Federal Government of Somalia

Ministry of Interior, Federal Affairs and Reconciliation

Strengthening Social Cohesion, Inclusion and Resilience through Community Institutions

(P508408)

Stakeholder Engagement Plan

(SEP)

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Abbreviations

ATMIS	African Union Transition Mission in Somalia
CBOs	Community Based Organizations
CDD	Community Driven Development
CLD	Community and Local Development
CoC	Code of Conduct
CSO	Civil Society Organizations
DG	Director General
E&S	Environmental and Social Risk
EHSG	Environmental, Health and Safety Guidelines
ESF	Environmental and Social Framework
ESI	Ethnically Segregated Indigenous groups
ESS	Environmental and Social Standards 2 (ESS2)
FGS	Federal Government of Somalia
FIMM	Fragility Index and Maturity Model
FMS	Federal Member States
GBV	Gender-Based Violence
GM	Grievance Committee
HIPC	Heavily Indebted Poor Countries
HIV and AIDS	Human Immunodeficiency Virus & Acquired Immunodeficiency Syndrome
ID	Identity Card
IDP	Internally Displaced Persons
IEC	Information Education and Communication
LMP	Labor Management Procedures (LMP).
M&E	Monitoring and Evaluation (M&E)
MOI	FMS Ministry of Interior
MOIFAR	Ministry of Interior, Federal Affairs and Reconciliation
MOLSA	Federal Ministry of Labor and Social Affairs
NDP	National Decentralization Policy
NDP	National Development Plans
NGOs,	Non-Governmental Organizations
NLGI	National Local Government Institute
NPSC	National Program Steering Committee
NSS	National Stabilization Strategy
NSS	National Stabilization Strategy
NTWG	National Technical Working Group
OHS	Occupational Health and Safety (OHS) hazards
OSH	Occupational Safety and Health (OSH)
PAD	Project Appraisal Document
PAPs	Project-Affected Parties
NPC	National Programme Coordinator
Secretariat	Project Implementation Unit at FGS and FMS levels
NS	National Secretariat
SS	State Secretariat
PM	Programme Manager
RCRF	Recurrent Costs and Reform Financing
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SRCP	Somalia Crisis Recovery Project
SURP	Somalia Urban Resilience Project
TA	Technical Assistance

UN JPLG	UN Joint Programme on Local Governance
UN	United Nations
USAID SHIIR	USAID Somalis Harmonizing Inter-and Intra-Communal Relationships k
VDC	Village Development Committees
VMGs	Vulnerable Individuals and Groups
WB	World Bank
FGDs	Focus Group Discussions

1.   Introduction

1.   Somalia has made incremental progress on consolidating its federal system, building core government capacity, and establishing its national development agenda. Over the last twelve years, there has been some sustained period of political and institutional progress, reflecting efforts to transition out of fragility and protracted crises. This progress includes: a) the establishment of the Federal Member States (FMS); b) the peaceful power transition of two successive administrations; c) the adoption of two National Development Plans (NDP) – the 2017-2019 NDP, the first in over 30 years, and the current 2020-2024 NDP; d) Somalia was able to clear its arrears under of the Heavily Indebted Poor Countries (HIPC) – HIPC Decision Point was reached in December 2023; and e) the Security Council's adoption of a resolution lifting the arms embargo on the Federal Government of Somalia (FGS).[1].

2.   Further, Somalia has continued to foster resilience through decentralized social networks, as well as a vibrant private sector. At community-level, Somalis have relied on informal institutions to respond to disasters[2,] resolve disputes, facilitate business, and address basic development problems. These informal institutions include clans with their leaders, religious leaders, as well as women, youth, and livelihood associations. They also include a growing number of project- or sector-specific community-level institutions, including Village Development Committees (VDCs), community development organizations, community education committees as well as revolving loan associations. Traditional clan-based systems play a significant role in local governance, both within and outside formal state structures. At the community level, clan elders utilize the revenues from Qaaraan (clan 'dues') to cover the convening of clan meetings, conflict resolution, and compensation to clan members in case of loss of property or life, and support for the most vulnerable members.[3]

3.   Despite the significant improvements of the past few years, governance and state presence varies significantly across Somalia. In Somaliland and, to a certain extent, Puntland, district governments as well as Village Councils are relatively well established and directly involved in collection of revenues and the delivery of basic services. Conversely, in South Central regions, formal state structures are mainly present in main urban centers controlled by FGS-aligned coalition forces with support from African Union Transition Mission in Somalia (ATMIS). According to 2023 FGS's Fragility Index and Maturity Model (FIMM), Hirshabelle, Southwest, Galmudug and Jubbaland are the most fragile states.[4]

4.   In recognition of these challenges and the need to work from both the top-down and the bottom-up to overcome them, the FGS and FMS have issued a series inter-connected policies that create pathway for expanding state presence and creating an inclusive social contract, namely: a) the government's *National Stabilization Strategy (NSS)* policy, which seeks to enhance community safety and recovery, social cohesion, social reconciliation, conflict management, youth livelihoods, community recovery, local institutional capacity, and the social contract; b) the National Reconciliation Framework (NRF), which aims to restore social relations, strengthen trust between people and government as well as support social recovery and environmental peace-making; and c) the FGS and FMS Decentralization Policies and the *Wadajir National Framework for Local Governance,* which seek to strengthen the role of community institutions and local governments in service delivery, local economic development, resilience as well as resource mobilization, participatory planning, coordination, and accountability. These three core policies—together with the government policies

[1] https://press.un.org/en/2023/sc15511.doc.htm#:~:text=Recognizing%20the%20benchmarks%20reached%20on,the%20Federal%20Government%20of%20Somalia.

[2] Maxwell D, Majid N, Adan G, Abdirahman K, Kim JJ. Facing famine: Somali experiences in the famine of 2011. Food Policy. 2016 Dec;65:63-73. doi: 10.1016/j.foodpol.2016.11.001. PMID: 28018025; PMCID: PMC5176329.

[3] van den Boogaard, V. and Santoro, F. 'Explaining Informal Taxation and Revenue Generation: Evidence from Southcentral Somalia'. ICTD Working Paper 118. Brighton: Institute of Development Studies DOI. 2021.

[4] Fragility Index and Maturity Model, Ministry of Interior, Federal Affairs and Reconciliation, November 2023

on Social Cohesion and Climate Adaptation—provide the policy foundation for tackling the challenges to expanding the presence and establishing an inclusive and legitimacy state.

5.   The ongoing institutional strengthening efforts and the expanding role of the state in basic service delivery offers an opportunity to recast state-society relations and the social contract between state institutions (federal, state, and district/municipal), social and non-government institutions (e.g., clans, militias, Non-Governmental Organizations (NGOs), Community Based Organizations (CBOs) and citizens. A recent World Bank (WB) paper on social contract in Somalia argues that if donor investments in service delivery are implemented through NGOs and non-state actors, state-society relations will not change. Positively, the paper notes some nascent changes in citizen expectations and demands for improved service delivery. In addition, the paper recommends investing further in citizen collective action, state capacity and inclusive political institutions that requires an adaptable approach attuned to the complex societal factors that shape these institutions.

6.   Investing in community institutions provides an opportunity to strengthen social contract, cohesion and inclusion while sustainable state structures are established. There are three main categories of community institutions in Somalia: clan-based, religious-based as well as state and non-state structures, including VDCs established by humanitarian and development programs, sector committees, women's groups, youth groups, and other CBOs representing the interests of marginalized groups including displaced populations. Somalia's fiscal position and low government tax revenues means that it may take years to fully roll out functioning government structures at the district and lower levels. In addition, while it is commendable to see the extent to which the private sector has stepped in to fill the service delivery gaps – there are the expected challenges around pricing, access and equity. Community institutions and Community Driven Development (CDD) approaches therefore offer opportunities to invest in communities not just as recipients but also as actors in the development process and to do so in a way that aligns or reinforces the state structures. These community structures can be resilient, have longevity even where state structures are fragile, and diversify risks associated with setbacks in state building efforts. Complementing broader efforts to recast citizen-state relations, investments in community institutions provide an opportunity to strengthen social cohesion, social exclusion (e.g., women, youth, Internally Displaced Persons (IDPs) and resilience from the bottom up.

7.   Under this context, the FGS and the FMS with the support of the WB are preparing the BUSLHO program to support government stakeholders and development partners to formulate strategies, policies and programs for strengthening social cohesion, inclusion and resilience through engagement with, and support for, community institutions. The BULSHO program will be implemented under the WB Environmental and Social Framework (WB's ESF) and especially the Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure that sets the requirement for preparation of this Stakeholder Engagement Plan (SEP).

2.   Project Description

2.1   Program Objectives
8.   The main objective of the BULSHO program is to strengthen community and local institutions for improved social cohesion, inclusion, and resilience.

2.2   Program Structure
9.   The program is organized into four (4) components with related activities as outlined in the table below.

Table 1: The structure of the proposed BULSHO Project

Component	Key Activities
Component 1: Community and District Social and Institutional Strengthening.	This component will finance the BULSHO program's institutional strengthening activities under the three district support packages including: o Foundational institutional strengthening for districts with minimal state presence under Package #1 (of which there are approximately 29 districts across Somalia), o Enhanced institutional strengthening for districts that have emerged from early stabilization support and/or established an interim or permanent state administration but are fragile and possesses limited capacity for community engagement, o Planning and service delivery under Package #2 (of which there are approximately 90 districts), and o Advanced institutional strengthening for districts that have established district councils and are capable of varying degrees of resource mobilization, coordination and service delivery (of which there are approximately 37 districts). Thus, this component will finance technical assistance to recognize inclusive community institutions and establish interim or permanent district administrations, foundational reconciliation and social healing activities, and awareness raising activities on the BULSHO program's principles, pathways and support packages.
Component 2: Local Social Contract Platform.	This component will scale up and support the institutionalization of district development planning piloted under programs such as JPLG and PCG through financing the BULSHO's program's local social contract platform under the program's Support Package #2 and Support Package #3. It will support each district to establish the BULSHO local social contract platform consisting of: o Community diagnostic and collaboration forums in each community, o Participatory planning systems, o Resource mobilization and budgeting systems, o Community oversight and accountability systems, o Citizen charters between citizens and the government that would encompass commitments to provide and/or facilitate the provision of basic services (i.e. via private or humanitarian actors) based on community prioritization, commitments on process (e.g., participation, transparency, grievance handling) as well as citizen commitments on process, o Capacity building, collective action allowances for select marginalized and/or disempowered groups (e.g., women, youth, IDPs), and access to Sokaab-like crowdfunding platforms and other participatory and social accountability tools.
Component 3: Matching Grants for Social Cohesion, Inclusion and Resilience.	This component will: o Finance the BULSHO program's matching grants under to the districts that graduate and/or meet the minimum participating conditions for Support Package #3, o Furthermore, over the life of the BULSHO program and as additional financing becomes available, more districts receiving support packages #1 and #2 under components 1 and 2, respectively, will graduate and thus meet the minimum participating conditions for accessing the matching grants,

	o Building on the lessons of the DIALOGUE project--which successfully used matching grants to incentive cross-community collaboration and build citizen-state trust--the component will incentivize communities to mobilize and pool resources with other communities and government authorities with the aim of increasing the building blocks of social cohesion (shared purpose, trust and willingness to cooperate) across communities as well as trust between citizen and state.
Component 4: Capacity Building for Coordination, Delivery, Innovation and Learning.	This component will finance: o Operational and technical capacity building of the Ministry of Interior, Federal Affairs and Reconciliation (MoIFAR) to review, develop and/or cascade policy, legislations, regulations and guidelines needed to achieve the BULSHO program objectives thereby establishing clear "rules of the game" and embedding them in the local policy framework, to augment the capacity of MoIFAR to deliver technical support and backstopping to FMS in relation to components 1-3, to comply with World Bank guidelines and requirements, to coordinate between and across government and with development partners, to monitor results and report progress, and to document and disseminate innovation and lessons including lessons from other development partner initiatives.

