administrations, i.e. Galmudug State and the Interim South West Administration. Somaliland is a self-declared state. State formation is currently ongoing in the Hiraa and Middle Shabelle regions.

Such insecurity and conflict can be due to continued local tension between different communities, competition over sources of power, such as governmental positions, as well as competition over aid resources brought down to the state or district level.

The social impacts and potential aggravation of resource-related conflicts is well documented in a range of pastoralist and agro-pastoralist assessments carried out in the Somali region. Access to water and pasture is a fundamental source of both conflict and co-operation between clans and civil authorities throughout the Somali region. In terms of conflict, extensive trans-boundary movements of livestock and limited access to the combination of water and pasture is one of the primary drivers of conflict across the Horn of Africa and within Somalia. Long and well documented records of conflict and cooperation over access to water and pasture in pastoralism domain exists. Following decades of low investment in Somaliland and Puntland, water points with adequate surrounding pasture are especially scarce, claimed by clans, fiercely guarded and intrinsically linked to resource conflict.

The Islamist group Al-Shabaab still controls areas in South Central Somalia, providing harsh treatment, forced recruitment vis-à-vis the local populations. It infiltrates other areas and conducts deadly attacks on citizens. Most importantly, Al Shabaab has introduced a harsh tax system in its areas of control and beyond. It has also started to expand on other administrative functions, such as the provision of justice. Given the weakness of the formal justice system, people go to Al Shabaab courts, where swift justice and the execution of judgments is guaranteed. Al Shabaab remains as a key source of violence, attacking government facilities, personnel, security forces, and members of international organizations.

Vulnerability and Social Exclusion: Internal Displacement: In April 2020, OCHA report 2.6 million IDPs in Somalia¹⁸, due to disaster and conflict among other issues. Conflict and violence has triggered 578,000 new displacements; while the disasters have triggered 547,000 displacement;, half of these as a result of floods and the other half as a result of drought in the southern regions of Bay, Lower Shabelle and Bakool¹⁹," (Internal Displacement Monitoring Centre) 70 During the drought in 2017, people dependent on livestock and agriculture had to abandon their rural homes to find new opportunities, migrating predominantly to urban areas.

Drought conditions are contributing to already pronounced rates of acute and protracted displacement. More than 278,000 people have been displaced in March alone within Somalia due to the drought, bringing the total number to approximately 585,630 since December 2016⁷¹.

While data on the demographic profile of migrating populations is needed, it is likely these drought-related internal displacements may be from minority clans, who have lost assets including their homes, livestock, and livelihoods. Camps are heavily congested and have also proportionally

¹⁸ OCHA, Somalia Situation Report, 5 April 2020.

received the largest number of new arrivals¹⁹. Displaced women and girls are among the most vulnerable populations and face multiple constraints including lack of access to adequate shelter, livelihoods and access to critical resources, including land. The attendant separation of many women and girls from community and familial support structures, as well as from traditional livelihoods activities, also contributes to an increased reliance particularly of women on marginal, inconsistent and hazardous livelihood strategies, which often increases exposure to violence.

IDPs commonly settle in informal urban settlements, where access to services and conditions are poor, and where they often become victims of forced eviction. Conditions of displacement often compound existing conditions of vulnerability and poverty. They are therefore part of the poorest strata in Somalia, and are often in dire need of access to food, water, sanitation, health services, shelter and education²⁰

Following a recent survey, a move to urban centers comes with some improvements in health and education for IDPs, but also with reduced access to work and lower income. 61 percent of male IDPs claim that they had work and an income before displacement, in comparison to 40 per cent after displacement. However, members of the host communities state the opposite since the arrival of the IDPs – they now claim to suffer from less employment. The greatest loss affecting IDPs is the loss of secure housing.²¹ per cent of IDPs claimed to have owned a house before they were displaced. Some IDPs receive support from their families in the Diaspora. More than a third of IDPs report to receiving remittances from overseas of an average monthly value of 113 USD. However, IDPs often have less remittances than other Somalis, extending in part from the separation from social networks that would otherwise provide support. Only 7 percent of IDPs rely on remittances.²²

In view of education and health, IDPs generally report better access than before their displacement. IDPs generally appear to have better access to education. Access to schools was usually more challenging in their previous rural homes. Access to health care has slightly improved since IDPs left their rural homes. 25 per cent of IDPs state that they have better access to health care than previously, while 60 per cent state there is no change. However, there are also significant concerns about improper sanitation and the outbreak of diseases in IDP settlements. However, while this mostly applies to urban IDP, generally, the socio-economic and human development indicators for IDPs are worse than those of non-IDPs. While 7 in 10 Somalis are poor, over three in four IDPs live under 1.90 \$ per day.

¹⁹ JRIA 2016

²⁰ Internal Displacement Monitoring Center 2020, p. 30

²¹ The World Bank, Somali Poverty and Vulnerability Assessment, Findings from the Wave 2 of the Somali High Frequency Survey, April 2019, p.73

²² The World Bank, Somali Poverty and Vulnerability Assessment, Findings from the Wave 2 of the Somali High Frequency Survey, April 2019, p.73

Gender-Based Violence and Gender Dynamics. Differentiated social roles and responsibilities between men and women across livelihood systems have implications on the available mechanisms to cope and respond to external shocks such as drought. Sexual violence against women and girls in Somalia, an abominable crime less prevalent in Somalia pre-civil war history. .Recent figures show 76% of all recorded cases happen among the IDPs whereas 14% occur in the hosting communities. In the face of crisis, such as insecurity, drought or famine, men and women adopt different coping strategies to increase household resilience. . Preventing and combating sexual violence requires informed participatory not limited to education and awareness campaigns, safeguarding and robust reporting, effective law enforcement and judicial process which can furnish proportionate remedy and penalty.

Available economic opportunities, however, are still quite limited for both men and women and female-headed households remain among the most vulnerable populations. Unemployment rates remain particularly high for women, and especially female IDPs who often remain reliant on charity through social protection mechanisms and contributions from the diaspora in the form of remittances. Women who are engaged in income generating activities are often engaged in the informal sector and further bear the double domestic burden of earning an income and taking care of the home. The consequences of this burden often fall to girls in the family, who are expected to contribute to the maintenance of the home, often at the expense of girls' education and skills development.

Women representation in politics and governance bodies has remained scarce. Political power and authority are perceived as masculine spaces, and the few women who are included in politics mostly act through their husbands or other male family members. Analytical work on political economy in Somalia has shown that political power is deeply rooted in access to resources. Women's economic empowerment should therefore play a fundamental role in their rise in politics and decision-making spheres. However, to date no analysis has explored the links between economic empowerment initiatives and political empowerment, nor has rigorous political economy analysis been coupled with a gender analysis. At least 30 per cent of seats in the national Parliament are reserved for women; while women's representation in Parliament has improved in recent years, at 24 percent representation, this quota remains unmet.

While there is a lack of statistical data on the situation of women in Somalia, the available evidence shows that Somali women are still far from enjoying equal rights and treatment. The Social Institutions & Gender Index for 2014 places Somalia on the 6th lowest position in the world, with 'very high' discriminatory family codes, 'very high' levels of restricted physical integrity, and a 'very high' level of restricted resources and assets²³. Lack of access to services, such as education

²³ OECD Development Center, Social Institutions and Gender Index, 2014, accessed at: http://genderindex.org/ranking?order=field_sigi_value14_value&sort=asc

and health, or lack of access to agricultural production or other livelihoods and employment opportunities have kept most of the female population of Somalia disempowered.

Youth as a Vulnerable Group: According to UNFPA, 38% of Somalia's population is at the age between 15-35 years. The majority of young people lives in the urban areas, 46% of all 15-29-year-old persons live in a city, followed by 25% that live as nomads. Only 49% of male youth is literate, compared to 41% of female youth. 69% of current youth are not enrolled in school. 3 in 10 youth are unemployed.⁸⁴ Irregular migration of youth populations in search of resources of livelihoods, particularly from rural to urban areas may compound existing challenges linked to youth vulnerability and unemployment.

A joint study by the World Bank and the United Nations on youth and attitudes to peace showed that for youth peace is not just about ending violence but includes strong and accountable institutions providing services and opportunities for all. For many respondents there was also a clear link between violence, including domestic violence, at the local level and national level conflict. Peacebuilding efforts, therefore, must start at home and at the community level²⁴.

Internal Displacement and Refugees in Somalia: Since 1991, millions of Somalis have fled their homes to escape fighting between different warring groups. During this period, conflict and generalized violence has resulted in large-scale internal displacement in the country, and many citizens have fled across the borders of Somalia to become refugees. Hundreds of thousands of people have sought refuge within the greater Horn of Africa region, while others have resettled to countries further away.

²⁴ The World Bank, UN Somalia, UN Habitat, Youth as Agents of Peace in Somalia, 2018, p. 10.

4 ENVIRONMENTAL AND SOCIAL RISKS AND MITIGATION MEASURES

4.1 Environment and Social Risks

4.1.1 Environment Risks

Potential environmental and social risks and impacts have been screened and been assessed to be minimal on the environment. The project may generate minimal e-wastes from computers and communication gadgets purchased under component 1. Further, under component 4 health and nutrition co-responsibility cash transfer has been provided under 3rd Additional Financing, it is envisaged that the that this support will incentivize uptake of health and nutrition services ultimately attracting health outlets among benefiting communities, the health outlets will be associated with hazardous medical wastes that require safe disposal as summarized in Table 4.1 below

Table 4-1: Management of E-Wastes and Medical Wastes

#	Risks	Mitigation
1	<i>E-wastes Management:</i> Risk associated with e-wastes from used computers to be purchased under the project	<p>In accordance with ESS3 and World Bank EHS Guidelines the following are the general requirements for E-waste management. E-waste segregation must take into account the hazardous nature of the waste or its content (e.g. heavy metals) shall always be segregated from other e-waste that does not contain environmental, carcinogenic, or other pollutants. The segregation shall be done based on content, and correct labelling and quantification must be applied. Below listed provisions will be complied with.</p> <ul style="list-style-type: none"> • Selection of technologies and equipment based on international standards to maximize their lifetime and minimize associated risks at their end-of-life stage • Coordination with the relevant authorities and stakeholders • Identification, labelling, and segregation of e-waste at source • E-waste quantification, and qualitative record keeping • Temporary storage on site • Collection and transport • Central storage at MoLSA designated location • Reuse, recycling, and recovery of suitable waste • Treatment and disposal • Incident reporting of e-waste related accidents
2	<i>Medical Wastes Management;</i> Risk associated with medical wastes generated from health and nutrition co-responsibility cash transfer under 3 rd AF proposed under component 4, Health and nutrition interventions might be associated with both Hazardous and nonhazardous waste as cumulative	<p>The waste producer (health facilities) will be responsible of waste segregation and will be done close to the source of waste production. Disposal of waste will ensure proper waste disposal, the main methods used will be incineration, shredding, and chemical disinfection. Specific measures in addressing hazardous and non hazardous wastes will include;</p>

<p>impact from the associated health services that might be triggered through incentive provided to community members to access health and nutrition services</p>	<ul style="list-style-type: none"> • Avoid discharging contaminated liquid waste into the domestic water and waste management sources. • Avoid burial of waste into lands close to populated areas and important natural resources areas. • Consider minimizing waste to be incinerated onsite, including segregating waste before final treatment. • Monitor releases according to relevant standards and guidelines, including those thresholds recommended by local authorities, GIIP and WBG’s EHSGs for healthcare facilities, and adopt whichever are more stringent. • In case of used sharps, consider using other options, such as disinfection, wet thermal treatment, encapsulation. • Where incinerators are utilized, construct ash pits for disposal of the hazardous waste (incinerator ash) from the waste treatment facilities. • Only dispose of waste in approved sanitary landfills, in close coordination with responsible municipalities.
---	--

4.1.2 Social Risks

Component 1 holds substantial risks for the human population. Given that the project will be implemented in areas of fragility due to endemic poverty, acute drought and protracted conflict and insecurity, directly accessing vulnerable beneficiaries will require careful planning.

Security risks and difficulty in accessing rural Somalia make stakeholder engagement effective and community participation challenging. As such, the primary challenge for the project is ensuring that cash transfers reach the most vulnerable eligible community members such as minority groups, people with disabilities, or widows. In addition, gender dynamics in Somalia can be restrictive for women and children (the target beneficiaries) and the nature of the project could potentially exacerbate GBV through providing opportunities for exploitation of vulnerable women. The implementing agency, MoLSA, has been assessed as having limited capacity to apply the World Bank's Environmental and Social Framework on the project. For these reasons, the social risks have been assessed to be Substantial.

To overcome the clients’ limited capacity and effectively manage the project-related risks outlined, the project will rely on high-capacity partners: World Food Program (WFP) and United Nations Children Fund (UNICEF). WFP will be the FGS’s implementing partner for Component 1 and hence responsible for managing the majority of project risks.

