

**FEDERAL GOVERNMENT OF SOMALIA**



**MINISTRY OF FINANCE**

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

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

**MAY 2023**

**TABLE OF CONTENTS**

1	<b>INTRODUCTION</b> .....	1
1.1	Background Information.....	1
1.2	Project Components.....	2
1.3	Project Beneficiaries.....	3
1.4	Project Implementation Arrangements .....	3
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 .....	5
1.6.3	Stakeholder Consultations .....	5
2	<b>DESCRIPTION OF ADMINISTRATIVE, LEGAL AND POLICY FRAMEWORK</b> .....	7
2.7.1	ESS1: Assessment and Management of Environmental and Social Risks and Impacts.....	15
2.7.2	ESS2: Labor and Working Conditions .....	16
2.7.3	ESS 3: Resource Efficiency and Pollution Prevention and Management .....	17
2.7.4	ESS4: Community Health and Safety.....	17
2.7.5	ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources, ..	18
2.7.6	ESS8: Cultural Heritage .....	18
2.7.7	ESS10: Stakeholder Engagement and Information Disclosure .....	19
2.7.8	Legal Gap Analysis.....	19
3	<b>BASELINE ENVIRONMENT AND SOCIAL ECONOMIC INFORMATION</b> .....	25
3.1	Biophysical Baseline .....	25
4	Potential Environmental and Social Impacts and Mitigation Measures .....	34
5	Procedures for Preparation, Review, Clearance, and Implementation of environment and social Safeguards Instruments .....	39
5.1.1	Environment and Social Screening.....	39
5.1.2	Environment and Social Scoping.....	40
5.1.3	Environmental Social Risk Classification .....	60
5.1.4	Mitigation and Enhancement Measures.....	63
5.1.5	Residual Impact .....	64
5.1.6	Management and Monitoring and Audit.....	64
5.2	Preparation of Environment and Social Instruments .....	41
5.3	Review and Approval .....	42
5.4	Public Consultations and Disclosure .....	42
5.5	Environmental and Social Provisions in the Tender Documents .....	42
5.6	Licensing and Permits.....	44
5.7	Construction Stage.....	44
5.8	Implementation Monitoring and Supervision .....	45
6	<b>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN, INCLUDING THE INSTITUTIONAL ARRANGEMENTS FOR THE PROJECT IMPLEMENTATION AND SUPERVISION</b> .....	46
6.1	Implementation Arrangements of ESMP.....	46
7	<b>INSTITUTIONAL ARRANGEMENTS FOR ESMF IMPLEMENTATION</b> .....	59
7.1	Institutional Arrangement.....	59
7.2	Institutional Frameworks on Environment and Social Safeguards in FGS Somalia .....	59
7.3	Institutional Frameworks on Environment and Social Safeguards in Somaliland .....	59
7.4	Role of institutions and other Entities relevant to implementation of ESMF.....	60
7.5	Capacity Development for Environmental and Social Management and Monitoring.....	60
7.6	Monitoring and Reporting .....	65
7.6.1	Internal Monitoring and Reporting .....	65
7.6.2	External Monitoring and Reporting.....	66

## ESMF – SERP

7.7	Bank’s Supervision.....	66
7.8	Resource and Budget.....	67
8	<b>GRIEVANCE REDRESS MECHANISMS</b> .....	68
8.1	Grievances Process Overview .....	68
8.2	GRM Core Principles .....	68
8.3	GRM Value Chain .....	69
8.4	GBV/SEAH-related Grievance.....	70
8.5	WB’s Grievance Redress Service (GRS) .....	76
9	<b>STAKEHOLDER ENGAGEMENT / CONSULTATION AND DISCLOSURE</b> .....	77
9.1	Overview.....	77
9.2	Stakeholder Inventory.....	77
10	<b>APPENDICES</b> .....	86

## ESMF – SERP

### List of Tables

Table 2-1: GAP analysis for WB and FGS (Somalia) / Somaliland Polices, Laws & regulations relevant to this ESMF .....	20
Table 4-1: Component 1 Interventions and Potential E&S Risks .....	35
Table 4-1: Component 2 Interventions and Potential E&S Risks .....	36
Table 4-3: Component 3 Interventions and Potential E&S Risks .....	37
Table 4-4: Mitigation of Potential Risks under Component 1 Interventions.....	51
Table 4-5: Mitigation of Potential Risks under Component 2 Interventions.....	53
Table 4-6: Mitigation of Potential Risks under Component 3 Interventions.....	54
Table 5-1: Impact characteristics.....	61
Table 5-2: Impact characteristics.....	61
Table 5-3: Definition of Likelihood .....	61
Table 5-4: Impact Significance.....	63
Table 5-5: Inclusion of Environment and Social Provisions in Tender Documents .....	43
Table 6-1: Social Impacts Mitigation and Monitoring Plan .....	47
Table 6-2: Environment Impacts Mitigation and Monitoring Plan .....	54
Table 7-1: Institutions and Entities Relevant in ESMF Implementation.....	60
Table 7-2: Capacity Building and Training Plan.....	62
Table 7-3: Resource and Budget.....	67
Table 9-1: Stakeholders Inventory.....	77
Table 9-2: Stakeholder Consultations Outcome.....	79

### List of Figures

Figure 3-1: Map of Somalia: Source: <a href="https://www.google.com/search?q=Somalia+Atlas+Map">https://www.google.com/search?q=Somalia+Atlas+Map</a> .....	25
Figure 3-2: Map showing Juba and Shabelle rivers.....	29
Figure 3-3:: Map showing Somalia's ecological parks, coral reefs and protected areas .....	31
Figure 3-4: Key Areas of Displacement in Somalia.....	43

**ABBREVIATIONS & ACRONYMS**

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
DRM	Domestic Revenue Mobilization
DSA	Detailed Site Assessment
DSI	Durable Solution Intervention
DMP	Dust Management Plan
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
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
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

## ESMF – SERP

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
PCU'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
SERP	Somalia Enhancing Public Resources Management Project
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SL	Somaliland
SRAMF	Security Risk Assessment Management Framework
SWS	South West Somalia
TA	Technical Assistants
TPMA	Third Party Monitoring Agents
NPARF	National Public Administration Reform Strategy Framework
UNFCCC	UN Framework Convention on Climate Change
UNICEF	United Nations International Children Emergency Fund
UNHCR	United Nations High Commissioner for Refugees
VAC	Violence against Children
WASH	Water Sanitation and Hygiene

## EXECUTIVE SUMMARY

### CONTEXT

Somalia is bordered by Ethiopia to the west, Djibouti to the northwest, the Gulf of Aden to the north, the Indian Ocean to the east, and Kenya to the southwest. Somalia has the longest coastline on Africa's mainland. The terrain consists mainly of plateaus, plains, and highlands. Hot conditions prevail year-round, with periodic monsoon winds and irregular rainfall. Somalia has an estimated population of around 17 million<sup>1</sup>, of which over 2 million live in the capital and largest city Mogadishu which has been described as Africa's most culturally homogeneous country. Around 85% of population are ethnic Somalis, who have historically inhabited the country's north. Ethnic minorities are largely concentrated in the south.

Somalia has been without a functional central government, making it the longest-running instance of complete state collapse in postcolonial Africa. A new constitution was adopted in 2012 and lays the framework for governance in the country. The constitution specifies and establishes a federal political structure, including a parliament, the Federal Government of Somalia (FGS) and the constituent Federal States of Somalia (FMSs). The country has also successfully undertaken three peaceful electoral processes at the federal level - in late 2012, early 2017 and mid-2022. The Federal Parliament of Somalia elects the President and Prime Minister and has the authority to pass and veto laws. It is bicameral, and consists of a 275-seat lower house, as well as an upper house, capped at 54 representatives. By law, at least 30% of all MPs must be women.

Although much remains to be done to stabilize Somalia and secure a lasting political settlement, the sustained political, economic, and institutional reforms undertaken supported by the Somali government in partnership with the international community have succeeded in rebuilding a degree of core state capabilities. Perennial droughts and occasional flooding remain key challenges in enabling meaningful livelihoods for the majority, especially in the rural areas. Although long term political stability remains in sight, there are short term political challenges manifested in a weak and fragile electoral system, politicization of discipline forces clan entrenched political contest and the Al Shabab menace.

### PROJECT INFORMATION

The Project Development Objective (PDO) of the Somalia Enhancing Public Resource Management Project (SERP) is to strengthen accountability, transparency, and institutional capacity in public resource management, across participating entities. The project will achieve the PDO through an innovative design to implement interdependent reforms in public resource management, in an integrated manner, across the whole of Somalia. The project supports the strengthening of Public Finance Management (PFM), Domestic Revenue Mobilisation (DRM), and Public Sector Management (PSM) across Somalia. The proposed project rests on the premise that synergies and sustainable improvements can be achieved by taking a comprehensive approach

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<sup>1</sup> "World Population Prospects 2022". population.un.org. United Nations Department of Economic and Social Affairs, Population Division. Accessed on April 4, 2023.

## ESMF – SERP

to governance reforms. In this regard, the project design aims to explore in detail the interlink between public financial management (PFM), domestic revenue mobilization (DRM), and the public sector.

The project components and subcomponents are summarized in **Table E-1** below.

**Table E-1: SERP Components**

Components	Subcomponents
1) Public Financial Management	1.1 Support essential budget execution functions
	1.2 Strengthen PFM for service delivery in the health and education sectors
	1.3 Support capacity building of PFM staff
	1.4 Facilitate the harmonization of PFM systems between FGS and FMS
	1.5 Improve budget preparation and transparency
	1.6 Strengthening Public Investment Management
2) Domestic Revenue Mobilization	2.1 Strengthening and harmonizing tax policy capacity
	2.2 Strengthening and harmonizing inland revenue and selected customs administration systems and capacity
	2.3 Strengthening and harmonizing taxpayer education and facilitation
3) Public Sector Institutions Management and Performance	3.1 Strengthening the Capacity and Performance of Central and Line Ministries, Departments, and Agencies building on the work of the PREMIS-PFM Project, CIP, and CSSP.
	3.2 Strengthening the implementation of workforce management policies.
	3.3 Expansion of key government services to local governments in Somaliland.
4) Project Management, Coordination, and Support in Delivery	4.1 Project management
	4.2 Results monitoring, which along with conducting day to day M&E and supporting government capacity will include a survey-based impact assessment.

### THE ESF FRAMEWORK AND THIS EMSF

This project will be screened for environmental and social risks using the World Bank’s Environmental and Social Framework (ESF). The ESF consists of a Vision for Sustainable Development,<sup>2</sup> and ten Environmental and Social Standards (ESSs),<sup>3</sup> which set out the requirements that apply to the Federal Republic of Somalia, an Environmental and Social Policy for Investment Project Financing (IPF),<sup>4</sup> which sets out the requirements that apply to the Bank, and an Environmental and Social Directive for IPF<sup>5</sup> and a Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.<sup>6</sup> The Framework applies to all IPF projects initiated on or after October 1, 2018.

The ESF supports green, resilient, and inclusive development by strengthening protections for people and the environment and making important advances in areas such as labor, inclusion and non-discrimination, gender, climate change, biodiversity, community health and safety, and stakeholder engagement. It uses a risk-based and proportionate approach that applies increased

<sup>2</sup> See <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=15&zoom=80>

<sup>3</sup> <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

<sup>4</sup> <https://thedocs.worldbank.org/en/doc/360141554756701078-0290022019/original/WorldBankEnvironmentalandSocialPolicyforInvestmentProjectFinancing.pdf>

<sup>5</sup> <https://ppfdocuments.azureedge.net/52955d77-eaea-40fa-9e42-299529933719.pdf>

<sup>6</sup> <https://policies.worldbank.org/en/policies/all/ppfdetail/9598117e-421d-406f-b065-d3dfc89c2d78>



## ESMF – SERP

oversight and resources to complex projects and allows for greater responsiveness to changes in project circumstances through adaptive risk management and stakeholder engagement. It promotes integrated environmental and social risk management.

The ESF places an emphasis on strengthening national environmental and social management systems and institutions and supporting Borrower capacity building. It promotes enhanced transparency and stakeholder engagement through timely information disclosure, meaningful and ongoing consultations throughout the project life cycle, and responsive grievance mechanisms to facilitate resolution of concerns and grievances of project-affected parties.

This Environment and Social Management Framework (ESMF) is an instrument required under the Bank's ESF and has been prepared to assist in screening, assessment and management of environmental and social risks of the project from early stage project planning. The ESMF includes context-relevant mitigation measures that shall be incorporated into the design and implementation of project activities. The ESMF provides specific guidance on the policies and procedures to be followed for environmental and social due diligence, screening and routine assessment, along with roles and responsibilities of the various stakeholder and agencies in the project.

The ESMF's focus is on identifying, characterizing, mitigating and monitoring the SERP's environmental and social (E&S) risks, including adverse E&S risks and impacts that are likely to occur during the implementation of activities in Component 3, and specifically in Subcomponent 3.1, which entails the construction of buildings to host offices and Information Technology (IT) labs for use by the Civil Service Commission.

Threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence may occur during both the construction and operational phases of the project. This will mostly apply to the project workers involved in Components 1 and 2, who will be involved in drafting policies, programs, plans, strategies, laws and/or regulation, and IT management systems, and Component 1 feasibility studies, detailed technical designs, safeguard instruments, bid documents and IT management systems.

The ESMF assesses potential discrimination toward individuals or groups regarding access to development resources and project benefits, particularly those who may be disadvantaged or vulnerable. The benefits as discussed under Subcomponent 3.1 on staff capacity enhancement in the Ministries Department and Agencies (MDAs) and 3.2 on Civil Service Management Systems and Policies, include, Pay reviews, Grading, and Pension among others. The ESMF also assess risks related to project impacts falling disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable. This risk will be related to Subcomponent 2.2, which involves interventions such as modernization and automation, capacity building and scholarships, and taxpayer education and facilitation. Finally, the ESMF also assesses impacts on the health, safety and well-being of workers and project-affected communities. This will apply to staff and community who will interphase with civil works activities involving rehabilitation and construction of offices as indicated under Subcomponent 3.1.

## ESMF – SERP

### 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) SERP’s Project Appraisal Document (PAD), November 2022 version, SERP’s Stakeholder Engagement Plan (SEP) February 2022 version, SERP’s Environmental and Social Review Summary (ESRS) and SERP’s Environmental and Social Commitment Plan (ESCP), dated March 2022.

Stakeholder consultations were significant to the preparation of this ESMF and formed the basis for the determination of potential project impacts and the design of viable mitigation measures. Specifically, from January 20<sup>th</sup> to 31<sup>st</sup> 2022, stakeholder consultation was undertaken with implementing partners in (i) Galmudug State of Somalia, Dhusamareb; (ii) Galmudug Civil Service Commission; (iii) Hirshabelle Civil Service Commission; (iv) Jubaland Civil Service Commission; (v) Auditor General Puntland State; (vi) PCU for SERP; (vii) South West Civil Service; and Office of the Auditor General, Somalia. The issues raised and concerns expressed as well as the possible mechanisms of addressing these issues and concerns are presented separately under the project’s SEP and summarized in Table 9.2 of this ESMF

### ENVIRONMENT AND SOCIAL RISKS

The project risk rating is assessed as “Moderate” for environmental risks and “Substantial” for social risks. The overall project risk rating, therefore, is ‘Substantial.’ While project activities are designed to have significant positive impacts through the transformation of the civil service and overall service delivery to citizens, the likelihood of project activities leading to adverse social risks and impacts is considered Substantial. Further, Technical assistance activities under the Project will be carried out in accordance with terms of reference acceptable to the Bank that are consistent with the provisions of Environment and Social Framework (ESF). Key environmental and social risks that relate to the SERP segregated as per project components are summarized in **Table E-2** below.

**Table E-2: An analysis of SERP Components and Environment and Social Risks**

<b>Component</b>	<b>Risks</b>
<b>Component 1</b> Public Financial Management	<b><u>Social Risks</u></b> Threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence. This will apply to project workers (Technical Assistants or TA) in drafting of policies, programs, plans, strategies, laws and/or regulation IT management systems and the team that will be involved in preparation of structural designs, layout plans and architectural impression for proposed office blocks and IT labs in the FMS,, ESF instruments, and bid documents and IT management systems  <b>Specific security issues include the ones listed below</b>

**ESMF – SERP**

<b>Component</b>	<b>Risks</b>
	<ul style="list-style-type: none"> <li>• Attacks to personnel working on the project by militia groups</li> <li>• Attacks on personnel working on the project threats based on clan sensitivity</li> <li>• Attacks on personnel working on the project due to the fact of them holding senior positions</li> </ul>
<p><b>Component 2</b></p> <p>Domestic Revenue Mobilization</p>	<p><b>Social Risks</b></p> <p>(i) Security risks for project operations including the protection of project workers, beneficiaries, and affected persons as detailed in Component 1 (above);</p> <p>(ii) 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;</p> <p>(iii) 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;</p> <p>(iv) There are also risks associated with ensuring universal access for all persons, including persons with disabilities. The capacity of the government agencies to manage these risks is low at present.</p> <p>(v) Challenges in access to beneficiaries for meaningful stakeholder and community engagement as well as grievance redress and monitoring;</p> <p><b>Specific Exclusions risks include</b></p> <ul style="list-style-type: none"> <li>• Exclusion from project benefits based on gender, whereby most of the people likely to benefit from the project are males who are the majority in civil service</li> <li>• Exclusion as a result of bias during civil service recruitment process for the staff to be seconded to the project</li> <li>• Exclusion as a result of political influence and pressure to recommend job opportunities for their friends and people who believe their ideologies</li> <li>• Exclusion as a result cultural perceptions, limited or lack of policies such as diversity and inclusion in workplaces, country’s political dynamics and power sharing strategies could affect recruitment in the civil service</li> <li>• Elite capture whereby personnel who are preview to the project will enable civil service and persons from their clans apply for project benefits to the disadvantage of the wider society</li> </ul>
<p><b>Component 3</b></p> <p>Public Sector Institutions Management and Performance</p>	<ul style="list-style-type: none"> <li>• Social Risks as discussed in component 2 (above)</li> <li>• <b>Other social risks</b> related to civil works involving rehabilitation and construction of office blocks and IT labs <ul style="list-style-type: none"> <li>(i) Child labor/Forced labor risks</li> <li>(ii) Labor influx risks</li> <li>(iii) labor disputes over terms and conditions of employment</li> <li>(iv) Community and workers’ health and safety: Risks associated with construction/rehabilitation work and operation, including risks of the COVID-19 transmission;</li> <li>(v) Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) or other forms of Gender Based Violence (GBV)</li> <li>(vi) Damage or disruption to tangible/intangible cultural heritage</li> <li>(vii) Lack of inclusive and meaningful consultations</li> </ul> </li> </ul> <p><b>Environment Risks</b></p>

## ESMF – SERP

Component	Risks
	<p>Environment risks will be related to construction and rehabilitation of activities discussed under Subcomponent 3.1 that entitles the construction of buildings to host offices and IT labs for their Civil Service Commissions. The risks will be related to;</p> <ul style="list-style-type: none"> <li>(i) Soil erosion and possible sedimentation of rivers from earth works and run-off during the construction phase;</li> <li>(ii) Disposal and management of large amounts of excavated material generated from construction activities;</li> <li>(iii) Occupational health and safety of workers during both the construction and operational phases, including possible exposure to COVID-19;</li> <li>(iv) Increased level of dust, noise, and vibration from the moving of construction vehicles and machinery; and</li> <li>(v) Community health and safety risks and pollution from surface and groundwater sources.</li> <li>(vi) The new public buildings to be constructed for the government institutions may pose structural safety risks on account of improper supervision or use of poor-quality construction materials.</li> </ul>

### IMPLEMENTATION OF ESF INSTRUMENTS

The environmental and social specialists at Project Coordination Unit (PCU) at the Ministry of Finance (MoF) at Federal Government of Somalia (FGS) and Federal Member States (FMS) will undertake environment and social screening and subsequent assessments on sites proposed for construction of buildings to host offices and IT labs for their Civil Service Commissions. The screening will be done using the Environmental and Social Screening Checklist provided in **Appendix I**. Thereafter, site specific Environmental and Social Management Plans (ESMPs) will be prepared when required and submitted to the Bank for approval. The PCU is required to ensure that all permits, consents and authorizations are obtained from the competent authorities before commencement of construction of the office blocks and IT labs in Subcomponent 3.1. Thereafter, the PCU is required to comply with terms of permits, consents, and authorizations throughout Project implementation.

Additionally, the ESMF provides that the Selection tools or criteria for selecting groups to benefit from the project will include provisions that provide equal or better chances of vulnerable, marginalized, and minority members of the community, Persons Living with Disabilities (PLWD) of being selected. Personnel involved in review and allocation of project benefits will sign a Code of Conduct (CoC) committing them avoid bias in allocating benefits. A sample Code of Conduct template is provided under **Appendix 1**

### IMPLEMENTATION ARRANGEMENTS

A Project Coordination Unit (PCU) will be established to provide support services to the implementing Federal Government of Somalia (FGS) and Federal member States (FMSs) Ministries Departments and Agencies (MDAs) and coordinate implementation at and between the FGS and FMSs. The PCU will be placed in the MoF of the FGS and led by a project coordinator, who will be responsible for: (i) coordination between components and FGS/FMSs;

## **ESMF – SERP**

(ii) Monitoring and Evaluation (M&E) of project activities; and (iii) provision of support services, such as procurement, environment, social standards, and communication, to project implementing MDAs. The project coordinator will be supported by a team consisting of technical advisors (PFM, DRM, and PSM) and specialists in procurement, M&E, environment, social standards, and communications.

### **CAPACITY DEVELOPMENT FOR ESMF**

Capacity enhancement for the skills and competencies of the project's environmental and social specialists has been built into the project design under component 5, Project Management, Coordination, and Support in Delivery. The focus of Sub Component 5.1 on project management support will be to support project coordination at FGS, FMSs, and SL.

The PCU will organize training for its E&S specialists on updating and implementing the provisions of the ESCP, ESMF, ESIAAs, ESMPs, SEAH/GBV Response and Prevention Plan, Labor Management Procedures, Security Risks Assessment Management Framework (SRAMF), Grievance Redress Mechanism (GRM), Occupational Health and Safety, and Stakeholder Engagement Plan.