2.3 Key Project Outputs

The key project outputs include:
a. Social commitments and citizen charters signed;
b. Social, technical and administrative training and support delivered to district officials and community leaders;
c. Platforms and tools for resource mobilization, investment tracking, and social accountability established and executed;
d. Resources from communities, local government, private sector, diaspora and development partners mobilized;
e. Inter-governmental conditional grant mechanism operationalized;
f. FMS and FGS technical, fiduciary and Environmental and Social (E&S) staffing capacity enhanced.

2.4 Institutional and Implementation Arrangements

10. The FGS Ministry of Interior, Federal Affairs and Reconciliation (MoIFAR) will be the lead implementing agency. At FMS-level, the Ministries of Interior will lead the implementation, working with relevant sector ministries. As BULSHO, is focused on building long-term country capacity, the institutional arrangements will favour the use of government staff where possible. The government's BULSHO program includes the following implementation structures:

11. **Program Steering Committee (PSC).** Composed of senior level representatives (ministers or deputy ministers) from relevant FGS ministries and FMS MoI, as well as senior donor representatives. Chaired by the MoIFAR Minister and co-chaired by FMS MoI Minister on rotation basis. Primary role is to make strategic decisions, including approving the yearly workplans and budget allocations.

12. **Technical Working Group (TWG).** Composed of the MoIFAR Director General (DG), DGs of FMS Ministries of Interior. Chaired by FGS MoIFAR DG and co-chaired by FMS MoI DG on rotation-basis. Primary role is to guide and oversee the implementation of the BULSHO program. It will hold preparatory meetings for the PSC meetings. It will involve a number of government agencies from FGS, and FMS when relevant, covering the relevant sectors.

13.   **National and State Secretariats. The National Secretariat at the FGS level will work under the** oversight of the TWG. The State (FMS) Secretariat will work under FMS DGs and be coordinated by the National Secretariat. The Secretariats will have the responsibility for the day-to day project management. In the first phase of BULSHO, the Secretariat will be composed of a dedicated team of technical specialists, who will coach and train staff from MoIFAR/MoI Departments of Local Governance. In the second phase, MoIFAR/MoI Departments of Local Governance will take over the specialist team.

2.5   Beneficiaries

14.   The main beneficiary categories and overall estimates of beneficiaries reached are three-fold as shown below:

- o **Individuals:** Approximately 1.9M residents (50% of women) of twenty target districts will directly and indirectly benefit from the project through increased access to services. Approximately 1,000 district officials and staff (25% of women) will benefit from the project through training and increased knowledge on management, planning & budgeting, PMF, M&E etc. Approximately 50,000 community representatives (30% of women) will benefit from the project through increased agency and participation in decision making.
- o **Communities:** Approximately 1,000 villages (or cluster of villages) will benefit from the project through increased capacity to identify opportunities, collaborate, and implement small scale investment.
- o **District Governments:** Twenty45 district governments in total will benefit from the project through increased capacity to plan, budget for and execute local investments, raise and manage financial resources, and deliver services to their population.

2.6   Objective/Description of SEP

15.   This Stakeholder Engagement Plan (SEP) outlines ways in which the Secretariats and implementing partners will ensure meaningful stakeholder engagement, consultation and information disclosure throughout the project cycle. Specifically, the SEP outlines a systematic process for:

a. Identifying and mapping project stakeholders at different levels.
b. Planning engagement modalities through effective communication, consultations, and disclosure.
c. Outlining platforms for stakeholders to influence decisions regarding the project.
d. Defining roles and responsibilities for the implementation of the SEP.
e. Defining reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings.
f. Elaborating the project Grievance Mechanism (GM) that will facilitate prompt resolution of project related complaints.
g. Outlining the dissemination of relevant project materials, including explanations of intended project benefits and, where appropriate, the setup of a project website.
h. Documenting stakeholder consultations on proposed project design, environmental and social risks (E&S) and impacts, mitigation measures, the SEP, and draft E&S risk management instruments.

2.7   World Bank Requirements for Stakeholder Engagement

16.   Consistent with the requirements stipulated under the World Bank's ESF and specifically the Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure, the implementing agency is required to engage with stakeholders throughout the project life-cycle. Such engagement is to commence as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. Consistent with ESS10, a Project with moderate E&S risk such as BULSHO is required to include several points of engagement prior to approval by the WB and ideally more than one point of engagement during project implementation. In practical terms, the engagement should include: i) stakeholder

consultation to inform stakeholder analysis; ii) dissemination of relevant project material, including explanations of intended project benefits and, where appropriate, the setup of a project website and iii) stakeholder consultations on proposed project design, E&S risks and impacts, mitigation measures, the proposed SEP, and draft E&S risk management instruments.

17.   Once the project is approved by the WB, project stakeholder engagement should include: i) disclosure of information on how stakeholder feedback was incorporated into project design and E&S management instruments; ii) consultations on implementation and supervision, on any new project characteristics or E&S risks, and on progress of E&S risk mitigation measures; iii) regular efforts to keep stakeholders informed on project implementation; and review of the adequacy of stakeholder identification in light of project implementation and related revisions to the SEP.

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

3   Stakeholder Identification and Analysis

19.   It is envisaged that the BULSHO project will engage a wide range of stakeholders in the course of its implementation. This will include non-state actors such as community leadership, project beneficiaries including disadvantaged and vulnerable individuals and groups such as Internally Displaced Persons (IDPs), Traditional Ethnic Minorities (Eyle, Bantu, Bajuni etc.,), women, youth, older persons and persons with disabilities (PWDs). The Secretariat will purpose to ensure that vulnerable groups are represented amongst the stakeholder groups engaged, as well as other stakeholders such as religious leaders, clan/village elders, Civil Society Organizations (CSOs), Non-Governmental Organizations (NGOs), United Nations (UN) agencies, Community/Faith Based Organizations (CBOs), and those organizations championing the interest of Traditional Ethnic Minorities and the private sector. Partnerships with other projects including those financed by the World Bank (WB) will also be engaged to ensure BULSHO leverages on their planned activities within the social cohesion, inclusion and resilience space. As guided under ESS10, the stakeholders of the proposed BULSHO project can be divided into the following core categories:

3.1. Project-Affected Parties

20.   According to ESS10, Project-Affected Parties (PAPs) include individuals or groups that are affected or likely to be affected by the project. PAPs are influenced (actual or potential) by the project and/or have been identified as most susceptible to change associated with the project. PAPs need to be closely engaged in identifying potential E&S risks and impacts including appropriate mitigation measures. Under BULSHO PAPs include the individuals and groups identified under Table 2. A number of stakeholders in this category were identified during the consultation sessions with various stakeholders from the States of Jubbaland, Puntland, Galmudug and Hirshabelle held on 16th - 20th January 2025.

Table 2: Project Affected Parties under the project

Category of Stakeholder	Relationship to BULSHO

Target communities living within areas where project activities will be implemented. This will include vulnerable individuals and households comprising women, youth, IDPs, Traditional Ethnic Minorities , Persons with Disabilities (PWDs) and older persons, young mothers, female - headed households, Orphaned and Vulnerable Children.	The BULSHO project focuses on extending local governance and services to hard-to reach and rural areas and seeks to build trust and legitimacy by focusing on process-or how services are delivered- while contributing to progress on service delivery outcomes. Within this framework, target communities are likely to access a number of benefits including the planned local social contract platforms that will facilitate access to basic services through the development of service charters between citizens and the government that would encompass commitments to provide and/or facilitate the provision of basic services (i.e. via private or humanitarian actors) based on community prioritization, commitments on process (e.g. participation, transparency, grievance handling) as well as citizen commitments on process and contributions.

The project will also enhance systems for community participation in planning resource mobilization and budgeting, community oversight and accountability systems thus Citizen charters.

Target communities are also likely to benefit from social and economic investment or livelihood initiatives to enhance community resilience and addressing gender gaps through its inclusive requirements and incentives. |
| Local community -based institutions, including:
o Women organizations;
o Youth organizations;
o Private sector;
o Community elders;
o Local leaders;
o Religious leaders;
o Village Development Councils (VDCs);
o Neighbourhood associations and
o Organizations championing the interests of vulnerable individuals and groups. | Due to the weak government structure, community institutions have shouldered the burden of delivering essential services like health, education, and water, often with limited resources. Such institutions will be targeted for support through actions such as social and Institutional strengthening, local social contract platforms, and matching grants for social cohesion, inclusion, and resilience

Local and religious leaders are critical in voicing the representing the interest of communities to the development partners. |
| The FGS MOIFAR and other relevant ministries at FGS level such as the Ministry of Finance (MOF), Ministry of Planning, Investment and Economic Development (MoPIED) Ministry of Labor and Social Affairs and Civil Service Commission. | The FGS MoIFAR will be the lead implementing agency. At FMS-level, the Ministries of Interior (MOI) will lead the implementation, working with relevant sector ministries. As BULSHO, is focused on building long-term country capacity, the institutional arrangements will favour the use of government staff where possible. The structures below cover the wider government BULSHO Program and allow for coordination with partners active in the federalism space. They will also coordinate with other existing coordination structures e.g., around stabilization.

The FGS ministries, departments and agencies are integral to the overall success of the project at all stages. They are crucial to the establishment of the physical, technical, legal and regulatory framework of the project as well as providing the human resources. Inter-and intra-agency collaboration will be essential for the implementation of the project activities.

The BULSHO will enhance the operational and technical capacity of the MoIFAR to:
• review, develop and/or cascade policy, legislations, regulations and guidelines needed to achieve the BULSHO |

	program objectives thereby embedding them in the local policy framework, • augment the capacity of MoIFAR to deliver technical support and backstopping to FMS in relation to components 1-3, • comply with World Bank guidelines and requirements, • coordinate between and across government and with development partners, to monitor results and report progress, and to document and disseminate innovation and lessons including those from other development partner initiatives.
FMS Secretariat, Ministry of Interior (MOI) and relevant line ministries and local government (Municipality Departments, and District councils and Ward administrators.	The FMS are also responsible for delivery of project activities at their level and together with local governments will benefits from various packages for institutional strengthening from BULSHO. FMS and local government institutions provide essential services to the communities living within the project area and represent their interests. Through the project, state and local government institutions will be enhanced to provide improved service delivery. These constituencies will also benefit from improved citizen engagement in government budgeting and feedback on services offered.
People who will benefit from the project interventions, project-related employment e.g. various categories of workers in FGS, FMS and local government administrations including Direct workers, Contractor and primary supply workers and community workers.	Direct workers including the Project Implementation Units at both the FGS and FMS level who will be responsible for key functions such as financial management, procurement, E&S risk management and communication and Monitoring and Evaluation (M&E). Other government staff at both FGS and FMS level may be seconded from other Ministries such as the Ministry of Labor to strengthen the E&S risk management capacity within the project. Service provides such as consultants and contractors may also be hired under the project components to deliver training services and other capacity building action and or delivery of office furniture equipment needed for day-to-day operation. Community workers will also be engaged to provide voluntary labor to the project.

3.2. Other Interested Parties

21.   The projects' stakeholders also include parties other than the PAPs. They include key stakeholders at the FGS and FMS/district levels working in the community development space who may have an interest in the project as listed below: A number of stakeholders in this category were identified during the consultation sessions with various stakeholders from the States of Jubbaland, Puntland, Galmudug, Galmudug and Hirshabelle held on 16th - 20th January 2025.