WFP has a proven track record in effectively implementing unconditional cash transfers, including in rural areas in Somalia and has developed mitigation mechanisms for all of the risks identified in paragraph below and applied them in their standard operating procedures. Central to WFP’s process for managing social risks are detailed requirements for robust and meaningful community consultations and a functioning GRM which has been in operation and under near continuous evaluation in Somalia for a number of years. In addition, WFP has developed a robust and

multitiered project monitoring approach which is required for all of their operations in Somalia and will be used on this project. Third Party Monitoring (TPM) agencies will also be used to provide independent verification of results. Table 4-2 below summarizes social risks and mitigation measures provided by this ESMF

Table 4-2: Management of Social Risks

#	Risks	Mitigation
1	<p><i>Security:</i> Conflict and insecurity remain persistent challenges in Somalia and have, in the past, impeded delivery of drought relief services. Ensuring security for project operations (including the handling of cash) amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the drought, will remain a significant challenge.</p>	<p>By design, the project will only operate in relatively permissive parts of the country, with security of operations and access to site for monitoring and supervision key criteria in the selection of districts for support. Further, the choice of WFP and UNICEF as key implementing partners provides the project access to the UNs system and local capacity for identifying and managing security threats to operations.</p> <p>UNDSS provides overarching security for all UN agencies. In addition, WFP has security officers in all of the regions who oversee the security of the WFP operations. These systems are tried and tested on projects such as this. They work in all districts except those controlled by armed groups and as such have established systems for managing the security of their operations. Moreover, the WFP service agreement with project service providers contains a contractual obligation for the service provider and any contracted security to uphold humanitarian principles such as “do no harm” and to protect beneficiaries (from violence, exploitation and abuse).</p> <p>They also contain an obligation to ensure the security of their own personnel or workers by implementing appropriate risk prevention and mitigation strategies to reduce the likelihood of a harmful event occurring and to mitigate the impact of a security event if it were to occur. The WFP have developed a Safe Distribution Guidelines which outline their requirements and provide training to contracted entities in their use.</p>
2	<p><i>Exclusion:</i> The security and other challenges associated with working in rural Somalia make effective stakeholder engagement and community participation very challenging. As such, the challenges of ensuring the project reaches vulnerable community members (such as minorities, people with disabilities or widows present in any cash transfer project are amplified</p>	<p>In Somalia, community participation has been more robust in rural areas than in Urban and is used extensively by WFP on like projects. The WFP guidelines for community participation (adopted by the Somalia Food Security Cluster) in targeting uses a community driven process for identifying vulnerable people at risk of exclusion. To monitor the application and effectiveness of the targeting process the WFP carries out their own monitoring, of this system and where they are unable to carry out their own monitoring they use a monitoring</p>

		contractor. Monitoring reports will be included in the SMP along with a detailed description of this process
3	<i>Selection:</i> The project targets women and children at risk of malnutrition due to the drought. As such gender and other cultural dynamics will need to be managed to ensure transferred cash being captured by spouses, family, nominated caregivers, community leaders or armed groups but instead makes it to the intended beneficiaries.	<p>WFP carries out periodic evaluations of intrahousehold dynamics including in Somalia seeking to better observe and understand this effect. After 10 years of administering cash transfer operations, WFP monitoring has not revealed an increase in intrahousehold abuse of the system including among spouses, family members or caregivers. However, this does remain of potential concern and hence WFP monthly monitoring screens for this effect. External capture has been observed both in terms of soliciting kickbacks and favoring one group of beneficiaries. To combat this, the WFP has developed a robust and multitiered monitoring system including hotline for anonymous reports.</p> <p>Where offenders are individuals, they are dismissed, or where the problem is systemic, contracts with implementing partners may be terminated and the matter is addressed with local authorities. Note WFP has not encountered this impact in their operations in Somalia. As WFP has a requirement to monitor their operations, they do not work in areas controlled by armed groups in Somalia. Similarly, capture by armed groups has not been a problem observed in parts of Somalia with elevated levels of lawlessness. The small amount of the cash transfer (\$20 per month) is also seen as a mitigation measure for this effect.</p>
4	<i>Gender Based Violence:</i> Closely associated to selection risks noted above, the targeting of women and children as beneficiaries necessitates the management of gender-based violence risks. The exchange of sexual favors for registration or transfer of funds, or the spousal abuse to receive cash are key risks for the project.	The project implementing teams will develop and implement measures and actions to assess and manage the risks of gender-based violence due to the receipt of cash transfers by women and children (within households or at payment points) and sexual exploitation and abuse risks such as sexual favors for registration or release of funds. A GBV action plan will be drafted and included in the SMP to include measures for minimizing gender-based violence, most notably sexual abuse and exploitation including outreach to local communities. This will include a code of conduct for partners making payments and their hired security.
5	<i>Systemic Weakness:</i> As noted below, the borrower capacity for the preventing adverse social impacts on the project is limited, as is the borrower's capacity for redressing the impacts of social harm where it has occurred.	The project has two primary approaches to overcoming the low capacity of the borrower. The first is the use of WFP as the implementing agent for the cash transfer system. WFP has a proven track record for delivering unconditional cash transfers in rural Somalia. It is also worthy of note that the project will work with regional and district governments as well, where the capacity is significantly higher than in the FGS. In addition, Component 2 of the project will see UNICEF build the capacity of the FGS to manage a national safety net program.

6	<p><i>Difficulty monitoring:</i> Security concerns and the remoteness of the project target areas combine to provide a significant challenge for monitoring and supervising project implementation. This can include challenges for community and stakeholder engagement, grievance redress and other risk mitigation protocols</p>	<p>Under WFP’s rules in Somalia, except in extreme lifesaving circumstances, they can only operate in environments permissible enough to monitor the implementation of their risk management processes. So, for this project, WFP will use their already established capability for monitoring the operations. WFP have a multifaceted approach to monitoring involving WFP staff, a contracted company that provides staff for monitoring where WFP staff can’t go and a complaints hotline. The Hotline is also used for proactive verification by making calls to beneficiaries to check how the project is operating. WFP is also monitored by other donors (notably USAID and DFID) plus the Bank will be hiring a third-party monitor to oversee this operation</p>
7	<p><i>Elite or Clan capture of project:</i> With no formal safety net system, Somalis largely depend on informal, clan-based support in the face of increasingly frequent shocks. As such, there is a risk that local community dynamics will see attempts to capture the benefits of the project for a particular group.</p>	<p>WFP’s system for targeting beneficiaries is independent of the clan structures and has strong mitigations against elite capture. FAO’s Food Security Nutrition Analysis Unit undertake an assessment for food security and nutrition which identified the target groups. This then underpins selection of the districts and existing data bases form a baseline for identifying target individuals within that district. Then the community consultation process is used to validate the data.</p>

4.1.3 Labor Related Risks

The key labor risks which anticipated for the project are:

- Failure of WFP, NGOs and Financial Service Providers engaged on the project to comply with national laws and ESS2 on terms and conditions of employment. This might trigger labor disputes where workers dispute over limited employment opportunities, labor wages/rates and delays of payment, discrimination in labor recruitment, disagreement over working conditions (particularly overtime payments and adequate rest breaks), and health and safety concerns about the work environment.
- Security risks from the Al Shabab and communal conflict, which could threaten the life, health and safety of project workers. With Al-Shabaab still in control of parts of the country and their attacks frequently targeting government and other strategic infrastructure and persons in urban areas, the security risk for the project workers is substantial.
- Gender-based violence / Sex Exploitation and sexual harassment, as well as transmission of HIV/AIDs. Covid 19 and other communicable diseases, among project workers and between project workers and local communities. Sexual harassment, exploitation and abuse: there are several concerns on the potential for GBV, increased risk of abuse and exploitation for vulnerable women workers, increased risk of sexual exploitation and violence of persons involved in the labor related activities. Thus, all staff and contracted workers should sign a code of conduct outlining expected standards of behavior in this regard and attend an awareness session on the same including the consequences of such actions.

- Recruitment and employment Labor discrimination against vulnerable and disadvantaged groups, including IDPs, unemployed youth, women, minority clans and ethnic minorities persons with disabilities, persons with HIV/AIDs, LGBTQ persons.
- Lack of access by project workers to worker grievance mechanism to address workplace related complaints, including workplace sexual harassment.

Table 4.2 below presents Labor and Working conditions (ESS2) and Community Health and Safety Risks analysis of a labor risks and suggested mitigation.

Table 4-3: Management of Labor Related Risks

Risk	Mitigation
Terms and conditions of employment:	<p>Project workers will be provided with information and documentation that is clear and understandable regarding their functions, terms and conditions of employment. The information and documentation will set out their rights under national Labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of ESS2. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur</p> <p>-The documentation will be translated into Somali and read out to workers who may not be literate</p> <p>-The workers will be provided with accessible and safe means to raise workplace concerns. This will be done through the workers' GM under ESS2 and project grievance mechanism as well as formation and joining of collective bargaining bodies</p>
Labor disputes	<p>The project shall adhere to the requirements proposed in the project LMP including:</p> <ul style="list-style-type: none"> • Fair terms and conditions shall be applied to all project workers (guided by relevant laws) • The project shall have GMs for project workers (direct workers, contracted workers, primary suppliers) to promptly address their workplace grievances. • The project shall respect the workers' right to join Labor unions and freedom of association
Discrimination of employment based on gender, disability or ethnicity	<p>The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.</p> <p>These provisions will be enshrined in the Code of Conduct that will be signed between the WFP and MoLSL. The CoC, to be signed by all workers, is aimed at preventing and addressing harassment, intimidation and/or exploitation.</p> <p>-Employees and workers (through a separate Workers' GRM) will equally have unfettered access to the GM channel to raise their concern</p> <p>-The social specialist will routinely and periodically supervise and monitor the contractor's approach and actions to ensure that no cases of discrimination occur or if they occur, they are addressed immediately through the appropriate channels.</p>
Insecurity	<p>All workers and ministry staff involved in the field operations shall be oriented on security threats and guidance provided in the project Security Management Plan. -</p>
GBV/SEAH	<p>The project shall adhere to the measures proposed in the GBV Action Plan and Stakeholder Engagement Plan (SEP). A GBV Service Provider will be recruited to be responsible for all aspects of prevention and management of GBV. The mitigation measures will include:</p> <ul style="list-style-type: none"> • Sensitize project workers and beneficiary communities on GBV/SEAH

Risk	Mitigation
	<ul style="list-style-type: none">• Sensitize communities and project workers on GBV/SEAH and the referral pathways• All project personnel to be sensitized on GBV/SEAH as well as the beneficiary communities• The CoC, to be signed by the workers contains provisions on GBV/SEAH

5 INSTITUTIONAL ARRANGEMENTS

5.1 Ministry of Labor and Social Services (MoLSA)

MoLSA would be the primary institutional home for the SNHCP and responsible for project implementation. The SNHCP would be implemented through MoLSA's existing structures, supported by the PIU, as described in Component 3. The Social Protection section of MoLSA would be responsible for the day-to-day management of the project and will report to the Minister of Labor and Social Affairs.

The PIU structures at the federal level would be as follows. The PIU at the federal level will be headed by a project manager/coordinator and will include an operations officer, a communication officer, an MIS officer, a GRM and social specialist, an M&E officer, an FM officer, and a procurement officer. Capacity building at the FMS level will be phased in and a support structure at FMS level would be determined in discussion with state governments. This may include support structure for key technical functions such as M&E, GRM and social risk monitoring, and communications.

MoLSA would sign service contracts with WFP and UNICEF to support the implementation of Components 1 and 2, respectively. These service contracts will follow the 'Standard Form of Agreement for Use by World Bank Borrowers: Delivery of Output Service Contract.'¹

5.2 World Food Program (WFP)

WFP was selected to support the FGS implement the cash transfers (Component 1) due to its experience and track record of implementing cash-based transfers in Somalia and globally. WFP has been implementing cash-based transfers in Somalia since 2012, starting with the use of paper vouchers and gradually shifting to multipurpose cash-based transfers since 2015. To optimize processes, since February 2015, WFP Somalia moved to using SCOPE, a digital beneficiary and transfer management platform that supports WFP's operational cycles from beginning to end. Due to the lack of a base registry widespread incidents of gatekeepers, and poor regulations of financial institutions in Somalia, WFP chose to use biometric signatures for authenticating delivery of transfers.