### **RESOURCE AND BUDGET**

Budget components include remuneration for the PCU's Environment and Social (E&S) specialists who will be hired to work throughout the project cycle to monitor and implement provisions of the ESMF, the experts include; Environmental, Social, GBV, Occupational Health and Safety (OHS), and Security Specialists. Further, the budget provides for training programs for PCU staff in relevant entities to implement their E&S responsibilities, Security Risk Assessment Management Framework (SRAMF), Updated Stakeholder Engagement Plan, Labor Management Procedures, GBV Action Plans, site specific ESIAAs, ESMPs and annual reviews. The ESMF estimates USD 1,360,000 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 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 PCU to respond and manage such grievances. The Project GRM provided for SERP 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**

A Stakeholder Engagement Plan (SEP) was developed to facilitate stakeholder identification and mapping. The process is described in the stand-alone SEP. The SEP objectives focus on obtaining the views of relevant stakeholders on subject matter relating to proposed activities, through engaging in effective, inclusive, culturally sensitive, and participatory consultation, and through informed information disclosure.

Stakeholder consultation was significant to the preparation of this ESMF and formed the basis for the determination of potential project impacts, and the design of viable mitigation measures. From January 20<sup>th</sup> to 31<sup>st</sup> 2022, stakeholder consultation was undertaken with implementing partners in (i) Galmudug State of Somalia, Dhusamareb; (ii) Galmudug Civil Service Commission; (iii) Hirshabeelle Civil Service Commission; (iv) Jubaland Civil Service Commission; (v) Auditor General Puntland State; (vi) PCU for SERP; (vii) South West Civil Service; and Office of the Auditor General, Somalia.. The issues raised and concerns expressed, including possible mechanisms of addressing these issues and concerns, are presented separately in the Stakeholder Engagement Plan (SEP) and summarized in Tables 9.2 of this ESMF.

# 1 INTRODUCTION

## 1.1 Background Information

According to its international partners, despite experiencing civil unrest, Somalia has maintained a healthy informal economy, based mainly on livestock, remittance and money transfer companies and telecommunications.<sup>7</sup> Owing to a dearth of formal government statistics and the recent civil war, it is difficult to gauge the size or growth of the economy. Somalia is continuing to make progress towards reaching the Heavily Indebted Poor Countries (HIPC) Initiative Completion Point in late 2023, following re-engagement with the International Development Association (IDA) and the clearance of arrears to International Financial Institutions. Currently, Somalia is in the HIPC interim period and all HIPC Completion Point legislative reforms have passed through both houses of Parliament and negotiations with creditors are in the process of being concluded.

Despite this rosy outlook, the long-term growth of the Somali economy continues to be held back by various shocks. Upon reaching the Heavily Indebted Poor Countries (HIPC) Initiative Decision Point milestone in 2020, economic growth was projected at 3.2 percent. Amid repeated shocks, growth in GDP averaged only 2% from 2013 to 2020. Owing to the multiple crises, GDP contracted by 0.2% in 2020. GDP growth recovered to 2.9% in 2021 but is projected to have fallen to 1.7% in 2022 under the regional drought and worsening global economic conditions. GDP growth is forecast to rebound to 2.8% in 2023 and 3.7% in 2024.<sup>8</sup> The numerous shocks on Somali economy include the Corona Virus Disease (COVID-19), floods, and a desert locust infestation, which had, for example, combined to cause an economic contraction of 0.2 percent in 2020.

Successive Somali governments have embarked on a broad reform agenda in the areas of public finances and public sector management. Several successes in this reform agenda, such as an updated legal and policy framework, automation, large and medium taxpayer offices and taxpayer identification in operation, and functional reviews completed in selected ministries, departments and agencies, have laid a solid foundation and set the stage for the next phase. Reform priorities have been identified in governments' strategy documents such as Federal Government of Somalia's (FGS's) Public Financial Management Reform Action Plan (PFMRAP), the Somaliland Strategy for Public Finance Management Reform 2020–2024, and the National Public Administration Reform Strategy Framework (NPARSF), as well as in World Bank diagnostics such as the Domestic Revenue Mobilization (DRM) and Public Finance Management (PFM) diagnostics carried out under the DRM and PFM modules of the programmatic Public Expenditure Review (P160458) and the Somalia Customs Support ASA (P172650) .

The proposed Somalia Enhancing Public Resource Management Project (SERP) rests on the premise that synergies and sustainable improvements can be achieved by taking a comprehensive

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<sup>7</sup> *The World Factbook*. Central Intelligence Agency. 10 November 2021

<sup>8</sup> <https://www.worldbank.org/en/country/somalia/overview>

## ESMF – SERP

approach to governance reforms. In this regard, the project design aims to explore in detail the interlink between Public Financial Management (PFM), Domestic Revenue Mobilization (DRM), and the public sector. The project has four 4 components as indicated in 1.2 below.

### 1.2 Project Components

**Component 1:** Public Financial Management. This component will support the efforts of the Federal Government of Somalia (FGS), Federal Member States (FMS) and Somaliland (SL) to address PFM challenges. The priority will be on downstream processes for all governments. In addition, there will be a focus on upstream processes such as budgeting and planning for those with substantial domestic revenue (Federal Government of Somalia FGS, Puntland Somali State PSS, Jubbaland Somalia State JSS and Somali Land SL). This will be implemented through the following sub-components: (i) Support essential budget execution functions; (ii) Strengthen PFM for service delivery in the health and education sectors; (iii) Support capacity building of PFM staff; (iv) Facilitate the harmonization of PFM systems between FGS and FMS; (v) Improve budget preparation and transparency; and (iv) Strengthening Public Investment Management.

**Component 2:** Domestic Revenue Mobilization. Under this component the project will strengthen the inland revenue and selected customs systems and capacity. The DRM operation will support selected Government-led tax policy, tax administration, and taxpayer education and facilitation reforms, with gender and citizen engagement as a cross-cutting reform measures. This will be done through the following components: i) Strengthening and harmonizing tax policy capacity; ii) Strengthening and harmonizing inland revenue and selected customs administration systems and capacity; and iii) Strengthening and harmonizing taxpayer education and facilitation.

**Component 3:** Public Sector Institutions Management and Performance. This component is proposed to support the management and performance of public sector institutions in the FGS, FMSs, and SL to improve their capacity in delivering services to their citizens. These will be achieved through the following subcomponents: i) Strengthening the Capacity and Performance of Central and Line MDAs, building on the work of the Public Resource Management in Somalia (PREMIS-PFM) Project, Capital Injection Project (CIP), and Civil Services Strengthening Project (CSSP); ii) Strengthening the implementation of workforce management policies; and iii) Expansion of key government services to local governments in Somaliland. Coverage will include the Civil Service Commissions, Ministries of Labour, Ministries of Planning, and Offices of the President. The procurement of IT equipment, furniture, and vehicles for the new FMSs, central MDAs in the FMSs, and the construction of buildings to host offices and IT labs for their Civil Service Commissions will also be part of this subcomponent.

**Component 4:** Project Management, Coordination, and Support in Delivery. This component will support the management, coordination, and M&E for the three components. Specifically, it will include two subcom ponents: i) Project management; and ii) Results monitoring, which along with



conducting day to day M&E and supporting government capacity will include a survey-based impact assessment.

### **1.3 Project Beneficiaries**

The improved management of public and human resources derived from the project will have a positive impact on the overall population of Somalia. While the primary beneficiaries will be the government, civil servants, and system users of the implementing MDAs in FGS, FMSs, and SL, the citizens will also benefit from the project. The government and system users in the MDAs will benefit from the harmonization and improvement of PFM, DRM, Human Resources Management (HRM) systems and structures across FGS, FMSs, and SL for better management of public resources and administration. The capacity strengthening of employees of selected MDAs will minimize over-reliance on outside experts as sources of knowledge and thus reduce costs. In the long term, the strengthened confidence, skills, knowledge, and resources from capacity building will foster a sense of ownership and empowerment to civil servants for greater control over their own future development and growth.

### **1.4 Project Implementation Arrangements**

A Project Steering Committee (PSC) will be established and be responsible for strategic policy and decision making, technical coordination across the FGS and FMSs, and for taking the lead on harmonization. The PSC participation will be at the Director General level from the relevant MDAs, including the MoF, in both the FGS and FMSs.

A Project Coordination Unit (PCU) will be established to provide support services to the implementing FGS and FMSs MDAs and coordinate implementation at and between the FGS and FMSs. The PCU will be placed in the MoF of the FGS and led by a project coordinator, who will be responsible for: (i) coordination between components and FGS/FMSs; (ii) M&E of project activities; and (iii) provision of support services, such as procurement, environment, Health and Safety Social standards, and communication, to project implementing MDAs. The project coordinator will be supported by a team consisting of technical advisors (PFM, DRM, and PSM) and specialists in procurement, M&E, environment, social standards, and communications.

The PCU will also include an Financial Management (FM) specialist assigned from the External Assistance Fiduciary Section (EAFS) of the Accountant General's Department. The project coordination team will be selected in an inclusive manner by a selection committee representing the three main technical streams: PFM, DRM, and PSM. In addition, each FMSs will have a project manager to independently coordinate project activities at the FMSs level and liaise with the FGS PCU coordinator at the Ministry of Finance (MoF).

## 1.5 Environment and Social Management Framework

The ESMF has been prepared to assist in screening, assessment, management of environmental and social risks of the project from an early stage in project planning and to integrate mitigation measures during the design of project activities and their implementation. The ESMF will provide specific guidance on the policies and procedures to be followed for environmental and social assessment along with roles and responsibilities of the various implementing agencies.

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 project implementation. The ESMF will identify potential risks and impacts and mitigation measures as per the World Bank's Environmental and Social Framework, including:

- To provide information about scope, approach and mitigation of adverse E&S risks and impacts expected during Component 3 Subcomponent 3.1 that entitles the construction of buildings to host offices and IT labs for their Civil Service Commissions.
- Threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence. This will mostly apply to project workers who will be involved in Component 1 and 2 who will involve in drafting of policies, programs, plans, strategies, laws and/or regulation, IT management systems and Component 1 who will involve of feasibility studies, detailed technical designs, safeguard instruments, and bid documents and IT management systems
- Any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged or vulnerable. This includes benefits discussed under Subcomponent 3.1 on staff capacity enhancement in the MDAs, 3.2 on Civil Service Management Systems and Policies, Pay and Grading, and Pension among others
- Risks that project impacts fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable. This risk will be related to Subcomponent 2.2, that involves interventions such as modernization and automation, capacity building and scholarships and taxpayer education and facilitation
- impacts on the health, safety and well-being of workers and project-affected communities. This will apply to staff and community who will interphase with civil works activities involving rehabilitation and construction of offices as indicated under sub component 3.1.

The ESMF also includes standalone sub plans including; Labor Management Procedures (LMP), Sexual Exploitation, Abuse and Harassment Prevention Plan (SEAH), Stakeholder Engagement Plan (SEP) Updated, Project Grievance Redress Mechanisms (GRMs) and separate Security Risks Assessment Management Framework (SRAMF)

## **1.6 Approach and Methodology**

### **1.6.1 Literature Review**

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

- SERP – Project Appraisal Document (PAD), November 2022
- SERP- Stakeholder Engagement Plan (SEP) February 2022
- SERP – Environmental and Social Review Summary
- SERP – Environmental and Social Commitment Plan (ESCP), March 2022
- World Bank Environmental, Health, and Safety General Guidelines 2007
- The 1992 United Nations Framework Convention on Climate Change UNFCCC (1992).
- United Nations Convention on Biological Diversity (1992).
- Convention on International Trade against Endangered Species (CITES):
- Vienna Convention on the Protection of the Ozone Layer:
- United Nations Convention to Combat Desertification (2002).
- Rotterdam Convention
- Convention on the Elimination of All forms of Discrimination against Women (CEDAW 1981):
- Protocol to the African Charter on Human and People’s Rights on the Rights of women in Africa

### **1.6.2 Preparation of ESMF**

Preparation of the ESMF included the following stages:

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

### **1.6.3 Stakeholder Consultations**

The stakeholder consultation was significant to the preparation of this ESMF and formed the basis for the determination of potential project impacts and design of viable mitigation measures. Specifically, from January 20<sup>th</sup> to 31<sup>st</sup> 2022, stakeholder consultation was undertaken with

## **ESMF – SERP**

implementing partners in (i) Galmudug State of Somalia, Dhusamareb; (ii) Galmudug Civil Service Commission; (iii) Hirshabelle Civil Service Commission; (iv) Jubaland Civil Service Commission; (v) Auditor General Puntland State; (vi) PCU for SERP; (vii) South West Civil Service; and Office of the Auditor General, Somalia. . The issues raised and concerns expressed including possible mechanisms of addressing these issues and concerns are presented separately under the stakeholder Engagement Plan (SEP) and summarized in Table 9.2 of this ESMF.

## **2 DESCRIPTION OF ADMINISTRATIVE, LEGAL AND POLICY FRAMEWORKS**

### **2.1 National Regulatory and Policy Framework**

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.

On human trafficking, the Constitution states that a person may not be subjected to slavery, servitude, trafficking or forced labour offences. Every labour law shall comply with gender equality. Article 24(5) stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation, and discrimination in the workplace. Every labour law and practice shall comply with gender equality in the workplace.

**The National Environmental Policy (2019):** 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 for approval since the collapse of the previous central administration in 1991. The Policy promotes the use of appropriate environmental assessment instruments. This Policy is a sectoral document aiming at mainstreaming environmental concerns in all development activities and acting as a guide to action in (i) developing programs and projects for environmental conservation; (ii) reviewing and enacting legislation at Federal and State levels; (iii) stimulating partnerships of different stakeholders for environmental management. The overall goal of the Policy is (i) to enhance the health and quality of life of the Somali people and (ii) to promote sustainable development through sound management of the natural resources of the country. This goal can be achieved through the following 3 main strategic objectives:

- (1) conservation of natural resources;
- (2) environmental governance; and
- (3) Multi-stakeholder partnerships.

The Policy also contains a number of basic principles, which are (i) environmental rights; (ii) sustainable development; (iii) public participation; (iv) precautionary principle; (v) polluter-pays principle; (vi) legal liability; (vii) decentralization; (viii) mainstreaming; (ix) preventive action.

### **National Climate Change Policy, 2020**

This overarching national climate change policy serves as the pillar for comprehensive sectoral strategies and action plans. The policy offers a strategic direction, particularly on adaptation measures, social development and the mitigation of climate change impacts. The policy captures sectorial laws and strategies that form the legislative foundation for specific activities that need to be evaluated in order to determine potential improvements that could enhance their ability to tackle climate change challenges and exploit emerging opportunities.

The policy enables better coordination of climate change work in the country and provides opportunities for cooperation and collaboration between the national and sub-national levels of government as well as with development partners and with international and regional institutions. The policy also stipulates the country's vision and strategies that recognize the importance of climate change and of international agreements and national commitments on climate change.

The specific laws that contain aspects which provide social and environmental protection include:

## ESMF – SERP

- Law No. 65 of 18 October 1972 to promulgate the Labor Code.
- Somali Fisheries Law (Law No. 23 of November 30, 1985)
- Somali national Water Law of 11 November 2017

Among the Federal Member States which will benefit from the project is Puntland, the state has enacted several laws related to the environment. Article 96 of the State’s constitution addresses environmental protection capturing key elements such as deforestation, soil erosion and pollution and the prohibition on the urbanization of unsuitable lands. The Puntland government has enacted the following environmental regulations, polices and strategies:

- Environmental Policy (2014);
- Environmental Management Act (2016);
- EIA Act and Regulation (2016); and
- Puntland Climate Change Strategy (2016)

### **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 include 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 Institutional Frameworks on Environment and Social Risk Management in Somaliland**

In Somaliland, the main government institutions directly focused on environment are the Ministry of Environment and Rural Development (MoERD). MoERD is mandated to manage environment protection, including biodiversity conservation. The Ministry is responsible for developing policies and strategic plans related to environment, including biodiversity.

A comprehensive Environment Act for Somaliland, including guidelines for environmental impact assessment, has been approved by the parliament. It is also clear that environmental and natural resources management in Somaliland is still scattered in sectors and sector laws and policies in absence of an umbrella law and a single institution mandated with environmental management in the country

### **2.4 International Conventions Signed and Ratified by Somalia**

**The 1992 United Nations Framework Convention on Climate Change UNFCCC (1992).** The primary purpose of the Convention is to establish methods to minimize global warming and in particular the emission of greenhouse gases. The Convention was adopted in 1992 and came into force in 1994. Somalia acceded the Convention in 2009. Somalia ratified the Kyoto agreement in 2010 and the Paris agreement in 2016.

**United Nations Convention on Biological Diversity (1992).** The Convention has three main goals including which are, the conservation of biological diversity (or biodiversity); the sustainable use of its components; and the fair and equitable sharing of benefits arising from genetic resources. Somalia acceded to the Convention in September 2009.

**Convention on International Trade against Endangered Species (CITES):** The convention aims to protect endangered plants and animals. Somalia signed the Convention in 1985, and ratified it in 1986. Its current status is that of accession.

**Vienna Convention on the Protection of the Ozone Layer:** The Vienna Convention was an intergovernmental negotiation for an international agreement to phase out ozone depleting



## ESMF – SERP

substance in March 1985. It ended in the adoption of the Vienna Convention for the Protection of the Ozone Layer. The Convention encourages intergovernmental cooperation on research, systematic observation of the ozone layer, monitoring of Chlorofluorocarbon (CFC) production, and the exchange of information. Somalia ratified the Convention in 2001, and its current status is that of accession.

**United Nations Convention to Combat Desertification (2002).** The Convention combats desertification in those countries that experience serious droughts and/or desertification. Somalia ratified the Convention in 2002, and its current status is that of accession.

**Rotterdam Convention:** This is a multilateral treaty that came into effectiveness in 2004. The purpose is to promote shared responsibilities in relation to importation of hazardous chemicals. The convention promotes open exchange of information and calls on exporters of hazardous chemicals to use proper labelling, include directions on safe handling, and inform purchasers of any known restrictions or bans. Signatory nations can decide whether to allow or ban the importation of chemicals listed in the treaty, and exporting countries are obliged to make sure that producers within their jurisdiction comply. Some types of asbestos are listed as banned under this treaty but Chrysotile asbestos is not yet banned though there are global discussions to include it on the listed chemicals. Somalia acceded the Convention in 2010.

**Convention on the Elimination of All forms of Discrimination against Women (CEDAW 1981):** The CEDAW affirms that gender equality is a precursor for development and peace. It establishes legal standards for the attainment of gender equality through the elimination of discrimination against women in all aspects of political, social, economic and cultural life. It highlights the importance of equality and equal opportunity in political and public life as well as education, health and employment. Ratifying Governments are required to set in place measures to enable and expedite gender equality in law and fact as well as confronting the underlying social political inequalities that perpetrate asymmetrical power relations based on gender. Although FGS is yet to ratify CEDAW, although the Cabinet has approved it subject to ratification by parliament.

**Protocol to the African Charter on Human and People's Rights on the Rights of women in Africa** (Maputo Protocol). Somalia has signed but not ratified the Protocol

## 2.5 International Labor Organizations ILO Ratified by Somalia

Somalia has been a member of the International Labor Organization (ILO) since 1960. The country has ratified below listed fundamental conventions of ILO:

Forced Labor Convention (1930/no. 29). The key objective of the Convention is to suppress the use of forced labor in all its forms. It defines forced labor as ‘all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily’. The Convention has been in force in Somalia since 1960.

UN Convention on the Rights of the Child. The Convention is a Human Rights treaty that sets out the civil, political, economic, social, health and cultural rights of children. It defines a child as any human being under the age of 18 unless the age of majority is attained earlier under national legislation. The Convention was ratified by Somalia I 2015.

Freedom of Association and Protection of the Right to Organize Convention, 1948 (No.87): Article 2 of the convention provides that workers and employers, without distinction whatsoever, shall have the right to establish and, subject only to the rules of the organization concerned, to join organizations of their own choosing without previous authorization. \_\_Article 3 provides that workers’ and employers’ organizations shall have the right to draw up their constitutions and rules, to elect their representatives in full freedom, to organize their administration and activities and to formulate their programs. Article 3 further provides that public authorities shall refrain from any interference which would restrict this right or impede the lawful exercise thereof.

Right to Organize and Collective Bargaining Convention, 1949 (No.98): The convention provides under article 1 Workers shall enjoy adequate protection against acts of anti-union discrimination in respect of their employment. Such protection shall apply more particularly in respect of acts calculated to—

- (a) Make the employment of a worker subject to the condition that he shall not join a union or shall relinquish trade union membership;
- (b) Cause the dismissal of or otherwise prejudice a worker by reason of union membership or because of participation in union activities outside working hours or, with the consent of the employer, within working hours.

Article 2 provides that workers’ and employers’ organizations shall enjoy adequate protection against any acts of interference by each other or each other’s agents or members in their establishment, functioning or administration.

Discrimination (Employment and Occupation) Convention, 1958 (No.111): The convention provides that each Member for which this Convention is in force undertakes to declare and pursue

## ESMF – SERP

a national policy designed to promote, by methods appropriate to national conditions and practice, equality of opportunity and treatment in respect of employment and occupation, with a view to eliminating any discrimination in respect thereof.

Worst Forms of Child Labor Convention, 1999 (No.182): The convention provides worst forms of child Labor comprises:

- (a) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory Labor, including forced or compulsory recruitment of children for use in armed conflict;
- (b) The use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- (c) The use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- (d) Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

The convention requires that each Member shall take all necessary measures to ensure the effective implementation and enforcement of the provisions giving effect to this Convention including the provision and application of penal sanctions or, as appropriate, other sanctions.

The Freedom of Association and Protection of the Right to Organize Convention (1948) No 87: Article 3 (1) Workers' and employers' organizations shall have the right to draw up their constitutions and rules, to elect their representatives in full freedom, to organize their administration and activities and to formulate their programs. Somalia ratified the Convention in 2014.