Table 3: Other Interested Parties

Category of Stakeholder	Stakeholder	Relation to BULSHO
• Other government agencies.	Ministry of Women and Human Rights and the Ministry of Labor and Social Affairs	Responsible to promote minority inclusion.
Other development partners, projects and NGOs.	o UN Agencies, o German Development Cooperation (GIZ), o Care Somalia,	The development partners and projects support initiatives to strengthen social cohesion,

	o Somalia Joint Fund (SJF) windows on inclusive politics, community recovery and local governance, o USAID's People Centred Governance Program, o Somalia Stability Fund, o Finland's MIDEEYE program, o Multi-donor Stability Trust Fund (SPF), o UN's Joint Programme for Local Governance (JP-LG), o USAID's SHIIR and Transition Initiatives for Stabilization (TIS+), o ALIGHT former American Refugee Committee (ARC), o Save the Children.	inclusion, and resilience through community institutions.
Civil society organizations including those championing the interest of vulnerable individuals and groups.	o Coalition for Grass Roots and Women organization (COGWO) – South Central. o Community Concern organization (COCO) – Banadir region. o Dr. Ismail Jimale Human Rights organization (DIJHRO) – South Central. o Elman Human Rights and Peace –South Central Somalia. o Galgaduud Youth Union (GYU) – Central Region. o Hidig Disabled Women organization (HIDWO) – South Central. o Hiran Youth development organization – Hiran Region. o Horn Africa Disability forum (HADF) – South Central.	They mediators between public authorities and communities. This empowers them to push forward social action and support sustainable and inclusive development pathways.
Project Financiers.	o The World Bank.	Provides financial resources for implementation of BULSHO activities.
Media.	o Mainstream media. o Social media influencers.	They promote public participation and community engagement; provide a variety of quality content that is universally accessible to a diverse audience on a national level.
Private sector.	o Business groups and associations. o Social media influencers.	The private sector has continued to be a source of resilience through decentralized social networks. At community-level, Somalis have relied on informal institutions including the private sector to respond to disasters and address basic development problems.
Other World Bank financed projects within the project area and working in the social inclusion, cohesion and inclusion space.	o Barwaaqo, the Recurrent Costs and Reform Financing (RCRF) project. o Somalia Crisis Recovery Project (SRCP), o Somalia Urban Resilience Project (SURP), o RCRF III's support for pilot Community Education Committees and Community Health Committees, o Biyoole's support for community livelihoods.	These projects seek to enhance service delivery and strengthen institutional operations thus providing an opportunity to invest in strengthening inclusion, cohesion and resilience.

Academia and Research Institutions.	o International Centre for Tax and Development (ICTD). o Heritage Institute, o the Rift Valley Institute, o and the Somali Public Agenda on district council formation in SouthWest, BRA, Hirshabelle and Galmudug.	BULSHO will rely both on current and previous research conducted by international research centers and local think tanks to generate learnings.

4 Stakeholder Engagement

22. Stakeholder engagement is the continuing and iterative process by which the Borrower identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. The BULSHO Secretariats at the FGS and FMS levels will ensure that stakeholder engagement begins as early as possible in project preparation to allow stakeholders' views and concerns to be considered in the project design, implementation, and operation. The Secretariats will also consider the different information access and communication needs of various stakeholder groups and individuals, including consideration of literacy, mobility and disability challenges, especially with the vulnerable individuals and groups.

23. The SEP will be implemented in a way that promotes monitoring of E&S risks while also setting mutual expectations, clarifying the extent of the government's commitments and resources, and obtaining feedback on activities. Lastly, the SEP will include a grievance Mechanism (GM) to allow the government to act upon complaints and suggestions for improvements in a timely fashion.

4.1 Stakeholder Engagement Principles

24. Stakeholder analysis generates information on the perceptions, interests, needs, and influence of actors on the project. Identifying the appropriate consultation approach for each stakeholder throughout the project lifecycle is necessary. In order to meet the best practice, the project will apply the following principles (but not limited to) for stakeholder engagement.
   a. **Openness and life-cycle approach:** public consultations for the project will continue during the whole project lifecycle from preparation through implementation to closure. Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation.
   b. **Informed participation and feedback:** information will be provided and widely distributed among all stakeholders in an appropriate and accessible format; conducted based on timely, relevant, understandable and accessible information related to the project; their rights and entitlements fully disclosed, and opportunities provided to raise concerns and ensure that stakeholder feedback is taken into consideration during decision making.
   c. **Inclusivity and sensitivity:** stakeholder identification will be undertaken to support better communication and building effective relationships. The participation process for the project will be inclusive, and where all stakeholders will be encouraged to be involved in the consultation processes. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods and ensuring that special attention is given to vulnerable groups.

4.2 Summary of Stakeholder Engagement Undertaken During Project Preparation

25. During project preparation, various categories of stakeholders were engaged to inform the design of the BULSHO program and E&S instruments including the Stakeholder Engagement Plan, Labour Management Procedures and the GBV-SEA/SH Action Plan. In November 2023, the MoIFAR-convened a Technical Working Group (TWG), jointly with Ministry of Finance (MoF) and Ministry of Planning, Investment and Economic Development (MoPIED), as well as FMS Ministries of Interior (MoI) to commence the formulation of the BULSHO Program. With financial and technical support from the World Bank, MoIFAR Director General convened a three-day technical design workshop in February

2024 that involved the participation of MoIFAR advisors, WB specialists, consultants, as well as development partners. The workshop was followed by dedicated technical design sessions in March and April 2024 to prepare a first version of the BULSHO program document. Further consultation workshops were held in each FMS (1-15 May 2024) that brought together a total of over 250 government and non-government stakeholders in Baidoa (Southwest), Dhusamareb (Galmudug), Garowe (Puntland), Jowhar (Hirshabelle), and Kismayo (Jubbaland). In September 23 -26, 2024 additional workshops with FGS stakeholders in Mogadishu and development partners in Nairobi were organized to validate the draft BULSHO program.

26.　　Additional consultations with various stakeholders were held on 13th January in Jubbaland and 16th - 20th January 2025 in the remaining states of Puntland, Galmudug and Hirshabelle. The consultations brought together stakeholders from government entities at FMS level, municipality officials, youth, civil society and media, women, community organizations and Persons with Disabilities (PWDs). As shown in Table 5, a total of 114 stakeholders constituting 79 males and 35 females were consulted.

Table 4: Number and Type of Stakeholders Consulted

State	Stakeholder(s)	Date of Consultation	No of Participants	
			Male	Female
Jubbaland	MOIFAR	13th January 2025	1	0
	Municipality officials	13th January 2025	3	0
	Community	13th January 2025	34	21
Puntland	Community	14th January 2025	6	5
Hirshabelle	Community	16th January 2025	16	4
Galmudug	Mixed group*	20th January 2025	19	5
		Sub Total	79	35
		Total		114

* as described in the above paragraph

27.　　The consultations were structured around key thematic areas including : i) presentation of relevant project information such as project objectives and target beneficiaries, potential E&S risks and impacts, mitigation measures and beneficiary rights and entitlements ii) stakeholder mapping and analysis; iii) approaches to stakeholder engagement and information disclosure; iv) beneficiary targeting and inclusion; v) grievance management; vi) forms of GBV SEA/SH in the project area and management approaches and vii) Environmental Health and Safety concerns including climate risks and impacts in the project area. Table 2 presents a summary of the stakeholder consultations and some of the key recommendations made. Detailed minutes are presented in this link.

 Detailled Summary
of Stakeholder Cons

Table 5: A summary of the key findings from the stakeholder consultation

Aspect	Key Recommendations by Stakeholders

a. Stakeholder Engagement	• The preferred methods for receiving project related information by the communities are through public meetings, formal letters, emails, community outreach programs, sign boards and by mobile phones.
	• Other preferred engagement methods include conducting periodic community feedback sessions and use of printed materials such as brochures and flyers containing relevant project information. Where possible the engagement needs to be every two weeks and communication should be in both Somali Maay and Maxaa dialects for ease of understanding.
	• Culturally appropriate consultation involves engaging clan elders, community elders, religious leaders or mosque Imams, and youth representatives. Continuous involvement throughout the project cycle is strongly preferred to ensure alignment with community needs from the start to the end of the project life cycle.
	• Dissemination of project information can also be done through local radio stations and digital platforms such as social media to foster community awareness, inclusivity, training, and civic engagement.
	• Besides the stated methods, communities also prefer refresher training to be organized to inform the beneficiaries on project progress and how to access project benefits and opportunities.
	• Where feasible, the project to establish community advisory board or community-based steering committees with representatives from all clans and marginalized groups to ensure inclusivity. Regular feedback mechanisms, such as surveys and grievance management platforms can promote inclusivity. These can be further strengthened by organizing sports activities like football tournaments between villages and districts to foster integration.
	• The project needs to provide a safe environment and neutral space for the meetings to boost community participation, especially for the vulnerable individuals and groups including the Traditional Ethnic Minorities.
	• It is also important to provide regular updates on project progress and organize feedback sessions and /or mechanisms for communities to effectively provide input to the project as implementation continues.
	• Further, to ensure inclusivity, the project team should organize rural forums involving diverse groups, including women, those from minority clans and other vulnerable individuals and groups on project related matters.
	• Some of the potential negative risks of the project include the likely resistance from the community members to accept the project without knowing the exact benefits of the project and can potentially lead to mismanagement of the project. This can be addressed through;
	  • Engaging the community regularly.
	  • Providing training for the project staff.
	  • Putting in place the conflict resolution mechanism will plays a very important role of mitigating the negative impacts of the project.
	  • Consulting with the representative from all clans to ensure inclusivity.

b. Targeting and Inclusion	• To ensure effective targeting of eligible beneficiaries, it is necessary to collaborate with clan elders, community leaders, and Village Development Committees (VDCs) and government institutions at FMS and Municipal levels. Further, the project team needs to leverage on existing records at FMS level and collaborate with district or ward-level administrators. • While the project team need to come up with clear eligibility criteria, this needs to be disclosed and discussed with the target beneficiaries through

public meetings and community engagement prior to inception of the targeting process.

- Where feasible, the process of targeting project beneficiaries needs to begin with municipality officials followed by community meetings to review and approve the list of individuals proposed for targeting.
- Ensure involvement of key community-based governance structures in the targeting process. The structures include VDC, women's associations, neighbourhood associations, business committees and youth groups etc.
- The project team may consider forming community boards that comprise representatives from different clans, religious backgrounds, genders, and age groups to offer a variety of perspectives and guidance. Involve trusted local leaders and elders who can enhance credibility and foster trust within the community. Engage current women's organizations or establish new ones to ensure that women's voices are heard, and their needs are met. Include youth representatives to connect with younger populations and gather their insights on priorities and concerns.
- Collaborate with local cultural and religious leaders to ensure alignment with community values and practices.
- Culturally, women do not take the role of elders and cannot be selected as community elders/leaders. While there might be resistance to placement of women in senior roles, sustained sensitization campaigns can address these challenges effectively. Good progress is already being made in this regard as women can take lead positions in local committees in areas such as Kismayo. A good example is the case of Farjano led by Khadro a female village leader.
- Besides the community structures, district and ward-level administrators, women's representatives, disability rights organizations, and NGOs championing the interest of marginalized individuals and groups can play crucial roles in enhancing inclusivity. The municipality can foster inclusivity for all by ensuring these groups are properly integrated into the project processes, ensuring broad participation and representation.
- To ensure inclusion of the vulnerable groups and individuals the project at both levels of government need to ensure effective consultation and engagement with clan elders at the local government and FMS level, religious leaders, women's group leaders, and youth association heads are pivotal and local NGOs working with and championing the interest of vulnerable individuals and groups.
- Potential barriers that are likely to impede access to project benefits and opportunities by vulnerable groups and individuals include lack of awareness, poor representation of the various community segments in the project governance structures, limited access to project information, political, cultural and social restrictions, physical challenges for PWDs, language barrier for some of the ethnic minority groups, violence, intimidation and logistical challenges such as distance and mobility.
- Mitigations to address the barriers include focused awareness campaigns, timely access to project information and ensuring all target communities including vulnerable individuals and groups are involved and informed, providing transport facilitation for remote participants, and ensuring safe and culturally sensitive meeting environments. Further, the targeting criteria and process needs to be publicly disclosed to all stakeholders prior to commencement of the targeting process and should also involve diverse community leaders.