5.3 United Nations Children Fund

UNICEF is also uniquely positioned to support the FGS to establish the key building blocks of safety net delivery systems and support institutional capacity building (Component 2). UNICEF's strategic priorities in Somalia includes a commitment to support the FGS to build a government-led Social Protection (SP) system, reflected in its Country Programme Document (2018–2020). As such, UNICEF has been supporting the FGS to establish a fit-for-purpose national SP system

on the ground, building on its in-depth knowledge of and long-term operational presence in Somalia. To that end, it has supported MoLSA, in collaboration with other partners, to develop the National Social Protection Policy. Moreover, UNICEF is well placed to support delivery systems and institutional capacity, as it is the lead agency within the UN country team focused on strengthening local authorities' capacity for social service delivery at the district level. In addition, UNICEF supports institutional building and service delivery at the FMS, district, and community levels for long-term human capital development, including health to nutrition; education; water, sanitation, and hygiene; and child protection. UNICEF has recently augmented its in-house technical expertise in the social policy, equity, and gender section to ensure evidence-based technical and impartial quality advice to the FGS and the sector. Table 5.1 below summarizes key institutions and their role in implementing the SNHCP project

Table 5-1: Institutions and Their Roles

Stakeholder Category	Role of Stakeholder
Ministry of Labour & Social Affairs (MoLSA)	It is the main driver and lead of the process. Political support and leadership, technical expertise, policy and program expertise, and implementation support through existing programs A PIU will be created within the SP Department of MoLSA and will be responsible for the day-to-day management and monitoring of the project. The PIU at the federal level will be established as soon as possible following project effectiveness. The PIU at MoLSA will comprise the key staff including; Project Manager, Communications Officer, Operations Officer, Safeguards Officer, MIS Officer, A GRM and social risk management officer, An M&E officer, Procurement officer and finance officer.
WFP	WFP was selected to support the FGS implement the cash transfers (Component 1) due to its experience and track record of implementing cash-based transfers in Somalia and globally
UNICEF	UNICEF is also uniquely positioned to support the FGS to establish the key building blocks of safety net delivery systems and support institutional capacity building (Component 2)
Banadir	Administrative, policy and implementation support
Ministry of Planning, Investment and Economic Development (MOPIED)	provide advice to the government on medium and long-term strategies for socio-economic development and sustainable economic growth
Ministry of Finance	Issues related in the funding for the project, Efficient use of the resource and accountability
Ministry of Health	Support in the H&N CCT; communication, sensitization, delivery of service, etc

5.4 Capacity Development for Environmental and Social Management and Monitoring

Component 3: Project Management, Monitoring and Evaluation, and Knowledge Management, this component will support PIU establishment at the federal level at MoLSA during the first year. Subsequently, separate antenna PIUs or focal points would be created in the member states in consultation and agreement with the governments of member states. The component will also finance the salary of PIU staff and the purchase of IT equipment and office furniture, as well as the operating cost. The ESMF provision on capacity enhancement of the environmental and

Social Standards skills and competencies of the projects will be expensed under this component. This ESMF provides that PIU staff will be trained and capacity built on provisions of ESCP, ESMF, SEAH/GBV Response and Prevention Plan, Labor Management Plan, Security Risks Assessment Management Framework (SRAMF), Grievance Redress Mechanism GRM. **Table 5-2** below lists some of the proposed training topic which will help building the capacity for smooth implementation of the Project.

Table 5-2: Capacity Building and Training Plan

Objectives	Issues for engagement	Method of engagement	Stakeholders/Target population and area	Responsible person	Time frame
ESMF	Training of all Technical Leads in the ESMF, World Bank Safeguards Awareness, Training of Environmental and Social Standards, Citizen Engagement (Events and workshops for community awareness in the Project areas).	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments. Private sector, CBO, and other interested stakeholders	PIU	Prior to commencement of activities
GBV Action Plan	Training of all Technical Leads in the GBV Action Plan	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments.	PIU	Prior to commencement of activities
GBV Procedures for Reporting and Prevention	Training and monitoring during project implementation to prevent GBV and support reporting of cases	Training, monitoring,	Community members / vulnerable groups	(Lead of GBV sub cluster)	Prior to commencement of activities
Mitigate impact of workers on local communities (LMP & GBV Action Plan)	Implement training of contracted Project Workers designed to heighten awareness of risks and to mitigate impacts on local communities and on their rights	Training	Contracted workers by UNICEF and WFP	All Technical leads	Prior to deployment
GBV	Response to domestic issues in a non-gender biased manner.	Training	Local leaders (as detailed in the GBV Action Plan)	PIU and Technical Leads	Prior to commencement of activities
Project GRM	Consultation on different GRMS mechanisms in place, development of overall GRM, and Training with all Technical Leads Set up Grievance Redress Mechanism and functioning in the Energy sector	Consultations and Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments.	PIU and Technical Leads	Prior to commencement of activities

OHS standards and provisions of SRAMF	H&S Standards for workers, Monitoring Occupational Health and Safety (OHS) Leadership, Management Safety performance assessment Hazard Analysis and Control Hazard Communication. Program Effective Accident Investigation, Conducting Health and Safety Audits Job Hazard Analysis, Occupational Health Risk Assessment Work Stress Risk, Assessment Electrical Safety Fire Safety, Fall Protection Plan and Fleet Safety Management	Training	Contracted workers by UNICEF and WFP	Technical leads	Prior to deployment
Create awareness of LMP and H&S Standards for workers	LMP and H&S Standards	Training	Contracted workers by UNICEF and WFP, PIU	Technical leads	Prior to deployment
Support Emergency Response Measures	Communication of Emergency Response Measure (ERM) to communities	Information, training	Contracted workers by UNICEF and WFP, PIU	PIU and Technical Leads	Prior to commencement of activities
Community Health & Safety	Road Safety Awareness	Training	Contracted workers by UNICEF and WFP, PIU	PIU and Technical Leads	Prior to commencement of activities
Community Health & Safety	Communicable diseases	Training	Contracted workers by UNICEF and WFP, PIU	PIU and Technical Leads	Prior to commencement of activities
Community Health & Safety	GBV, as per Action Plan	Training and awareness raising	Contracted workers by UNICEF and WFP, PIU	PIU and Technical Leads	Prior to commencement of activities
GRM	Project GRM as described in the SEP	Information disclosure and training	Contracted workers by UNICEF and WFP, PIU	PIU and Technical Leads	Prior to commencement of activities

5.5 Monitoring and Reporting

MoLSA would have overall responsibility for monitoring and supervision of project activities, supported by WFP and UNICEF. A dedicated M&E officer will be hired by the MoLSA PIU to lead project M&E and would report to the project manager. WFP and UNICEF will ensure timely and quality monitoring of the activities and would report on progress and challenges/issues to MoLSA. MoLSA will provide the World Bank with semi-annual progress reports, including social management plan implementation reports and quarterly financial reports. These reports are to be submitted 45 days after the end of each reporting period. In addition, MoLSA will hire a TPM agency to undertake quarterly monitoring and verification of the cash transfer component. This will include verification of the targeting mechanism, beneficiary identity verification, compliance of the payment delivery agents, and beneficiary feedback. The quarterly TPM exercise will be conducted on a sample of beneficiaries with a focus on high-risk areas and will include visits to payment sites as well as to beneficiaries' homes.

A targeting evaluation would be undertaken during the first year of implementation. The purpose would be to assess the accuracy of the targeting and distribution of beneficiaries and benefits, and to measure the soundness of the targeting approach under Component 1. The results of the evaluation would be used to inform and adjust the targeting approach under Component 1, and also provide input to the dialogue and design of the national program's targeting methodology under Component 2.

5.6 Resource and Budget

Budget components include; implementing agency safeguards capacity development activities; a training program for all relevant entities to implement their E&S responsibilities, Security Risk Assessment Management Framework (SRAMF), Updated Stakeholder Engagement Plan, Labor Management Procedures, and GBV Action and annual reviews. **Table 5-3** below gives the cost estimate (budget) of implementing this ESMF including the preparation of sub projects, monitoring and supervision and capacity building only:

Table 5-3: Resource and Budget

	Required Resources	Estimated Costs in USD
PIU – Monitoring of ESMF		
	A GRM and social risk management officer (12 months x 2 x 5000 USD)	60,000
	1 GBV Specialist (12 months x 1 x 5000 USD)	60,000
	Logistics / Travel (Lump sum)	50,000
Implementation of Risk Mitigation Measures PI		
	Monitoring and SEP implementation (SEP has a separate budget)	Separate budget in SEP
	Security Management (Security Management Company on general budget)	Separate budget in SRA&SRAMP
	Implementation of GBV Action Plan / GBV Service Provider	Separate Budget under GBV/SEAH Action Plan
	Capacity Development and Training	100,000
	Total	270,000

6 GRIEVANCE REDRESS MECHANISMS

6.1 Grievances Process Overview

As per World Bank standards, a project GRM will be operated in accordance with a SEAH/GBV Prevention and Response Plan, which includes reporting and referral guidelines (SEAH/GBV Prevention and Response Plan). The project GRM will also operate separately to worker grievance redress mechanisms, which are laid out in the LMP. The World Bank ESSs require that Bank-supported projects facilitate mechanisms that address concerns and grievances that arise in connection with a project²⁵. ESS 10 (Stakeholder Engagement and Information Disclosure) specifies that project-affected parties be provided with accessible and inclusive means to raise issues and grievances, and that borrowers respond and manage such grievances.

The fragile and volatile nature of FGS and FMS require an effective GRM able to address concerns and disagreements (specified in Table 3.2,) that might be triggered during project planning and implementation phase. It will therefore be key in the fragile environment of Somalia to ensure that grievances and perceived injustices are handled by the PIU, and that the project mitigates general conflict stresses by channeling grievances between people, groups, government actors and beneficiaries and project staff, NGOs, CSOs or contractors. Aggrieved parties need to be able to refer to institutions, instruments, methods and processes by which a resolution to a grievance is sought and provided.

The GRM provides an avenue for expressing concerns, providing redress, and allowing for general feedback from community members. The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

The GRM provides an effective avenue for expressing concerns, providing redress, and allowing for general feedback from community members. The GRM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

²⁵ Under ESS 2 (labor and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate labor Management Plan (LMP). The World Bank's Good Practice Note on 'Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works' spells out requirements for a GBV grievance redress mechanisms, which will be defined in a separate GBV/SEA and Child Protection Risks Action Plan.

6.2 GRM Core Principles

The GRM is based on six core principles

- **Fairness:** Grievances are treated confidentially, assessed impartially, and handled transparently.
- **Objectiveness and independence:** The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment in each case. GRM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that stakeholders can easily understand them. Project stakeholders have a range of contact options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety.
- **Responsiveness and efficiency:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.
- **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.
- **Participation and social inclusion:** A wide range of stakeholders are encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensure that marginalized or vulnerable groups, including those with special needs, are able to access the GRM.

6.3 GRM Value Chain

Step 1: Grievance Uptake: Multiple channels must be available for stakeholders to file their complaint, grievance, or feedback. The stakeholder must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

Means of Filing a Grievance

There are four distinct means, at least two of which must be made available at the sub-project locality for people to file a grievance (see complaints log, complaints form and grievance register,

1. **A phone number for a hotline operator:** The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator should be available from 8.00 am to 5.00 pm every day. The hotline operator is set up and managed by the PIU. Any concerned party can call the hotline number and file a grievance with the Project.
2. **A help desk** will be set up during the implementation of sub-project activities in a specific locality, especially where construction activities are undertaken. It should be manned by the implementing staff, in close coordination with local authorities. At the help desk, stakeholders can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk.
3. **Relevant assigned personnel** available in each project site will be required to accept grievances and ensure that avenues for lodging grievances are accessible to the public. The first point of contact for all potential grievances from community members may be the contractor or a local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance.
4. **A suggestion box** will be installed at the nearest sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the suggestion box must be expressed in writing.
5. Email or a web-based submission form, this form will be available stakeholders sensitized on how the applicable email address and web page by the PIU

6.4 GBV/SEAH-related Grievance

A separate SEAH action plan has been prepared for SNHCP, the action plan details the necessary operational measures and protocols that will be put in place to address project related Sexual Exploitation and Abuse and Sexual Harassment (SEAH) Response and Prevention Plan. The plan includes protocols that will be adopted to resolve any SEAH allegations that may arise during implementation of the SNHCP project. The plan also provides procedures for preventing and responding to SEAH, how complaints of SEAH will be handled, and disciplinary action for violation of the Code of Conduct (CoC) by project workers. .

The overall objective of the SEAH Response and Prevention Plan is to provide tools and frameworks that will support the SNHCP Project Implementation Committee (PIU) in preventing and responding to the Project-induced SEAH and GBV risks.

Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of SEA/SH-related grievances.

Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

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

The grievance recipient will be responsible for the recording and registration of the complaint. A GRM operator cannot reject a SEA/SH complaint. At the same time, however, the project can only respond to a SEA/SH complaint if it is directed into the designated GRM channels.

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

Informed Consent: The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up. Asking for consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs or PIU), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on. In the case of children, informed consent is normally requested from a parent or legal guardian and the children

Incident reporting: Severe incidents (defined as an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, for example: serious injuries, fatality, GBV, forced or child labor, damage on Project infrastructure, as well as organized large scale robbery, looting etc., abuse and cases of mistreatment of communities and/ or workers by

security forces (including GBV/SEA/SH, spread of communicable diseases among workforce, kidnapping, etc), will be reported within 48 hours to the PIU and onwards to the World Bank.

At all times, the PIU will provide feedback promptly to the aggrieved party, for example through the phone. Feedback is also communicated through stakeholder meetings and beneficiary meetings during project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Steps listed below provide clarity on of the process.

Step 1: Receipt of Grievances: Records of all feedback and grievances reported will be established by the PIU. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person providing feedback as well as the county, (where applicable), the project activity and the nature of feedback or complaint.

Step 2: Sort and Process: All registered grievances will be transferred to the PIU GRM Officer – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM Officer will categorize the complaint. Worker-related grievances will be handed over to a workers’ GRM. Where grievances are of sexual nature, the focal point has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the SEA/SH Action Plan. Dedicated training on how to respond to and manage complaints related to SEA/SH will be required for all GRM operators and relevant project staff.

Where grievances can be handled locally, the GRM Officer will return these grievances to the appropriate local structures to be handled by existing dispute settlement mechanisms. However, these can only be involved if the GRM Officer assesses that the complainant is not a member of a vulnerable group or minority that would not be catered for by the local mechanism in an equal manner.

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

The GRM Officer will also transfer the grievance information into a more comprehensive grievance register.

GBV/SEA/SH

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

Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded and the case will be considered closed.