The Right to Organize and Collective Bargaining Convention, 1949 (No. 98): Article 1 Each Member which ratifies this Convention shall take immediate and effective measures to secure the prohibition and elimination of the worst forms of child labor as a matter of urgency. Somalia ratified the Convention in 2014.

Convention concerning Forced or Compulsory Labor (ILO No. 29): Article I Each Member of the International Labor Organization, which ratifies this Convention, undertakes to suppress the use of forced or compulsory labor in all its forms within the shortest possible period. Article 5 1. No concession granted to private individuals, companies or associations shall involve any form of forced or compulsory labor for the production or the collection of products which such private individuals, companies or associations utilize or in which they trade. The Convention has been in force in Somalia since Nov<sup>18</sup>th, 1960.

ILO Convention 182 on Worst Forms of Child Labor. Ratification of this Convention makes a country commit itself to taking immediate action to prohibit and eliminate the worst forms of child

## ESMF – SERP

labor. Some predefined worst forms of child labor include sale of a child, trafficking of children, forced or compulsory labor, commercial exploitation of children, prostitution or the production of pornography, and work by its nature that is likely to harm the health, safety and morals of children. The Convention was ratified by Somalia in 2014.

Occupational Safety and Health Convention, 1981 (No.155): The Conventions provides that each Member shall, in the light of national conditions and practice, and in consultation with the most representative organizations of employers and workers, formulate, implement and periodically review a coherent national policy on occupational safety, occupational health and the working environment. \_The aim of the policy shall be to prevent accidents and injury to health arising out of, linked with or occurring in the course of work.

Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187). The Convention provides that each Member which ratifies this Convention shall promote continuous improvement of occupational safety and health to prevent occupational injuries, diseases and deaths, by the development, in consultation with the most representative organizations of employers and workers, of a national policy, national system and national program.

Further, the convention provides that each Member shall take active steps towards achieving progressively a safe and healthy working environment through a national system and national programs on occupational safety and health by taking into account the principles set out in instruments of the International Labor Organization (ILO) relevant to the promotional framework for occupational safety and health.

Each Member, in consultation with the most representative organizations of employers and workers, shall periodically consider what measures could be taken to ratify relevant occupational safety and health Conventions of the ILO.

### **2.6 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.

## ESMF – SERP

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

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 are likely to be triggered by the Project.

### 2.7 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. SERP 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

#### 2.7.1 ESS1: Assessment and Management of Environmental and Social Risks and Impacts

The project ESCP has committed the government to prepare safeguard instruments with specific measures and actions over a specified timeframe to avoid, minimize, reduce or mitigate specific

## ESMF – SERP

risks and impacts of the project. The government will not carry out any activities in relation to the project that may cause material adverse environmental or social risks or impacts until the relevant plans, measures or actions have been completed in accordance with the ESCP.

The project risk rating is assessed as “Moderate” for environmental and “Substantial” for social considerations. While project activities are designed to have significant positive impacts through the transformation of the civil service and overall service delivery to citizens, the likelihood of project activities leading to adverse social risks and impacts is considered Substantial. Key environmental and social risks that relate to the SERP are discussed in chapter 4.

The World Bank's ESS 1. Provides for the Environmental and Social Screening for each sub-activity under the project. The screening enables high risk projects to be excluded as provided by the exclusion list (**Appendix 1**). These screening forms are to be filled and reviewed by an environmental and social safeguards expert under the PCU at MoF. Where subprojects are likely to have minimal or no adverse environmental or social risks and impacts, such subprojects do not require further environmental and social assessment following the initial scoping. However, ESMP will be prepared for project with moderate risks.

### **2.7.2 ESS2: Labor and Working Conditions**

ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 applies to project workers including full-time, part-time, temporary, seasonal and migrant workers.

The PCU will develop and implement written labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS. The procedures will address the way in which this ESS will apply to different categories of project workers including direct workers, and the way in which the PCU will require third parties to manage their workers in accordance with ESS2. ESS2 requires also a grievance redress system which allows workers to raise their grievances.

These will include, PCU's, technical consultants and E&S firms, construction workers hired for the anticipated construction of office blocks and IT Labs under Sub Component 3.1. ESS2 also applied to community workers, however, SERP will not engage this category of workers as detailed in the Labor Management Plan prepared as a stand-alone document for the Project.

### **2.7.3 ESS 3: Resource Efficiency and Pollution Prevention and Management**

ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle

There are potential ESS 3 related risks to civil works during construction of office blocks and IT labs where solid and liquid wastes might be generated from construction activities. Construction activities may also account for an increased demand for resources including water, energy and raw materials that may generate hazardous wastes and increase demand for water and energy.

### **2.7.4 ESS4: Community Health and Safety**

ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable. While not explicitly mentioned, prevention and mitigation of different forms of gender-based violence, specifically Sexual Exploitation and Abuse, is covered by ESS4. Labor influx associated with disposable income may increase the risk of exposing the communities to transmissible infections, GBV/SEAH cases, HIV/AIDS and COVID 19.

Conflict and insecurity remain persistent challenges in Somalia and have, in the past, impeded delivery of projects. 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. The government (FGS) will be guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers. A Security Risk Assessment Management Framework has been prepared to address security risks in relation to project implementation.

The project will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. Due diligence will be done to ensure the security firm hires are (i) not implicated in past abuses; (ii) adequately trained (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) compliant with the applicable law and any requirements set out in the ESCP.

### **2.7.5 ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources,**

ESS6 recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development. As discussed in ESS1, screening will provide that any inter-phasing with critical habitats would be excluded as provided by the exclusion list (**Appendix 1**). ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support.

The World Bank's ESS 1. Provides for the Environmental and Social Screening for each sub-activity under the project, the screening will provide those sites for construction of office blocks and IT Labs provided under sub component 3.1 be screened against the exclusion list provided under (**Appendix 1**)

ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the non-living environment. All habitats support complexities of living organisms and vary in terms of species diversity abundance and importance.

### **2.7.6 ESS8: Cultural Heritage**

This ESS recognizes that cultural heritage, in its many manifestations, is important as a source of valuable scientific and historical information, as an economic and social asset for development, and as an integral part of people's cultural identity and practice. The objective of this ESS is to protect cultural heritage from the adverse risks and impacts of project activities and to promote meaningful consultations with stakeholders regarding cultural heritage. The Borrower will implement globally recognized practices for field-based study, documentation and protection of cultural heritage in connection with the project, including by contractors and other third parties.

A chance finds procedure is a project-specific procedure which will be followed if previously unknown cultural heritage is encountered during project activities. It will be included in all contracts relating to construction of the project, including excavations, demolition, movement of earth, flooding or other changes in the physical environment. The chance finds procedure will set out how chance finds associated with the project will be managed.

The procedure will include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence-off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of this ESS and national law; and to train project personnel and project workers on chance find procedures. This ESMF also includes a set of



## ESMF – SERP

Guidelines for the Protection of Cultural Heritage Sites that covers ‘known sites’, and ‘unknown sites’ plus procedures for ‘chance finds’, as can be found in **Appendix 2**.

### **2.7.7 ESS10: Stakeholder Engagement and Information Disclosure**

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

ESS 10 applies as it addresses the importance of open and transparent stakeholder engagement, which is essential in improving the environmental and social sustainability of the project. Stakeholder engagement must be a socially inclusive process conducted throughout the project life cycle. In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Framework (SEF) proportionate to the nature and scale of the project and its potential risks and impacts. The SEF also outlines the establishment of a functioning grievance redress mechanism. For SERP, SEF has been prepared and presented as stand-alone plan.

### **2.7.8 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 Somalia and Somaliland 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
<b>ESS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>			
<p><b>Objectives of ESS 1 are:</b></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>Site-specific instruments such as Environmental and Social Management Plan (ESMP) and to be prepared at later phases of the project.</p>
<b>ESS 2: Labor and Working Conditions</b>			
<p><b>The Objectives of ESS 2 are:</b></p> <p>To promote safety and health at work.</p> <p>To promote the fair treatment, non-discrimination and equal opportunity of project workers.</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 not allow any forced and child labor. It will hold all contractors liable to the implementation of the LMP. The PCU will have overall responsibility to</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 &amp; 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>monitor the implementation of the LMP</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>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><b>ESS 3: Resource Efficiency and Pollution Prevention and Management</b></p>			

<p><b>The Objectives of ESS 3 are:</b></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 measures are laid out in this ESMF</p>
<p><b>ESS 4: Community Health and Safety</b></p>			

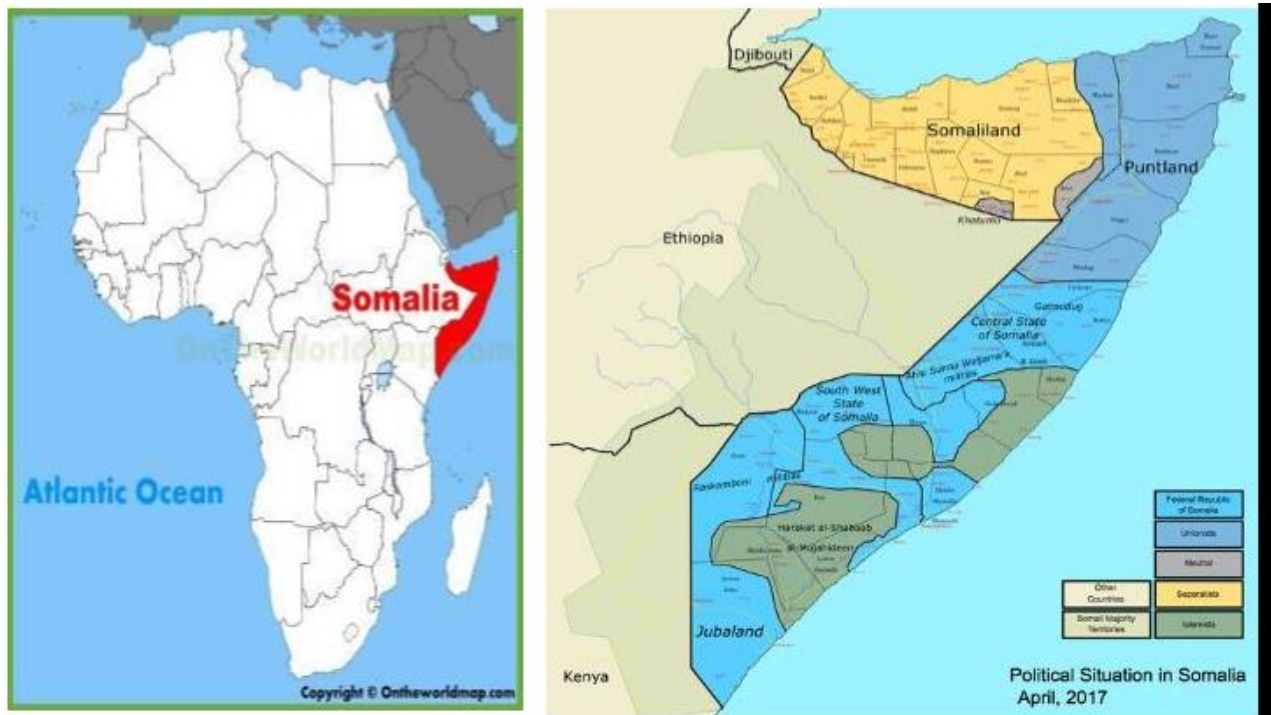
<p><b>The Objectives of ESS 4 are:</b></p> <p>To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances.</p> <p>To avoid or minimize community exposure to project-related traffic and road 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>Contractors will develop road safety management plan, as necessary, and a Health and Safety Plan as part of the CESMP to address the impacts on local communities of moving construction equipment; measures and actions developed to assess and manage specific risks and impacts outlined in the ESMF and subsequent ESMPs.</p>
<p><b>ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b></p>			
<p><b>The Objectives of ESS 6 are:</b></p> <p>To protect and conserve biodiversity and habitats.</p> <p>To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity.</p> <p>To promote the sustainable management of living natural resources.</p> <p>To support livelihoods of local communities, including Indigenous Peoples, and inclusive</p>	<p><u>Provisional Constitution of the Federal Republic of Somalia.</u></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. Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources.</p>	<p>No detailed laws govern biodiversity conservation and sustainable management of living natural resources at this point.</p> <p>There are no clear distinctions to the location and extent of protected areas and national biodiversity hotspots in the country.</p>	<p>The Project will avoid any encroachment into any modified, natural, critical habitat and/or protected areas, this will be achieved through screening prior to intervention. Prior consultations will be undertaken with competent authorities to ensure that no areas of biodiversity importance are infringed in any way by project interventions.</p>

<p>economic development, through the adoption of practices that integrate conservation needs and development priorities</p>			
<p><b>ESS 10: Stakeholder Engagement and Information Disclosure</b></p>			
<p><b>The Objectives of ESS 10 are:</b></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, understandable, accessible and appropriate manner and format.</p> <p>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>	<p><u>Provisional Constitution of the Federal Republic of Somalia.</u> 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 public24 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 SEP and Information Disclosure provisions in the SEP/ESS 10</p> <p>The PCU 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>

### 3 BASELINE ENVIRONMENT AND SOCIAL ECONOMIC INFORMATION

#### 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 km<sup>2</sup> 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 point<sup>5</sup>. 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 further<sup>9</sup>.

### 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%) urban<sup>10</sup> Current estimates from the World Bank shows a total population of 14, 742,523<sup>11</sup>. At least 70 per cent of Somalia’s population is under the age of 30<sup>12</sup>.

**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 services<sup>13</sup>.

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 areas<sup>14</sup>.

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<sup>9</sup> 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.

<sup>10</sup> <http://www.fao.org/nr/water/aquastat/data/query/index.html?lang=en>

<sup>11</sup> <https://data.worldbank.org/country/somalia>

<sup>12</sup> <https://www.unicef.org/somalia/education.html>

<sup>13</sup> Government of the Federal Republic of Somalia and the World Bank, Somalia. 2019 Flood Impact and Needs Assessment, February 2020, p. 18

<sup>14</sup> Government of the Federal Republic of Somalia and the World Bank, Somalia 2020, p. 18.

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 years<sup>15</sup> low human development countries<sup>16</sup>; and the mortality rate under the age of 5 lies at 127 per 1000 life births<sup>17</sup>, 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 Bank<sup>18</sup> 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.

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

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<sup>15</sup> UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

<sup>16</sup> UNDP, Human Development Report 2019, p.38

<sup>17</sup> UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

<sup>18</sup> <https://data.worldbank.org/indicator/NY.GDP.MKTP.CD>

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 547,000<sup>19</sup>. 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 2016<sup>20</sup>

**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 Sheikh 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 commenced<sup>21</sup> 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. 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

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<sup>19</sup> 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.

<sup>20</sup> UNHCR, UN Habitat, IOM, JIRA and Local Ministries of Interior, IOM and The World Bank, 2017

<sup>21</sup> 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.

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 Somalia<sup>22</sup>, 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 Bako”l," (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 2023 alone within Somalia due to the drought, bringing the total number to approximately 585,630 since December 2016<sup>71</sup>.

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 received the largest number of new arrivals<sup>23</sup>. 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.

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<sup>22</sup> OCHA, Somalia Situation Report, 5 April 2020.

<sup>23</sup> JRIA 2016

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 education<sup>24</sup>

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. 66 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. 66

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.

**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.

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<sup>24</sup> Internal Displacement Monitoring Center 2020, p. 30

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 6<sup>th</sup> 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 assets<sup>25</sup>. Lack of access to services, such as education 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 live 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.<sup>84</sup> 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

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<sup>25</sup> OECD Development Center, Social Institutions and Gender Index, 2014, accessed at: [http://genderindex.org/ranking?order=field\\_sigi\\_value14\\_value&sort=asc](http://genderindex.org/ranking?order=field_sigi_value14_value&sort=asc)

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 level<sup>26</sup>.

**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.

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<sup>26</sup> The World Bank, UN Somalia, UN Habitat, Youth as Agents of Peace in Somalia, 2018, p. 10.

## 4 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

### 4.1 Environment and Social Risks

The project risk rating is assessed as “Moderate” for environmental and “Substantial” for social considerations. While project activities are designed to have significant positive impacts through the transformation of the civil service and overall service delivery to citizens, the likelihood of project activities leading to adverse social risks and impacts is considered Substantial.

**Environmental risks:** Civil works related to the proposed construction of public buildings, will likely generate adverse site-specific risks and impacts such as air pollution and soil erosion during the construction phase, noise pollution and increased levels of dust and vibration from heavy construction machinery. There are concerns on appropriate sourcing of construction materials, as well as risks to community health and safety from possible structural deficiencies. Other environmental risks envisaged include occupational health and safety risks for workers, as well as risks related to improper disposal of solid waste. The new public buildings to be constructed for the government institutions may pose structural safety risks on account of improper supervision or use of poor-quality construction materials.

There are also risks associated with ensuring universal access for all persons, including persons with disabilities. Other risks include improper disposal and management of large amounts of excavated material and other construction debris generated from construction activities. Potential exposure of workers to COVID-19 and other communicable diseases is another environmental risk. The capacity of the governmental agencies to manage these risks is low at present. The environmental risks will be mitigated by way of procedures to be enumerated in this ESMF as well as in Environmental and Social Management Plans (ESMPs) that will be prepared for the project during its implementation phase.

#### **Social risks:**

Key environmental and social risks that relate to the SERP segregated as per project components are discussed below.

#### **Component 1: Public Financial Management**

**Table 4.1** below discusses component 1 activities and related social risks, environment risks under this component are negligible. This is because the component involves activities that do not result into environment related impacts, the focus of the component is on improving capacity, accountability and transparency in budget preparation execution and oversight.



**Table 4-1: Component 1 Interventions and Potential E&S Risks**

<b>Component</b>	<b>Subcomponent</b>	<b>Key activities</b>	<b>Risks</b>
Public Financial Management	1.1 Support essential budget execution functions	(i) Strengthen the internal control environment and quality, comprehensiveness, and transparency of financial reporting (ii) Support the use of financial management information systems (FMISs) (iii) Strengthen procurement processes. (iv) Support external audit and parliamentary oversight on public expenditure	<p><b><u>Social Risks</u></b> Threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence. This will apply to project workers (TA) in drafting of policies, programs, plans, strategies, laws and/or regulation, IT management systems and the team that will be involved involve of feasibility studies, detailed technical designs, safeguard instruments, and bid documents for construction of office blocks and IT labs and IT management systems</p> <p><b>Specific security issues include the ones listed below</b></p> <ul style="list-style-type: none"> <li>• Attacks to personnel working on the project by militia groups</li> <li>• Attacks on personnel working on the project threats based on clan sensitivity</li> <li>• Attacks on personnel working on the project due to the fact of them holding senior positions</li> </ul> <p><b>Environment Impacts</b> Downstream impacts related to construction of office blocks are discussed in Table 4.3 below that discusses Component 3 impacts</p>
	1.2 Strengthen PFM for service delivery in the health and education sectors	Support stronger health and education service delivery by ensuring sustainable and efficient planning, budget allocations, cash forecasting and expenditure management in the FGS, PSS and JSS	
	1.3 Support capacity building of PFM staff	Address immediate capacity needs while also aiming to institutionalize capacity building to reduce dependency on consultants	
	1.4 Facilitate the harmonization of PFM systems between FGS and FMS	(i) Harmonize FGS's and FMSs' PFM Acts, Accounting, and Reporting (ii) Harmonize PFM staff competency framework and pay and grading system in collaboration with Component	
	1.5 Improve budget preparation and transparency	(i) Support key budget preparation processes to improve budget credibility for states with significant domestic revenue (FGS, PSS, JSS and SL) (ii) Enhance budget transparency of the FMSs	
	1.6 Strengthening Public Investment Management	Support potentially the FGS, PSS and other FMSs, and SL, in strengthening the institutional framework for enhanced decision-making in public investment management (PIM) and, at a higher level, contribute to sustainable levels of debt over the medium to long term.	

## **Component 2: Domestic Revenue Mobilization**

Table 4.2 below discusses component 2 activities and related social risks, environment risks under are negligible. This is because the component involves activities that do not result into environment related impacts, the component focusses on improving tax administration capacity, transparency and access to revenue information for public services.

**Table 4-2: Component 2 Interventions and Potential E&S Risks**

Component	Subcomponent	Key activities	Risks
Domestic Revenue Mobilization	2.1 Strengthening and harmonizing tax policy capacity	(i) Strengthening and harmonizing tax policy capacity (ii) Review of the FMSs tax laws (iii) FGS and FMSs consensus-building for alignment of their legal frameworks for which the Intergovernmental Fiscal Forums (IGFF) has already been established with support from the Bank’s RCRF project.	<p><b>Social Risks</b></p> <p>(i) Security and OHS risks for project operations including the protection of project workers, beneficiaries, and affected persons as detailed in component 1 (above)</p> <p>(ii) 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;</p> <p>(iii) 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;</p> <p>(iv) There are also risks associated with ensuring universal access for all persons, including persons with disabilities. The capacity of the government agencies to manage these risks is low at present.</p> <p>(v) Challenges in access to beneficiaries for meaningful stakeholder and community engagement as well as grievance redress and monitoring;</p> <p><b>Specific Exclusions risks include</b></p> <ul style="list-style-type: none"> <li>• Exclusion from project benefits based on gender, whereby most of the people likely to benefit from the project are males who are the majority in civil service</li> <li>• Exclusion as a result of bias during civil service recruitment process for the staff to be seconded to the project</li> <li>• Exclusion as a result of political influence and pressure to recommend job opportunities for their friends and people who believe their ideologies</li> <li>• Exclusion as a result cultural perceptions, limited or lack of</li> </ul>
	2.2 Strengthening and harmonizing inland revenue and selected customs administration systems and capacity	(i) Implementation and harmonization of taxpayer segmentation strategy e.g. large taxpayer office (LTO) (ii) Strengthening and harmonizing business process mappings and redesign processes to fit to the local context, and informed by the experiences of the FGS and PSS, which were supported under the DRM and PFM Project (iii) Strengthening and harmonizing the modernization and automation of the ITAS with a focus on a ‘fit for purpose’ (iv) Strengthening and harmonizing capacity building in close conjunction with Component 3	
	2.3 Strengthening and harmonizing taxpayer education and facilitation	Support needs-based establishment of taxpayer orientation programs, taxpayer service charters, facilitation and grievance help desks, reports for proactive disclosure of revenue performance and forecasting, tax forums, and a revenue academy	

			<p>policies such as diversity and inclusion in workplaces, country’s political dynamics and power sharing strategies could affect recruitment in the civil service</p> <ul style="list-style-type: none"> <li>• Elite capture whereby personnel who are preview to the project will enable civil service and persons from their clans apply for project benefits to the disadvantage of the wider society</li> </ul>
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**Component 3: Public Sector Institutions Management and Performance**

Table 4.3 below discusses component 3 activities and related social risks and environment risks. The component focus is on improving quality of capacity in public service and delivery and public services management. This component unlike component 1 and 2, triggers environment risk associated with civil activities that will involve construction of office blocks and IT land discussed under sub component 3.1.