	• Further, the project team should develop targeted outreach programs that reach every corner of each district, ensuring both physical and digital accessibility through TV talk shows, FM radio, and social media, and fostering partnerships with community-based organizations (CBOs) and development partners. These efforts will improve access to project information and raise awareness, giving the community confidence in the project.
	• The project team should also use open, transparent selection criteria for job recruitments, engaging local leadership, ethnic minority groups and utilizing geospatial mapping tools to identify underserved areas and routinely assess their participation.
	• To enhance access to project benefits, it is important to establish and operationalize a robust grievance mechanism, mediate social conflicts through respected elders, and ensuring equitable resource distribution through transparent monitoring.
	• In summary the following procedure may assist in the targeting progress:
	    • Conduct a thorough assessment to identify community needs.
	    • Use community mapping techniques to engage marginalized groups.
	    • Establish and communicate transparent eligibility criteria.
	    • Design accessible and user-friendly registration processes.
	    • Organize workshops with marginalized communities for input.
	    • Continuously monitor targeting processes and gather beneficiary feedback.
	    • Train project staff on inclusive practices and cultural sensitivity.
	    • Be flexible in adjusting project targeting strategies based on ongoing assessments.

c. Grievance Management	• The main conflicts include resource allocation disputes, inter-clan rivalries, climate-related conflicts, issues surrounding land and resources and disputes over project prioritization. Other conflicts include disputes over political representation, discrimination and marginalization of vulnerable individuals and groups, conflicts arising from differing cultural practices and beliefs, disparities in wealth and access to economic opportunities. • Conflicts are typically resolved through dialogue and mediation by elders, local councils, and religious leaders and traditional conflict resolution mechanisms remain strong. Further, organizations focused on the rights of ethnic minority groups can help address grievances and promote social justice. Community councils can facilitate discussions and resolutions at the local level, ensuring that all voices are heard. • Suggested measures include establishing a clear and accessible grievance mechanism, involving traditional elders in dispute resolution, and maintaining transparency through regular public updates and providing channels for confidential reporting for sensitive cases such as Gender-Based Violence (GBV). • Preferred channels for reporting grievances include direct reporting to project staff, use of suggestion boxes in community centers, and anonymous hotlines. Further it is necessary to train project staff in conflict resolution, establishing grievance committees with diverse representation of key stakeholders at the community level, and conducting regular monitoring on grievance resolution and management. • The municipality has established grievance committees, and consults with community, women, and religious leaders to mediate conflicts.

	• Formal municipal complaint channels exist for escalation before reaching the police and judiciary as a last resort. Conflicts are typically resolved through a 4 to 5 resolution process involving tribal and clan leaders, with elders and the municipality playing key roles in addressing and resolving issues.
	• The proposed project needs to address grievances through a dedicated municipal grievance desk and provide various uptake channels including a 24/7 toll-free hotline for ease of reporting grievances, suggestion box, social media grievance wall, and community grievance committees. The municipality with appointed elders to oversee the process, ensuring transparency and timely resolution. If needed, the Ministry of Interior and the police will intervene.
	• Define a transparent access criterion to project benefits and opportunities and dispute resolution protocols. Conduct community meetings and focus groups discussions for inclusive dialogue. Train neutral mediators and conduct conflict resolution workshops. Engage local elders and respect traditional practices in decision-making.
	• Establish community advisory boards to guide BULSHO initiatives. Create accessible grievance procedures and provide regular updates. Allow anonymous reporting of complaints and implement data protection policies. Set clear response timeframes and appoint dedicated grievance officers. Establish community offices and regular outreach clinics.
	• Training to be provided for staff and community members on conflict resolution. It is important to ensure that the vulnerable individuals and groups have a voice in the grievance resolution process and there are defined timeframes for grievance resolution.
d. SEAH and other forms of GBV (e.g., IPV)	• Forms of GBV experienced at the community level include domestic violence, early marriage, and workplace Sexual Harassment (SH) and Sexual Exploitation and Abuse (SEA) that can occur in humanitarian settings, where vulnerable populations may be exploited by aid workers or community leaders. Other forms include rape, domestic abuse, trafficking of women, girls, and boys, along with detrimental traditional practices such as female genital mutilation/cutting, and bride inheritance, among others.
	• Physical, emotional, and psychological abuse within households is common and often normalized by cultural practices.
	• Rape and sexual assault, which can occur in both public and private settings with women and girls being particularly vulnerable.
	• Early and forced marriages where young girls may be married off at a young age, often against their will, leading to various forms of abuse.
	• Female Genital Mutilation (FGM) practiced in some communities is a harmful traditional practice that poses serious health risks and violates the rights of women and girls.
	• It is important to note that currently, there are limited formal and dedicated mechanism for reporting GBV SEA/SH within the community, with most cases being handled informally by village elders and religious leaders and community leaders through dialogue and negotiation. With the existing gap in formal management of grievances related to GBV SEA/SH, the project team needs to take appropriate measures to address it.
	• There are a few Non-Governmental Organizations(NGOs) such as ALIGHT former American Refugee Council Save the Children who work with the Ministry of Gender that offer such services but have low capacity in terms of technical competence and limited outreach due to inadequate resourcing.

	• The activities of these NGOs on GBV/SEAH aspects are not fully integrated with municipal programs. They work independently and rarely share information and data with municipality officials or even government entities and this issue needs to be addressed for the project to be effective in managing GBV SEA/SH complaints.
	• The project team needs to leverage on these efforts by partnering with such NGOs in conducting community awareness campaigns, training of project staff on handling GBV SEA/SH related complaints and also during establishment of specific grievance mechanism for safe reporting and handling of GBV SEA/SH complaints.
	• Enhance support for a multispectral strategy to aid survivors of GBV, highlighting the necessity of integrating sexual and reproductive health services with GBV services. Additionally, there is need to establish pooled funding mechanism designed to meet urgent GBV needs and services in remote regions, which should include mental health and psycho-social Support Services, protection, health care, and safe spaces for women, girls, and boys.
	• Further, the project needs to create dedicated GBV response units at FGS, FMS and Municipal level mostly with women employees, establishing safe spaces for survivors, and launching awareness campaigns and more sensitization programs. Where feasible special laws focusing on addressing GBV SEA/SH to be enacted with heavy punishments to stop it.
	• Develop clear procedures and protocol for prevention, reporting, and response for GBV SEA/SH. Set up confidential and accessible reporting channels including hotlines, suggestion boxes, and implement community awareness campaigns to educate the public about SEAH and GBV, their effects, and the importance of reporting incidents.
	• Conduct regular training sessions for staff, community leaders, and volunteers on identifying, preventing, and responding to SEA/SH and GBV.
	• Involve local leaders and influencers to change cultural attitudes and norms that condone violence. Foster collaboration between government, NGOs, and community organizations to create a unified response to SEA/SH and GBV. Involve men and boys in advocacy and prevention efforts to promote gender equality.
e. Environment, Health and Safety (EHS)	• Some of the key environmental challenges in the project area include deforestation, soil erosion especially of the sand dunes and water scarcity due to unsustainable practices that are further aggravated by climate change. The discussions highlighted that Somalia continues to face a multitude of environmental issues, notably land degradation and overfishing. The deterioration of land, exacerbated by overgrazing, soil erosion, the loss of topsoil, and deforestation, has profound implications for the socio-political dynamics of the country, serving as a primary catalyst for climate-related and resource-based conflicts.
	• Furthermore, the stakeholders emphasized that climate change is increasingly recognized as a significant factor influencing the situation and poses a substantial challenge in meeting the growing needs of the most vulnerable communities. The implications of climate change encompass both potential positive and negative effects of infrastructure and operations, considering human, physical, and ecological environments. They added that climate change is exacerbating conflict and displacement in Somalia, as farmers

	compete for limited natural resources vital for their survival. The immediate consequences are evident in violent clashes, while the long-term effects pose a serious threat to peace in a nation that has suffered from three decades of persistent conflict.
	• Climate-induced flooding has damaged urban infrastructure, homes, and displaced low-income and vulnerable communities. Addressing this requires investment in climate-resilient infrastructure, including improved drainage systems and increased solar lighting to minimize hazards and enhance safety. Overall, frequent droughts and occasional floods have displaced communities and strained local resources, impacting resilience.
	• In Beledweyne, adverse climate changes such as droughts and flooding have significantly impacted local communities, leading to displacement, loss of livelihoods, and the destruction of infrastructure. The last floods were in 2023 November, and it devastated the town. These environmental challenges undermine the resilience of the affected populations, making it increasingly difficult for them to recover and adapt.
	• Ecologically sensitive and culturally significant sites include mangrove forests along the coast especially Gobweyn area with some cactus in some areas. The project could help protect these sites but might also increase human activity in these areas.
	• Ecologically sensitive sites like urban wetlands are at risk of encroachment. Urban wetlands, especially in riverine areas in Beledweyne are threatened by encroachment from urban development. Protecting these wetlands is essential for maintaining biodiversity and water quality. Implementing zoning regulations can restrict harmful development, while public awareness campaigns can educate communities about their ecological importance especially in the outskirts of Kismayo like Gobweyn.
	• Urban challenges such as inadequate waste management, pollution, and encroachment on green spaces and beaches require integrated municipal planning and increased resources for comprehensive surveys. Issues like sand dune management and potential destruction of biodiversity during construction must also be addressed to prevent hazards and preserve environmental integrity. For example, in Beledweyne urban challenges such as poor waste management, environmental pollution, and the invasion of natural areas highlight the need for a unified strategy in urban planning, along with increased funding for detailed assessments.
	• Hazards include construction-related accidents and exposure to oil spills and sewage exposure because Kismayo area is marine and coastal area. Mitigation measures include safety training for workers and proper waste disposal protocols.
	• Currently there are no major security concerns whether armed conflicts and IED threats in Kismayo but theft and vandalism at project sites might be anticipated if not manned by security personnel. Ensuring proper lighting, security patrols, and community watch programs can mitigate these risks. Community meetings should be held in secure locations, and security assessments and frisking must be a routine part of project implementation in all gatherings. Equally should be disability friendly area and to be conducted in government premises or secure safe hotels.

	• In Beledweyne, the presence of various armed groups, including the self-declared Hiiran State, Hirshabelle forces, and the Macawisley militia—who typically lack identifiable uniforms—created chaos in the town. However, a week ago, the Federal Government of Somalia (FGS) mediated the situation, leading to the evacuation of all armed groups. Currently, the situation appears to be stable. IED can take place anytime, but the project should keep in mind and come up with safety and security protocols.

4.3   Summary of Project Stakeholder Engagement Tools and Techniques

28.   The National and State Secretariats will apply some of the most effective mechanisms to reach identified stakeholders including vulnerable and disadvantaged groups such as IDPs, minority groups, women, youth, older persons and the Traditional Ethnic Minorities (TEM) that fit ESS7 criteria. To be effective, the FGS and FMS Secretariats work with existing community structures and adopt various communication and participatory methods designed to inform, consult, involve, collaborate or empower. Such communication methods may include Focus Group Discussions (FGDs), public meetings, social media, local FM radios etc. Due to the obstacles such as literacy, disability mobility, cost implication etc., impeding effective participation by the vulnerable individuals and groups, the project will work closely with organizations that advocate interests of such groups to ensure their concerns are addressed and their views taken into consideration. Further, the project to ensure that engagement sessions are held at venues closer to communities. At national level, the SEP will be implemented closely with existing citizen engagement platforms and intra-government engagement structures and build upon the channels of communication and engagement already established with stakeholders by FGS and FMS as a strategy to minimize costs and maximize impact and access to stakeholders.