If the survivor provides informed consent, the grievance recipient should inform the GRM Specialist. The GRM Specialist at the PIU will inform the World Bank. The report will be on the anonymized incident as soon as it becomes known to the PIU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the Project; the survivor's age and sex' and whether the survivor was referred to other services. The Project's SEA/SH Action Plan has mapped all referral services in the different counties designated for interventions. The project team will keep an updated list available of these services.

Step 3: Acknowledgement and Follow-Up: The PIU will decide whether a grievance can be solved locally, with local authorities, contractors, or NGOs, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Officer the appropriate individuals that could be addressed with the case, if the case can be solved at the local level. At all times, the GRM Officer will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

GBV/SEA/SH

Referrals are a process through which the survivor gets in touch with professionals and institutions regarding her case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient will instantly provide the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient will

provide allowances. Referral services are provided even in cases where the survivor opts to not pursue the case through the GRM or through legal channels.

The grievance recipient explains to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor will be informed about his or her right to place limitations on the type of information they want shared. The survivor's consent must be documented.

Step 4: Verify, Investigate and Act: The GRM Officer will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, and redressing action and plan.

Verification: Check for eligibility (objectively based on set standards and criteria) of the complaint in terms of relevance to the project; escalate outright grievances that require high level interventions; refer outright grievances that are outside the project jurisdiction (e.g., refer to PIU Project Manager or relevant external institution)

Once eligibility is determined, the GRM Officer will categorize the complaint into defined categories:

Investigation:

- GRM Officer to appoint an independent investigator (E&S Specialists, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence
- Analyze to establish facts and compile a report

Grievance Action Plan

- Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction
- undertake mutually agreed follow-actions
- Update of complainant
- Provide complainant with a grievance redress status update and outcome at each stage of redress, (iii) update PIU on grievance redress across the GRM value chain.

GBV/SEA/SH

The PIU GRM Specialist will be the key focal point for management of such grievances and concerns and will work closely with respective GBV Specialist counterparts at the Ministry of Gender and Social Welfare. Once a case has been taken in by a GRM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the GRM Specialist. The GRM Specialist will first ensure that the survivor has been provided with all necessary GBV referral services, and will ensure that the survivor is in safety.

Where the SEA/SH grievance was allegedly committed by a project worker, the grievance will be reported to the respective employer. The GRM Specialist will follow up and determine the likelihood that the allegation is related to the project. The GRM Specialist will follow up and ensure that the violation of the Code of Conduct is handled appropriately, e.g., the worker is removed from his or her position and employment is ended. The responsibility to implement any disciplinary action lies with the employer of the alleged perpetrator, in accordance with local labor legislation, the employment contract, and the code of conduct. The GRM Specialist will report back to the survivor on any step undertaken and the results.

Where the survivor has opted to take a formal legal route, the GRM Specialist will ensure that the survivor has all the support required to file a case at court. The GRM process will still proceed with the survivors' consent. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GRM's remit to conduct investigations, to make any announcements, or to judge the veracity of an allegation. The GRM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.

Since this project assumes a fully survivor-centered approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered access to referral services and the GRM Officer should note that the survivor did not wish for the case to be pursued, and the case is considered solved. Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions; and appropriate actions have been taken against the perpetrator; b) the service provider has initiated accountability proceedings with the survivor's consent.

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

Step 5: Monitor, Evaluate and Provide Feedback: The GRM Officer will provide feedback to GRM users and the public at large about: results of investigations; actions taken; why GRM is important; enhance the visibility of the GRM among beneficiaries; and increase in users' trust in the GRM.

The PIU will undertake the following monitoring actions: develop indicators for monitoring the steps of GRM value chain; track grievances and assess the extent to which progress is being made to resolve them; conduct a stakeholder satisfaction survey for the GRM services; conduct analysis of the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact; provide a report on grievance redress actions pertaining to the steps of GRM value chain.

The PIU will evaluate the GRM by: analyzing grievance data to reveal trends and patterns; sharing GRM analysis in management meetings; and taking corrective action on project implementation approaches to address the grievance

6.5 WB's Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS),

<http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For service. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

7 STAKEHOLDER ENGAGEMENT AND DISCLOSURE

7.1 Overview

This project is being prepared under the World Bank's ESF. As per Environmental and Social Standard (ESS) 10, the implementing agencies are required to provide stakeholders with timely, relevant, understandable and accessible information, and to consult with them in a culturally appropriate manner free from manipulation, interference, coercion, discrimination and intimidation. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. For SNHCP, and as provided in the SEP, stakeholder engagement will be undertaken on a continuous basis through the project implementation phase.

Stakeholder engagement is an inclusive process conducted throughout the project lifecycle. Where properly designed and implemented, the Stakeholder Engagement Plan (SEP), which has been prepared as a separate plan for this project, supports the development of strong, constructive, and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.

7.2 Stakeholder Inventory

Table 7-1 below summarizes the potential role, interests, and influence for each of the stakeholder groups for the project. There are several categories of persons and institutions that will need to be consulted and engaged in the project activities across all regions where project activities are conducted

Table 7-1: Stakeholders Inventory

Stakeholder Level	Stakeholder Category	Stakeholder Description	Role of Stakeholder
International	International Agencies and NGOs	United Nations World Food Programme WFP, United Nations Children’s Fund (UNICEF), United Nations Food and Agricultural Organization (FAO) and other Agencies including other international NGOs	Implementation support in the Health and Nutrition (H&N) research and learning
Regional	BRA	Benadir Regional Administration.	Administrative, policy and implementation support
	Chambers of commerce and business groups	private sector business, employers	Key support in implementation especially on EI Pilot, job placements
International	World Bank	SP and Jobs team, health team, etc	Technical expertise, implementation Support, monitoring and evaluation
National	Ministry of Labour & Social Affairs (MoLSA)	MoLSA Management, TVET and Department of employment.	It is the main driver and lead of the process. Political support and leadership, technical expertise, policy and program expertise, and implementation support through existing programs
	Ministry of Planning, Investment and Economic Development (MOPIED)	MOPIED management	provide advice to the government on medium and long-term strategies for socio-economic development and sustainable economic growth
	Baxnaano	PIU	To deliver the objectives in close collaboration with Federal, FMS and District Health Authorities and other stakeholders.
	Ministry of Finance	Departments of IFMIS, ETC	Issues related in the funding for the project, Efficient use of the resource and accountability
	MoH	Department of Health, department of nutrition, projects such as Damal caafimaad and Marwo caafimaad	Support in the H&N CCT; communication, sensitization, delivery of service, etc

District Level	Local Government Authorities	Deyniile	Facilitate the project at district level, and support in implementation
Regional / National	Civil society/CBO's	CS/CBO's & Community leaders	Possibility to influence and support project components especially on mobilization of the community.
Regional / National	Financial service providers	Banks, Telecommunications on cash transfer (EVC, E-Dahab, Premier Wallet, etc)	Implementation and operational support
Local	Community leaders	Elected leaders, clan elders, religious leaders and opinion leaders from targeted communities	Provide required linkage between the project to the community lowest structures
	Women	Mothers or female caregiver of the children under 5 that reside in target and non target areas. Direct and non recipients of the transfer	
	Vulnerable Members of the community (widows, disabled, single women) including minorities	Community members that may meet the project target criteria and are comparatively unable to anticipate, cope with, resist and recover from the impacts of disasters such as droughts and wars	

Table 7-2: Other Interested Parties

Stakeholder	Description	Potential issues of concern
Community leaders	Elected leaders, clan elders, religious leaders and opinion leaders from targeted communities	<ul style="list-style-type: none"> • Sustainability of the CT and risk of dependency to the CT • Delivery points cash transfers may be targeted by opportunistic armed actors including Al-Shabaab. • Inward migration as the project only operated in one district per region in Somalia there remains a possibility, that people from neighboring districts will seek to migrate to the project areas to benefit from the project • Security of project workers- as the project targets rural areas with comparatively prevalent poverty and protracted conflict making implementation, monitoring and supervision a key challenge
Government officials and Local Administration	Officials from administrative structures responsible target beneficiary communities and non-beneficiary communities	<ul style="list-style-type: none"> • Availability of robust systems to take over Social protection programmes at the end of the project • Sustainability of the CT and risk of dependency to the CT • Conflict and insecurity that can impede the delivery of the CT • Delivery points cash transfers may be targeted by opportunistic armed actors including Al-Shabaab.

		<ul style="list-style-type: none"> • Security and remoteness of the operations combine to provide a significant challenge for monitoring and supervising project implementation • Inward migration as the project only operated in one district per region in Somalia there remains a possibility, that people from neighboring districts will seek to migrate to the project areas to benefit from the project • Security of project workers- as the project targets rural areas with comparatively prevalent poverty and protracted conflict making implementation, monitoring and supervision a key challenge
WFP	UN agency with established systems and ground presence tasked with the delivery of Component 1	<ul style="list-style-type: none"> • Conflict and insecurity that can impede the delivery of the CT • Delivery points cash transfers may be targeted by opportunistic armed actors including Al-Shabaab. • Security and remoteness of the operations combine to provide a significant challenge for monitoring and supervising project implementation • Inward migration as the project only operated in one district per region in Somalia there remains a possibility, that people from neighboring districts will seek to migrate to the project areas to benefit from the project • Security of project workers- as the project targets rural areas with comparatively prevalent poverty and protracted conflict making implementation, monitoring and supervision a key challenge
UNICEF	UN agency with established systems and ground presence tasked with the delivery of Component 2	<ul style="list-style-type: none"> • Conflict and insecurity that can impede the delivery of Component 2 activities • Security of project workers- as the project targets rural areas with comparatively prevalent poverty and protracted conflict making implementation, monitoring and supervision a key challenge
WFP Contracted NGOs	Non-Governmental organizations and Community Based organization with a local presence and knowledge tasked with conducting project awareness, communication and engagements including community-based targeting	<ul style="list-style-type: none"> • Conflict and insecurity that can impede the delivery of the CT • Delivery points cash transfers may be targeted by opportunistic armed actors including Al-Shabaab. • Inward migration as the project only operated in one district per region in Somalia there remains a possibility, that people from neighboring districts will seek to migrate to the project areas to benefit from the project • Security of project workers- as the project targets rural areas with comparatively prevalent poverty and protracted conflict making implementation, monitoring and supervision a key challenge
Male Community members	Male members of the community ranging from spouses of women beneficiaries to other male members of the non-	<ul style="list-style-type: none"> • Sustainability of the CT and risk of dependency to the CT • Access to pay points and the associated risks of gender based and other violence • Tension within households from disagreements on use of cash by intended recipients • Change in family dynamics when male view CTs as disempowering them hence a shift in power balance

	beneficiary community	<ul style="list-style-type: none"> Inward migration as the project only operated in one district per region in Somalia there remains a possibility, that people from neighboring districts will seek to migrate to the project areas to benefit from the project
--	-----------------------	---

7.3 Previous Consultations Held

Engagements and consultation on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant Government agencies, development partners and the implementing agencies (WFP and UNICEF). Engagements and consultations have been held with key stakeholders identified as presented in Table 6. 3 below

Table 7-3: Summary of Stakeholder Consultations and their Outcomes

Stakeholder	Date	Participants	Key Points Raised
Ministry of Labour and Social Affairs	September 25, 2023	MoLSA <ul style="list-style-type: none"> State Minister DG Head of Administration Head Section of Social Protection GRM Officer Social Development Specialist Director of Social Affairs Deputy District – BRA Commissioner-Deynile District 	the meeting reiterated the importance of continued cooperation and coordination between MoLSA, BRA, and other stakeholders for the successful implementation of the Baxnano program.
United Nations World Food Programme (WFP)	March 2021	<ul style="list-style-type: none"> World Bank Social Protection team MoLSA PIU 	<ul style="list-style-type: none"> Increasing the payment delivery timelines of the project for the existing 200,000 households with the additional financing through the systems and modalities under the parent project. Grievance Redress Mechanisms
Ministry of Finance	May 2019	<ul style="list-style-type: none"> H.E Adirahman Duale Beileh (Minister) 	<ul style="list-style-type: none"> Strengthening of social protection & its role in human capital accumulation Planned activities, implementation arrangements
Ministry of Labour & Social Affairs (MoLSA)	May 2019	<ul style="list-style-type: none"> H.E Sadik Hersi Warfa (Minister) Fardosa Ahmed Abdullahi (Senior Policy Advisor/ National SP Coordinator) Abullahi Jibril Ali, Interim Procurement Specialist 	<ul style="list-style-type: none"> Existing systems and structures for social protection Strengthening of social protection & its role in human capital accumulation Planned activities, implementation arrangements Targeting and enrollment processes MoLSA capacity building and the PIU structure
Ministry of Planning and	June 2019	<ul style="list-style-type: none"> H.E Gamal Hassan 	<ul style="list-style-type: none"> Strengthening of social protection & its role in human capital accumulation