**Table 4-3: Component 3 Interventions and Potential E&S Risks**

Component	Subcomponent	Key activities	Risks
Public Sector Institutions Management and Performance	3.1 Strengthening the Capacity and Performance of Central and Line Ministries, Departments, and Agencies building on the work of the PREMIS-PFM Project, CIP, and CSSP.	(i) Improvement of strategic staffing, informed by affordability (ii) Capacity development in Civil Service Commissions, MoFs, the OAGs, and selected priority MDAs. Procurement of IT equipment, furniture, and vehicles for the new FMSs, central MDAs in the FMSs, and the construction of buildings to host offices and IT labs for their Civil Service Commissions will also be part of this subcomponent. (iii) Support the improvement of the quality of staff through blended approaches in training including building a pipeline of future civil servants, strengthened performance management, and support to peer learning networks.	<p><b><u>Social Risks</u></b></p> <p>(i) Security risks for project operations including the protection of project workers, beneficiaries, and affected persons as discussed in component 1 above ;</p> <p>(ii) Social risks as detailed in component 2 above</p> <p><b><u>Other social risks</u></b> related to civil works involving rehabilitation and construction of office blocks and IT labs</p> <p>(viii) Child labor/Forced labor risks</p> <p>(ix) Labor influx risks</p> <p>(x) labor disputes over terms and conditions of employment</p> <p>(xi) Community and workers’ health and safety: Risks associated with construction/rehabilitation work and operation, including risks of the COVID-19 transmission;</p> <p>(xii) SEA/SH or other forms of GBV</p> <p>(xiii) Damage or disruption to tangible/intangible cultural heritage</p> <p>(xiv) Lack of inclusive and meaningful consultations</p>
	3.2 Strengthening the implementation of workforce management policies.	(i) Human Resource Management Information Systems (HRMIS) that have been established in the FGS, FMSs, and SL. (ii) support Pensions. In GSS, HSS, JSS, and SWSS support will be for	<p><b><u>Environment Risks</u></b></p> <p>Environment risks will be related to construction and rehabilitation of activities</p>

		<p>the development of related policy and legal frameworks</p> <p>(iii) Support the Pay and Grading (P&amp;G) systems already being established in the FGS and PSS, while ensuring that P&amp;G reforms are fiscally sustainable across all FMSs.</p> <p>(iv) Support labor market surveys in GSS, HSS, JSS, and SWSS to form the foundations for future reviews of their P&amp;G systems</p> <p>(v) Support a review exercise of: (a) existing civil service management policies and regulations to identify any improvement needs; and (b) existing mechanisms for policy planning, development, oversight and coordination in GSS, HSS, JSS, and SWSS.</p>	<p>discussed under Subcomponent 3.1 that entitles the construction of buildings to host offices and IT labs for their Civil Service Commissions. The risks will be related to;</p> <p>(i) Soil erosion and possible sedimentation of rivers from earth works and run-off during the construction phase;</p> <p>(ii) Disposal and management of large amounts of excavated material generated from construction activities;</p> <p>(iii) Occupational health and safety of workers during both the construction and operational phases, including possible exposure to COVID-19;</p> <p>(iv) Increased level of dust, noise, and vibration from the moving of construction vehicles and machinery; and</p> <p>(v) Community health and safety risks and pollution from surface and groundwater sources. The new public buildings to be constructed for the government institutions may pose structural safety risks on account of improper supervision or use of poor-quality construction materials.</p>
	<p>3.3 Expansion of key government services to local governments in Somaliland.</p>	<p>Support SL to expand key government services to local districts, which may include the issuance certificates of good conduct, licensing (driving, trade), registration of properties, tax payments, and so on</p>	<p>(vi) - Risk of environmental liabilities in rehabilitation of existing buildings (asbestos containing materials, lead based paints, contaminated soil, etc.)</p> <p>(vii) - Disaster risks related to relevant natural hazards such as earthquakes, flooding, etc.</p>
	<p>4.2 Results monitoring, which along with conducting day to day M&amp;E and supporting government capacity will include a survey-based impact assessment.</p>		<p>(viii) Fire safety and emergency response during the operational phase</p>

## **5 PROCEDURES FOR PREPARATION, REVIEW, CLEARANCE, AND IMPLEMENTATION OF ENVIRONMENT AND SOCIAL RISK MANAGEMENT INSTRUMENTS**

### **5.1 Environment and Social Assessment**

The Environmental and Social Specialists at the Project Coordination Unit (PCU) in the Ministry of Finance (MoF) at the Federal Government of Somalia (FGS) and Federal Member States (FMS) will undertake environment and social screening and subsequent assessments, as required, on sites proposed for construction of buildings to host offices and IT labs for the Civil Service Commissions discussed in the sub sections below.

#### **5.1.1 Environment and Social Screening**

The assessment procedure will be preceded by a screening assessment, early at feasibility stage, designed to identify and appraise the type and scale of adverse environmental and social impacts or risks that may arise from a planned sub-project or site-specific activity. The screening aims to identify avoidance, minimization or mitigation, including offset or compensation, of adverse environmental and social impacts of the Project and to ensure compliance with the national laws and regulations and the compliance with Environmental and Social Framework (ESF) requirements.

The environmental and social safeguard screening will occur during the sub project preparation stage as a soon as the fairly accurate site location(s) is (are) known for the sub-project(s). This sub-section sets out the procedures for identifying, preparing and implementing the sub project environmental and social screening; preparation of required E&S plans; consultation on such plans; review and approval; and implementation.

The first step in the screening process is the determination of the environmental and social aspects of activities as detailed under the project components. This is done to ascertain the type of environmental and social assessment required (if any) in accordance with ESS 1 and consistent with the ESSs. The objectives of screening is to;

- i. Determine the type/s of mitigation measures, assessment, specific plan(s) or safeguard instrument(s) to be prepared based on the outcomes of the screening.
- ii. Identify ineligible project activities that will not be supported by the project as listed in the exclusion list provided under **Appendix 1**. This is done by analyzing the proposed activities in relation to their environmental & social context (area of influence) using a checklist approach.

The screening process of the project components (1,2 and 3) interventions will also inform decision makers and the project management of the nature and extent of potential environmental and social

risks and impacts of each sub-project which may have a different and lower risk rating. Based upon the screening result the appropriate E&S instruments will be prepared. However, as provided in the PAD as well as the level of social and environmental risks associated with SERP, on ESMPs will be prepared.

An Environmental and Social Screening Checklist is provided in **Appendix I**.

### **5.1.2 Environment and Social Scoping**

Environment and social scoping are informed by the results of the screening assessment. Scoping informs the level of Environment and Social Management Plans (ESMP) required for the proposed project components as indicated below:

- Determination of applicable national and international policy provisions and legal statute relevant to the project
- The application of relevant ESSs of the World Bank
- Relevant stakeholders to be meaningfully consulted and engaged during the ESMP preparation stage
- Determination of the scope and geographical extend of Environment and Social Impacts to be analyzed further at ESMP preparation stage.

The scoping assessment for construction activities under sub component 3.1 will be undertaken through literature review, field assessment, data collection, site surveys, and collection of secondary and primary data. The Scoping assessment will present the aspects summarized below:

- Description of project background
- Determination of project area of influence (Geographical, Social and Stakeholders)
- Consideration of all project-relevant physical, biological, socio-economic, cultural aspects & risks
- Analysis of alternatives
- Impact identification (Direct, Indirect, Induced, & Cumulative)
- Preliminary mitigation measures
- Definition of assessment methods for ESMP & personnel required.

### **5.1.3 Principles of ESMP**

The ESMP will focus on achieving below listed principles

- Avoid at Source, Reduce at Source: avoiding or reducing at source through the design of the Project (e.g., avoiding by siting or re-routing activity away from sensitive areas or reducing by restricting the working area or changing the time of the activity).

- Abate on Site: add something to the design to abate the impact (e.g., pollution control equipment, traffic controls, perimeter screening and landscaping).
- Abate at Receptor: if an impact cannot be abated on-site then control measures can be implemented off-site (e.g., noise barriers to reduce noise impact at a nearby residence or fencing to prevent animals straying onto the site).
- Repair or Remedy: some impacts involve unavoidable damage to a resource (e.g., agricultural land and forestry due to creating access, work camps or materials storage areas) and these impacts can be addressed through repair, restoration or reinstatement measures.
- Compensate in Kind including offset, Compensate Through Other Means: where other mitigation approaches are not possible or fully effective, then compensation for loss, damage and disturbance might be appropriate (e.g., planting to replace damaged vegetation, financial compensation for damaged crops or providing community facilities for loss of fisheries access, recreation and amenity space).

#### **5.1.4 Mitigation of Impacts**

The priority in mitigation for the Project is to first apply mitigation measures to the source of the impact (i.e., to avoid or reduce the magnitude of the impact from the associated Project activity), and then to address the resultant effect to the resource/receptor via abatement or compensatory measures or offsets (i.e., to reduce the significance of the effect once all reasonably practicable mitigations have been applied to reduce the impact magnitude

Once mitigation and enhancement measures are specified, the next step in the Impact Assessment Process was to assign residual impact significance. This is essentially a repeat of the impact assessment steps discussed above, considering the implementation of the proposed mitigation and enhancement measures.

The final stage in the impact assessment process was the development of a management plan for implementing controls and mitigation and also monitoring the effectiveness. Monitoring is done to verify that: a) impacts or their associated project components remain in conformance with applicable standards; and b) mitigation measures are effectively addressing impacts and compensatory measures and offsets are reducing effects to the extent predicted.

#### **5.2 Preparation of Environment and Social Instruments**

E&S Specialist would recommend the type of assessment after reviewing the screening and Scoping reports. The PCU would review and approve the recommendation of the E&S Specialist and submit the screening and scoping report to the Bank for Bank review and clearance to undertake Environment and Social Assessment commensurate to the potential risks and impacts of the project. The PCU shall there after engage the services of Environment and Social Safeguards consultants to prepare the detailed assessment. Additionally, when similar building in similar geographical areas is foreseen, the

PCU will consider development of overarching ESMP in order to reduce the number of instruments to be prepared. The ESMPs will be put place prior to the relevant contractors' bidding phase so that adequate resources can be estimated for the implementation of ESF requirements.

The PCUs Safeguards Specialist's duties include backstopping the sub-projects implementing teams to comply with the relevant National Environmental and Social requirements and the World Bank's ESF requirements. This includes reviewing, screening, approving, monitoring and reporting on the progress of the sub-projects. The Technical persons hired by the ministries (Environment and Social Consultancy Firm) should guide the formulation and development of the sub project specific ESMPs for the project, and periodically (quarterly) review and improve capacity to manage safeguards compliance amongst local stakeholders

### **5.3 Review and Approval**

The Environment and Social Instruments prepared for civil works shall be reviewed by Environmental and Social Specialists at PCU within MoF and cleared by World Bank. Thereafter the reports (safeguard instruments) will be submitted to the relevant authorities (Directorate of Environment and Climate Change) for review and licensing

### **5.4 Public Consultations and Disclosure**

In carrying out the ESMP, supporting evidence of comprehensive public consultation shall be required, such as signed minutes of consultation meetings, attendance lists and filled questionnaires. Public consultations shall take place during the environmental and social screening process and during the validation of the ESMP report. The results of public consultation shall be incorporated and or influence the design of mitigation and monitoring measures. ESMP study reports for the subproject shall be disclosed in-country by the PCU in formats that are accessible to all project stakeholders and on the World Bank external website. Public consultations should be conducted in a manner accessible to all project stakeholders, and taking into account the guidance set out in the project Stakeholder Engagement Plan and any other relevant guidance, such as the Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings due to COVID19. A notice of the meeting shall be communicated at least seven (7) days before the actual meeting date.

### **5.5 Environmental and Social Provisions in the Tender Documents**

The tender documents for construction of office blocks and IT Labs will under General and Specification Section will provide a clause for the bidder that will submit a Project Specific Construction Environmental and Social Management Plan (C-ESMP) and Health and Safety Plan for review and approval by the PCU before commencement of civil works. Additional environmental,



social, gender, health and safety clauses and Environment Health and Safety Guidelines (EHSG) General Guidelines will be provided to help bidders understand what will be required to implement the environmental and social measures associated with the sub-project. The Compliance of this Clause by the Contractor is deemed to be covered in his rates quoted in the Bid.

Given that majority of the anticipated environmental and social risks and impacts will occur during the construction phase, the contractor will be contractually bound to prepare and implement a C-ESMP consistent with the associated E&S instruments. The implementing entities will ensure the C-ESMPs summarize the context, interested parties, compliance requirements, checks for compliance, risks and opportunities, activity-specific environmental and social objectives and specific targets, training plans, inspections, peer reviews and other monitoring actions and incidents as discussed.

The C-ESMPs will inform the actions expected from the respective contractors and others and the monitoring of their performance through the implementing schools. The ESHS topics identified during the Environmental and Social Impact Assessment of the project will be included in specifications of tenders for construction of infrastructure as presented in **Table 5-5** below,

**Table 5-1: Inclusion of Environment and Social Provisions in Tender Documents**

<b>Environment and Social Provisions in Tender Documents</b>	<b>Yes/no</b>
ESHS resources and facilities and ESHS monitoring organization	[select:] YES / NO
Project Areas management (base camps and borrow pits, water sources, storage areas)	[select:] YES / NO
Health & Safety on work-sites	[select:] YES / NO
Management of SEA-SH, GBV, VAC and Child Labor, safeguarding VMG& IP and PLWD	[select:] YES / NO
Local recruitment and ESHS trainings of local staff (capacity building), ESHS trainings of sub-contractors and local partners (transfer of knowledge)	[select:] YES / NO
Relations with stakeholders, information and consultation of local communities and authorities	[select:] YES / NO
Traffic management	[select:] YES / NO
Hazardous materials and oil products management	[select:] YES / NO
Waste-water (effluents) Management	[select:] YES / NO
Protection of water resources	[select:] YES / NO
Atmospheric emissions, noise and vibrations	[select:] YES / NO
Solid Waste management including e-wastes	[select:] YES / NO
Biodiversity: protection of fauna and flora	[select:] YES / NO
Site rehabilitation and re-vegetation	[select:] YES / NO
Erosion and sedimentation	[select:] YES / NO

Control of infectious and communicable diseases (COVID 19, HIV/AIDS, malaria, etc.)	[select:] YES / NO
Grievance Management	[select:] YES / NO

## 5.6 Licensing and Permits

The PCU would require to ensure that all permits, consents and authorizations are obtained that are activity specific before commencement of the respective of construction of office blocks and IT labs as provided under Sub Component 3.1. Thereafter, comply with terms of permits, consents, and authorizations throughout Project implementation. Tentatively the license required will be the environment license from the Ministry of Environment and Climate Change (MoECC) and building plans approval from the District Physical Planner.

## 5.7 Construction Stage

The PCU will also have a dedicated Environment, Social, Health, and Safety officer to monitor C-ESMP implementation, labor management and occupational health and safety risks. The PCU will ensure the C-ESMP is prepared with minimum provisions and requirements of World Bank ESH Guideline 2007 General Guidelines listed below.

### C-ESMP

<ul style="list-style-type: none"> <li>a) <i>Project Background Information</i></li> <li>b) <i>General Information</i></li> <li>c) <i>Contractors Environment, Social, Health and safety Policies</i></li> <li>d) <i>Licenses and permits to be acquired</i></li> <li>e) <i>Personal Protective Equipment/welfare requirements</i></li> <li>f) <i>Scope of ESMP and HSMP</i></li> <li>g) <i>Objectives of the ESMP and HSMP</i></li> <li>h) <i>Project Description and Baseline Information</i></li> <li>i) <i>Site and Work Activities</i></li> <li>j) <i>Analysis of Legal Provisions</i></li> <li>k) <i>Resource Roles and Responsibilities of Workforce on site</i></li> <li>l) <i>Competence and awareness training</i></li> <li>m) <i>Standard Operating Procedures</i></li> <li>n) <i>Stakeholder engagement and Grievance Management</i></li> <li>o) <i>Environment, Social Health and Safety Management Plan for Specific site activities</i></li> <li>p) <i>Environment Social Health and Safety Monitoring Plan</i></li> </ul>	<ul style="list-style-type: none"> <li>q) <i>Noise and Vibration Management Plan</i></li> <li>r) <i>Hazardous Prevention and Control Plan</i></li> <li>s) <i>Solid and liquid Waste Management Plan</i></li> <li>t) <i>Health and Safety Management Plan</i></li> <li>u) <i>Gender Based Violence, Sexual Exploitation Prevention and Response Plan</i></li> <li>v) <i>Program Induced Labor Influx</i></li> <li>w) <i>Workers Accommodation Plan</i></li> <li>x) <i>COVID-19, HIV/AIDS and Drug Abuse Prevention</i></li> <li>y) <i>Security Plans</i></li> <li>z) <i>Employees and Employers Code of Conduct</i></li> <li>aa) <i>Logistic Risks Management Plan</i></li> <li>bb) <i>Grievance Redress Mechanism</i></li> <li>cc) <i>Traffic Management Plan</i></li> <li>dd) <i>Emergency Preparedness and Response Plan</i></li> <li>ee) <i>Material Borrow pits/Quarry Management Plan</i></li> <li>ff) <i>Biodiversity Management Plan</i></li> <li><i>Erosion and Sediment Control Plan</i></li> </ul>
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### Labor Management

The ESMP prepared for the office blocks and IT labs will provide that at project implementation stage the contractor will review and adopt the project Labor Management Plan (LMP) that includes mandatory requirement to procure all unskilled (and as much as possible, semi-skilled) labor as well

as locally available materials from the local community while ensuring equal pay for equal work for men, women and people with disability. Measures listed below will be implemented:

- The contractors will reduce labor influx<sup>27</sup> by tapping into the local workforce. Depending on the size and the skill level of the local workforce, a share of the workers required for the project may be recruited locally. This may be easier for unskilled workmen. Specialized workmen may be hired from elsewhere. Local workers may also be trained especially if they are required for the operation of the project.
- The contractor will ensure effective community engagement and strong grievance mechanisms on matters related to labor with a discrete mechanism for safely and confidentially reporting issues of SEA and GBV at the community level.
- Effective contractual obligations for the contractor to mitigate risks of labor influx, the contractor must engage a local community liaison person if required.
- The contractor will ensure proper records of labor force on site while avoiding child and forced labor.
- The works contractor will be required under its contract to prepare and enforce a No Sexual Harassment and Non-Discrimination Policy, in accordance with national law as well as to the World Bank Code of Conduct guidelines where applicable.
- The contractor will develop and implement a Children Protection Strategy, this strategy will ensure that no child under the legal age of 18 years is employed to the Project.
- The contractor will ensure SEA is addressed in all employment contracts and a COC is signed by all workers.
- The contractors will develop training and sensitization of workers on SEA and ensure specific signage on SEA zero tolerance in all work sites.

## **5.8 Implementation Monitoring and Supervision**

All the activities to be financed under the project will follow the ESF, environment and social standards and the provisions described and agreed to in the ESCP. The PCU will make sure that all bid documents and contracts include the ESMP together with all other sub plans and require compliance with it. Environmental and social monitoring will check the effectiveness and relevance of mitigation measures through the implementation/operation phase. The PCUs Environment and Social Specialists shall monitor project activities.

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<sup>27</sup> Labour Influx means convergence of labor force from different areas away from the project location, tapping from local labor force reduces conflicts and complaints from locals.

## **6 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN, INCLUDING THE INSTITUTIONAL ARRANGEMENTS FOR THE PROJECT IMPLEMENTATION AND SUPERVISION**

### **6.1 Implementation Arrangements of ESMP**

Environmental and Social Management Plan (ESMP) implementation including institutional responsibility is provided in Table 6.1 below. The costs for mitigation and monitoring cannot be determined at this point as specific details are unknown. However, site specific ESMP will be prepared at all sites that will be identified for construction of office blocks and IT labs as detailed in Sub Component 3.1 on strengthening the capacity of central and line MDAs.