29.   Meaningful stakeholder engagement is based on the prior disclosure and dissemination of relevant, transparent, objective, and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format. The FGS and FMS Secretariats need to ensure that relevant project related information is available as early as possible and throughout the project life cycle in a manner, format, and language appropriate for each stakeholder group. This way, stakeholders will have an opportunity to influence the program in ways that do not present risks to those raising critical and sensitive issues regarding the project. Table 7 presents methods to be applied for stakeholder engagement and information disclosure that also incorporates the recommendations provided by the consulted stakeholders. The project team will disclose relevant project information through oral presentations during public meetings, printed materials with project information such as posters, brochures, pamphlets, non-technical summaries, on-literate diagrams etc., depending on stakeholder needs.

Table 6: Proposed consultation strategy

Stakeholder	Channels of Engagement	Frequency	Purpose	Responsibility
Target communities living within areas where project activities will be implemented. This will include vulnerable individuals and households	Use of public meetings with all the target communities in their respective district, municipality or villages. To be more effective, separate FGDs to be organized with women and other vulnerable individuals and groups.	At the launch of project activities in a District and there after monthly and quarterly.	Create awareness on the project's objectives, expected results, activities, target beneficiaries and project timelines.

Raise awareness on potential E&S risks, impacts, opportunities, benefits, rights and | FGS Social specialist /GBV Specialist and FMS E&S Focal Points. |

| | | | entitlements and measures to mitigate risks and negative impacts, as well as the enhance positive impacts.

Understand the perceptions of the target communities on the planned activities and how best to design the project to address community needs.

Receive feedback from the target communities about their concerns, issues and perceptions of the overall project implementation.

Provide information on key project information related to E&S and GBV risks, especially on reporting and response services/protocols. | |
| comprising women, youth, IDPs, Traditional Ethnic Minorities, Persons with Disabilities (PWDs) and older persons, young mothers, female - headed households, Orphaned and Vulnerable Children. | Meetings will also be held with legitimate representatives of Traditional Ethnic Minorities.

Dissemination of project information through local radio stations and digital platforms such as social media as well as and use of printed materials such as brochures and flyers containing relevant project information.

Public campaigns conducted in Somali dialects (Maay and Maxaa Tiri), to foster community awareness, inclusivity, training, and civic engagement.

Undertake urban forums involving diverse groups, including women, those from minority clans and other vulnerable individuals and groups. | | | |
	Display of relevant project information on, social media platforms, FGS and FMS websites.	Throughout the project cycle.		
	Periodic surveys for sampled community representatives including vulnerable groups where targeted project services are provided.	Annually.		
	IEC materials such as brochures, posters billboards displaying project information in local language will also be developed and displayed.	Throughout the project cycle.		
Community based/local institutions such as CBOs, clan and religious leaders	Meetings will be held with community institutions, local leaders and legitimate representatives of the	Before the launch of activities and on quarterly basis through project	Create awareness on the project's objectives, expected results, activities,	FGS Social specialist /GBV Specialist and FMS E&S Focal Points.

or Imams and legitimate representatives of Traditional Ethnic Minorities.	Traditional Ethnic Minorities. IEC materials such as brochures, posters displaying project information in local language will be shared during the meetings for further redistribution in their respective communities. Dissemination of project information through local radio stations and digital platforms such as social media to foster community awareness, inclusivity, training, and civic engagement.	implementation phases.	target beneficiaries and project timelines. Raise awareness on potential E&S risks, impacts, opportunities, benefits, rights and entitlements and measures to mitigate risks and negative impacts, as well as the enhance positive impacts. Receive feedback from the community -based institutions regarding the concerns, issues and perceptions of the target communities on the overall project implementation.	
FGS and line ministries, departments, and government agencies directly supported by the project. FMS and local government entities.	High-level policy meetings at FGS-FMS and local government level. Working sessions with FGS and FMS technical departments, agencies and local government counterparts. Technical meetings with technical staff at both levels of government to review project progress and incorporate learnings. Periodic public meetings at the municipality for community feedback is necessary.	At the launch of project activities and twice yearly.	Raise awareness potential E&S risks, impacts, opportunities, benefits, rights and entitlements and measures to mitigate risks and negative impacts, as well as the enhance positive impacts. Review the project E&S performance and strategies for strengthening the same. Review performance of the project and worker GM processes	FGS and FMS Secretariats. FGS Social specialist /GBV Specialist and FMS E&S Focal Points.
People who will benefit from the project interventions, project-related employment e.g. various categories of workers in FGS, FMS and local government administrations	Conducting regular physical and virtual meetings to review project progress. Undertaking periodic surveys to assess job satisfaction. WhatsApp groups formed to share information and	Throughout the project cycle.	Provide timely access to relevant project information. Receive feedback on beneficiaries on any E&S risks and impacts (positive and negative) of concern and appropriate measures to effectively address E&S risks	FGS and FMS Secretariats. FGS Social specialist /GBV Specialist and FMS E&S Focal Points.

including direct , contracted, community and primary supply workers.	Suggestions. Sessions to review performance of the project GM and identifying strategies for its enhancement.		To create awareness on the project GM, assess its performance and identify strategies to enhance its effectiveness	
UN, international and local NGOs and bilateral donor agencies.	Donor, sectoral/cluster level meetings Knowledge sharing forums on social cohesion, inclusion, resilience and climate change.	Throughout the project cycle.	Receive feedback on project implementation and guidance on the management of E&S risks and negative impacts and enhancement of benefits. Strengthen collaboration and a multi-sectoral approach to services including to GBV/SEA/SH survivors.	FGS and GMS Secretariats. FGS Social specialist /GBV Specialist and FMS E&S Focal Points.
Civil society organizations, private sector.	Public meetings for information and knowledge sharing.	Throughout the project cycle.	Receive feedback on project implementation and guidance on the management of E&S risks and negative impacts and enhancement of benefits.	FGS and GMS Secretariats. FGS Social specialist /GBV Specialist and FMS E&S Focal Points.

5.   Stakeholder Engagement Plan

30.   This Stakeholder Engagement Plan (Table 8) indicates the methodology for stakeholder engagement and information disclosure. Formats to provide information may include presentations, printouts, non-technical summaries, project leaflets, non-literate diagrams and posters and pamphlets, depending on stakeholder needs.

Table 7: SEP Summary Table

Project stage	Target stakeholders	Topic of consultation / message/activity	Method used
Before implementation.	**Project-Affected Parties**: Target communities living within project area where project activities are implemented including vulnerable individuals and households comprising women, youth, IDPs, Traditional Ethnic Minorities, Persons with Disabilities (PWDs) and older persons, young mothers, female - headed households, Orphaned and Vulnerable Children.	General discussion regarding the project activities, benefits and opportunities, E&S risks and potential mitigation measures and GM.	Public meetings held during the preparation and separate Focus Group Discussions for men and women. Disclosure of written information - widespread Radio, TV (in parts of the country), social media, mobile phone. Brochures/flyers translated in Somali. Monthly public meetings and public campaigns conducted in Somali dialects (Maay and Maxaa Tirir) held during the preparation and where necessary, separate Focus Group Discussions to be held for men and women. All sessions to be conducted in Somali language.
	o FGS level ministries and departments and agencies directly engaged in the project delivery. o FMS level ministries and departments, agencies and local government (municipality departments, municipal councils, and district offices.	Technical details of the project including the potential E&S risks and impacts and mitigation measures. Awareness-raising on the project, and GM, SEP LMP, and the SEA/SH Prevention and Response Action Plan disclosure. Disclosure of the finalized E&S plans including the SEP, SEA/SH Prevention and Response Action Plan, GM and the LMP.	Public and individual meetings during the preparation of the project documents. Face to face meetings with concerned agencies and departments at FGS and FMS level. Disclosure of written information - widespread Radio, TV (in parts of the country), social media, mobile phone. Brochures/flyers with project information translated into Somali.
	o People who will benefit from the project interventions, project-related employment e.g. workers in FGS, FMS administrations).	General discussion regarding the project activities, benefits and opportunities, E&S risks and potential mitigation measures and GM. Awareness-raising on the project, and GM, SEP LMP, and the SEA/SH Prevention	Public meetings held during the preparation and separate Focus Group Discussions to be conducted for men and women. Engaging legitimate representatives of the communities including clan elders, community elders, religious leaders or mosque imams, and youth representatives.

		and Response Action Plan disclosure.	
	Other interested parties: Development partners, CSOs, media, UN Agencies etc.	Technical details of the project including E&S risks of the project and potential mitigation measures. Awareness-raising on the project, and SEP LMP, GM and the SEA/SH Prevention and Response Action Plan disclosure.	Public meetings during the preparation of the project documents. Disclosure of written information through brochures, flyers, posters, websites, social media communication and translated in Somali.
During project implementation.	Project-Affected Parties as captured above.	Plans for implementation of SEP, LMP, GM, SEA/SH Prevention and Response Plan, and LMP. Meetings to provide regular updates and progress on implementation of the E&S plans (SEP, GM, LMP and SEA/SH Prevention and Response Action Plan). Discussions with minority VMGs about the project with feedback generated. Engagement on complaints about project implementation. General discussion regarding the project progress and extent of participation and access to project benefits by vulnerable individuals and groups.	Public forums and FGDs with beneficiaries including minority VMGs and other disadvantaged groups. Periodic community feedback sessions conducted in Somali dialects. Printed materials containing relevant project information disclosed to the target communities including disadvantaged and vulnerable individuals and groups. Engaging clan and community elders, religious leaders or Imams, and youth representatives. Monthly public meetings and public campaigns conducted in Somali dialects (Maay and Maxaa Tirir) held during the preparation and where necessary, separate Focus Group Discussions (FGDs) to be held for men and women.
	Interested Parties as captured above.	Regular updates on project progress and E&S mitigation measures.	Printed materials (newsletter, flyers); Program progress reports; Regular project meetings; Social Media platforms.
Monitoring, evaluation and reporting.	Project-Affected Parties as captured above.	Regular updates on project progress and implementation of E&S mitigation measures, status of grievance resolution, stakeholder engagement program etc.	Public forums and FGDs with beneficiaries including minority VMGs and other disadvantaged groups.

Interested Parties as captured above.	Regular updates on project progress and implementation of E&S mitigation measures.	Monitoring and Evaluation meetings; Regular project meetings; Program progress reports; Social Media platforms.

6.   Vulnerable or Disadvantaged Individuals or Groups

The World Bank's directive on addressing risks and impacts on vulnerable or disadvantaged individuals or groups outlines the obligations of the Borrower regarding these groups during project preparation, implementation and monitoring. The directive requires due diligence to identify and mitigate risks and impacts on individuals or groups who may be more vulnerable to project impacts, including those based on age, gender, ethnicity, disability, and other factors.

Consistent with ESS10, vulnerable or disadvantaged groups within the project are the stakeholders who may be disproportionately impacted or further disadvantaged by the project as compared with other groups due to their vulnerable status. They are more likely to be excluded from or are unable to fully participate in the mainstream consultation process. It is therefore important to put in place targeted measures/interventions to ensure that they can effectively participate in project consultations processes free of coercion and duress. In the case of BULSHO, such individuals or groups include persons with disabilities, women, older persons, youth, orphans and traditional ethnic minorities, among others. As such, projects are required to map these groups, assess project risks and impacts on them, and identify differentiated mitigation measures as they pertain to the disadvantaged or vulnerable individuals or groups that are identified. They may also require special engagement efforts to ensure their equal and effective representation and participation in the consultation and decision-making processes, including in taking advantage of benefits and opportunities associated with the project.