Economic Development			<ul style="list-style-type: none"> Planned activities, implementation arrangements Sustainability of the CTs program
United Nations World Food Programme (WFP)	May 2019	<ul style="list-style-type: none"> Deputy Country Director Ilara Dettori, Regional Program Advisor Delphine Dechaux, Head of Programmes for WFP Sara Karimbhoy, Emergency Manager Tsedeye Girma, Emergency Specialist, NY. 	<ul style="list-style-type: none"> Existing systems and structures for social protection Strengthening of social protection & its role in human capital accumulation On-going WFP support and how this project can leverage on existing programs/expertise/systems Technical design, planned activities, & implementation arrangements Targeting and enrollment processes & beneficiary databases Payment systems Grievance Redress Mechanisms Existing institutional systems and capacities at WFP, including for financial management, procurement, and safeguards
United Nations Children's Fund (UNICEF)	May 2019	<ul style="list-style-type: none"> Jesper Moller, Deputy Representative Jose Maria Bendito Prieto, Chief Social Protection, Equity & Gender Peta Barns, Emergency Logistics Manager Rachael Wamoto, Cash Officer. 	<ul style="list-style-type: none"> Existing systems and structures for social protection On-going policy dialogue and governance arrangement support by UNICEF & how this project can leverage on existing programs/expertise/systems Strengthening of social protection & its role in human capital accumulation Technical design, planned activities, & implementation arrangements Targeting and enrollment processes Grievance Redress Mechanisms Existing institutional systems and capacities at UNICEF, including for financial management, procurement, and safeguards
United Nations Food and Agricultural Organization (FAO)		<ul style="list-style-type: none"> Etienne Peterschmitt, Deputy Representative Johanna Erhardt, Head of Strategy Resource Mobilization Simone Alzari, Head of IM Unit Hiba Abou Swaid, Cash Expert Ezana Kassa, Emergency Coordinator 	<ul style="list-style-type: none"> Strengthening of social protection & its role in human capital accumulation Technical design, planned activities, & implementation arrangements
Development Partners	June 2019	<ul style="list-style-type: none"> European Union Johan Heffinck, Head of Office, EC Somalia 	<ul style="list-style-type: none"> Technical design, planned activities, & implementation arrangements

		<p>ECHO:</p> <ul style="list-style-type: none"> • Quentin Le-Gallo, Technical Assistant Somalia/ Regional Drought Coordination, • Sapenzie Ojiambo • Hjordis Ogendo, EEAS <p>DFID USAID Australia Italy Sweden Switzerland</p>	<ul style="list-style-type: none"> • On-going support by donors & coordination/collaboration with this project to leverage on existing programs / expertise / systems • Strengthening of social protection & its role in human capital accumulation
--	--	---	---

8 APPENDICES

APPENDIX 1:
ENVIRONMENTAL AND SOCIAL RISK CATEGORIES AND SCREENING
TEMPLATES

Risk Category

Risk Category	Nature of Risk and Impact	Examples
Category D: Low Risk	Activities that do not have a physical footprint. These will not require E&S instruments preparation, however, E&S clauses in the contract are recommended (to be prepared by the PIU prior to bidding process)	Foot paths; Purchase of furniture for existing health clinics, haffirs for animal and human consumption; communication and translations; Small training and workshops; management of funds and grants; management of social protection activities
Category C: Moderate Risk	Activities that have low to medium E&S risks and impacts, including that are site specific, temporal and reversible in nature. In addition to the E&S clauses in the contract, these activities may require an ESIA that will collate findings into a detailed ESMP. Contractors will also be required to prepare C-ESMPs. Furthermore activities may require risk mitigation measures laid out in the GBV Action Plan, Security Management Plan, Labor Management Procedures, Pest Management Plan, etc (see screening template)	Construction or repair of non-motorized hand-pumps and boreholes (boreholes will be improvements or change to an existing water scheme); tanks; dug wells; provision or repair of latrines for public use; construction of flood protection infrastructure; repair of flood protection infrastructure; repair of small-scale community irrigation schemes; repair of small-scale irrigation schemes; rehabilitation of local roads; repair of local roads; culverts; bridges; repair or extension of existing health clinics; general buildings with local materials; markets; livestock dips; activities with security implication for all project workers and project-affected parties; activities with a risk of diversion of funds; activities that may spark conflict over allocation of resources; activities leading to involuntary resettlement, land acquisition and restrictions to land use; etc
Category B: Substantial	Activities that have substantial E&S risks and impacts, including those that are not as complex as high risk projects, more temporary in nature and more predictable and reversible. This category includes risks of limited degrees of social conflict, and impacts on human security; impacts that are medium in magnitude, medium to low probability of serious adverse effects to human health and/or environment.	Activities that include potential security risks, such as delivery of goods to insecure areas; activities that could lead to GBV (e.g. labor influx)
Category A: High Risk	Subprojects that contain significant environmental and social risks impacts. These subprojects would require a full ESIA and a detailed ESMP. They would also require an ARAP or a RAP depending on the number of Project Affected Persons (PAPs) and resettlement impact anticipated.	dams; power stations; industrial installations (refineries, chemical installations); long distance roads, transmission lines (water, power); waste treatment and disposal installations; large water and wastewater treatment plants; river basin or land development; large-scale irrigation ; projects in critical habitat and protected areas; projects involving significant quantities of

		hazardous substances; industrial installations (refineries, chemical installations)
--	--	---

Exclusion List

- Sub Projects that involve the transformation or degradation of critical natural habitats and may result in the loss of biodiversity, including any official protected natural areas, such as national parks and other protected areas or can cause degradation of critical habitats.
- Sub Projects that within areas identified as at risk from flooding, rising water levels, landslides, ravines, fires, etc.,
- Sub Projects that that would damage non-replicable cultural property.
- Sub Projects that that in any way impact land owned or claimed by Historically Disadvantaged Local Communities and /or Indigenous Peoples without complete and documented free, prior and informed consent of such communities.
- Sub Projects that include activities that may have significant adverse social impacts and may give rise to significant social conflict between communities.
- Sub Projects that involve harmful or exploitative forms of forced labour / harmful child labour.
- Sub Projects that involve significant air emissions, harmful effluents, noise emissions above international standards, or represent potential physical, chemical, biological, and radiological hazards, or any threat to community health and safety that cannot be mitigated by the environmental and social instruments proposed in this ESMF.

Code of Conduct for Inclusiveness (VMG, PLWD) and Prevention of Elite Capture

I _____ acknowledge that adhering to provision aimed at eliminating exclusion of vulnerable, marginalized, and minority members of the community, Person Living with Disabilities PLWD from accessing project benefits is important.

I understand that the PIU, MoF in both FGS and FMS including the World Bank and as provided by ESS 10 on Stakeholder Engagement and Information Disclosure requires me not to participate in activities that could be deemed as “elite capture” or activities that lead to exclusion of vulnerable, marginalized, and minority members of the community, Person Living with Disabilities PLWD from accessing project benefits.

I understand that failure to conform to these provision amount to gross misconduct and are therefore grounds for sanction, penalties or potential termination of employment including prosecution as provided by labor laws of FGS and FMS.

I agree that while working on SNHCP I will:

- a) I will not participate in activities that trigger risks related to exclusion of vulnerable, marginalized, and minority members of the community from project benefits because project investments are rolled out in a context of limited resources against widespread need and amplified by weak formal redress systems and limitations in effective community engagement and participation;
- b) I will not participate in activities that trigger risks related to selection bias and elite capture with potential leakages of project benefits such as training opportunities for auditors, selection for strategic staffing, and reorganization of the civil service;
- c) I will not participate in activities that trigger risks associated with ensuring universal access for all persons, including persons with disabilities.

I do hereby acknowledge that I have read the foregoing individual Code of Conduct, do agree to comply with the standards contained therein.

NAME:

SIGNATURE:

STAMP:

Sign

SNHCP Project Coordinator

E&S SCREENING TEMPLATE

Environmental and Social Screening Template				
SECTION A: General Information				
Date of screening				
Activity/Sub project title				
Activity/Sub project component				
Implementing Partner				
Proposed activity budget				
Proposed activity duration				
ES Screening Team Leader and Contact Details				
ES Screening Team Members				
Site/Activity location				
New/Rehabilitation project				
Project Description. Briefly describe project activities, activities that interact with the ES				
Categorize Project Activities into List A or List B or List C (see above)				
Information about actions needed during the construction including support/ancillary structures and activities required to build them, e.g. need to quarry or excavate borrow materials, laying pipes/lines to connect to energy or water source, need to open an access road etc A description of the location, siting, current land uses, and soil occupation surroundings is required				
Potential Environmental/Social Risks Impacts of Activities	Yes	No	I don't know	If these risks ('yes') refer to:
Risk Category <i>(Please check each line appropriately. At this stage, questions are answered without considering magnitude of impact – only yes, no or I don't know are applicable answers)</i>				
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts				
Is there a risk of diversion of project benefits?				Stakeholder Engagement (SEP) Grievance Redress Mechanisms (GRM)
Is there a risk of lack of monitoring of project activities due to remoteness of location and insecurity?				Security Management
Is there a risk that project benefits may not reach truly vulnerable populations?				Floods Impact Needs Assessment (FINA) Stakeholder Engagement Plan (SEP)

Is there a risk that the activity will cause population influx from neighbouring areas?				Floods Impact Needs (FINA) Stakeholder E Plan (SEP)
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?				Security Management (SMP) Grievance Red Mechanisms (GRM)
Are there any new projects in the vicinity of the sub-project that could contribute to cumulative impacts.				ESMF Provisions
ESS 2: Labour and Working Conditions				
Does the activity include any of the known labor rights / ESS 2 non-compliance risks in Somalia (child and forced labor)?				Labor Management Pr (LMP) Occupational H Safety Plan (OHS)
Does the activity include a construction component?				Labor Management Pr (LMP) C-ESMP Occupational Health a (OHS)
Does the activity include labour-intensive manufacturing?				Labor Management Pr (LMP) Occupational H Safety Plan (OHS)
Does the activity include primary agricultural activities?				Labor Management Pr (LMP) Occupational H Safety Plan (OHS)
Will the activity require a larger contractor workforce?				Labor Management Pr (LMP) Occupational H Safety Plan (OHS) C-
Is there a security risk for Project Workers?				Security Management
Is there a risk of lacking OHS for workers at the construction site?				Occupational Health a (OHS) Pest Managem
Is there a risk of delayed payment of workers?				Labor Management Pr
Is there a risk that workers are underpaid?				Labor Management Pr
Is there a risk that women will not be included in deployment in equal numbers?				Labor Management Pr (LMP) GBV Action P
Does the activity/sub-project include the recourse to community workers? Will the infrastructure works require a worker's camp? If "Yes", how many workers are expected to occupy the camp?				
Are the infrastructure works' activities prone to natural hazards, risks and could result in accidents and injuries to workers during construction or operation?				
Does the activity/work require the use of pest management technique that could affect the agriculture and /or public health?				
ESS 3: Resource Efficiency and Pollution Prevention Management				

Will the activity result utilization of nonrenewable energy in large quantities				
Will the activity result in the production of solid waste? (directly by the project or by workforce)				Waste Management P WBG Environmental, Safety General Guidel Pest Management Plan C-ESMP
Will the activity result in the production of toxic or hazardous waste? (e.g. used oils, inflammable products, pesticides, solvents, pharmaceuticals, industrial chemicals, ozone depleting substances)				General Guidelines Pest Management Plan C-ESMP
Will the activity result in the generation of dust and noise?				C-ESMP
Will the activity result in soil erosion?				C-ESMP
Will the activity produce effluents (waste water)?				C-ESMP Waste Management P
Will the activity result in increased levels of vibration from construction machinery?				C-ESMP
Will the project produce air pollution? (e.g. significant greenhouse gas emissions, dust emissions and other sources)				C-ESMP
Will the activity disturb any fauna and flora?				C-ESMP
Will the activity result in irrigation water with high TDS with more than 1,500 ppm?				C-ESMP Waste Management P
Can the project affect the surface or groundwater in quantity or quality? (e.g. discharges, leaking, leaching, boreholes, etc.)				
Will the project require use of chemicals? (e.g. fertilizers, pesticides, paints, etc.)				
Is there any risk of accidental spill or leakage of material?				
ESS 4: Community Health and Safety				
Is there a risk of community exposure to pesticides?				Pest Management Plan
Is there a risk of communal drinking water pollution through pesticides?				Pest Management Plan
Is there a risk of increased GBV/SEAH cases due to labor influx?				GBV/SEAH Action P Labor Management P
Is there a risk of spread of communal diseases due to labor influx?				Labor Management P (LMP) C-ESMP
Is there a security risk to the community triggered by project activities?				Security Management

Does the activity have the potential to upset community dynamics?				Stakeholder Engagement (SEP) Grievance Redress Mechanisms (GRM)
Will the activity include payments or cash transfers?				Stakeholder Engagement (SEP) Grievance Redress Mechanisms (GRM)
Will the activity expose community members to physical hazards on the project site?				C-ESMP
Will the activity pose traffic and road safety hazards?				C-ESMP
Will the activity include debris removal that may pose a safety hazard for the community?				Waste Management P
Is there a possibility that the activity contaminates open wells?				Waste Management P C-ESMP
Is there a possibility that the activity spreads pathogens and other pollutants (eg latrines)				Waste Management P C-ESMP
Can the activity contribute to the spread of disease (eg health facilities)?				Waste Management P
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement				
Will the project lead to the displacement of a population? (e.g. forceful relocation, relocation of the local community)				Resettlement Policy F (RPF) Resettlement A (RAP)
Will the displacement / resettlement affect IDPs?				Resettlement Policy F (RPF) Resettlement A (RAP)
Is the project located in a conflict area, or has the potential to cause social problems and exacerbate conflicts, for instance, related to land tenure and access to resources (e.g. a new road providing unequal access to a disputed land)?				Stakeholder Engagement (SEP) Grievance Redress Mechanisms (GRM)
Would the project potentially discriminate against women and girls based on gender, especially regarding participation in design and implementation or access to opportunities and benefits?				Stakeholder Engagement (SEP) Grievance Redress Mechanisms (GRM)
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?				Resettlement Policy F (RPF) Resettlement A (RAP)
Will the activity lead to disputes over land ownership?				Resettlement Policy F (RPF) Resettlement A (RAP)
Will the activity lead to blocked access to people in the area?				Resettlement Policy F (RPF) Resettlement A (RAP)
Will the activity require acquisition of land or physical buildings or infrastructure?				