The matrix further provides social risks discussed for both Component 1 and 2 that are related to; Threats to human security, Risks related to exclusion of vulnerable, marginalized, and minority members of the community, Risks related to selection bias and elite capture with potential leakages of project benefits, risks associated with ensuring universal access for all persons, including persons with disabilities and Challenges in access to beneficiaries for meaningful stakeholder and community engagement as well as grievance redress and monitoring

The bidding documents under specification to bidders will include provisions of site specific ESMPs. Further, PCU officers will sign code of conduct that commits them to selection tools or criteria to be used to select project beneficiaries, with a provision that provides equal or better chances of selection of Persons Living with Disability, Vulnerable, Marginalized, and Minority Members of the Community for accessing project benefits

**Table 6-1: Social Impacts Mitigation and Monitoring Plan**

Impact / Risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
<b>Social risks</b>					
<p><b>Threats to human security</b> through the escalation of personal, communal or inter-state conflict, crime or violence. Applicable to component 1: Public Finance Management</p>	<p><b>ESS4: Community Health and Safety</b></p> <ul style="list-style-type: none"> <li>• PCU shall work closely with the Ministry of Interior to ensure the security of the workers, Project teams shall seek security approval and clearances from the project coordinator.</li> <li>• Project teams shall be periodically subjected to security awareness campaigns.</li> <li>• iii. Project teams should have alternative communication devices, such as two-way radios or satellite phones in areas with limited or no cellular network coverage.</li> <li>• The Somalia government, and in consultation with project team, will determine balancing of the security risks with the potential development benefits in high risk areas.</li> <li>• Project activities will initially focus on interventions in sub-regions with a moderate security threat profile, and gradually deploy additional links in more insecure areas, as and when the security context evolves positively and provides a more permissible operating environment.</li> <li>• Site-specific assessments in the sub-regions will be required prior to the rolling out of interventions through support from security risk management firms;</li> <li>• Further protocol details and holding point structures will be included in the Project Operation Manual. This will include a procedure to include management views</li> </ul>	<p>Number of Security incidences reported</p>	<p>Daily</p>	<p>PCUs (<i>Safeguards Specialists</i>); <i>Supervising Consultant, Security personnel</i></p>	<p>To be included in specific Security Risk Assessment and Management Framework (SRAMF)</p>

Impact / Risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
<b>Social risks</b>					
	<p>on World Bank no objection to launch new phases of network deployment or initiating contracts in previously higher risk areas.</p> <ul style="list-style-type: none"> <li>• For areas where works are at acceptable risk level, basic risk management approaches will be outlined in the site specific Security Management Plans (SMP). Training workers on-site on basic security elements, response to and reporting incidents among other will also be undertaken.</li> <li>• In addition, capacity strengthening measures including security advisors in the PCUs will be required</li> <li>• The task team will work with procurement to ensure flexibility in contracting and budgeting in need for a ‘security premium’ for contractors needing to hire additional security; while a militarized approach to security will be avoided.</li> <li>• xi. Specialized security risk management firms may be hired to support assessments as needed.</li> <li>• In line with ESS4 and WB GPN on the use of security personnel including code of conduct, incident reporting, grievance redress and training/awareness-raising for security officers on the principles of proportionality in the use of force.</li> <li>• Close coordination with security authorities and local communities.</li> <li>• Deploy police officers to provide site security for the workers where appropriate.</li> <li>• Active use of remote monitoring tools, and cautious management of project visibility, e.g., public display of project information such as signboards at works <b>sites</b>.</li> </ul>				

Impact / Risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
<b>Social risks</b>					
	•				
Security risks for project operations including the protection of project workers, beneficiaries, and affected persons;  Applicable to component 1: Public Finance Management	<b>ESS10: Stakeholder Engagement and Information Disclosure</b> <ul style="list-style-type: none"> <li>Comply with the Security Risk Assessment and Management Framework for the project,</li> <li>PCU shall work closely with the Ministry of Interior to ensure the security of the workers, Project teams shall seek security approval and clearances from the project coordinator.</li> <li>Project teams shall be periodically subjected to security awareness campaigns.</li> <li>Project teams should have alternative communication devices, such as two-way radios or satellite phones in areas with limited or no cellular network coverage</li> </ul>	Number of Security incidences reported under the Project	Daily	PCUs ( <i>Safeguards Specialists</i> ); <i>Supervising Consultant</i> , <i>Security personnel</i>	To be included in specific Security Risk Assessment and Management Framework (SRAMF)
Risks related to exclusion of vulnerable, marginalized, and minority members of the community from project benefits Applicable to component 2: Domestic Resource Mobilization	<b>ESS10: Stakeholder Engagement and Information Disclosure</b> <ul style="list-style-type: none"> <li>Selection tools or criteria to include a provision that provides equal or better chances of all staff within the civil services accessing project benefits</li> <li>Personnel involved in review and allocation project benefits such as trainings will sign a Code of Conduct with a provision committing them not to be involved in bias</li> </ul>	Cases of exclusion of vulnerable, marginalized, and minority members of the community reported	Monthly	PCUs ( <i>Safeguards Specialists</i> ); <i>Supervising Consultant</i>	TBD
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;	<b>ESS10: Stakeholder Engagement and Information Disclosure</b> <ul style="list-style-type: none"> <li>Selection tools or criteria to include a provision that provides equal or better chances to Persons Living with Disability (PLWD) accessing project benefits.</li> </ul>	Cases Grievances from civil servants related exclusion from benefiting from the project	Monthly	PCUs ( <i>Safeguards Specialists</i> ); <i>Supervising Consultant</i>	TBD

Impact / Risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
<b>Social risks</b>					
Applicable to component 2: Domestic Resource Mobilization	<ul style="list-style-type: none"> <li>Personnel involved in review and allocation project benefits such as trainings will sign a Code of Conduct with a provision committing them not to be involved in bias</li> </ul>				
Risks associated with ensuring universal access for all persons, including persons with disabilities. Applicable to component 2: Domestic Resource Mobilization	.	Cases of exclusion of PLWD reported	Monthly	PCUs (Safeguards Specialists); Supervising Consultant	TBD
Challenges in access to beneficiaries for meaningful stakeholder and community engagement as well as grievance redress and monitoring; Applicable to component 2: Domestic Resource Mobilization	<b>ESS10: Stakeholder Engagement and Information Disclosure</b> <ul style="list-style-type: none"> <li>Identify disadvantage groups within the civil service and benefiting communities.</li> <li>Establish and maintain continuous liaison with the communities including disadvantaged groups.</li> <li>Facilitate the participation of vulnerable groups to consultations (such as provision of transportation and accessible venues)</li> <li>Establish GRCs involving vulnerable groups.</li> <li>Inform and sensitize all stakeholders on accessible GRM</li> </ul>	Complaints reported on effectiveness of stakeholder engagement and disclosure mechanism	Monthly	PCUs (Safeguards Specialists); Supervising Consultant	TBD
Child labor Applicable to component 3: Public Sector Institutions Management and Performance	<b>ESS2: Labor and Working Conditions</b> <ul style="list-style-type: none"> <li>The project will require the implementation of age verification procedures by contractors for all its prospective employees, the verification procedure will be shared and verified by the social specialist.</li> <li>The contractor will keep a list of all the workers at the site together with their details including age. These data will be shared periodically and on demand with the PCU and World Bank</li> </ul>	Cases of under aged children reported to be employed on the project	Monthly	PCUs (Safeguards Specialists) ; Supervising Consultant	To be included in specific GBV/SEAH Prevention and Response Plans



Impact / Risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
<b>Social risks</b>					
	<ul style="list-style-type: none"> <li>The PCU will work closely with the State and District Labor Inspectors to ensure and monitor compliance of the contractor with the Labor code and the ESS2</li> </ul>				
Forced Labor Applicable to component 3: Public Sector Institutions Management and Performance	<b>ESS2: Labor and Working Conditions</b> <ul style="list-style-type: none"> <li>The employment of project workers will be based on the principle of fair treatment;</li> <li>The project management will hold sensitization meetings on forced labor and conflict resolution mechanism</li> <li>The contracts with third parties will include prohibition of forced labor requirements as part of the monitoring system</li> <li>All contracts will have contractual provisions to comply with the non-use of forced labor requirements including penalties for non-compliance in-line with the relevant national laws.</li> <li>Subproject Environmental and Social</li> </ul>	Cases of forced labor reported under the project	Monthly	PCUs (Safeguards Specialists) ; Supervising Consultant	TBD
Labor influx risks Applicable to component 3: Public Sector Institutions Management and Performance	<b>ESS2: Labor and Working Conditions</b> <ul style="list-style-type: none"> <li>Contractors shall ensure that all non-technical work is reserved for local people (identifiable with the host communities and witnessed by host community leadership)</li> <li>All workers will be required to sign a CoC that will be enforced by all contractors</li> <li>An abbreviated CoC will be produced and displayed in all facilities and offices implementing and of interest to the project</li> <li>Broadly share information among the workers on the availability of safe and accessible GM and the presence of GBV/SEAH focal persons including</li> </ul>	Project Compliance to labor provisions Frequency of Stakeholder Engagements Code of conducts signed	Monthly	PCUs (Safeguards Specialists) Supervising Consultant	To be included in specific LMP

Impact / Risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
<b>Social risks</b>					
	contacts of the social specialist for the project.				
labor disputes over terms and conditions of employment Applicable to component 3: Public Sector Institutions Management and Performance	<p><b>ESS2: Labor and Working Conditions</b></p> <ul style="list-style-type: none"> <li>Fair terms and conditions shall be applied to all project workers (guided by relevant laws)</li> <li>The project shall have GMs for project workers (direct workers, contracted workers, primary suppliers and community workers) to promptly address their workplace grievances. The social specialist at the PCU will ensure the GM is functional accessible.</li> <li>The project shall respect the workers' right to join Labor unions and freedom of association</li> </ul>	Project Compliance to labor provisions Frequency of Stakeholder Engagements Code of conducts signed	Monthly	PCUs (Safeguards Specialists) Supervising Consultant	To be included in specific LMP
SEA/SH or other forms of GBV Applicable to component 3: Public Sector Institutions Management and Performance	<p><b>ESS2: Labor and Working Conditions</b></p> <ul style="list-style-type: none"> <li>Sensitize project workers and the PCU staff and beneficiary communities on GBV/SEAH</li> <li>Sensitize communities and project workers on GBV/SEAH and the referral pathways</li> <li>All project personnel to be sensitized on GBV/SEAH as well as the beneficiary communities</li> <li>The CoC, to be signed by the workers contains provisions on GBV/SEAH</li> <li>The project will undertake GBV risk assessment and mapping of GBV services.</li> <li>Sensitization campaigns and awareness creation on GBV services.</li> <li>All direct and contracted workers will sign a CoC,</li> <li>Periodically update GBV assessment of potential risks that may arise in relation to primary suppliers.</li> </ul>	Number of GBV cases happening at the community level that receive survivor-centered referral and care	Monthly	PCUs (Safeguards Specialists); Supervising Consultant	To be included in specific GBV/SEAH Prevention and Response Plans

Impact / Risks	Mitigation Measure	Monitoring Indicator	Frequency	Monitoring Responsibility	Budget
<b>Social risks</b>					
	<ul style="list-style-type: none"> <li>• Application of WB GBV Guidance Notes in work procedures and interactions, especially those addressing social aspects.</li> <li>• Special GRM for GBV/SEA/SH cases will be set up, and</li> <li>• GBV Risk Assessment and Action Plan has been prepared and that the project will comply with the measures outlined in the GBV-Action Plan</li> </ul>				

**Table 6-2: Environment Impacts Mitigation and Monitoring Plan**

Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
<p>Soil erosion and possible sedimentation of rivers from earth works and run-off during the construction phase; Applicable to component 3: Public Sector Institutions Management and Performance</p>	<p><b>ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b></p> <ul style="list-style-type: none"> <li>• Where clearing is done, compact loose soil on excavated areas, land should be landscaped and reclaimed by planting more trees and other vegetation;</li> <li>• Where erosion may occur due to vegetation loss, erosion control measures will be put in place like re-vegetation, stone bunds;</li> <li>• Vegetation clearing and topsoil disturbance will be minimized where possible;</li> <li>• Avoid moving heavy machineries and other equipment unnecessarily and away from designated transport routes;</li> <li>• Reclaim and re-vegetate the site once work is completed to reduce run-off</li> <li>• Contouring temporary and permanent access roads / lay-down areas to minimize surface water run-off and erosion</li> </ul>	<ul style="list-style-type: none"> <li>• Soil quality and level of contamination and sediment load</li> <li>• Findings of soil analysis reports</li> </ul>	<p>Monthly</p>	<p><i>PCUs (Safeguards Specialists); Supervising Consultant</i></p>	<p>To be included in specific ESMPs</p>
<p>Disposal and management of large amounts of excavated material generated from construction activities; Applicable to component 3: Public Sector Institutions Management and Performance</p>	<p><b>ESS 3: Resource Efficiency and Pollution Prevention and Management</b></p> <ul style="list-style-type: none"> <li>• Educate workers about proper waste collection, storage and disposal</li> <li>• Preparation of waste management plan for each waste stream and implementation of the waste hierarchy</li> <li>• Disposal of project-generated wastes at Municipal approved sites only, for hazardous wastes comply to provisions of WBG ESH General Guidelines of 2007 and provisions of ESS3: Resource Efficiency and pollution prevention</li> <li>• The contractors shall ensure provision of waste bin at the project sites to handle wastes generated.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>			

Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	<ul style="list-style-type: none"> <li>• Efficient use of materials to as much as possible avoid and minimize waste production.</li> <li>• Ensure waste are recycled/reused before opting to dispose.</li> <li>• Use of durable, long-lasting materials that shall not need to be replaced often.</li> <li>• Ensure waste is collected and disposed in accordance to Somalia Government regulations.</li> <li>• Measures leading to efficient use of energy and water during design, construction and operations shall be adopted</li> <li>• Environmental liabilities lies with PCU with regards to rehabilitation of existing buildings (asbestos containing materials, lead based paints, contaminated soil, etc.)</li> </ul>				
<p>Noise and Vibrations Impacts to Communities and workers Applicable to component 3: Public Sector Institutions Management and Performance</p>	<p><b>As provided by ESS4: Community Health and Safety and EHSG on Noise ESS 2 Labor and Working Conditions</b></p> <ul style="list-style-type: none"> <li>• Siting noisy plant and equipment as far away as possible from classrooms and use of barriers (e.g., site huts, acoustic sheds or partitions) to reduce the level of construction noise at receptors wherever practicable;</li> <li>• Construction workers should be aware of the sensitive nature of work places where they are operating in &amp; advised to limit verbal / other form of noise;</li> <li>• Undertake regular maintenance of the construction equipment/ vehicles as per the operational manual</li> <li>• Where practicable noisy equipment will be orientated to face away from the nearest classroom and other receptors;</li> <li>• Working hours for significant noise generating construction work will be on daytime only and preferably during the school holidays</li> </ul>	<p>Serviced plant and equipment to manufacturers specification</p>	<p>Monthly</p>	<p><i>PCUs (Safeguards Specialists); Supervising Consultant</i></p>	<p>To be included in specific ESMPs</p>

Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	<ul style="list-style-type: none"> <li>• Alternatives to diesel and petrol engines and pneumatic units, such as hydraulic or electric-controlled units, will be used, where practicable;</li> <li>• Where practicable, stationary equipment will be located in an acoustically treated enclosure;</li> <li>• For machines with fitted enclosures, doors and door seals will be checked to ensure they are in good working order; also, that the doors close properly against the seals;</li> <li>• Throttle settings will be reduced and equipment and plant turned off, when not being used;</li> <li>• Equipment will be regularly inspected and maintained to ensure it is in good working order. The condition of mufflers will also be checked; and fitting of mufflers or silencers of the type recommended by manufacturers.</li> </ul>				
<p>Impacts on Air Quality to Communities and workers</p> <p>Impact to health of Communities and Workers working on infrastructure projects</p> <p>Applicable to component 3: Public Sector Institutions Management and Performance</p>	<p><b>As provided by ESS4: Community Health and Safety and also ESS 2 Labor and Working Conditions</b></p> <ul style="list-style-type: none"> <li>• The contractor shall undertake measures that protect the community against OSH risks including; barricades of deep excavations, proper signage and awareness on OSH</li> <li>• The contractor shall develop a traffic management plan and ensure that all traffic on site is regularly serviced</li> <li>• The contractor shall develop SOPs for managing the spread of communicable diseases such as COVID 19 and HIV AIDS during project execution and submit them for the approval of the E&amp;S specialist before mobilizing to site</li> <li>• The contractors shall provide the workers with the required PPE and always enforce use while at the worksite.</li> <li>• The contractors shall develop Emergency preparedness and response plan for any emergencies on site such as floods, the plan will approve by E&amp;S specialist before mobilizing to site</li> </ul>	<ul style="list-style-type: none"> <li>• Level of Compliance level Dust Management Plan</li> <li>• Services and inspection reports of plant and equipment</li> <li>• Air quality monitoring report findings</li> </ul> <p>Number of complaints from community related to dust menace</p>	Monthly	PCUs (Safeguards Specialists); Supervising Consultant	To be included in specific ESMP

Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	<ul style="list-style-type: none"> <li>● The contractor shall SOPs for managing hazardous material on site to be approved by E&amp;S specialist</li> <li>● The contractors should keep emergency and first aid tool kit in the sites, which will be replenished once used</li> <li>● The equipment used in the works should be routinely serviced to ensure proper and safe functionality</li> <li>● Carry out job risk assessment (analysis of hazards likely to exist and precautions required) before executing the assignment, and at different intervals as may be practically possible to ensure safety assurance</li> <li>● Use of safety signage “MEN/WOMEN AT WORK” or “Object Falling” to warn the project staff and other workers on site</li> <li>● Provision of adequate signage and communication in Somali language of risks to workers and community members</li> <li>● Hazardous areas should be clearly marked with signs easily understood by workers, visitors and the general public, as appropriate</li> <li>● Contractor workers should be trained in the use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyard</li> <li>● Electrical works should be performed by trained and qualified experts</li> <li>● Ensure that electrical equipment is properly connected before switching on sockets</li> <li>● Use only the standard electrical connectors when joining extension leads or cables</li> <li>● In case of any spillage at work areas, the contractor should clean the spillage immediately, anti-slip hazard warning signs should be used when mopping floors to reduce chances of slip falls</li> <li>● Installation of different type of fire extinguishers</li> <li>● Training of staff and the relevant team members on the use of the fire extinguishers</li> </ul>				

Environmental Impact	Mitigation Measures	Monitoring Indicator	Frequency of monitoring	Monitoring Responsibility	Budget
	<ul style="list-style-type: none"> <li>• There will be an elaborate health and safety requirement which will address the OHS risks in every subproject, including hazard analysis, health and safety plans among others.</li> <li>• Site-specific OHS measures will be further elaborated in the LMP and site-specific LMPs</li> </ul>				
Impacts on Cultural Heritage sites, project interfering with critical cultural heritage sites Applicable to component 3: Public Sector Institutions Management and Performance	Conform to provisions of finds procedures provided in Appendix 2,	• Number of Cultural Heritage Sites impacted by the project	Monthly	<i>PCUs (Safeguards Specialists); Supervising Consultant</i>	To be included in specific ESMP



## **7 INSTITUTIONAL ARRANGEMENTS FOR ESMF IMPLEMENTATION**

### **7.1 Institutional Arrangement**

A Project Coordination Unit (PCU) will be established to provide support services to the implementing FGS and FMSs MDAs and coordinate implementation at and between the FGS and FMSs. The PCU will be placed in the MoF of the FGS and led by a project coordinator, who will be responsible for: (i) coordination between components and FGS/FMSs; (ii) M&E of project activities; and (iii) provision of support services, such as procurement, environment, social standards, and communication, to project implementing MDAs. The project coordinator will be supported by a team consisting of technical advisors (PFM, DRM, and PSM) and specialists in procurement, M&E, environment, social standards, and communications, the Environment, OSH and Social Specialist will be hired on full time basis for the entire project cycle.

### **7.2 Institutional Frameworks on Environment and Social Safeguards in FGS Somalia**

The statutory mandate for national environmental management lies with the Ministry of Environment and Climate Change, the Ministry takes the lead in the formulation of environmental policies and laws, coordinates stakeholder consultation and partnerships with state agencies, local councils, civil society and private sector entities. The Directorate is also the operational focal point for multilateral environmental agreements and funds, such as, the Global Environment Facility (GEF), Green Climate Fund (GCF), etc. It is also tasked with conducting Sectoral Environmental Assessments (SEAs), Environment Impact Assessments (ESIAs) and Environmental Audits (EAs).

### **7.3 Institutional Frameworks on Environment and Social Safeguards in Somaliland**

In Somaliland, the two main government institutions directly focused on environment are the Ministry of Environment and Rural Development (MoERD) and the National Environment Research and Disaster Preparedness Authority (NERAD). The Ministry of Environment and Rural Development is mandated to manage environment, including biodiversity conservation. The Ministry is responsible for developing policies and strategic plans related to environment, including biodiversity.

Ministry of Environment and Rural Development (MoERD) is a lead sector on matters of environment management in Somaliland, a comprehensive Environment Act for Somaliland, including guidelines for environmental impact assessment, has been approved by the parliament. It is also clear that, environmental and natural resources management in Somaliland is still scattered in sectors and sector laws and policies in absence of an umbrella law and institution mandated with environmental management in the country.

## 7.4 Role of institutions and other Entities relevant to implementation of ESMF

The role of specific institutions relevant to implementation of ESMF provisions is summarized below in **Table 7-1**

**Table 7-1: Institutions and Entities Relevant in ESMF Implementation**

Institution / Entity	Role
PCU	<p>A Project Coordination Unit (PCU) will provide support services to the implementing FGS and FMSs MDAs and coordinate implementation at and between the FGS and FMSs. The PCU will be placed in the MoF of the FGS and led by a project coordinator, who will be responsible for: (i) coordination between components and FGS/FMSs; (ii) M&amp;E of project activities; and (iii) provision of support services, such as procurement, environment, social standards, and communication, to project implementing MDAs. The role of responsibilities for undertaking field supervision on EHS matters will be responsibility of OHS expert who will be hired under the PCU</p> <p>The project coordinator will be supported by a team consisting of technical advisors (PFM, DRM, and PSM) and specialists in procurement, M&amp;E, environment, social standards, and communications. The PCU will also include an FM specialist assigned from the External Assistance Fiduciary Section (EAFS) of the Accountant General’s Department.</p>
Ministry of Environment and Climate Change	<p>The ministry will be responsible in formulation of environmental policies and laws, coordinates stakeholder consultation and partnerships with state agencies, local councils, and civil society and private sector entities. The ministry will be tasked with conducting Sectoral Environmental Assessments (SEAs), Environment Impact Assessments (ESIAs) and Environmental Audits (EAs) in liaison with PCU</p>
Supervisory Consultants	<p>Supervisory Consultants will supervise the activities of Contractors engaged to implement the main activities. With regards to environmental and social performance, their responsibilities will include monitoring of the implementation of mitigation measures contained in the Contract Agreement of Contractors and in the implementation of the C-ESMP. Supervise the contractors’ obligation with regard to the Environmental, Social, Health and Safety (ESHS) clauses included in tender documents and in respective contracts.</p>
The World Bank	<p>The Bank will be responsible for the final review and clearance of environmental and social assessment instruments; as well as reviews and the giving of a “no objection” to the Terms of Reference for instruments (ESIAs, ESMPs, ESAPs, etc.).</p> <p>Conduct regular supervision missions to check on the performance of SERP and assess its compliance to agreed grant covenants and environmental and social instruments and Recommend measures for improving the performance.</p>

## 7.5 Capacity Development for Environmental and Social Management and Monitoring

The ESMF provision on capacity enhancement of the environmental and Social Standards skills and competencies of the projects PCU has been built into the project design under component 5 that Project Management, Coordination, and Support in Delivery. Sub Component 5.1 on project management support, the focus will be to support project coordination at FGS, FMSs, and SL. The sub component will provide (a) overall coordination for the project; and (b) support services

to implementing agencies in procurement, financial management, etc. Project management staff salaries, allowances, training, and basic facilities for managing the project will be funded under the project.