Traditional Ethnic Minorities: The Bank assessed the applicability of ESS7 and determined that f**our** groups **–** Bajuni**,** Bantu, Eyle and Gabooye/Tumal/ Yibir meet the criteria to be identified as traditional ethnic minorities. These groups are likely present in target districts and communities where the project is implemented. To this end, MoIFAR has prepared this Stakeholder Engagement Plan (SEP) with section 6 dedicated to addressing the inclusion of vulnerable or disadvantaged individuals or groups, including traditional ethnic minorities.

MoIFAR did not engage traditional ethnic minorities during the design stage due to time limitations. However, once the project becomes effective, MoIFAR shall undertake detailed and meaningful consultations with them and update and redisclose the SEP. The updated SEP shall highlight the consultation methods and means of communication preferred by traditional ethnic minorities based on cultural practices. The SEP will also lay out the actual process and provide more details on the concrete steps to be carried out for agreeing on the consultation plan with vulnerable stakeholders, including traditional communities, and then carrying out such consultation.

6.1 Strategies for Inclusion of Vulnerable or Disadvantaged Individuals or Groups

31.   The project implementation teams will ensure effective engagement of vulnerable or disadvantaged individuals or groups to ensure their needs and concerns in terms of accessing information, services, project benefits and opportunities, and any other challenges experienced during project implementation are timely addressed. Organizations working with or representing the

interests of these groups including Civil Society Organizations (CSOs) and CBOs will be consulted in the respective areas of operation on how best to ensure inclusivity.

32.   Special sessions will be held with such groups to ensure their needs are captured and voices heard including where necessary conducting separate FGDs for women and youths amongst them. The project will endeavour to enhance women participation by providing transport facilitation as well as childcare opportunities, (ii) engaging current women's organizations or establishing new ones to ensure that women's voices are heard, and their needs are met and (iii) including youth representatives to connect with younger populations and gather their insights on priorities and concerns.

33.   Culturally, women do not take the role of elders and cannot be selected as community elders. While there might be resistance to placement of women in senior roles, sustained sensitization campaigns can address these challenges effectively. Good progress is already being made in this regard as women are able to take lead positions in local committees in areas such as Kismayo.

34.   The project team will also use female facilitators to ensure women have appropriate space and a safe environment to air their views. Besides these, the project team will adopt the following strategies recommended by the consulted stakeholders.
- o Utilize preferred methods for receiving project related information through public meetings, formal letters, emails, community outreach programs, sign boards and by mobile phones and social media;
- o Conduct periodic community feedback sessions and use of printed materials such as brochures and flyers containing relevant project information
- o Establish community advisory boards or community-based steering committees with representatives from all clans and marginalized groups to ensure inclusivity.
- o Provide regular feedback mechanisms, such as surveys and grievance management platforms can promote inclusivity.
- o Engage district and ward-level administrators, women's representatives, disability rights organizations, and NGOs championing the interest of marginalized individuals and groups to enhance inclusivity.
- o Undertake effective consultation and engagement with clan elders at the local government and FMS level, religious leaders, women's group leaders, and youth association heads, local NGOs working with and championing the interest of vulnerable individuals and groups.
- o Establish a clear and accessible grievance redress mechanism, involving traditional elders in dispute resolution, and maintaining transparency through regular public updates. Confidential reporting channels should also be made available. Preferred channels for raising grievances include direct reporting to project staff and use of toll-free lines.
- o Utilize open and transparent selection criteria for job recruitments, engaging local leadership, minority groups and utilizing geospatial mapping tools to identify underserved areas and routinely assess their participation.

35.   Further the project will undertake the following to ensure effective participation of vulnerable or disadvantaged individuals or groups;
- o Identify, map and document community governance structures currently operating in the respective project sites.
- o Identify local CSOs and CBOs working with and championing the interest of these groups. This will also require the FMS Secretariat to make reasonable efforts to verify that such persons do, in fact, represent the views of such individuals and communities, and that they are facilitating the communication process in an appropriate manner. The protocol for verification of the legitimacy of such organizations is provided in section 6.2.
- o Ensure continued involvement and engagement of the identified community-based governance structures in all the project processes including targeting and engaging project beneficiaries.

- o Seek input/feedback of the identified community-based governance structures and other stakeholders to avoid or minimize the potential E&S risks and impacts associated with the planned interventions on these groups.
- o Address the barriers (highlighted in Table 6) that are likely to impede their access to project benefits and opportunities. The mitigations to address the barriers as provided by the stakeholders engaged include focused awareness campaigns, ensuring timely access to project information and that all beneficiary communities are involved and informed, providing transport facilitation for remote participants, and ensuring safe and culturally sensitive meeting environments. Further, the beneficiary selection criteria and process needs to be publicly and extensively disclosed to all stakeholders prior to commencement of the process and should also involve diverse community leaders.

36.   Consultations will be carried out prior to the commencement of project activities and throughout implementation, there will be continuous stakeholder engagement that will ensure the active involvement of vulnerable or disadvantaged individuals or groups. In this regard, the project teams will:
- o Disclose all relevant project information including potential E&S risks and impacts, as well as their rights and entitlements in a timely and culturally appropriate manner ensuring meaningful consultations and provision of feedback. All project E&S plans will be disclosed and made available in hard copies, at easily accessible locations such as village offices and community centers.
- o Conduct meetings in a language(s) understood by these groups and if that is not vernacular language, translation will be provided. PWDs will be provided with information in accessible formats.
- o Announce meetings in a timely manner (a minimum of 7 days in advance). Stakeholders shall be mobilized using notices posted in public spaces, clan and religious leaders, Grievance Committees at the community level, local radio and TV stations, and social media platforms, among others.
- o Facilitate their broad participation with adequate gender and intergenerational representation. The participation of women in the preliminary consultations at design was fair, however, a lot more could be achieved through engaging female facilitators, providing childcare opportunities, and facilitating transport to access meeting venues.
- o Ensure communication methods are appropriate given the low level of literacy among them as well as the communication challenges for PWDs.
- o Ensure adequate and ongoing consultation based on a pre-agreed consultation plan (and in line with this SEP) with them in a manner that is free of external manipulation, interference, coercion, discrimination, and intimidation. The project team shall consider and respond to feedback promptly and, document and disclose all consultations held, clearly providing minutes and signed list of attendance. Further, the project shall provide regular updates on project progress and organize feedback sessions and /or mechanisms for communities to effectively provide input to the project as implementation continues.
- o Organize and conduct the consultations in forms that ensure free expression of their views and preferences.
- o Document details of all consultation meetings on their perceptions towards the project activities and the associated impacts, especially adverse ones.
- o Share any input/feedback offered by them; and provide an account of the conditions agreed with the people consulted.

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

- o Establish an effective mechanism for monitoring implementation of the project activities by the FGS and FMS Secretariats, including the E&S team.
- o Involve suitably experienced CBOs and CSOs to engage these groups through developing and implementing targeted action plans that are issue focused (e.g. on recruitment of women and PWDs).
- o Ensure adequate representation of the vulnerable individuals and groups in all project governance structures.
- o Design and publicly disclose the project grievance mechanism that is SEA/SH-responsive . The E&S and GBV specialists at the FGS level and E&S focal points at the FMS level will be instrumental in sensitizing vulnerable individuals and groups on the project GM including the grievance management structures, escalation tiers and uptake channels. Feedback on reported grievances will be provided to all the vulnerable individuals and groups in a timely manner as described in the project GM. The project GM shall incorporate existing traditional dispute resolution mechanism as the first tier. The E&S teams will ensure that all concerns/conflicts are addressed promptly and effectively, in a transparent manner that is culturally appropriate. All received grievances including those reported anonymously shall be logged, dated; processed, resolved and closed out.
- o For effective engagement and participation of vulnerable individuals and groups, the FGS and FMS Secretariats will ensure that relevant project information disclosed is;
    - o Accurate, up-to-date and easily accessible.
    - o Articulates the principle and rationale for the various strategies being used by the project at the different levels.
    - o Includes an indicative timeline and phasing of the project activities in the respective districts.
    - o Includes explanation of measures that will be used in the selection of workers and how the effects on the public and communities will be minimized; and
    - o Includes information on where target communities and other stakeholders can go for more information, ask questions, channel their complaints and grievances, and provide feedback (and contact persons as appropriate) and acts on their feedback appropriately and confidentially.

6.2   Legitimacy of Representatives of Vulnerable or Disadvantaged Individuals or Groups

To ensure effective engagement of vulnerable groups and specifically the Traditional Ethnic Minorities, the project team will need to establish the legitimacy of organizations claiming to represent their interests prior to their engagement. This is to ensure that they are the genuine advocates of the community and their interest. Once their legitimacy is confirmed such representatives will be useful in i) providing helpful insights into the local settings, ii) act as main focal points for dissemination of BULSHO-related information and iii) serve as a primary communication/liaison link between the Program and their established networks. To confirm legitimacy of such representatives (more details will be provided in the POM), the SGS and FMS teams will undertake:

- o Informal inquiry regarding such organizations from a sample of community members drawn from vulnerable groups in the respective communities during initial engagements with the Program.
- o Formal inquiry through conducting Focus Group Discussion (FGDs) with the community members.
- o Engagement of local leaders such as the clan leaders and religious leaders.
- o Engagement of respective E&S Focal Points in the respective FMS and local government to verify legitimacy of community representatives and representing organizations from the official CBO registration records.

o Drawing on lessons and experiences from similar WB financed projects previously implemented and or currently ongoing within the similar geographical areas. Such projects may include Costs and Reform Financing (RCRF) project, the Somalia Crisis Recovery Project (SRCP), and the Somalia Urban Resilience Project (SURP) among others.

7   Resources and Responsibilities for Implementing the SEP

7.1.   Institutional Implementation Arrangements

38.   The FGS MoIFAR will be the lead agency responsible for the overall implementation and supervision of the project, including this SEP in close cooperation with the Ministry of Finance and sector lines ministries. At FMS-level, the MOI of each state will lead the implementation of the BULSHO program including the SEP in their respective states. The government's BULSHO program includes the following implementation structures:

39.   **Program Steering Committee (PSC).** Composed of senior level representatives (ministers or deputy ministers) from relevant FGS ministries and FMS MoI, as well as senior donor representatives. Chaired by the MoIFAR Minister and co-chaired by FMS MoI Minister on rotation basis. Primary role is to make strategic decisions, including approving the yearly work plans and budget allocations.

40.   **Technical Working Group (TWG).** Composed of the MoIFAR Director General (DG), DGs of FMS Ministries of Interior. Chaired by FGS MoIFAR DG and co-chaired by FMS MoI DG on rotation-basis. Primary role is to guide and oversee the implementation of the BULSHO program. It will hold preparatory meetings for the PSC meetings. It will involve a number of government agencies from FGS, and FMS when relevant, covering the relevant sectors.

41.   **National and State Secretariats (**Project Implementation Unit - Secretariats). The National (FGS) Secretariat will work under the oversight of the TWG. The FMS Secretariats will work under FMS DGs and be coordinated by the National Secretariats. The Secretariats will have the responsibility for the day-to day project management. In the first phase of BULSHO, the Secretariat will be composed of a dedicated team of technical specialists, who coach, and train will staff from MoIFAR/MoI Departments of Local Governance. In the second phase, MoIFAR/MoI Departments of Local Governance will take over the specialist team.

42.   **E&S Capacity:** At the FGS level, the Secretariats will be managed by a Project Coordinator (PC) engaged for this purpose. To meaningfully support the implementation of the legally binding Environmental and Social Commitment Plan (ESCP) measures, MoIFAR will recruit qualified and experienced Environmental Specialist, Social Specialist and GBV-SEA/SH Specialist. Further, each participating FMS will engage a Project Manager and appoint E&S Focal Points. In this arrangement, the MoIFAR PC will provide strategic direction with respect to the SEP, led by the Social Specialist and GBV-SEA/SH Specialist, supported by the E&S Focal Points in each of the participating FMS.