Will the activity requires voluntary land donation? If yes, can all ESS 5 principles on this matter be respected and documented?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)
Did any resettlement occur prior to land acquisition? If so, is there any pending land disputes? Are there any significant legacy issues?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
Will the activity impact sensitive areas?				C-ESMP and ESMF p
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or migration routes, water consumption and contamination?				C-ESMP and ESMF p
Is there a risk that the activity causes loss of precious ecological assets?				C-ESMP and ESMF p
Is the sub-project area (or components of it) located within/adjacent to any protected areas designated by government (national park, national reserve, world heritage site etc.)?				C-ESMP and ESMF p
Are there wetlands (swamp, seasonally inundated areas) that could be affected? Are there any critical, natural habitats, environmentally sensitive areas or threatened species that could be significantly converted/adversely affected due to the works?				C-ESMP and ESMF p
ESS 8: Cultural Heritage				
Will the project be located in or close to a site of natural or cultural value?				Chance Find Procedure
Is the project site known to have the potential for the presence of cultural and natural heritage remains?				
ESS 10: Stakeholder Engagement and Information Disclosure				
Is there a risk that the activity fails to incorporate measures to allow meaningful, effective and informed consultation of stakeholders, such as community engagement activities?				Stakeholder Engagement
Is there a historical exclusion of disabled persons in the area?				Stakeholder Engagement
Is there a lack of social baseline data?				ESMF
Is there a lack of community consultations by the government generally?				Stakeholder Engagement
Are women likely to participate in decision-making processes in regards to the activity?				Stakeholder Engagement
Is there a risk that exclusion of beneficiaries leads to grievances?				Stakeholder Engagement (SEP) Grievance Redress Mechanisms (GRM) –

Is there a risk that the activity will have poor access to beneficiaries?				Stakeholder Engagement (SEP) Grievance Redress Mechanisms (GRM) –
Will the Covid-19 outbreak hamper proper stakeholder engagement?				WB and FGS guidance regulations on Covid-
Has input from community members and those who may be affected by the works been sought?				Stakeholder Engagement Grievance Redress Mechanisms (GRM) – see ESMF
Has the sub-project received overall stakeholder support including from vulnerable individuals and marginalized groups?				Stakeholder Engagement Grievance Redress Mechanisms (GRM) – see ESMF
Is there any opposition to the activity/project?				Stakeholder Engagement Grievance Redress Mechanisms (GRM) – see ESMF
SUMMARY OF THE SCREENING PROCESS				
E&S Screening	Results and Recommendation			
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Individual Risk/ Impact Rating	Mitigation At the end of the screen process, tabulate ESMP Format (see below)	
	Eg Land Degradation	Low	Rehabilitation of worked out areas.	
Is Additional Assessment Necessary? Evaluate the Risks/Impacts and reflect on options (see below)	Screening Result		Summary of Screening Result Justification	
	1. No further ES Assessment required.			
	2. No further ES Assessment required but requires simple ESMP.			
	3. Detailed ESMP. Done internally.			
	4. Detailed ESMP. Contracted to Consultancy.			
	5. ESMP required. Contracted to consultancy.			

E&S Screening	Results and Recommendation		
Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Mitigation, also provide provision of PIU carrying environmental and social offenses committed under the	
	Eg Land Degradation	Rehabilitation of worked out areas.	
	Eg Occupational Safety and Health	Use of appropriate PPE.	
	Eg. Destruction of crops during trenching	Engage the Project Affected Persons. Trench off crops where you cannot avoid.	
Is Additional Assessment Necessary?	Screening Result		Summary of Screening Result Justification
	No further ES Assessment required.		
	No 2. No further ES Assessment required but requires simple ESMP.		
	Yes 1. Detailed ESMP. Done internally.		
	Yes 2. Detailed ESMP. Contracted to Consultancy.		

	YES 2.ESMP required. Contracted to consultancy.	
Next Steps	Screening Result	Action. Select applicable action consistent with the S the screening and follow up tools should be disclosed
	No1. No further ES Assessment required.	Proceed to project implementation in compliance with SEP.
	No 2. No further ES Assessment required but requires simple ESMP.	Produce the ESMP and submit it with Screening Form 2. Proceed to project implementation in compli Action Plan, SEP.
	Yes 1. Detailed ESMP. Done internally.	Submit the Screening form with the TORs for the ES PIU. 2. Produce the ESMP and submit to PIU for review 3. Ensure the detailed ESMP mainstreams the LMP 4. Do not implement works until approval of the ES
	Yes 2. Detailed ESMP. Contracted to Consultancy	Submit the Screening form with the TORs for the ES PIU. 2. Engage a Registered ESIA Consultant to pro first for initial review, then to World Bank for review 3. Ensure the ESMP mainstreams the LMP, GRM, 4. Do not implement works until approval of the ES
	YES 2. ESMP required. Contracted to Registered Consultancy.	Submit the Screening form with the TORs for the ES PIU. 2. Engage a ESIA Consultant to produce ESMP review, then to World Bank for review and approval. 3. Ensure the detailed ESMP mainstreams the SEP. 4. Do not implement works until approval of the de World Bank.

**ANNEX 2:
GBV/SEAH PREVENTION AND RESPONSE
ACTION PLAN**

(Presented as Separate Plan)

ANNEX 3:
LABOR MANAGEMENT PROCEDURES
(Submitted as a Separate Plan)

Initiate Communication Content

- What was the incident? What happened? To what or to whom?
- Where and when did the incident occur?
- What is the information source? How did you find out about the incident?
- Are the basic facts of the incident clear and uncontested, or are there conflicting versions?
- What were the conditions or circumstances under which the incident occurred?
- Is the incident still ongoing or is it contained?
- Is loss of life or severe harm involved?
- How serious was the incident? How is it being addressed? How is the Borrower responding?
- What, if any, additional follow up action is required, and what are the associated timelines?
- Are any Bank staff involved in the incident?

Clear classification of the incident’s severity

- Indicative: Small-scale incident that could indicate risk of future serious events.
- Serious: Incident that has caused significant harm to workers, community members or the environment.
- Severe: An incident that caused great harm to individuals or the environment (e.g. fatality, GBV, forced or child labor)

Examples	Environmental	Social	Occupational Health & Safety
Indicative	Poor quality or delayed site restoration and revegetation	Minor instances of inappropriate behavior of security forces or other Contractor personnel	Minor job site injuries; Absence of health & safety plan and training
Serious	Over-exploitation of natural resources	Case/s of mistreatment of community members or vulnerable groups by project workers or security forces.	Injuries requiring off-site medical attention
Severe	Major river contamination causing decimation of fish population or other aquatic resources	Forced evictions or resettlement of communities without due process or compensation	Any fatality

**ANNEX 5
INCIDENT REPORTING GUIDANCE**

An incident report should contain the following information:

Incident Report Form

Please report any incident within 24 hours to the PIU

Implementing Partner	
Subproject / Activity	
Report Date	
Reported By (Name and Title)	

Details of Incident

Incident Date	
Incident Time	
Incident Place	

Identification of Type of Incident and Immediate Cause

Select the type of the incident from the list below. An incident can be classified at the same time as H&S/environmental/social.

Type of Incidence		
Health and Safety	Social	Environment
Moving Machinery/vehicles at project site	Damage to Cultural Heritage	Chemical/Oil Spill with impact on population and/or environment
Hand Tools	Occurrence of infringement of labor rights	Improper Disposal Waste
Animals or insects	Occurrence of infringement of human rights	Disasters (Earthquake, Flood, etc)
Fire or Explosion at project site	Strike, demonstration	Water Pollution/ Sedimentation
Trips & smaller falls	Other (please specify)	Damage to ecosystems (e.g. damage to flora/fauna)
Drowning	Dust, Fumes, Vapours that impact the population and/or environment	Odor air Emissions
Borrow-pit Management		Dust, Fumes, Vapors, Air pollution with impact on population and/or environment
Noise		Other (please specify)
Temperature or heat		

Overexertion		
Structural Failure		
Chemical/biological		
Stress		
Other (please specify)		

For each type of incident, select the relevant descriptor(s) from the list. You can select up to 5 descriptors for each type of incident. If a descriptor is not listed below, please type in short descriptor in "Other". Add more rows as necessary.

Incident Type	Descriptor 1	Descriptor 2	Descriptor 3	Descriptor 4	Descriptor 5	Other
H&S						
Social						
Environmental						

Provide a description of the immediate cause of the incident:

Description of the Incident

Record all facts prior to and including the incident, if it was a planned activity, describe/list material, ecosystem and property damaged, etc:

Root Cause Analysis

Select the root cause(s) of the incident from the list below. If 'Other', please specify

Root Cause	Yes	No
Improper Planning		
Poor Maintenance		
Poor Supervision		
Poor Quality of Equipment		
No rules, standards, or procedures		
Lack of knowledge or skills		
Improper motivation or attitude		
Failure to comply with rules		
Other		

Additional Questions:

- Is the incident still ongoing or is it contained?
- Is loss of life or severe harm involved?
- What measures have been or are being implemented by the Implementer?

Incidence Report Content

- Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?
- What were the conditions or circumstances under which the incident occurred (if known at this stage)?
- Is the incident still ongoing or is it contained?
- Is loss of life or severe harm involved?
- Is the Borrower aware of the incident? What is their response to date?
- What measures have been or are being implemented by the Borrower/Contractor?

Sample Safeguards Corrective Action Plan (SCAP)

<i>Example SCAP Sections</i>		<i>Possible Borrower Actions</i>
Immediate to near term actions		Stop works, secure the site, provide medical care and counseling, pay compensation, remediate contamination, enforce anti-poaching, notify relevant authorities, design and implement response mechanism, etc.
Medium term/ongoing actions	Documentation, monitoring and reporting	Stream-line, consolidate and review existing ESHS/OHS monitoring and reporting tools, with a focus on increased monitoring of leading indicators to increase effectiveness.
	Contractual agreements /enforcement	Review bidding/contractual arrangements to determine if existing language is adequate to ensure <u>sufficient onsite</u> presence of <u>qualified</u> and independent safeguards professionals for adequate implementation of the health safety plan and identify if any adjustments may be necessary for future agreements.
	Risk assessment, processes, procedures and training plans for managing risks	<p>UXO example: update risk assessment and management plans to address:</p> <ul style="list-style-type: none"> • the UXO-chance find, clarifying (i) risk factors such as the geophysical characteristics of excavation areas and depth of excavation, the civil war history, (ii) the detailed written information and maps to be obtained from Borrower/implementer(s) about past surveys and clearance operations before construction can begin, (iii) situations where mechanical excavation should be chosen over manual excavation, (iv) how to safely conduct manual excavation where mechanical excavation is not possible (with input from the Borrower/implementer(s) and/or other demining experts), (v) develop an adequate training program for workers. •Fire risk and adequate fire extinguishers placement •Electric risk should also be reviewed, and safe work procedures developed for handling, maintaining and checking electric equipment and extension cords.
		<ul style="list-style-type: none"> • Permit to work procedures should be developed for high risk activities with daily verification and sign-off of competent health and safety officers or supervisors.

		<p>Delayed Resettlement Compensation example: update risk assessment and management plans to address:</p> <ul style="list-style-type: none"> • Based on the RCA determination of the reasons for the continued delays in payment of compensation, put in place an effective strategy for addressing them as necessary • Ensure that all outstanding and new claims are appropriately addressed • Determine whether there were impacts that have not previously been considered (livelihoods/loss of business income, vulnerable groups) for which compensation or assistance may be required • Ensure continuing consultation with Project-affected people and a well-functioning grievance mechanism (GRM) • Monitor implementation and provide fortnightly progress reports • Recruit a separate expert to conduct an audit to confirm satisfactory implementation of the process above
	<p>Competencies, roles and responsibilities:</p>	<p>Onsite staffing resources and organizational arrangements dedicated to environment, social safeguards, health and safety by the implementer(s) (e.g., construction company and the supervision consultant) should be reviewed considering the updated risk assessment and findings. This may include adjustments in terms of number, competence, onsite presence, organization, communication and reporting, so that project activities may comply with the EHS/OHS plan requirements.</p>
	<p>High level monitoring and evaluation:</p>	<p>Once the monitoring and reporting system is consolidated, the supervision consultant and PIU should be able to monitor leading indicators such as near-misses (e.g., a heavy load that falls near a worker), and deviations with high risk potential (e.g., absence of protective barriers, uninsured workers) based on daily observations by the Contractor and the supervision consultant.</p>

Xxxxx Company is committed to minimizing significant environmental impacts of our activities, processes and products.
The following Environmental Policy Statement:

- We are committed to comply with all the relevant Somalia National legislations and regulations related to environment.
- Continual improvement in environmental performance incorporating sustainable measurement and monitoring mechanisms;
- We will ensure the responsible use of natural resources, especially energy, raw materials and water in an efficient manner
- We will implement construction mitigation measures, monitoring and audit programs as specified.
- We will minimize the release of any pollutant or effluent that may cause environmental damage to the air, water or soil.
- We will control pollution through adoption of innovative cleaner production technologies;
- We will use environmentally safe and sustainable energy sources to meet our needs, and invest in improved energy efficient technologies where available. Energy efficient management practices will be developed.
- We will minimize the environmental, health and safety risks to the employees and communities in which we operate by employing safe technologies and operating procedures, training the employees and by being constantly prepared for emergencies.
- We will commit management resources to implement this environmental policy; all employees will be made aware of their individual responsibilities for acting in accordance with the Program Environmental Policy.
- We will seek to be good neighbors, improve the aesthetic appearance of the site(s), develop a system for handling complaints, resolving and make great effort to provide an efficient and friendly channel of communication.
- We will conduct annual self-evaluation of our environmental performance and compliance with requirements.
- We will work towards the timely creation of independent annual environment audit procedures to which we will adhere to.