Project level capacity building support on E&S including setting up an E&S risk & impact management system, staffing and training on the enhancing the E&S capacity through ESF requirements based on a robust capacity building plan to be implemented will be anchored under this sub component. Focus of capacity building will be on

Training on preparation and implementation of provisions of ESCP, ESMF, ESMPs, SEAH/GBV Response and Prevention Plan, Labor Management Plan, Security Risks Assessment Management Framework (SRAMF), Grievance Redress Mechanism GRM, Occupational Health and Safety, Stakeholder Engagement Plan. **Table 7-2** below lists some of the proposed training topics which will help building the capacity for smooth implementation of the Project.

**Table 7-2: 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	PCU	Prior to commencement of activities
ESMPs,	Training of all Technical Leads in the Environment and Social Safeguards Instruments, World Bank Safeguards Awareness and Training of Environmental and Social Standards and WBG EHS Guidelines	Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments. Hired Ministry Environment and Social Safeguards Consultants	PCU	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.	PCU	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 in construction office Blocks and IT Labs	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)	PCU 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	Consultation s and Training	Technical Leads / relevant staff responsible for the implementation of E&S instruments.	PCU	Prior to commencement of activities

	Set up Grievance Redress Mechanism and functioning in the Energy sector				
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 in construction office Blocks and IT Labs	Technical leads	Prior to deployment
Create awareness of LMP and H&S Standards for workers	LMP and H&S Standards	Training	Contracted workers in construction office Blocks and IT Labs	Technical leads	Prior to deployment
Support Emergency Response Measures	Communication of Emergency Response Measure (ERM) to communities	Information, training	Contracted workers in construction office Blocks and IT Labs	PCU	Prior to commencement of activities
Community Health & Safety	Road Safety Awareness	Training	Communities in Project areas, with particular focus on vulnerable communities	PCU and Technical Leads	Prior to commencement of activities
Community Health & Safety	Communicable diseases	Training	Communities where office Blocks and IT Labs will be constructed	PCU and technical leads	Prior to commencement of activities
Community Health & Safety	GBV, as per Action Plan	Training and awareness raising	Communities where office Blocks and IT Labs will be constructed	PCU and technical leads	Prior to commencement of activities
GRM	Project GRM as described in the SEP	Information disclosure and training	Communities where office Blocks and IT Labs will be constructed with particular focus on vulnerable communities	PCU and Technical Leads	Prior to commencement of activities



## **7.6 Monitoring and Reporting**

PCUs at FGS and FMS shall establish a database for each component of the project to periodically monitor the evolution of implementation, outputs, and results, with systems for regular data gathering and processing of information required to monitor the main performance indicators and intermediary indicators as defined in the results framework. The PCUs shall collect and compile data to provide basis for a compressive mid-term review.

The PCUs will be responsible for overall implementation and management of awarded contracts in accordance with the agreed contractual obligations. This ESMF has identified preliminary potential environmental and social issues and risks related to the project activities and has proposed subsequent mitigation measures. To ensure effective implementation of measures, the following monitoring and reporting system which include both internal monitoring and reporting and external monitoring and evaluation. This will be enhanced further in the ESMPs to be developed prior to conceptual design of project components

The significance of monitoring stems from the fact that the inputs will go into the project design and planning, including mitigation measures, are based largely on “predictions”. It is essential that the basis for the choices, options and decisions made in formulating or designing the project and other environmental and social safeguard measures are verified for adequacy and appropriateness. Monitoring verifies the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented. Monitoring specifically helps to:

- Improve environmental and social management practices.
- Check the efficiency and quality of the EA processes;
- Establish the reliability and credibility of the EA for the project (as well as the quality of experts providing EA consultancy services
- Provide the opportunity to report the results on safeguards and impacts and proposed mitigation measures implementation.

### **7.6.1 Internal Monitoring and Reporting**

Internal Monitoring shall begin once E&S project documents are approved and disclosed and the project implementation has commenced. The PCU (and other implementing agencies, as appropriate) commence monitoring as an important feedback mechanism. This ensures that the environmental and social mitigation measures:

- Identified in the planning phase (contained in the ESMP reports), and incorporated in the project design and cost are being implemented.
- Are maintained throughout the construction phase, and where applicable in the operation phase, and to the decommissioning of sites, facilities and equipment;
- Where inadequate, additional remedial actions are identified (including corrective measures or re-design of mitigation measures).

The monitoring by the PCUs shall actively and effectively monitor the contractors engaged to construct the office blocks and IT labs. The monitoring results will be analyzed, and the monitored information and recommended actions will be compiled for the attention and action of the respective implementing agencies.

The monitoring report will be formalized with the agency's agreed action and timeframes and submitted as the respective implementation agency's MoF and the Bank. The project monitoring framework shall develop standard reporting forms which shall provide for quarterly and yearly reports. This will include:

- List of consultations held, including locations and dates, name of participants and designations.
- Main points arising from consultations including any agreements reached.
- A record of grievance applications and grievance redress.
- Construction supervision reports that include assessment of contractor's compliance with safeguards;
- Progress report on technical, Environmental and Social studies, designs E&S instruments
- Progress report on capacity building plan
- Safeguards staff at the PCUs will prepare consolidated quarterly monitoring reports

## **7.6.2 External Monitoring and Reporting**

The PCU Environmental and Social Specialists will assess the compliance of all implementer activities against the ESMF and their subsequent ESMPs and will report possible non-compliance to the Project Coordinator of the PCU. Indicators identified in both documents will be used as a baseline for assessing progress on project implementation. The PCU will also engage Independent Verification Agents (IVA) to conduct monitoring, verification and inspection of the activities of all implementers to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts. Performance will be integrated into quarterly reports to the WB. Performance will be integrated into quarterly reports to the WB.

The World Bank will equally supervise and assess environmental and social performance through review of the quarterly monitoring reports and through regular site visits. The GRM will help track complaints and the effectiveness of grievance resolution, including those with environmental and social impacts. Third Party Monitoring Agents (TPMA) will be deployed to monitor overall project implementation, including the implementation of E&S Risk Mitigation Measures. The TPMA will report non-compliance to the PCU and directly to the World Bank

At project completion stage, the PCU shall undertake an assessment of the success of the ESHS instruments and include relevant information in the Implementation Completion Report (ICR). This ICR will be followed by the Bank's own ICR. If either of these assessments reveals that any key objectives of the ESHS instruments were not achieved, follow-up measures shall be developed to remedy the situation.

## **7.7 Bank's Supervision**

The Bank will provide the second line of monitoring compliance and commitments made in the ESCP through implementation support missions albeit in a less frequent manner and detail as compared to the first line of monitoring that will be undertaken by the PCU. The Bank will further undertake monitoring



during its scheduled biannual implementation support missions. Specifically, for each year that the agreement is in effect, sub project contractors will be required to submit to the monthly, quarterly monitoring reports to the PCU will consolidate and summarize these reports and submit to the Bank as part of its reporting to the Bank and the Bank supervision missions will review these reports and provide feedback.

## 7.8 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. Resettlement Policy Framework, Security Risk Assessment Management Framework (SRAMF), Updated Stakeholder Engagement Plan, Labor Management Procedures, and GBV Action, subproject ESMPs etc.; and annual reviews, below, presents a provisional estimate of the budget needed to implement the ESMF. **Table 7-3** below gives the cost estimate (budget) of implementing this ESMF including the preparation of sub projects, monitoring and supervision and capacity building only:

**Table 7-3: Resource and Budget**

	<b>Required Resources</b>	<b>Estimated Costs in USD</b>
<b>PCU – Monitoring of ESMF</b>		
	Human Resources: 1 Environmental, 1 Social Specialist (48 months x 2 x 5000 USD)	480,000
	1 GBV Specialist (48 months x 1x 5000 USD)	240,000
	1 OHS Specialist (48 months x 1x 5000 USD)	240,000
	1 Security Specialist (48 months x 1x 5000 USD)	240,000
	Logistics / Travel (Lump sum)	50,000
<b>Preparation of site-specific Plans (ESMP and HSMP)</b>		
	Site Specific Environment and Social Management Plan (ESMP), Health and Safety Management Plan (HSMP),	20,000
<b>Grievance Redress Mechanism hotline</b>		
	Hotline and other mechanisms (Lump sum)	10,000
	GBV/SEAH reporting mechanisms (Lump sum)	Separate Budget under GBV/SEAH Action Plan
<b>Implementation of Risk Mitigation Measures PI</b>		
	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 (except items on IP budgets)	100,000
	<b>Total</b>	<b>1,380,000</b>

## 8 GRIEVANCE REDRESS MECHANISMS

### 8.1 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 project<sup>28</sup>. 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 requires an effective GRM able to address concerns and disagreements (specified in Table 4.1, 4.2 and 4.3) 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 PCU**, 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.

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### 8.2 GRM Core Principles

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<sup>28</sup> 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.

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 are 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.

### 8.3 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 PCU. 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 PCU

#### **8.4 GBV/SEAH-related Grievance**

A separate SEAH action plan has been prepared for SERP, 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 SERP 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 SERP Project Coordinating Committee (PCU) 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 PCU), 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 PCU and onwards to the World Bank.

At all times, the PCU 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 PCU. 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 PCU 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 (see specific SEA/SH reporting form, Appendix 13).

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 PCU will inform the World Bank. The report will be on the anonymized incident as soon as it becomes known to the PCU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the 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 PCU 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 PCU 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 the IP or PCU on grievance redress across the GRM value chain.

### **GBV/SEA/SH**

The PCU 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 PCU 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 PCU 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

### **8.5 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](http://www.inspectionpanel.org)

## 9 STAKEHOLDER ENGAGEMENT / CONSULTATION AND DISCLOSURE

### 9.1 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 SERP, 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.

### 9.2 Stakeholder Inventory

**Table 9-1** 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 9-1: Stakeholders Inventory**

Level	Stakeholders	Description
<b>Directly or Indirectly Project-Affected Parties</b>		
National	<ul style="list-style-type: none"> <li>-Ministry of Finance (MoF),</li> <li>- Accountant General,</li> <li>- Directorate General of Revenue,</li> <li>- ICT Department</li> </ul> <p>Central Bank of Somalia, Attorney General’s Office, Ministry of Health,</p>	<ul style="list-style-type: none"> <li>- MoF will house PCU who will provide coordination support across line Ministries and key agencies; will be responsible for M&amp;E, and will lead prioritization of activities;</li> <li>-MoF also houses all these other departments working with the SERP except for Central Bank.</li> <li>- Central Bank of Somalia (CBS) – project finances shall be channeled through CBS.</li> </ul>

	Ministry of Education, OPM Auditor General's Office	<ul style="list-style-type: none"> <li>- Attorney General's office will contribute to the legal frameworks of the project.</li> <li>- Ministry of Health and Min of Education will receive capacity building support; and will be consulted in regard to project activities under component 2 of the project.</li> <li>- OPM will provide overall strategic guidance to the PCU</li> </ul>
Regional	FMS governments and line Ministries - FMS Ministries of Finance, Education and Health	<ul style="list-style-type: none"> <li>- FMS MoFs, Health and Education will receive capacity-building support, and will be consulted on project activities.</li> <li>- Other departments housed in the MoF will also receive support from the project (Accountant General's Office and the Revenue Department).</li> <li>- Independent institutions like offices of Auditor Generals from the FMSs will receive capacity building support.</li> </ul>
Local District-Level Administrations	District Administrations in proposed locations	District Administrators are usually the authorities that handle day-to-day needs and grievances; community development, community consultations in case of civil works.
<b>Other interested parties</b>		
Contractors	Those who will be hired to construct the offices at the Federal and State levels	The contractors and staff will be subject to the national provisions on labour and World Bank's ESS2 with a focus on recruitment, remuneration and overall management of the workers.
Civil society Organizations	These include partners supporting the government efforts in the country	Civil servants play a key role of resource mobilization, capacity building and advocacy. The project team will identify and engage CSOs throughout the project lifecycle.
Development partners	IMF, FCDO, EU, NORAD, WB	Have been funding similar interventions at the MoF/CBS
People working/ managing similar projects or projects in the same sites	PFM, DRM, RCRF, PROFR, CSSP	Likely to coordinate with the project to share experiences.
Communities	The public	These are the direct beneficiaries of the performance of the civil servants. They will need to be consulted to gather information on their experience in accessing services and their suggestions on the areas that need strengthening/improvement
	Community leaders	With formal administration systems only developing and non-existent in some areas, community leaders including clan and religious leaders play a vital role in community entry and the attainment and social license to operate. This may be necessary for the civil works.
Media/ Strategic communication – Spotlight	Access to information	Ensure information about the project and importance is shared to all stakeholders including disadvantaged groups and that communication modes that are appropriate. On social media – use more targeted messaging on Facebook and twitter and bearers of the message should be known influencers with integrity and following.
<b>Disadvantaged and vulnerable individuals and groups</b>		
Civil servants	Female workers, persons with disabilities	These workers may be left out of the engagement activities unless concerted efforts are made to include them. They may also not fully benefit from the project benefits.

### 9.3 ESMF and SEP Consultations

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

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

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

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

Between January 20th and 31st 2022, a form was shared with several implementing partners to capture various aspects of the project of relevant to the SEP. Eight (8) institutions/agencies responded to the questionnaire: (i) Galmudug State of Somalia, Dhusamareb; (ii) Galmudug Civil Service Commission; (iii) Hirshabeelle Civil Service Commission; (iv) Jubaland Civil Service Commission; (v) Auditor General Puntland State; (vi) PCU for SERP; (vii) South West Civil Service; and Office of the Auditor General, Somalia. The responses are summarized in Table 9.2 below.

**Table 9-2: Summary of Stakeholder Consultations and their Outcomes**

<b>Theme</b>	<b>Key issues for consideration</b>
<b>Key themes</b>	<b>Responses</b>
Perception about the project and its implementation	<p><b>How relevant is this intervention? What problems do you foresee it solving?</b></p> <p>-This intervention will strengthen the efficiency and transparency of the public sector management, address immediate capacity needs of the public sector workforces and improve public service delivery</p> <p>-The project will allow the Civil Service to have office buildings</p> <p><b>What social risks can this project cause/exacerbate? How can these risks be prevented/mitigated?</b></p>

Theme	Key issues for consideration
Key themes	Responses
	<p>-Although 5 of the 7 respondents noted there are no social risks expected from the project, the Puntland respondent noted that gender may be an issue whereby most of the people that will benefit from the project will be males who are the majority in civil service</p> <p><b>What lessons have you learnt from the other donor funded projects that can be used to inform the planned project?</b></p> <ul style="list-style-type: none"> <li>-To have agreed and approved work plans between the government and the WB</li> <li>-To build and hire a team of competent staff with proven track record of their past work</li> <li>-Secondment of staff to projects has not been successful in the past</li> <li>-Delayed procurement and slow implementation</li> <li>-The need to use local instead of international consultants to ease the knowledge transfer since it is easier for the staff to interact and receive knowledge and skills from the local consultants</li> <li>-Planned Bank support missions during each year help with the steering the project to ensure results are achieved in the agreed timelines</li> </ul> <p><b>What are the major obstacles or impediments to the success of this project? How can these challenges/risks be mitigated?</b></p> <ul style="list-style-type: none"> <li>-A major obstacle is the lack of an effective steering committee</li> <li>-Covid-19 is still an issue facing the entire world and this might hinder in-person consultation and interviews for planned staff and consultant positions</li> <li>-Lack of a work plan with clear milestones and timelines for each task to be completed by whom and when</li> <li>-Lack of clear coordination and channels of communication for submitting required instruments</li> <li>-Lack of qualified staff</li> <li>-The design of the project could also create its own obstacles as there can be some political tensions between the FGS and FMS which could hinder the success of the project</li> <li>-World Bank bureaucracy whereby the request process, especially for procurement items, can take forever which may have a negative impact on the successful implementation of the project</li> </ul> <p><b>Challenges Mitigation</b></p> <ul style="list-style-type: none"> <li>-Competitive selection processes or retention of the previous advisors attached to the CSC offices</li> <li>-Build a team of proven track records of their past work-related experience</li> <li>-Develop and use a work plan with clear millstones</li> <li>-Empower the role of steering committees</li> <li>-Train the staff and provide remuneration and allowances</li> <li>-Strengthen the coordination between the World Bank and the project team to ensure seamless implementation of interventions</li> </ul>
Exclusion during project implementation	<p><b>What is the risk of exclusion either in consultations or benefits (i.e., the exclusion is specific cadre of staff, gender or those in certain districts) during project implementation? How can these be overcome?</b></p> <ul style="list-style-type: none"> <li>-Gender discrimination is a potential risk because of the nature of civil service that is male dominated</li> </ul> <p><b>What is the risk of creating tension among different groups and/or cadres of workers?</b></p> <ul style="list-style-type: none"> <li>-This could happen when the staff paid by the government get less salary and benefits than the staff paid by the project. This could be resolved by putting a Pay Scale Policy in place.</li> </ul> <p><b>Besides discrimination, what are other causes of exclusion in the civil service at the federal and state levels?</b></p> <ul style="list-style-type: none"> <li>-Sometimes there may be conflict of interest during civil service recruitment process</li> </ul>

Theme	Key issues for consideration
Key themes	Responses
	<ul style="list-style-type: none"> <li>-Political influence and pressure to recommend job opportunities for their friends and people who believe their ideologies</li> <li>-Cultural perceptions, limited or lack of policies such as diversity and inclusion in workplaces, country’s political dynamics and power sharing strategies could affect recruitment in the civil service</li> <li>-Imposter syndrome – which is a personal challenge that is faced by many people in general and has to be overcome to allow people to apply for the positions advertised</li> </ul>
Stakeholder engagement	<p><b>How best could civil servants be effectively engaged in this project?</b></p> <ul style="list-style-type: none"> <li>-Share with them the project key milestones to familiarize themselves</li> <li>-They should be assigned a participative role in the project</li> <li>-Conduct two-day training for project induction</li> <li>-Project focal points and HR advisors in the field should show commitment and adjust their TORs to contain some clauses that reflect effective engagements with the civil servants</li> </ul> <p><b>How do we ensure that we capture the voices of all civil servants and other key stakeholders in consultations?</b></p> <ul style="list-style-type: none"> <li>-Through the development of project evaluation feedback that captures how they feel towards the project delivery and its implementation and make recommendations for future improvements</li> <li>-Conduct site visits</li> <li>-Create and deploy questionnaires to capture their views</li> <li>-Develop project feedback mechanisms that capture how the civil servants feel about the project delivery and its implementations and made recommendations for future improvements</li> </ul> <p><b>How can the project draw in civil society organizations and development partners that involved in civil service reforms?</b></p> <ul style="list-style-type: none"> <li>-Hold consultative meetings and focus group discussions</li> <li>-Hold a big launching ceremony to inform them that the CSC is in the forefront of civil service reforms through the support of WB SERP project</li> <li>-All tenders for civil service reforms to be publicly advertised and awarded through a competitive process</li> <li>-Get support from the Office of the Auditor General</li> </ul> <p><b>How can the citizenry (public) be effectively involved in the planning and implementation of the project?</b></p> <ul style="list-style-type: none"> <li>-Hold public forums and debates to ensure communication between the relevant stakeholders such as the CSOs, government and the project team/donors share and contribute their ideas towards the project from planning to implementation</li> <li>-Job opportunities – during construction of the offices those who can work for wage will benefit from the project</li> <li>-Prepare and share project summary reports</li> </ul> <p><b>How best can the project be communicated to the different stakeholders?</b></p> <ul style="list-style-type: none"> <li>-Hold a big launch ceremony to inform them that the CSC is in the forefront of civil service reforms through the support of WB SERP project</li> <li>-Fix billboards around the public spaces where citizens can easily see and read</li> <li>-Focal points and HR advisers to attend coordination and humanitarian meetings both at the FGS/FMS government levels</li> <li>-Hold face-to-face meetings with leaders of the MDAs (while adhering to Covid-19 protocols)</li> </ul>

Theme	Key issues for consideration
Key themes	Responses
Labor-related risks	<p><b>What labor risks can this project cause/exacerbate? If so, how can this be overcome and mitigated?</b></p> <p>Some of the foreseeable labour risks include:</p> <ul style="list-style-type: none"> <li>○ Lack of health cover</li> <li>○ Poor wages or financial insecurity</li> <li>○ Absence of legal protection</li> <li>○ Unlimited working hours</li> <li>○ Poor working conditions</li> <li>○ Insecurity at the workplace</li> <li>○ Health hazards</li> </ul> <p><b>What are your views regarding compliance with Somalia labor laws, e.g., child labor, pay and working conditions and fairness in recruitment, promotion and dismissal of workers? If so, how can these risks be prevented/mitigated?</b></p> <p><b>-The compliance of Somalia labor laws is very low both in the public and private institutions</b></p> <p><b>Mitigation measures</b></p> <p>-Both governments and private institutions to enforce relevant labor laws including the World Bank requirements</p> <p><b>What is the status of workers’ unions in Somalia and what risks do you foresee in labor movements?</b></p> <p>-There is a Federation of Somali Trade Unions whose mission is protect and promote the rights, well-being and the interests of all workers in Somalia in just, democratic, peaceful and prosperous nation of Somalia by enhancing quality of life and improving the income and other working as well as living conditions of all workers. Unfortunately, many workers do not know about this Union</p> <p>-There will be no welfare for workers</p> <p>-Low productivity of the workers and service delivery</p> <p>-Poor legislative framework will continue to exist</p> <p>-No new innovations for amendments and proposals for changes in the polices</p> <p><b>What is the risk of exclusion practices of recruitment processes by the contractors that will be hired to build the offices?</b></p> <p>-There will be no risk of exclusion practices of recruitment processes by the contractors that will be hired to build the offices since they are private businesses with their own governing principles (the reliability and quality will lead to choose the most suitable one)</p> <p><b>What is the risk of SEA/H in the project and what mitigation measures do you propose?</b></p> <p>-There will be no risk of SEA/H in the project delivery and management</p>
Security issues and conflicts	<p><b>Have there been any security-related incidents, local conflict in the country in the last 6 months?</b></p> <p>-There were security-related incidents in the last 6 months, Al Shabab Militants has been a threat to the government operations in some states</p> <p>-No security incidents reported in Jubaland and Puntland over the last 6 months</p> <p><b>What are some of the key security threats to the workers in the country (at the national, state and district levels)?</b></p> <p>-Al-shabab Militants have been a threat to the government operations at the national, state and district levels</p> <p>-Sometimes workers face security threats based on clan sensitivity</p>