43.   The MoIFAR however, lacks prior experience in implementing WB funded projects and has limited knowledge if any, in the application of the WB's ESF and the related ten Environmental and Social Standards (ESSs). Under this context, the project team and especially the E&S team at the FGS and FMS levels   i will participate in continuous capacity strengthening sessions on E&S risk management and application of ESF instruments and supported by the WB project team throughout implementation cycle.

44.   The overarching implementation and monitoring of the SEP will be the responsibility of the National Secretariat. The direct responsibility of implementation will be designated to the National Social Specialist- assisted by the E&S Focal Points in each of the participating FMS. The National Social Specialist will work with other ministry and state-level E&S Focal Points to ensure that the objectives

of the SEP are met and with the appropriate allocation of the necessary resources for its implementation.

7.2   Resources

43. The MoIFAR will ensure that adequate funds are allocated from the overall project cost, for implementation of the SEP. The budget will be used to cater for costs related to organizing meetings, workshops and training, hiring of staff, field visits, translation and printing of relevant E&S materials. Reports on stakeholder engagement and a summary of grievances received will be submitted to the National Social and GBV specialists by the E&S Focal Points at the FMS level every month. In turn, the Social and GBV specialists will share the same with the WB on a quarterly basis The E&S Focal Points at FMS level will receive training on E&S risk management from the E&S and GBV specialists at the FGS level supported by the WB project team.

44. The SEP will also include resources for implementing the project GM and will be referenced when developing the detailed work plan. The budget estimate for implementing SEP for 5 years is US$ 320,250 as presented under Table 8. The budget includes costs related to awareness creation of beneficiaries and local leadership, induction of project workers on the provisions of the BULSHO E&S instruments as well as a single budget to monitor the implementation of all E&S aspects.

Table 8: Estimated Budget for Implementing the SEP

Item	Budget basis and Assumption	Total Cost (US$)
1. Capacity Building: (awareness creation, induction and trainings on E&S provisions)		
Summarize key provisions of E&S instruments (SEP, SEAH Plan, LMP, ESCP).	Once per year	To be undertaken by the Social /GBV Specialist at FGS level
Prepare information Education Communication materials (leaflets, posters, brochure, banner on project and GM, GM forms, registers in Somali).	Once per year	15,000
Train project staff at FGS and FMS on the provisions of the E&S instruments.	Twice per year	30,000.
Train contractors and other implementing partners on stakeholder engagement, GM implementation, Monitoring, and reporting on E&S.	Twice per year	40,000
Sensitize project beneficiaries, and local leadership on the provisions of the E&S instruments at FMS and community level.	Twice per year	20,000.
FM radio press conferences and call ins.	Twice per year at FGS and FMS level	45,000
2. Compliance Monitoring on Implementation of E&S Provisions		
Stakeholder engagement at FGS level to update on project progress.	Quarterly	20,000
Stakeholder engagement at FMS level to update on project progress.	Quarterly	40,000
Monitoring compliance and extent of implementation of ESF instruments including the SEP.	Quarterly	40,000
3. Grievance Management		

Develop and operationalise the project, worker GMs including a separate GM for handling SEAH related grievances.		50,000
Maintain the toll-free line.	Yearly	5,000
Total Estimated Budget		**305,000**
Contingency (5%)		**15,250**
Grand Total		**320,250**

8   Grievance Mechanism

45. The stakeholder consultations undertaken during project preparation (more details under Section 4.2) revealed that some of the most common types of conflicts in the project area include among others resource allocation disputes, inter-clan rivalries, and disputes over project prioritization, discrimination and marginalization of vulnerable individuals and groups, conflicts arising from differing cultural practices and beliefs, disparities in wealth and access to economic opportunities.

46. The identified sources of conflict are consistent with the findings of the initial E&S risks assessment conducted by the WB team and the proposed project is therefore likely to exacerbate these conflicts given the limited project resources against the widespread needs of the target communities. This concern is further amplified by MoIFAR's lack of prior experience in implementing WB funded projects and their limited knowledge if any, in the application of the WB's ESF and the related Ten Environmental and Social Standards (ESSs).

47. Some of the key recommendations to manage project related grievances made by the consulted stakeholders are as follows:
   o Conflicts are typically resolved through dialogue and mediation by elders, local councils, and religious leaders and traditional conflict resolution mechanisms remain strong. There is therefore a need to establish a clear and accessible grievance mechanism, involving traditional elders to assist in dispute resolution, and maintaining transparency through regular public updates and providing channels for confidential reporting.
   o Preferred channels for reporting grievances include direct reporting to project staff, use of suggestion boxes in community centers, and anonymous hotlines. Further it is necessary to train project staff in conflict resolution, establishing a grievance committee with diverse representation of key stakeholders, and conducting regular monitoring on grievance resolution and management.
   o The proposed project needs to address grievances through a dedicated municipal grievance desk and provide various uptake channels including a 24/7 toll-free hotline for ease of reporting grievances, suggestion box, social media grievance wall, and a community grievance committee. The municipality with appointed elders to oversee the process, ensuring transparency and timely resolution. If needed, the Ministry of the Interior and the police will intervene.

48.   Under this context, and consistent with the stakeholder recommendations, the project team needs to put in place and operationalize a robust four tier GM to effectively address conflicts/complaints that may arise during project implementation.

8.1 Project Grievance Mechanism

49.   In line with the ESS10 requirements, the National Secretariat will establish and operate a Grievance Mechanism (GM) to ensure effective management of grievances that may arise in the course of project implementation. The GM needs to be readily accessible to all project-stakeholders, at no cost and without retribution. The GM is also expected to address project related concerns promptly and effectively, in a transparent and culturally appropriate manner. Further, the Secretariat

will ensure that the GM is well documented, and all its processes publicly disclosed to enhance its accessibility by all stakeholders including target communities. The National Secretariat and specifically the Social and GBV specialists in close cooperation with the Project Coordinator (PC) will assume the lead responsibility for resolution of all projects related grievances in accordance with the laws of FGS, the participating FMS and the WB ESSs.

First Tier: (Federal Government State Level Grievance Committee)

50.   A Grievance Committees (GC) will be established at the national level and chaired by the Project Coordinator (PC) while the Social Specialist will serve as the secretary, as well as the key Focal Point in charge of grievance management under the project. The main task of the committee is to review progress on complaints resolution and assess overall effectiveness of the GM. Membership to the GC will include staff responsible for procurement, finance, Monitoring and Evaluation (M&E), and communication, among others. In addition, staff from the relevant line Ministries at the FGS level will be invited as required.

Social Specialist at the National Level

51.   Specifically, the Social Specialist will:
   o   Coordinate the formation of Grievance Committees (GCs) at the FGS and FMS levels prior to commencement of project activities;
   o   Support resolution of all projects related grievances in collaboration with FMSs E&S Focal Points and communities ;
   o   Maintain and regularly update the overall project GM log detailing grievances, received, resolved, and closed;
   o   Monitor the performance of the GM through quarterly audits and recommend any corrective actions as appropriate;
   o   Compile and prepare consolidated quarterly GM monitoring reports and submit to the WB through the National PC;
   o   Liaise with the PC to ensure adequate resources are allocated for implementing the GM;
   o   Facilitate GM trainings for BULSHO staff and stakeholders in the counties as well as information dissemination to beneficiaries in liaison with FMS.

Second Tier: (Federal Member State Level Grievance Committee)

52.   A Grievance Committees (GC) will be established in each of the participating States and will be chaired by Project Coordinators while the E&S Focal Point for each FMS will serve as the Secretary. Membership to the GCs will include staff responsible for procurement, finance, Monitoring and Evaluation (M&E), and communication, among others. . In addition, staff from the relevant Ministries at the FMS level will be invited as required. For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, the E&S Focal Point should immediately inform the Social and GBV Specialists at the FGS level, who will inform the World Bank within 48 hours as per the Environmental and Social Incident Response Toolkit (ESIRT).

53.   The FMS Secretariat in close cooperation with the Project Coordinator will designate the E&S Person as the FP for grievance management with the following responsibilities:
   o   Serve as the main FP for grievance management at the state level;
   o   Create awareness of the GM amongst all the stakeholders at the state level;
   o   Register, categorize, analyse, resolve and escalate grievances submitted to the FMS and provide feedback to the aggrieved;
   o   Maintain the GM log in both soft and hard copies;
   o   Follow up on pending issues with the community, state and national level grievance committees;

- o Identify gaps and recommend actions for improving the GM to the national and state level Secretariats;
- o Prepare monthly/quarterly reports on all grievances received and processed and submit to the National Secretariat;
- o Build the capacity of the project staff at the FMS level and community level grievance committees on grievance management;
- o Monitor performance of the project GM by taking periodic audits of all GM activities at the FMS and community levels.

54.   The entry point for all grievances at the State level will be the E&S Focal Point who will receive grievances, acknowledge, log, forward, follow up on grievance resolution and inform the complainant of the outcome. The complainant has the right to remain anonymous, in which case their identifying details will not be logged. Measures will also be put in place to ensure whistle-blower protection. Grievances related to the overall project will be dealt with by the National Secretariat while those regarding project activities at state level will be resolved in conjunction with respective FMS Secretariats. The FGS Social and GBV Specialists will train FMS E&S Focal Points and staff from relevant ministries at state level, as well as community grievance committees on complaints handling and reporting.

Third Tier (District Level Grievance Committee)
55.   At the District level, a GC will be formed but will draw its membership from relevant departments and agencies. s. The project team will document and disclose the GC in the respective districts. The Project Coordinator in close cooperation with the Social and GBV Specialists, E&S Focal Points and the respective Districts GC, will designate one member to be the GM FP and together be responsible to receive, log and resolve complaints where possible or if not the District GC will refer the grievance to FMS grievance focal person who will then present it to the FMS GC for resolution. If the FMS GC is unable to resolve the grievance, then it will be referred to the Social and GBV Specialists who will convene the national GC at the FGS level to address the grievance.

Fourth Tier (Community Level Grievance Committee)
56.   At the village level, a GC will be formed but will draw its membership from grievance redress mechanisms currently existing within the respective villages currently comprising village, clan, religious and village elders as well as representatives from the local council. As described during the stakeholder consultations, traditional conflict resolution mechanisms remain strong in Somalia and conflicts are typically resolved through dialogue and mediation by clan elders, local councils, and religious leaders. Where applicable and especially within Traditional Ethnic Minorities, the GC at this level will consist of the tradition grievance redress structures currently existing within such communities. The project team will document and disclose such structures as substantive GC in the respective villages. The Project Coordinator in close cooperation with the Social and GBV Specialists, E&S Focal Points and the respective community GC, will designate one member to be the GM FP and together be responsible to receive, log and resolve complaints where possible or if not the community GC will refer the grievance to District grievance focal person who will then present it to the District GC for resolution. If the District GC is unable to resolve the grievance, then it will be referred to FMS GC who will in turn escalate to the Social and GBV Specialists if unable to resolve. The Social and GBV Specialists will convene the national GC at the FGS level to address the grievance.

8.2 Grievance Redress Process Steps
The project will adopt the following steps in resolving project related grievances.

Step 1: Reporting and Receiving Grievances
57.   The National Secretariat and close cooperation with the Social and GBV Specialists and E&S Focal Points will sensitize all project staff and stakeholders on the project GM including where and

how to submit grievances. The national and state level Secretariats will ensure that various grievance uptake channels are provided at all tiers of grievance resolution before commencement of project activities. Grievances can be submitted by email, publicized toll-free phone lines managed by the Social and GBV Specialist at the FGS level, letters, walk-ins to FGS and FMS offices, verbally through project GM Focal Points at both FGS and FMS levels or through community level grievance focal points, use of anonymous/suggestion boxes in community centers. The project GM will not prevent access to judicial or administrative remedies. The project team will inform all stakeholders about the grievance process in the course of its community engagement activities and will make publicly available a record documenting the responses to all grievances received. The project GM will also allow receipt and resolution of anonymous complaints and will incorporate existing traditional grievance mechanisms. The grievance uptake channels are presented in Annex 4.