MANAGING DIRECTOR:
SIGNATURE:
STAMP:

ANNEX 7
SAMPLE HEALTH AND SAFETY POLICY

Xxxxxx Company recognizes and adopts the Occupational Safety Health provisions at work place, all other applicable legislation and is therefore committed to ensuring the Health, Safety and Welfare of all employees and any others who could be affected by acts or omissions of **Xxxxxx Company**. Furthermore, **Xxxxxx Company** is committed to continuous improvement in respect of Health and Safety Performance and supporting Management Plan.

We will, so far as is reasonably practicable:

- i. Provide adequate resources to maintain health and safety within the sub-project sites.
- ii. Provide and maintain systems of work which are safe and without risk to workers and school community health.
- iii. Establish arrangements for the use, handling, storage and transportation of articles and substances provided for use at work, which are safe and without risks to health.
- iv. Provide employees with such information, instruction, training and supervision as is necessary to ensure their safety and health at work and that of others who may be affected by their activities.
- v. Ensure that all machinery, plant and equipment are maintained in an efficient and safe working condition.
- vi. Make adequate provision and arrangements for welfare facilities (sanitation facilities, water) at work.
- vii. Keep the workplace safe and ensure that all access and egress points are safe and without risk.
- viii. Monitor health and safety performance to maintain agreed standards.
- ix. Maintain effective communication on the health and safety policy to employees and their representatives.
- x. Provide information and assistance to public on community health and safety issues arising from our operations
- xi. Review our health and safety objectives regularly for continual improvement

The duties of employees are to:

- i. Take reasonable care of their own health and safety, and that of others who may be affected by their acts or omissions at work.
- ii. Not interfere with, misuse or willfully damage anything provided in the company.
- iii. Comply with the company's health and safety policy

MANAGING DIRECTOR:
SIGNATURE:
STAMP:

Operating Procedures

The GRM is implemented as per the standard operational procedures summarized below in terms of detailed list allowable practices (DO's) and disallowed practices (DON'Ts). This will be provided to all PIU and beneficiaries. Where need be, the SOPs will be translated into the respective VMGs languages. The SoPs are presented below.

GRM Standard Operating Procedures

Dos	Stage	Don't
<ul style="list-style-type: none"> ● Build capacity for staff involved in the complaints handling process; ● Establish multiple channels for communication and reporting; ● Use user friendly channel; ● Assign responsibility for uptake and response; ● Create awareness on the GRM; ● Encourage communication/ feedback from the public; ● Spread uptake points across the project management levels and project operational areas ● Acknowledge receipt for each complaint made ● Encourage anonymous complaints 	Uptake	<ul style="list-style-type: none"> ● Create unnecessary restrictions, obstruct grievance process ● Create scary conditions/environment for potential complainant ● Use unfriendly language, tone, expression, cues, etc. ● Forget to take measures to ensure that vulnerable groups are able to access GRM ● Create barriers to complaining by making uptake processes time consuming or complicated ● Charge complainants ● Make judgements prematurely ● Unduly focus on the identity and profiling of the complainant at the expense of issue submitted
<ul style="list-style-type: none"> ● Indicate who is responsible for handling the different types of complaints, including reliable contacts and location; ● Establish clear procedures for the grievance redress process ● Assign each complaint a unique ID reference number 	Sort and Process	<ul style="list-style-type: none"> ● Develop a GRM that does not differentiate between different types of complaints ● Leave any ambiguity about how complaints are supposed to be routed
<ul style="list-style-type: none"> ● Inform users about steps in the complaints handling process ● Stick to agreed schedules/guidelines for responding to users ● Use simple and clear language 	acknowledge and follow-up	<ul style="list-style-type: none"> ● Divulge complainant's identity and profile to others ● Treat GRM users as if their complaints is an inconvenience ● Belittle, dismiss, and ignore complaints
<ul style="list-style-type: none"> ● Objectively evaluate the complaints merits on the basis of facts ● Ensure that investigators are neutral ● Take action that is proportional to the comment or complaint ● Strategically plan for the investigation 	Verify, Investigate and act	<ul style="list-style-type: none"> ● Appoint investigators that are biased ● Breach confidentiality ● Expect complainants to prove that they are right ● Forget to update complainant on the status of their complain
<ul style="list-style-type: none"> ● Build capacity for GRM - M&E ● Indicate importance of grievances ● Establish a tracking system to record, classify, and assess grievances ● Analyze grievance redress data and make improvements 	Monitor and evaluate	<ul style="list-style-type: none"> ● Miss the opportunity to integrate the GRM into the Project's Management Information System ● View the resolution of complaints as an end in itself
<ul style="list-style-type: none"> ● Provide timely feedback 	Provide	<ul style="list-style-type: none"> ● Neglect to follow up with users

<ul style="list-style-type: none"> Contact users to explain how their grievances will be resolved and how/where they can appeal (if need be) 	feedback	<ul style="list-style-type: none"> Keep complaint results as private matter
---	-----------------	--

Grievance Mechanism Forms

GRM_GRIEVANCE HANDLING REGISTER TEMPLATE

No.	Date Received	Name of Complainant/Rep	Complaint Issue	Complaint Channel	Date Acknowledged	Action Taken	Complaint Status

GRM_ACCESS TO INFORMATION REGISTER TEMPLATE

No.	Date Received	Name of Requester	Type of information Requested	Requisition Channel	Request Status

GRM_COMPLAINT INVESTIGATION TEMPLATE

No.	Nature of Complaint	Officer/Department complained Against	Cause of Complaint	Corrective/Preventive Action Taken

GRM_GRIEVANCE LODGING FORM

Ref. No.
SECTION A: Personal Information (*Provision of information in this section is voluntary*)

Complainant’s Name:
 ID Number:
 Postal Address:
 Mobile No.
 Email (where applicable)
 Village/Ward/Sub-County:
 Age:

SECTION B: Complaint Lodge

ITEM	DETAILS
Which public official/office are you complaining about?	
Name/Department/Sub-county/Ward/Agency	
Have you reported this matter to any other county official/office? YES/NO	
If YES, which one?	
Has this matter been the subject of court proceedings? YES/NO	
If NO, please give a brief summary of your complaint and attach all supporting documents (Indicate all the particulars of what happened, where it happened, when it happened and by whom)	
Action Taken	

Place of Submission Signature of Complainant Date

GRM. ACCESS TO INFORMATION REQUEST FORM

Ref. No.

SECTION A: PERSONAL DETAILS

Name:..... (Dr/Mr/Mrs /Ms)
 ID Number:.....
 Postal Address:
 Mobile Phone No.
 Email (where applicable):
 Villag:
 Age:
 Gender: Male/Female / Other (specify):

SECTION B: DESCRIPTION OF INFORMATION REQUESTED

ITEM	DESCRIPTION
I would like to (<i>tick all that apply</i>)	<input type="checkbox"/> Inspect the record <input type="checkbox"/> Listen to the record <input type="checkbox"/> Have a copy of the record availed to me
Delivery Method (<i>tick where applicable</i>)	<input type="checkbox"/> Collection in person <input type="checkbox"/> By email <input type="checkbox"/> By mail
Does the information requested concern the life or liberty of any person?	<input type="checkbox"/> No <input type="checkbox"/> Yes (<i>explain</i>)
Is the request being made on behalf of another person or group of persons?	<input type="checkbox"/> No <input type="checkbox"/> Yes (<i>explain</i>) <input type="checkbox"/> No <input type="checkbox"/> Yes (<i>explain</i>)
Action taken	

Place of Submission Signature of Complainant Date

GRIEVANCE MANAGEMENT AND ACCESS TO INFORMATION INFRASTRUCTURE

No.	INDICATORS	DETAILS OF IMPLEMENTATION
1	Physical location: Provide the contact and physical address	Include the details of all GRM offices.
2	<ul style="list-style-type: none"> a. Provide names, contact details(Official telephone & e-mail address) and designation of officers in-charge of Grievance handling b. Provide names, contact details and designation of the Information access officers 	Include details for all the GRM offices.
3	Communication channels: <ul style="list-style-type: none"> a. Complaint desk email(s) b. Dedicated telephone line(s) c. Official email address of the county d. County website (Links/portals to access information and grievance handling information e. Official e-mail address of the County Secretary 	
4	Updated service delivery charters that include GRM	Include the service charters for all the departments and agencies
5	<ul style="list-style-type: none"> a. Complaints Register b. Access To Information Register 	Include the registers of all GRM offices but for internal purposes only
6	GRM Policy and Procedures	
7	Legislation, Policy and Procedures	
8	<ul style="list-style-type: none"> a. Grievance Handling Committee members: appointment letters & minutes of meetings held b. Designation letters for all GRM & Information officers 	

GRM_ M&E TOOL

Name of County: _____

<i>OUTCOME: Services rendered by county government</i>					
<i>INDICATOR: Percentage change in the complaints resolved in a year</i>					
No. of complaints received	Mode of complaint lodge	No. of complaints pending	No. of complaints resolved	Duration taken to resolve complaint	Recommendation for system improvement

Compiled by

Signature

Date

Approved by

Signature

Date

GRM _ SUMMARY COMPLAINTS' REPORTING FORM

Name of County: _____

Reporting Period: Monthly/Quarterly/Annually _____

OUTCOME: Services rendered by county government improved

INDICATOR: Percentage change in the complaints resolved in a year (to be reported once per year)

Sector	Administrative Unit	No. of Complaints Received	Resolved complaints		Pending complaints		Modes of complaint lodge	Average duration taken to resolve complaint
			No.	%	No.	%		

Compiled by

Signature

Date

Approved by

Signature

Date

Gender-based Violence / Sexual Exploitation and Abuse (GBV/SEA)

GBV/SEA Case Registration Form

GBV/SEA/SH Case Registration Form	
Administrative Information	
	Grievance ID
2	Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)
3	Date of grievance registration
4	Date of Incident
5	Reported by survivor or an escort of the survivor, in the presence of the survivor
6	Reported by someone other than the survivor without survivor present
Survivor Information	
7	Gender / age
8	Location / Residence
9	Current civil/marital status
1	Occupation
1	Is the survivor a person with mental or physical disabilities?
1	Is the survivor an unaccompanied or separated child?
1	Was the perpetrator related to the project?
1	Has Informed Consent been provided? yes/no?
	Has the case been reported elsewhere (including police / lawyer/health services/psychosocial counseling, other)?
Sub-Section for Child Survivor	
	If the survivor is a child (less than 18 years), does he or she live alone?
	If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; elative; spouse; other)
	What is the caretaker's current marital status?
Details of the Incident (in survivor's words)	
	Details of the incident
	Incident location and time
	Were money, goods, benefits and/or services exchanged in relation to the incident?
Alleged Perpetrator Information	

Number of alleged perpetrators	
Sex of alleged perpetrators	
Age group of alleged perpetrator(s)	
Indicate relationship between perpetrator(s) and survivor	
Main occupation of the alleged perpetrator(s)	
Employer of the alleged perpetrator(s)	
Planned Actions / Actions Taken	
Was the survivor referred by anyone?	
Was the survivor referred to a safe house / shelter?	
Which services does the survivor wish to be referred to? <ul style="list-style-type: none"> • Psychosocial services • Legal services • Police • Health services • Livelihood program 	
What actions were taken to ensure the survivor's safety?	
Describe the emotional state of the client at the beginning of the report	
Other relevant information	

ESMF SECURITY CHECKLIST

EMSF Checklist

NAME OF IMPLEMENTING PARTNER:				
DATE:				
NAME OF RESPONDENT:				
NO	CRITERIA	YES	NO	REMARK
	General Security			
1	Does the IP conduct security risk assessments prior to all activity?			
2	Is there a continuous review process of the security risk assessments in place?			
3	Are all Security protocols linked to these risk assessments, i.e. does the level of risk identified directly impact on which security mitigation measures are employed?			
4	Does the IP have a clear, formal and transparent internal Security hierarchy with clearly denoted security responsibilities?			
5	Does the IP employ a full time security professional to manage and mitigate risk for its personnel in Somalia?			
6	Do IP staff responsible for security have the authority to take or demand corrective action?			
7	Is there an effective procedure to escalate or deescalate security IP posture?			
8	Does the IP maintain SOPs for the Security of personnel, property and infrastructure?			
9	Are all IP personnel aware of their responsibilities within these SOPs?			
10	Does the IP hold and maintain communication protocols, are these robust enough to ensure communication with all personnel during emergencies? i.e. can the IP reach all of its personnel all of the time?			
11	Does the IP hold and maintain movement protocols, are these implemented effectively and are they linked to Security Risk Assessments?			
12	Are IP staff who are responsible for security obliged to take action for all project missions?			
13	Does the IP maintain access mapping?			
14	Do clear lines of communication exist for project workers when organizing missions and understanding the required levels of security and mitigation measures?			
15	Are there internal processes in place to record, track, and monitor the ongoing missions and any action taken on them?			
16	Is there a templated and mandated security reporting framework?			