Theme	Key issues for consideration
Key themes	Responses
	<p>-Some workers have been killed due to holding senior positions            -There is security threat to key government workers at the national level, as well as targeted government meetings, especially in Mogadishu which is central to Federal institutions. The threat is less imminent at the state level as well as the districts in the entire country, apart from Mogadishu Banadir area</p> <p><b>Are there any armed groups, if so, how do they relate to recent incidents?</b>            -The Al Shabab Militants who are armed groups, relate to the recent incidents by disrupting all government operations and killing any persons affiliated with the government</p> <p><b>How would security protocols for workers be enhanced at all levels?</b>            -The government could engage with the Al Shabab Militants if there is mutual agreement            -Create awareness and sensitization of the communities to support the government project            -Security teams should have knowledge, skills and training to enhance their abilities            -Support community policing</p>
Gender-based violence (GBV)	<p><b>What risks do female workers face at their workplaces?</b>            -Lack of promotion opportunities and motivation            -Women are not treated as equal to men in some workplaces            -Women may face sexual harassment in some areas            -Absence of female leaders in most of the workplaces            -Some women may have their own special problems such as family problems</p> <p><b>What are the potential GBV/SEAH risks of the proposed project (including construction, etc.)?</b>            No response on this particular question indicating the need to sensitize the teams on GBV/SEAH</p> <p><b>What are the reporting channels for GBV/SEAH-related cases in your organization/agency/Ministry/Department? What is the level of confidentiality?</b>            -Generally, there are no written and clear reporting channels for GBV/SEAH-related cases, however induction and orientation are conducted for all recruited staff about employee conduct and disciplinary regulations and instructions            -In Jubaland, there is a system that is used manage SEAH reports:           <ul style="list-style-type: none"> <li>o Get the survivor immediate medical attention</li> <li>o In cases of sexual abuse, demand that a Post Exposure Prophylaxis (PEP) test be administered at the hospital within 72 hours</li> <li>o Take the survivor to the police station and file a report with as much detail as possible</li> <li>o The level of confidentiality is very high in our institution. We Keep records in a secure location at all times. We Do not include identifying information on records. All files can only be identified by a number or code, and not by an individual's name</li> </ul> </p> <p><b>How has the Government been responding to GBV? What provisions of law/ policy guide the civil service on GBV/SEA/SH?</b>            -The government responds to GBV and all related abuses            -One of the CSCs reported that it does not have a specific policy on GBV but works closely with the ministry of gender and human right and refer such cases for them to handle, albeit they have not experienced cases related to GBV at the workplace</p> <p><b>In your view, what is the possibility that project workers or security forces would likely cause GBV/SEAH?</b>            -There may be such cases of GBV/SEAH during the project delivery but so far, we have not seen it yet.</p>

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

Theme	Key issues for consideration
Key themes	Responses
	<ul style="list-style-type: none"> <li>-Not having a clear work plan with timeline</li> <li>-Consultants and contractor’s payment delay</li> <li>-Not conducting state level launch ceremonies for this project</li> </ul> <p><b>What suggestions do you have regarding how the project team should implement the project?</b></p> <ul style="list-style-type: none"> <li>-Prepare yearly work plans with key milestone to be achieved and with flexible adaptability</li> <li>-Establish a Steering Committee to mitigate risks and for easy coordination of the activities</li> <li>-Reduce bureaucracy of getting approvals such no objection letters when activities need to be conducted</li> </ul> <p><b>-Implement the project in timely manner to allow the public to enjoy the benefits</b></p> <ul style="list-style-type: none"> <li>-Stay Focused on the Main Goal of the project</li> <li>-Improve Project Planning and Quality</li> <li>-Stay in touch with the project stakeholders</li> <li>-Regular communication with the project stakeholders</li> <li>-Prioritize project main Tasks</li> </ul>

## **10 APPENDICES**

**APPENDIX 1:**  
**ENVIRONMENTAL AND SOCIAL RISK CATEGORIES AND SCREENING**  
**TEMPLATES**

**Risk Category**

<b>Risk Category</b>	<b>Nature of Risk and Impact</b>	<b>Examples</b>
<b>Category D: Low Risk</b>	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 PCU 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
<b>Category C: Moderate Risk</b>	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.
<b>Category B: Substantial</b>	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)
<b>Category A: High Risk</b>	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)
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**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 PCU, 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 provisions 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 SERP 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**

**SERP Project Coordinator**

**E&S SCREENING TEMPLATE**

<b>Environmental and Social Screening Template</b>					
<b>SECTION A: General Information</b>					
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					
<b>Potential Environmental/Social Risks Impacts of Activities</b>	<b>Yes</b>	<b>No</b>	<b>I don't know</b>	<b>If these risks ('yes') are present, refer to:</b>	<b>Comments</b>
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>					
<b>ESS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>					
Is there a risk of diversion of project benefits?				Stakeholder Engagement Plan (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 Plan (SMP)	
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 Assessment (FINA) Stakeholder Engagement Plan (SEP)	
Is there a risk that the selection of the activity location or beneficiaries will lead to conflict?				Security Management Plan (SMP) Grievance Redress Mechanisms (GRM)	
Are there any new projects in the vicinity of the sub-project that could contribute to cumulative impacts.				ESMF Provisions	
<b>ESS 2: Labour and Working Conditions</b>					
Does the activity include any of the known labor rights / ESS 2 non-compliance risks in Somalia (child and forced labor)?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Does the activity include a construction component?				Labor Management Procedures (LMP) C-ESMP Occupational Health and Safety Plan (OHS)	
Does the activity include labor-intensive manufacturing?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	

Does the activity include primary agricultural activities?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS)	
Will the activity require a larger contractor workforce?				Labor Management Procedures (LMP) Occupational Health and Safety Plan (OHS) C-ESMP	
Is there a security risk for Project Workers?				Security Management Plan (SMP)	
Is there a risk of lacking OHS for workers at the construction site?				Occupational Health and Safety Plan (OHS) Pest Management Plan (PMP)	
Is there a risk of delayed payment of workers?				Labor Management Procedures (LMP)	
Is there a risk that workers are underpaid?				Labor Management Procedures (LMP)	
Is there a risk that women will not be included in deployment in equal numbers?				Labor Management Procedures (LMP) GBV Action Plan	
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?					
<b>ESS 3: Resource Efficiency and Pollution Prevention Management</b>					
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 Plan, based on <i>WBG Environmental, Health, and Safety General Guidelines</i> Pest Management Plan (PMP)	

				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)				<i>General Guidelines</i> Pest Management Plan (PMP) 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 Plan	
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 Plan	
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?					
<b>ESS 4: Community Health and Safety</b>					
Is there a risk of community exposure to pesticides?				Pest Management Plan (PMP)	

Is there a risk of communal drinking water pollution through pesticides?				Pest Management Plan (PMP)	
Is there a risk of increased GBV/SEAH cases due to labor influx?				GBV/SEAH Action Plan Labor Management Procedures (LMP)	
Is there a risk of spread of communal diseases due to labor influx?				Labor Management Procedures (LMP) C-ESMP	
Is there a security risk to the community triggered by project activities?				Security Management Plan (SMP)	
Does the activity have the potential to upset community dynamics?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM)	
Will the activity include payments or cash transfers?				Stakeholder Engagement Plan (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 Plan	
Is there a possibility that the activity contaminates open wells?				Waste Management Plan C-ESMP	
Is there a possibility that the activity spreads pathogens and other pollutants (e.g., latrines)				Waste Management Plan C-ESMP	
Can the activity contribute to the spread of disease (e.g., health facilities)?				Waste Management Plan	
<b>ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>					
Will the project lead to the displacement of a population? (e.g., forceful relocation, relocation of the local community)				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the displacement / resettlement affect IDPs?				Resettlement Policy Framework (RPF) Resettlement Action Plan (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 Plan (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 Plan (SEP) Grievance Redress Mechanisms (GRM)	
Is there a risk that the activity leads to loss of income, assets or means of livelihoods?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to disputes over land ownership?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity lead to blocked access to people in the area?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
Will the activity require acquisition of land or physical buildings or infrastructure?					
Will the activity require 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, are there any pending land disputes? Are there any significant legacy issues?				Resettlement Policy Framework (RPF) Resettlement Action Plan (RAP)	
<b>ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>					
Will the activity impact sensitive areas?				C-ESMP and ESMF provisions	
Is there a risk that the activity causes changes in land form and habitat, habitat fragmentation, blockage or				C-ESMP and ESMF provisions	

migration routes, water consumption and contamination?					
Is there a risk that the activity causes loss of precious ecological assets?				C-ESMP and ESMF provisions	
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 provisions	
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 provisions	
<b>ESS 8: Cultural Heritage</b>					
Will the project be located in or close to a site of natural or cultural value?				Chance Find Procedures (ESMF)	
Is the project site known to have the potential for the presence of cultural and natural heritage remains?					
<b>ESS 10: Stakeholder Engagement and Information Disclosure</b>					
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 Plan (SEP)	
Is there a historical exclusion of disabled persons in the area?				Stakeholder Engagement Plan (SEP)	
Is there a lack of social baseline data?				ESMF	
Is there a lack of community consultations by the government generally?				Stakeholder Engagement Plan (SEP)	
Are women likely to participate in decision-making processes in regards to the activity?				Stakeholder Engagement Plan (SEP)	
Is there a risk that exclusion of beneficiaries leads to grievances?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	

Is there a risk that the activity will have poor access to beneficiaries?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Will the Covid-19 outbreak hamper proper stakeholder engagement?				WB and FGS guidance and regulations on Covid-19	
Has input from community members and those who may be affected by the works been sought?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Has the sub-project received overall stakeholder support including from vulnerable individuals and marginalized groups?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
Is there any opposition to the activity/project?				Stakeholder Engagement Plan (SEP) Grievance Redress Mechanisms (GRM) – see ESMF	
<b>SUMMARY OF THE SCREENING PROCESS</b>					
<b>E&amp;S Screening</b>	<b>Results and Recommendation</b>				
Screening Results: Summary of Critical Risks and Impacts Identified	<b>Risk/Impact</b>	<b>Individual Risk/ Impact Rating</b>	<b>Mitigation</b> At the end of the screen process, tabulate the mitigation measures in an ESMP Format (see below)		
	E.g., Land Degradation	<b>Low</b>	Rehabilitation of worked out areas.		
Is Additional Assessment Necessary? Evaluate the Risks/Impacts and reflect on options (see below)	<b>Screening Result</b>		<b>Summary of Screening Result Justification</b>		
	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.					

Screening Results: Summary of Critical Risks and Impacts Identified	Risk/Impact	Mitigation, also provide provision of PCU carrying environmental responsibility for environmental and social offenses committed under the project
	E.g., Land Degradation	Rehabilitation of worked out areas.
	E.g., Occupational Safety and Health	Use of appropriate PPE.
	E.g., Destruction of crops during trenching	Engage the Project Affected Persons. Trench off cropping season. Compensate fully 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.	
Next Steps	Screening Result	Action. Select applicable action consistent with the Summary of Risks. All end results of the screening and follow-up tools should be disclosed at the appropriate level.
	No1. No further ES Assessment required.	Proceed to project implementation in compliance with LMP, GRM, GBV/ Action Plan, SEP.
	No 2. No further ES Assessment required but requires simple ESMP.	Produce the ESMP and submit it with Screening Form for review and approval by PCU. 2. Proceed to project implementation in compliance with LMP, GRM, GBV/ Action Plan, SEP.
	Yes 1. Detailed ESMP. Done internally.	Submit the Screening form with the TORs for the ESMP for review and approval by PCU. 2. Produce the ESMP and submit to PCU for review and approval by PCU. 3. Ensure the detailed ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP. 4. Do not implement works until approval of the ESMP by PCU, World Bank.
	Yes 2. Detailed ESMP. Contracted to Consultancy	Submit the Screening form with the TORs for the ESMP for review and approval by PCU. 2. Engage a Registered ESIA Consultant to produce ESMP and submit to PCU first for initial review, then to World Bank for review and approval. 3. Ensure the ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP. 4. Do not implement works until approval of the ESMP by PCU, World Bank.



	<p>YES 2. ESMP required. Contracted to Registered Consultancy.</p>	<p>Submit the Screening form with the TORs for the ESMP for review and approval by PCU.</p> <ol style="list-style-type: none"> <li>2. Engage a ESIA Consultant to produce ESMP and submit to PCU first for initial review, then to World Bank for review and approval.</li> <li>3. Ensure the detailed ESMP mainstreams the LMP, GRM, GBV/ Action Plan, SEP.</li> <li>4. Do not implement works until approval of the detailed ESMP by PCU, World Bank.</li> </ol>
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## **ESMP Template**

Executive Summary

Project Background

- ESMP Introduction
- Work Description
- Environmental and Social Policy
- Occupational Safety and Health Policy
- Standard Operating Procedures
- Standard Operating Procedures

Environmental and Social Impacts Assessment and Mitigation

- Potential Positive Impacts
- Potential Positive Impacts during Mobilization
- Potential positive impacts during construction phase
- Potential positive impacts during demobilization
- Environmental and Social Management Plans
- Risks on Biophysical Environment
- Health and safety risks at the worksite
- Social environment risks
- Stakeholder engagement
- Safety Inspection of Construction Work

ORGANISATION STRUCTURE AND STAFFING

- Stakeholder engagement
- Duties and Responsibilities of Stakeholders
- Client's Supervisor
- Contractor Staffs

COMMUNICATION, REPORTING AND TRAINING PROCEDURES

- Communication Procedures
- Community Relation Program
- Contractor's Role in Community Liaison
- Environmental and Safety Reports
- Accidents and Emergence Response Plan
- Safety Training Program for Contractor Staff
- Safety Training Program
- HIV-Aids Awareness Program
- Occupational Safety and Health Assessment
- Monitoring Plan

Management Acknowledgements

Annex

## **APPENDIX 2: CULTURAL AND CHANCE FIND PROCEDURES**

This procedure was developed in accordance with the World Bank's ESS 8 (to protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, to promote meaningful consultation with stakeholders regarding cultural heritage. To promote the equitable sharing of benefits from the cultural heritage).

This procedure is included as a standard provision in the implementation of civil activities under SERP contracts to ensure the protection of cultural heritage (Archaeological and Historical Sites). All implementers / contractors will be required to observe this procedure as documented hereafter.

Excavation in sites of known archaeological interest should be avoided. Where this is unavoidable, prior discussions must be held with the PCU and the World Bank in order to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied.

- Stop construction activities;
- Delineate the discovered site area;
- Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the responsible authority takes over;
- Notify the responsible foreman/archaeologist, who in turn should notify the PCU and the World Bank and local authorities (within less than 24 hours);
- The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historic, scientific or research, social and economic values;
- Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration or salvage;
- Implementation of the decision concerning the management of the finding;
- Construction work can resume only when permission is given from the respective authorities, PCU at Ministry of Finance (MoF), Ministry of Environment and Climate Change (MECC) for FGS and Ministry of Environment and Rural Development MoERD for Somali Land (SL) and World Bank after the decision concerning the safeguard of the heritage is fully executed;
- In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled for any kind of compensation or claim other than what is directly related to the execution of the archaeological findings works and protections.

**ANNEX 3:  
GBV/SEAH PREVENTION AND RESPONSE  
ACTION PLAN**

*(Presented as Separate Plan)*

**ANNEX 4:**

**PROCEDURES FOR MANAGING CONTRACTORS DURING PROJECT  
IMPLEMENTATION STAGE**

**Managing Contractors during Project Implementation Stage**

This procedure was developed consistent with the World Bank Group ESHS Guideline which incorporates the IFC ESHS Guidelines, under the “Good Practice Note: Managing Contractors’ Environmental and Social Performance”. This is to remind the borrower’s responsibility to comply with the ESHS Guidelines, loan agreement commitments, ESMP, local laws and regulations, and permits and standards, ensuring that any contractor providing services of any kind to the implementing entity duly follows these requirements throughout the duration of the contract, including any activity or services performed by subcontractors or third parties undertaking a contract from the contractor.

The PCU may not have direct control over subcontractor performance, although it may have some influence over selection and will supervise their E&S performance. Therefore, the PCU must use their direct control over their contractors to ensure that E&S requirements are being met by subcontractors. To achieve this commitment, the implementing entity should require contractors to include in subcontracts the requirement to comply with all the relevant World Bank Safeguards standards and all E&S requirements that are appropriate for the works being subcontracted and consistent with the implementing entities and the contractor’s E&S management programs.

**Understanding Implementation Responsibilities**

The roles of the PCU and implementing partners / contractors in meeting E&S requirements are usually intertwined and must be worked out at the project level. Some actions described below as being the responsibility of the client or the contractor may be reversed or shared on some projects. In some cases, such as stakeholder engagement, both PCU and contractors will have certain obligations and limits and will need to coordinate their efforts. In others, such as monitoring, each party will monitor E&S performance, but at different frequencies and levels of detail. In all cases, the PCU remains ultimately responsible to World Bank for ensuring E&S requirements are met, with the responsibilities of the contractor defined in the contract. For design-build (or design-build-operate) contractors, the design standards and requirements (and operation standards) will also be set out in the terms of reference to the contract. For public-private partnership (PPP) projects the administration may also have roles and responsibilities (to the Bank) which may be additional to their usual regulatory functions.

**Contractor Oversight**

The PCU will monitor contractor and subcontractor E&S performance and ensure the contractor monitors its own and all subcontractors’ E&S performance throughout construction, including mobilization, the main construction phase, and demobilization. Clear responsibilities and reporting lines are essential to avoid duplication of effort or, conversely, gaps in monitoring. If operations are carried out under contract, or some work is performed by contractors, the PCU and contractor will monitor E&S performance during operations as well. Overall, the client will require that all contractors engaged on the project operate in a manner consistent with the requirements of the ESSs, including the specific requirements set out in the Environmental and Social Commitment Plan (ESCP).

The PCU should require contractors to report on an agreed frequency their E&S performance and metrics (which shall include relevant information and data from subcontractors, as applicable). Timely reporting of

E&S performance and results enables the client to identify opportunities for improvement, prevent poor performance issues, and assist contractors if remedial action is to be taken.

### **E&S Performance Meetings**

Regular meetings are essential to ensure contractor performance is satisfactory and that project specifications are being met. Experience has shown that the PCU may share performance-monitoring results at weekly meetings with all contractors to effectively drive improved performance by introducing a competitive element, sometimes with small incentives. The authority of monitoring staff who control contractor performance also needs to be clarified and understood by contractors (for example, who gives instructions to stop work or proceed but with modifying the approach, scope, equipment, and so forth).

The PCU should ensure that contractors employ qualified E&S personnel to oversee E&S performance, and that contractor staffing and resources are commensurate with the magnitude and timing of work and potential E&S risks. The PCU should also approve documentation, including for training programs, to ensure all staff are aware of E&S commitments and their part in meeting them.

### **Review and Approval of Contractor Site-Specific E&S plans**

The PCU is responsible for its contractors, meeting all of the project's E&S requirements, it is essential for them to review and approve project E&S management plans and procedures. These might include such plans as working within boundaries (footprint management), protection of biodiversity, land clearing and erosion control, traffic management, labor sources and methods of recruitment of workers, worker accommodation, noise and dust control, and possibly others. Where Site Specific ESMP has not been approved, no works will commence in the area.

### **Kickoff Meeting**

Prior to early work activities, the PCU should hold a kickoff meeting with each of the contractors prior to arriving at the site. Timing of mobilization based on logistical issues, resources, customs delays, and so forth should be considered in the planning. The PCU and contractor project managers and major subcontractors should participate in these meetings. The purpose is to review planned activities and schedules, review E&S requirements (among others), review the roles of the various parties in implementing and monitoring mitigation measures, and agree on project-specific induction and training content. These meetings should include a discussion about control of access to the site, use of security forces if applicable, and how to best coordinate the PCU's security management system and E&S activities at both the base camp (accommodation site) and any remote construction sites. Both client and contractor E&S representatives should be present to reiterate all E&S commitments and establish initial compliance points and coordination requirements during site establishment.

### **E&S Induction and Training**

A general E&S site induction should be mandatory for all workers, with specialized technical E&S training delivered to staff. The degree of training should be based on the project's E&S risks, on the tasks that will be performed, the CoC, including the SEP, and SMP, and on the general E&S provisions that are applicable for all personnel, including contractors and subcontractors. All workers should be made aware of the worker GRM and Project GRM and how to access them. In particular, security contractors should be given detailed training on community engagement and the grievance mechanism, as complaints may be brought to their attention in the first instance, and as contractors are not often included in employee training. Contractors should develop and implement SEA and GBV awareness training for staff at all levels, from contract management to day laborers. Additional training may be needed for staff that will be responsible for implementing, monitoring, and reporting E&S performance. Once the general E&S induction is defined, a series of specific trainings may

be required in order to ensure that the requirements, controls, and mitigation measures are well communicated and understood.