17	Are project personnel provided with pre deployment briefings (security briefings), HEAT training, culture briefings, and training on the IP's security procedures?			
18	Are all workers (including from sub-contractors) inducted to internal safety and security policies?			
19	Does the IP maintain and train its personnel on in extremis 'Actions on'?			
20	Does the IP conduct regular security exercises, table top and physical, to test risk mitigation measures?			
21	Does a process for quality assurance and periodic evaluation of the internal security policies and procedures exist, that informs proactive actions for development?			
22	Does the IP have a quality assurance mechanism to qualify security contractors performance?			
23	Do clear security service procurement guidelines exist?			
24	Is there a security component to the recruitment process, i.e. criminal background checks			
25	Does the IP have established community engagement protocols ?			
26	Does the IP have Crisis response procedures (including Hostage incident management protocols)?			
27	Does the IP have effective Headcount procedures in place i.e. can it, at any time, accurately locate all its personnel?			
28	Does the IP hold and maintain effective Relocation and Evacuation procedures? and are these tested regularly?			
29	Are these Relocation and Evacuation procedures tested regularly?			
30	Does the workers' safety and security policies cover all types of workers?			
	Does the IP request every worker to sign a Code of Conduct with reference to internal safety and security policies?			
	Does the IP request every sub-contractor to request from its workers to sign a Code of Conduct with reference to internal safety and security policies?			
	Is the IP and its subcontractors able to furnish records of all mission information and project worker incidents, and provide them to the PIU?			

E- WASTE MANAGEMENT PLAN

Environmental Impacts			
Impact	Mitigation Measure	Monitoring Tools	Responsibility
Air Pollution	<ul style="list-style-type: none"> Procure Electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as e-Waste. Apply WBG Procurement procedures and GIIP. Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to operational needs Implement stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste to be managed. Identify and recycle some of the ICT products that can be reintroduced into the operational processes. 	<ul style="list-style-type: none"> Review of procurement evaluation report for the manufacturers supplying the electronic devices. Records of good housekeeping and visual inspection. Review of procurement evaluation report for the manufacturers supplying the electronic devices. Availability of E-waste receptacles for collecting e-waste. Inclusion of e-waste management provisions in contracts. Inclusion of E&S measures that cover labor, E&S mitigation measures into contracts. Records of good housekeeping and visual inspection. Certificate of disposal of E-wastes given by a licensed E-waste firm, stating that E-waste from the project has been successfully disposed of. Awareness campaigns and publications for users of electronic devices on E- waste management. Assess the contracts and staffing of e-waste contractors to ensure no child labor is employed. 	Project implementers & Contractors
Increased amount of waste	<ul style="list-style-type: none"> Establish E-waste collection centers, including collection bins, receptacles. Regular audits of e-waste segregation and collection practices. Tracking of e-waste generation trends by type and amount, preferably by facility departments Documenting any changes to a storage facility, and any significant changes in the quantity of materials in storage. 	<ul style="list-style-type: none"> Certificate of disposal of E-wastes given by a licensed E-waste firm, stating that E-waste from the project has been successfully disposed of. Audit reports present. Records of duly filled tracking forms. 	
Water pollution	<ul style="list-style-type: none"> Instituting good housekeeping and operating practices, including inventory control to reduce the amount of e-waste 	<ul style="list-style-type: none"> Records of good housekeeping and visual inspection. 	

	resulting from materials that are out-of-date, off specification, contaminated, damaged, or excess to operational needs		
Economic Impacts			
Increased healthcare expenditure	<ul style="list-style-type: none"> Remitting all statutory deductions as per the laws of the Federal Government of Somalia. 	<ul style="list-style-type: none"> Checking of medical records for the workers 	
Informal trade and e-waste management centre	<ul style="list-style-type: none"> Contract a licensed E-waste firm/ or liaise with appropriate authorities for the timely removal of E-waste for treatment and disposal at permitted facilities. Ensure that receiving entities or firms are contractually committed to providing their workers with all necessary requirements and provisions. Workers need to be aware of the existence of the Workers' GM and are to be provided with orientation. 	<ul style="list-style-type: none"> Availability of E-waste receptacles for collecting e-waste. Availability of licenses and permits for the facilities. 	Project implementers & Contractors
Loss of useful resources/materials	<ul style="list-style-type: none"> Identify and recycle some of the E-waste products that can be reintroduced into other operational processes. Identification, labelling, and segregation of e-waste at source E-waste quantification, and qualitative record keeping 	<ul style="list-style-type: none"> Availability of E-waste receptacles for collecting e-waste 	
Social Impacts			
Health and Safety of the Public	<ul style="list-style-type: none"> Contract a licensed E-waste firm/ or liaise with appropriate authorities for the timely removal of E-waste for treatment and disposal at permitted facilities. Ensure that receiving entities or firms are contractually committed to providing their workers with all necessary requirements and provisions. Raising awareness campaigns to the public. Engaging in stakeholder participation. 	<ul style="list-style-type: none"> Awareness campaigns and publications for users of electronic devices on E- waste management. Availability of licenses and permits for the facilities 	Project implementers & Contractors
Loss of appreciation to ICT	<ul style="list-style-type: none"> Raising awareness for the users of electronic devices to ensure that they engage in best practices for E-waste management. 	<ul style="list-style-type: none"> Awareness campaigns and publications for users of electronic devices on E- waste management. 	
Aesthetic value of land	<ul style="list-style-type: none"> Establish E-waste collection centers, including collection bins, receptacles. Create banners and posters and distribute them in strategic places. 	<ul style="list-style-type: none"> Availability of E-waste receptacles for collecting e-waste. Availability of posters and banners on best E-waste practices. 	
Child Labor and GBV impacts	<ul style="list-style-type: none"> Inclusion of E&S measures that cover labor, E&S mitigation measures into contracts. Preparing a detailed LMP for the contractors to adhere to. 	<ul style="list-style-type: none"> Assess the contracts and staffing of e-waste contractors to ensure no child labor is employed. 	

INFECTION CONTROL & WASTE MANAGEMENT PLAN (ICWMP)

1. Introduction

1.1 Describe the project context and components

1.2 Describe the targeted healthcare facility (HCF):

- Type: E.g. general hospital, clinics, inpatient/outpatient facility, medical laboratory, quarantine or isolation centers;
- *Special type of HCF in response to COVID-19: E.g., existing assets may be acquired to hold yet-to-confirm cases for medical observation or isolation;*
- Functions and requirement for the level infection control, e.g., biosafety levels;
- Location and associated facilities, including access, water supply, power supply;
- Capacity: beds

1.3 Describe the design requirements of the HCF, which may include specifications for general design and safety, separation of wards, Heating, Ventilation and Air Conditioning (HVAC), autoclave, and waste management facilities.

2. Infection Control and Waste Management

2.1 Overview of infection control and waste management in the HCF

- Type, source and volume of HCW generated in the HCF, including solid, liquid and air emissions (if significant)
- Classify and quantify the HCW (infectious waste, pathological waste, sharps, liquid and non-hazardous) following WBG [EHS Guidelines](#) for Healthcare Facilities and pertaining GIIP.
- *Given the infectious nature of the novel coronavirus, some wastes that are traditionally classified as non-hazardous may be considered hazardous. It's likely the volume of waste will increase considerably given the number of admitted patients during COVID-19 outbreak. Special attention should be given to the identification, classification and quantification of the healthcare wastes.*
- Describe the healthcare waste management system in the HCF, including material delivery, waste generation, handling, disinfection and sterilization, collection, storage, transport, and disposal and treatment works
- Provide a flow chart of waste streams in the HCF if available
- Describe applicable performance levels and/or standards
- Describe institutional arrangement, roles and responsibilities in the HCF for infection control and waste management

2.2 Management Measures

- Waste minimization, reuse and recycling: HCF should consider practices and procedures to minimize waste generation, without sacrificing patient hygiene and safety considerations.
- Delivery and storage of specimen, samples, reagents, pharmaceuticals and medical supplies: HCF should adopt practice and procedures to minimize risks associated with delivering, receiving and storage of hazardous medical goods.
- Waste segregation, packaging, color coding and labeling: HCF should strictly conduct waste segregation at the point of generation. Internationally adopted method for packaging, color coding and labeling the wastes should be followed.
- Onsite collection and transport: HCF should adopt practices and procedures to timely remove properly packaged and labelled wastes using designated trolleys/carts and routes. Disinfection of pertaining tools and spaces should be routinely conducted. Hygiene and safety of involved supporting medical workers such as cleaners should be ensured.

- Waste storage: A HCF should have multiple waste storage areas designed for different types of wastes. Their functions and sizes are determined at design stage. Proper maintenance and disinfection of the storage areas should be carried out. Existing reports suggest that during the COVID-19 outbreak, infectious wastes should be removed from HCF's storage area for disposal within 24 hours.
- Onsite waste treatment and disposal (e.g. an incinerator): Many HCFs have their own waste incineration facilities installed onsite. Due diligence of an existing incinerator should be conducted to examine its technical adequacy, process capacity, performance record, and operator's capacity. In case any gaps are discovered, corrective measures should be recommended. For new HCF financed by the project, waste disposal facilities should be integrated into the overall design and ESIA developed. Good design, operational practices and internationally adopted emission standards for healthcare waste incinerators can be found in pertaining EHS Guidelines and GIIP.
- Transportation and disposal at offsite waste management facilities: Not all HCF has adequate or well-performed incinerator onsite. Not all healthcare wastes are suitable for incineration. An onsite incinerator produces residuals after incineration. Hence offsite waste disposal facilities provided by local government or the private sector are probably needed. These offsite waste management facilities may include incinerators, hazardous wastes landfill. In the same vein, due diligence of such external waste management facilities should be conducted to examine its technical adequacy, process capacity, performance record, and operator's capacity. In case any gaps are discovered, corrective measures should be recommended and agreed with the government or the private sector operators.
- Wastewater treatment: HCF wastewater is related to hazardous waste management practices. Proper waste segregation and handling as discussed above should be conducted to minimize entry of solid waste into the wastewater stream. In case wastewater is discharged into municipal sewer sewerage system, the HCF should ensure that wastewater effluent comply with all applicable permits and standards, and the municipal wastewater treatment plant (WWTP) is capable of handling the type of effluent discharged. In cases where municipal sewage system is not in place, HCF should build and properly operate onsite primary and secondary wastewater treatment works, including disinfection. Residuals of the onsite wastewater treatment works, such as sludge, should be properly disposed of as well. There're also cases where HCF wastewater is transported by trucks to a municipal wastewater treatment plant for treatment. Requirements on safe transportation, due diligence of WWTP in terms of its capacity and performance should be conducted.

3. Emergency Preparedness and Response

Emergency incidents occurring in a HCF may include spillage, occupational exposure to infectious materials or radiation, accidental releases of infectious or hazardous substances to the environment, medical equipment failure, failure of solid waste and wastewater treatment facilities, and fire. These emergency events are likely to seriously affect medical workers, communities, the HCF's operation and the environment.

Thus, an ERP that is commensurate with the risk levels is recommended to be developed. The key elements of an ERP are defined in ESS 4 Community Health and Safety (para. 21).

4. Institutional Arrangement and Capacity Building

A clearly defined institutional arrangement, roles and responsibilities should be included. A training plan with recurring training programs should be developed. The following aspects are recommended:

- Define roles and responsibilities along each link of the chain along the cradle-to-crave infection control and waste management process;

- Ensure adequate and qualified staff are in place, including those in charge of infection control and biosafety and waste management facility operation.
- Stress the chief of a HCF takes overall responsibility for infection control and waste management;
- Involve all relevant departments in a HCF, and build an intra-departmental team to manage, coordinate and regularly review issues and performance;
- Establish an information management system to track and record the waste streams in HCF; and
- Capacity building and training should involve medical workers, waste management workers and cleaners. Third-party waste management service providers should be provided with relevant training as well.

5. Monitoring and Reporting

Many HCFs in developing countries face the challenge of inadequate monitoring and records of healthcare waste streams. HCF should establish an information management system to track and record the waste streams from the point of generation, segregation, packaging, temporary storage, transport carts/vehicles, to treatment facilities. The HCF is encouraged to develop an IT based information management system should their technical and financial capacity allow. Reports shall be prepared by each vaccination centre and submitted to the PCIU every quarter, as part of the regular reporting by the contractor engaged for the project (UNICEF).

As discussed above, the HCF chief takes overall responsibility, leads an intra-departmental team and regularly reviews issues and performance of the infection control and waste management practices in the HCF. Internal reporting and filing systems should be in place.

Externally, reporting should be conducted per government and World Bank requirements