### **PCU Monitoring of Activities**

The monitoring of contractor E&S performance by the PCU must be the practice throughout construction, from mobilization through demobilization. This should involve both visits to work locations and reviews of records kept by the contractor and of reports submitted by the contractor. The frequency of site visits should be commensurate with the magnitude of the E&S risks of the activities being carried out and permanence of potential impacts that could result from ongoing activities. Monitoring may be conducted by PCU E&S staff.

The PCU environmental and social officers should review one or more recent inspection reports and the contractor's previous month's E&S progress report prior to visiting the site to monitor the contractor's E&S performance. They should do the same before participating in meetings where the contractor's E&S performance is to be discussed. The PCU will review contractor reports and follow up as needed to ensure timely resolution of issues of noncompliance with E&S requirements. This may include additional visits to the contractor's site or offices, further communications with contractor E&S personnel, issuance of notices of deficiency or warnings to the contractor, and other actions as needed.

At any stage of construction or other work, if the contractor has not taken appropriate action to achieve compliance with E&S requirements after repeated notices of violation and warnings of noncompliance, and significant E&S impacts are occurring or imminent, the PCU should order the contractor to stop work until E&S performance is brought under control and up to acceptable standards.

### **Contractor Monitoring and Reporting**

The PCU should require contractors to monitor and keep records on E&S performance in accordance with the E&S management plans. This may include monitoring of E&S matters, scheduled and unscheduled inspections to work locations, observations made during routine activities, desk reviews, drills, and any other monitoring protocols implemented by the contractor to ensure E&S compliance. The PCU must be familiar with the contractor's monitoring and record-keeping system so this aspect of the contractor's performance can itself be monitored.

Responsibilities for monitoring need to be clear between the client and contractor, and results (if client and contractor are both collecting data) must be comparable, for example, collected using the same methodologies, analyzed at the same labs, and using similar equipment, and so forth<sup>29</sup>.

The PCU should require contractors to report on E&S performance on at least a monthly basis throughout the construction phase, including mobilization, construction, and demobilization. This could be more frequent for more sensitive E&S projects. It can be part of the overall technical progress report or a stand-alone E&S report. The table below shows the E&S parameters considered in the reporting of E&S performance.

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<sup>29</sup> To improve efficiency, responsibilities should be defined early regarding who collects what data. In relation to the data collected by the contractor, the owner should be comfortable with what is being collected and how it is being collected, analyzed, reported, and so forth. This is usually done through the sign-off by the owner on the proposed monitoring plan of the contractor

**Parameters to consider for E&S reporting by Contractor at least on a monthly basis**

<b>Item</b>	<b>Parameter</b>	<b>Description</b>
1	<i>Safety:</i>	Hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
2	<i>Environmental incidents and near misses:</i>	Environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
3	<i>Major works:</i>	Those undertaken and completed, progress against project schedule, and key work fronts (work areas).
4	<i>E&amp;S staffing:</i>	New hires and departures, and listing of current staff and titles.
5	<i>E&amp;S requirements:</i>	Noncompliance incidents with permits and national law (legal noncompliance), project commitments, or other E&S requirements.
6	<i>E&amp;S inspections and audits:</i>	by contractor, engineer, or others, including authorities—to include date, inspector or auditor name,
7	<i>Workers:</i>	Sites visited and records reviewed, major findings, and actions taken, number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, and skill level (unskilled, skilled, supervisory, professional, management).
8	<i>Training on E&amp;S issues:</i>	including dates, number of trainees, and topics
9	<i>Footprint management:</i>	Details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
10	<i>External stakeholder engagement:</i>	highlights, including formal and informal meetings, and information disclosure and dissemination—to include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups (e.g., disabled, elderly, children, etc.).
11	<i>Details of any security risks:</i>	Details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project or from inappropriate conduct from security forces employed either by the client or public security forces.
12	<i>Worker grievances:</i>	Details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.
13	<i>External stakeholder grievances:</i>	Grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender-disaggregated. Particular sensitivity may be needed around SEA or GBV issues raised.
14	<i>Major E&amp;S changes:</i>	to E&S management, or E&S practices (most often done by the Project Implementing Entity)
15	<i>Deficiency and performance management:</i>	actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or Plans for actions to be taken—these should continue to be reported until the client determines the issue is resolved satisfactorily.
16	<i>Key Mitigation measures implemented</i>	The contractor will be required on a monthly basis to report key mitigation measures implemented as provided in the ESMPs



### **E&S Review of Contractor Invoices**

The PCU should be part of the process for signing off on all payments to contractors, even if the payment is not for work that is explicitly related to E&S mitigation and performance. E&S staff shall work closely with the project manager (PCU or engineer's project manager, depending on who employs the E&S personnel) to determine if there are any outstanding E&S items and whether including that full or partial payment under specific line items of the bill of quantities should be withheld, either temporarily or permanently, or that there should be some combination of temporary and permanent withholding. This right should be exercised as follows;

- Temporary withholdings should be recommended in case of repeated minor violations of E&S requirements that are not leading to significant impacts on workers, external parties, or environmental resources; minor violations that are not corrected after repeated warnings; or first-time major violations that can be corrected easily and that have not led to permanent E&S impacts. The withheld amounts should be paid upon contractor correction of the deficiency to the client's satisfaction.
- Permanent withholdings should be recommended for minor violations that are not corrected after repeated warnings and that could result in significant impacts; or for any violations that have resulted in significant impacts, including permanent impacts. Some portion of such withholdings may be released upon satisfactory resolution of the issue, but some significant portion must be permanently withheld as a penalty to discourage repeated incidents.
- Payments that are withheld either temporarily or permanently will be all or part of the payment specified for a line item in the bill of quantities, which in turn will be the payment due for a discrete portion of the total works. The PCU should work with the project manager and others as needed to arrive at the amount to be withheld. This amount should not be based directly on the cost of compliance but rather should be somewhat higher than this amount, and based on a specific percentage of the line item in question.
- The contractor should be notified of the specific actions that must be taken in order to receive further payments for the works in question, or to receive payment that has been temporarily withheld.

If the contractor does not take timely action to reach compliance with E&S requirements, the PCU and the project manager should continue to take appropriate action to encourage compliance, which could include orders to stop work, withholding of further payments, and/or escalation of the issue to higher management. If significant impacts are occurring or imminent, the client may notify the contractor that another party will be brought in to deal with the issue and the payment to the contractor will be reduced by the amount paid to the other party, as would be specified in the contract.

## **PROCEDURES FOR PRIMARY SUPPLIERS DURING PROJECT IMPLEMENTATION STAGE**

Primary supply workers are employees of suppliers who on an ongoing basis, provide goods and services to the Project. Although suppliers may be sub-contracted by other implementers, the PCU has oversight on the implementation of the LMP requirements in this category.

The objective of the procedure is to ensure that labor related risks, especially child and forced labor as well as serious safety issues to the Project from primary supply workers are managed in line with the requirements of ESS2.

### **The procedure is detailed below.**

Procure supplies from legally constituted supplier. The legal registration ensures that the company is legally obliged to comply with all applicable labor laws in Somalia, which makes it possible to assume mainstreaming of the labor laws within the supplier's firm. This will include ensure evidence of Certificate of incorporation

Make a physical check on the supplier's labor management system, including;

- Occupational safety and health
- Any past work related environmental or occupational incidents
- Age restrictions (18 and above)
- Employment is voluntary

**ANNEX 5:**  
**LABOR MANAGEMENT PROCEDURES**  
*(Submitted as a Separate Plan)*

**ANNEX 6:**  
**GENERAL QUARTERLY AND ANNUAL E&S REPORTING FORMAT**

**Summary of Key E&S Aspects during the Reporting Period**

Project Status, E&S Incidents, E&S Changes, E&S Initiatives

**Project Status**

Provide a brief description of any new developments in relation to operations and facilities over the reporting period.

**E&S Incidents**

*Please provide a summary of all the notifiable E&S incidents including the ones reported as provided by ESIRT, Please expand or collapse the table where needed.*

Date	Incident description	Class	Reports sent to lenders	Corrective actions / Remedial plan

**E&S Changes**

*Please provide a summary of all the notifiable E&S changes. Please expand or collapse the table where needed.*

Date	Change description	Reports sent to lenders	Implementation status

**Improvements/initiatives regarding E&S performance**

Briefly describe improvements/initiatives implemented during the reporting period on management of &S aspects (e.g., energy/water savings, sustainability reports, waste minimization, etc.)

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

**E&S Impact / Risk Assessment**

Have any supplemental environmental, social, health and safety impact/risk studies been conducted during the reporting period? (Please provide copies)

**Compliance with Environmental and Social Management Plans**

The status of the ESMP implementation should be described and any issues that remain outstanding should be detailed.

## ESS2. Labor and Working Conditions

### Human Resources Management

Have implementers and contractors changed/updated their Human Resource (HR) policy and procedures, Hr manual, and Health & Safety procedures, during the reporting period?

Yes  No.....

If yes, please provide details.

	# community workers	# direct workers	# Female direct workers	Turnover	# Contracted workers 192
Previous year					
Reporting year					

Provide the following information regarding the workforce:

List the worker-related court cases and describe their status.

### Occupational Health and Safety

Describe the main changes implemented in terms of Occupational Health and Safety (OHS) during the reporting period, e.g., revision of the OHS management procedures, action plans for technical improvements, leading/lagging indicators used/introduced, identification of hazards, new controls, etc.

Please attach Health & Safety audit reports available for the reporting period.

Copies attached with this report  Copies available upon request  Not Available

### Accident Statistics Monitoring

Report TOTAL numbers for each parameter	This reporting periods			Last reporting period (not cumulative) <sup>(OB)</sup>		
	Community workers	Direct workers	Contracted workers	Community workers	Direct workers	Contracted workers
Total number of workers						
Total man- hours worked annual						
Total number of lost time occupational injuries <sup>30</sup>						
Total number of lost workdays <sup>31</sup> due to injuries						
Lost time injury frequency <sup>32</sup>						
Fatalities						

<sup>30</sup> A *lost-time injury* (LTIs) is the incapacity to work for at least one full workday beyond the day on which the accident or illness

<sup>31</sup> *Lost workdays* are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

<sup>32</sup> The number of *lost time injuries* (LTIs) recorded for Project workers per million man-hours worked by them. LTI Frequency Rate = injuries per million hours worked = # of lost time accidents x 1,000,000 hours / total man-hours worked).

Vehicle collisions <sup>33</sup>						
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Provide details for the non-fatal lost time injuries during this reporting period.

UNOPS/IOM / contractor/ Subcontractor employees?	Total workdays lost	Description of injury	Cause of accident	Corrective measures to prevent reoccurrence

Provide details for fatal accidents during this reporting period, if any, (and provide copies of accident investigation and respective corrective plan).

Date of Accident	Type of Accident	Description of # of Preventive measures taken after the incident	Accident	Fatalities

### OHS Training

Describe Health and Safety training programs carried out in the reporting period.

Type of Training	Number of Persons attended	Time Training Held	Topics Trained

### Workplace Monitoring

Please provide copy of any Workplace Monitoring reports developed for the reporting period.

## ESS3. Resource Efficiency and Pollution Prevention

### Environmental Monitoring

Provide copy of environmental monitoring data reports for this reporting period, collected consistent with the ESMPs for the sub-projects.

Briefly describe environmental mitigation measures implemented during the reporting period to comply with E&S requirements

### Resources Efficiency: Energy and Water

Provide data on energy and water consumption during the reporting period. If the data requested is available in another format, they can be submitted instead.

Describe the Concessionaires' resources efficiency measures/efforts being implemented to minimize fuel, energy, and water consumption.

<sup>33</sup> Vehicle Collision: When a vehicle (device used to transport people or things) collides (comes together with violent force) with another vehicle or inanimate or animate object(s) and results in injury (other than the need for First Aid) or death

## Hazardous and non-Hazardous Waste<sup>34</sup>

### Erosion Control, Slope Stability and Reinstatement

Please describe status and actions implemented in terms of erosion control, slope stability, and reinstatement within the project's footprint and area of influence.

## ESS4 Community Health, Safety and Security

### Community Health and Safety

*Please list and describe any initiatives implemented in relation to community health and safety during the reporting period.*

Please provide the list and description of the actions, the expected or actual dates of implementation, Progress/status, results obtained. You can use a tabular format (as below) or provide the information as an attachment of the report.

During the reporting period, have any emergency drills been conducted with participation of the local authorities, public emergency organizations, local communities? Are the communities aware of the emergency response plans?

### Accident Reporting

Provide details for the non-fatal casualties, involving third parties, during this reporting period.

Date of Accident	Type of Accident	Description of the Accident	Number of people	Preventive measures taken

Provide details for fatal accidents during this reporting period (and provide copies of accident investigation and respective corrective plan).

Date of Accident	Type of Accident	Description of the Accident	Number of people	Preventive measures taken

### GBV/SEA Action Plan

Please provide an update on the status and progress of the actions as defined in the GBV/SEA Action Plan. You may attach relevant monitoring reports.

## ESS5 Land Acquisition and Involuntary Resettlement

Not applicable under SERP

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<sup>34</sup> Waste types include but are not limited to: chemical containers, chemical sludge, containers/pallets, dewatered sludge, domestic waste, ferrous and non-ferrous scrap, hospital waste, laboratory waste, liquids, off-specification raw materials, paint waste, sludge, solids, truck and auto tires, waste fuel hydrocarbons, waste hydraulic fluids, waste lubricating hydrocarbons, waste solvents, waste treatment sludge, contaminated soil, creosote sleepers, etc

## ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

### Biodiversity Management

Please report on the mitigation measures included in the ESMF and ESMPs

As needed, using the table below describe any new activities or expansions that have increased the project footprint into new areas of habitat during the reporting period.

New Activity / Expansion	Total Area covered	Type of Habitat

## ESS8 Cultural Heritage

Report if chance find procedures have been applied if not, please indicate Not Relevant.

## ESS 10 Stakeholder Engagement and Information Disclosure

### Stakeholder Engagement, Public Consultation and Disclosure

List any stakeholder engagement events, including public hearing, consultation and disclosure, liaison with non-governmental organizations, civil society, local communities on E&S.

Date	Participant(s)	Formats of Interaction	Issues Discussed	UNOPS response/ Agreement reached (attach minutes if any)	Actions Taken (if any)/ Remarks

### Grievance Mechanism and Court Cases

Report the number and type of requests and/or grievances received from project affected people / local communities / local organizations

How many have been resolved and how many are pending? (Please attach a log of the grievance redress registry.)

Report the number and type of court cases on E&S grounds, if any (Please attach a log of all court cases and their status)

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## ANNEX 7 WORLD BANK INCIDENT CLASSIFICATION GUIDE

### 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	<b>Environmental</b>	<b>Social</b>	<b>Occupational Health &amp; Safety</b>
<b>Indicative</b>	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
<b>Serious</b>	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
<b>Severe</b>	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 8  
INCIDENT REPORTING GUIDANCE**

An incident report should contain the following information:

**Incident Report Form**

Please report any incident within 24 hours to the PCU

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>
<b>Immediate to near term actions</b>		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.
<b>Medium term/ongoing actions</b>	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><b>UXO example:</b> update risk assessment and management plans to address:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>•Fire risk and adequate fire extinguishers placement</li> <li>•Electric risk should also be reviewed, and safe work procedures developed for handling, maintaining and checking electric equipment and extension cords.</li> </ul>
		<ul style="list-style-type: none"> <li>• 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.</li> </ul>

		<p><b>Delayed Resettlement Compensation example:</b> update risk assessment and management plans to address:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Ensure that all outstanding and new claims are appropriately addressed</li> <li>• 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</li> <li>• Ensure continuing consultation with Project-affected people and a well-functioning grievance mechanism (GRM)</li> <li>• Monitor implementation and provide fortnightly progress reports</li> <li>• Recruit a separate expert to conduct an audit to confirm satisfactory implementation of the process above</li> </ul>
	Competencies, roles and responsibilities:	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.
	High level monitoring and evaluation:	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.

**DETAILED ESHS TO INCLUDE IN THE SPECIFICATIONS OF TENDER DOCUMENTS AND  
SAMPLE ENVIRONMENT AND SOCIAL MANAGEMENT PLAN (ESMP)**

1. **Environmental policy**
  - Declaration of ESHS policy signed by the managing director of the Contractor and clearly defining the commitment of the Contractor in terms of (i) ESHS management for its construction sites and (ii) compliance with the ESHS Specifications of the Contract.
  
2. **Worksite-ESMP**
  - Target and content of the contractors Environmental and Social Management Plan (C-ESMP)
  - Preparation and updating schedule
  - Quality assurance and validation
  
3. **ESHS resources**
  - Human resources:
    - ESHS Manager
    - ESHS Supervisors
    - Person in charge of relations with stakeholders
    - Medical personnel
  - Logistics & communications:
    - ESHS vehicles
    - In situ noise, air and water measuring equipment
  - Reporting:
    - Weekly inspections
    - Monthly
    - Accident / Incident
  
4. **ESHS regulations**
  - Definition of standards for the applicable national ESHS regulations applicable to the execution of works:
    - Discharge standards
    - Minimum wage
    - Day and/or night traffic restrictions
  - Definition of ESHS standards for the industry applied
  
5. **ESHS operational inspection resources**
  - Site tracking procedure:
    - Frequency
    - Personnel
    - Assessment criteria
  - Non-conformity handling and detection procedure:
    - Distribution information
    - Notification depending on the level of importance allocated to non-conformities
    - Tracking of the closing of the non-conformities
  - Management of data on tracking and non-conformities:
    - Archiving

- Use as a performance indicator
- 7. **Health and Safety Plan** Identification and characterization of health and safety risks, including the exposure of personnel to chemicals,
  - Description of working methods to minimize hazards and control risks
  - List of the types of work for which a work permit is required.
  - Personal protection equipment.
  - Evacuation procedure for medical emergencies.
  - Description of the internal organisation and action to be taken in the event of an accident or incident.
- 8. **Training plan**
  - Basic training for non-qualified staff
  - Health & safety training
- 9. **Labor Conditions**
  - Description of Human Resource Policy for construction works of direct and indirect workers
- 10. **Local recruitment**
  - Local labor requirements:
    - Job descriptions and the levels of qualifications required
    - Recruitment procedure and deployment schedule
    - Initial training to be provided by the Contractor for each job description
  - Location and management of the local recruitment office(s)
- 11. **Traffic Management Plan**
  - Deployment (Project Area & schedule) and maintenance sites for each vehicle and machine
  - Mapping of itineraries, travel times, and areas where speeds are limited
  - Dust suppression:
    - Mapping of road sections where dust reduction initiatives apply
    - Water points identified or to be created for refueling tanker trucks
    - Capacity of the tanker trucks used and calculation of the number of trucks required
    - Width of the track to determine if one watering run or equivalent is adequate (narrow track) or if two runs are required (wide track)
    - Number of watering or equivalent operations proposed per day depending on the climate
- 12. **Effluents**
  - Characterization of effluents discharged to the receiving environment
  - Facilities for the treatment or pre-treatment of effluents
  - Measures for reducing the sediment content of rainwater runoff
  - Measures for monitoring the efficiency and performance of facilities for reducing sediment content of rainwater runoff
  - Resources and methods for monitoring effluent and rainwater runoff quality
- 13. **Noise and vibrations**
  - Estimation of the frequencies, duration, days of the week and noise levels per Project Area
- 14. **Waste**
  - Inventory of waste per Project Area and per period

- Collection, intermediate storage, handling and treatment methods for ordinary or inert waste
- Storage and handling methods for hazardous waste
- 15. Clearing and re-vegetation**
  - Methods & schedule for clearing vegetation
  - Methods, species and schedule for the re-vegetation of Project Areas disturbed by the Works
- 16. Prevention of erosion**
  - Location of zones suffering from erosion
  - Methods and schedule for the implementation of anti-erosive actions, including topsoil storage
- 18. Documentation on the Project Area condition**
  - List and cover of viewpoints
  - Imaging method
  - Archiving photographs
- 19. Rehabilitation**
  - Method and schedule for Project Area rehabilitation



**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 11**  
**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’T’s). This will be provided to all PCU and beneficiaries. Where need be, the SOPs will be translated into the respective VMGs languages. The SoPs are presented below.

**GRM Standard Operating Procedures**

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

<ul style="list-style-type: none"> <li>Contact users to explain how their grievances will be resolved and how/where they can appeal (if need be)</li> </ul>	<b>feedback</b>	<ul style="list-style-type: none"> <li>Keep complaint results as private matter</li> </ul>
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**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	<p>a. Provide names, contact details( Official telephone &amp; e-mail address) and designation of officers in-charge of Grievance handling</p> <p>b. Provide names, contact details and designation of the Information access officers</p>	Include details for all the GRM offices.
3	<p>Communication channels:</p> <p>a. Complaint desk email(s)</p> <p>b. Dedicated telephone line(s)</p> <p>c. Official email address of the county</p> <p>d. County website (Links/portals to access information and grievance handling information)</p> <p>e. Official e-mail address of the County Secretary</p>	
4	Updated service delivery charters that include GRM	Include the service charters for all the departments and agencies
5	<p>a. Complaints Register</p> <p>b. Access To Information Register</p>	Include the registers of all GRM offices but for internal purposes only
6	GRM Policy and Procedures	
7	Legislation, Policy and Procedures	
8	<p>a. Grievance Handling Committee members: appointment letters &amp; minutes of meetings held</p> <p>b. Designation letters for all GRM &amp; Information officers</p>	

### GRM\_ M&E TOOL

Name of County: \_\_\_\_\_

<b><i>OUTCOME: Services rendered by county government</i></b>					
<b><i>INDICATOR: Percentage change in the complaints resolved in a year</i></b>					
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

<b>GBV/SEA/SH Case Registration Form</b>	
<b>Administrative Information</b>	
	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
<b>Survivor Information</b>	
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)?
<b>Sub-Section for Child Survivor</b>	
	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?
<b>Details of the Incident (in survivor's words)</b>	
	Details of the incident
	Incident location and time
	Were money, goods, benefits and/or services exchanged in relation to the incident?
<b>Alleged Perpetrator Information</b>	



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"> <li>• Psychosocial services</li> <li>• Legal services</li> <li>• Police</li> <li>• Health services</li> <li>• Livelihood program</li> </ul>	
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
	<b>General Security</b>			
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 PCU?			