Step 2: Recording and processing of grievances
Documentation of complaints and grievances is important, including those that are communicated informally and orally. Records provide a way of understanding patterns and trends in complaints, disputes, and grievances over time. While transparency should be maintained for example, through regular reports on issues raised and rates of resolution, – provision should also be made for confidentiality of information or anonymity of the complainant(s) especially where SEA/SH cases are involved. At both the FGS and FMS levels, all submitted complaints and grievances will be entered into the grievance log/register and archived including all scanned documents received or related to the case along the process. A sample grievance log is provided in Annex 3 Once logged, the grievance should be assessed, assigned to an individual for management, tracked and closed out or "signed off" when resolved, ideally with the complainant(s) being consulted, where appropriate, and informed of the resolution.

58.   The FGS, FMs, District and community level GM structures will maintain a grievances log in which complaints received by GM FPs or other project staff, either in written or verbal form, are entered. A grievance log should capture the following information:
- o   Serial number,
- o   Reference number,
- o   Uptake channel used,
- o   Name and address of the complainant/s,/their representatives/if anonymous,
- o   Date of complaint,
- o   Summary of the complaint/grievance,
- o   Signature of the complainant/s,
- o   Category,
- o   Resolution process (Not commenced/In process/Completed),
- o   Referred,
- o   Signature of the complainant/s.

Step 3: Reviewing and Investigating and Resolution of Grievances
59.   All grievances will need to undergo some degree of review and investigation, depending on the type of grievance and clarity of circumstances. Once the grievance is well understood, resolution options can be developed taking into consideration stakeholders' preferences, project policy, past experiences, current issues, and potential outcomes.

Step 4: Feedback mechanism
60.   One of the most important steps of the project GM is to provide clear feedback of outcome to the complainants. The GM FPs at the FGS, FMS, District and community levels, are responsible to give feedback to the complainants via email, message, phone call or verbal. The complainants must know that their complaints were recorded by the GC's and that the issue is being investigated. In case of anonymous complaints, acknowledgement will not be possible. The complainants shall receive

acknowledgement feedback within 7 working days after the issue is reported. The resolutions agreed upon must also be recorded in the grievance log for purposes of tracking grievance management and reporting. The project GM will use various approaches for **acknowledgment and communicating the grievance outcome and this includes:**

   a. **Email/messaging**: Either an automatic or manual reply will be sent to the complainants confirming the receipt of their complaints and getting back to them after analysing it. The complainant, who has sent his /her grievance through email, will receive the final feedback through email.
   b. **Grievance resolution form**: A printed, or soft copy grievance resolution form will be used. The form and other GM related templates (grievance acknowledgement form, grievance log template, GC meeting format, and grievance resolution form) are provided in Annex 3.
   c. **Phone call:** The complainant, who has shared his/her grievance through mobile, will also receive feedback through a call by relevant GM FP, or verbally.

Step 6: Monitoring and Reporting of Grievance Mechanism

61.   Monitoring and reporting can be a useful tool for measuring the effectiveness of the GM and for determining broad trends and recurring problems so that they can be resolved proactively before they become points of contention. Monitoring and reporting create a base level of information that can be used to report to communities. To ensure smooth operation of GM, the GM FPs at all levels will conduct frequent supervisions and monitoring missions on GM to ensure that it is functioning as anticipated and GM aspects are included in regular reporting mechanism. The status of grievances received and resolved or escalated will be reported by State level GM FPs on a monthly basis. The GM reports will be submitted to the national level GM FPs (who serves as the main GM FP) for compilation and submission to the WB in consultation with the National level PC.

8.3   Workers Grievance Mechanism

62.   Typical work-place grievances include fair and equal opportunity for employment; discrimination, labour wages rates and delays in payment; disagreements over working conditions; and health and safety concerns in work environment. Therefore, in line with the ESS2 requirements, a separate GM will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the GM at the time of recruitment and the measures put in place to protect them against any reprisal for its use. A separate Grievance Mechanism for community workers will be operationalized.

63.   Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers enabling to prevent, mitigate, or resolve tensions and problems before they escalate into more serious issues that will require extra resources to address. The GM will also allow for anonymous complaints to be raised and addressed. Individuals who submit their grievances may request for confidentiality which needs to be safeguarded to ensure safety and freedom of workers that lodged complaints including ensuring whistle blower protection. The Secretariat will investigate any suspected breach of confidentiality where it has been requested.

64.   The GM will be designed to address concerns using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution. The GM may utilize existing grievance mechanisms, providing that they are properly designed and implemented, address concerns promptly, and are readily accessible to such project workers. Existing grievance mechanisms may be supplemented as needed with project-specific arrangements. The worker GM will not impede access to other judicial or administrative remedies that might be available under the law or through arbitration procedures or mechanisms provided through collective agreements.

65.   Project staff at the FMS and FGS level will be encouraged to raise concerns with their

immediate supervisor in the first instance. However, if the concern relates to the project, the staff can also raise it via the E&S Focal Points at the FMS level who will in turn forward to the FGS and/or FMS Project Coordinators.

66.   For all contractors, a workers GM will be required and included in bidding documents and contracts. If the contractor does not have a GM in place for contracted workers, the direct workers' GM will be made available to them. Further, a separate grievance mechanism for community workers consistent will be established. Sample templates for complaint registration, logging and reporting are provided under Annex 3.

Procedure of Management of Workers Grievance

67.   This section below outlines the procedure to be applied under BULSHO in addressing grievances between project workers and their employees or amongst project employees before the intervention of the formal court, except in cases where the grievance constitutes a criminal offense that requires notification of the law enforcement agencies.

a.   A code of conduct should be developed and translated into Somali. (Sample provided in GBV SEA/SH Prevention and Response Action Plan (SEA/SH Action Plan).

b.   All those with physical presence in project areas/project sites should receive an orientation on the code of conduct and the workers GM and sign a code of conduct outlining their rights and responsibilities regarding OHS requirements (including security protocols and SEA/SH prevention). All records of induction shall be kept and made available for inspection by the FGS and FMS Secretariats or the WB.

c.   In case of violation, the aggrieved employee must capture and present the details of the grievance to the immediate supervisor or the supervisor's superior in case of conflict of interest.

d.   The supervisor will verify the details and seek to address the matter within the shortest time up to 48 hours.

e.   If not resolved within 48 hours, the supervisor will escalate the matter until a resolution is found.

f.   Where no resolution is found, the employee can escalate the matter to the social /GBV specialists at the FMS level who will in turn forward to the Project Manager for resolution through the project GM. The Secretariat, in this case, will facilitate a fair agreement between the worker and the employer.

g.   If the grievance is still not resolved, the grievance will be escalated by the Social /GBV specialists at the FGS level to the sector specific institutions or FGS Secretariat or courts.

h.   Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to and handled through the Project GM. The Secretariat, in this case, will facilitate a fair agreement between the worker and the employer.

i.   The Contractor shall keep records of all proceedings of GM that are within its jurisdiction and furnish the FMS and FGS Secretariat as part of the periodic progress reporting to the Secretariat.

j.   All GBV SEA/SH related grievances should follow the SEA/SH Action Plan referral pathways and complaints resolution mechanism (more details are provided in the project (SEA/SH Action Plan

k.   In case of risk of retribution, the employee may immediately escalate to the court system or to the Secretariat as noted above.

8.4   Grievances related to Gender Based Violence (GBV)

68.   While the social risk rating of the proposed project is moderate, preliminary assessment of the project-related GBV SEA and SH risk is substantial. This is because project activities will likely be implemented in districts/communities where SEA/SH and other forms of Gender-Based Violence

(GBV), such as Intimate Partner Violence (IPV), are prevalent as a result of high insecurity, cultural norms, high levels of poverty and marginalization, severe spells of drought and famine, unemployment, low levels of literacy and project investments rolled out in a context of limited resources against widespread need.

69.   The FGS Social and GBV Specialists will be the main FP responsible for ensuring GBV related complaints are addressed. The E&S Focal Points at each of the participating FMS will also serve as the main focal points for handling GBV related grievances. Further, the project will provide various avenues for reporting GBV-SEA/SH cases. Such avenues include through the FGS Project Coordinator and the Social and GBV Specialists, FMS Project Coordinator and E&S Focal Points, , dedicate email and SMS and the toll-free line. Complaints relating to GBV- SEA/SH will be addressed immediately by referring the SEA/SH survivors to support services as per the GBV Referral Pathway (more details provided in SEA/SH Action Plan). In addition, the GBV Specialist at the FGS will have a dedicated telephone line, SMS service and email address where such complaints can be raised.

70.   In line with the survivor-centred approach, the grievance recipient to whom an allegation is disclosed will provide a safe, caring, and supportive environment. This means being non-judgmental, empathetic, and compassionate, and demonstrating emotional support to the survivor while clarifying relevant information. It also means respecting confidentiality and the wishes of the survivor. Once a case has been taken in by a GM operator or via the identified focal points, informed consent of the survivor is obtained to proceed with the case, the case file/information will be submitted to the FGS Social and GBV Specialists, who will ensure that the survivor has been provided with all necessary GBV referral services and he/she is safe.

8.5   World Bank Grievance Mechanism

71.   The overall responsibility of addressing the complaints is with the project implementing agency in this case MOIFAR in conjunction with the FGS Grievance Committee. If no satisfactory response is reached, affected people can contact the following to facilitate the follow up process.

72.   **World Bank Somalia:** If a grievance has been raised with the FGS Secretariat, and no satisfactory response has been received, an email can be sent to somaliaalert@worldbank.org.

World Bank Washington Office: If no satisfactory resolution has been received from the World Bank Country office, grievances can be raised with the World Bank Office in Washington. For more information:
http://www.worldbank.org/grs, email: grievances@worldbank.org
Or
The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018
1818 H St NW
Washington, DC 20433, USA
Email: grievances@worldbank.org
Fax: +1 202 614 7313

Complaints may be submitted by mail, fax, e-mail, or hand delivery to the World Bank headquarters or any World Bank country office.

World Bank's Independent Inspection Panel: If not satisfactory solution to the complainants is reached through the GRS, 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.
www.inspectionpanel.org

9.   Monitoring and Reporting

73.   The national Social Specialist will be the lead responsibility for implementation and monitoring of the SEP in close cooperation with the national Project Coordinator, Environmental Specialist and GBV Specialist. The FGS project Coordinator will allocate the necessary resources for successful implementation of the SEP and ensure that the objectives of the SEP are met. The SEP reporting will include the following:

(i)   Progress reporting on the ESS10-Stakeholder Engagement commitments under the Environmental and Social Commitment Plan (ESCP).

(ii)   Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, or SEA/SH Action Plan or LMP if needed; (b) issues that have been raised and can be addressed during project implementation; (c) issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees can also be annexed to the monitoring reports. The table below summarizes the quantitative monitoring indicators.

Table 9: Quantitative Monitoring indicators

Potential Indicators	Means of Verification
No. of project stakeholders accessing project information, benefits and opportunities.	Quarterly FGS and FMS Secretariat reports.
Percentage of stakeholders who are aware of the GM mechanism including the workers and GBV GMs and report that they trust the mechanism to resolve complaints satisfactorily.	Stakeholder meetings and surveys by FMS, type of stakeholder and gender.
Level of awareness among affected parties, other stakeholders and vulnerable groups on project implementation procedures and potential E&S risks and impacts including associated mitigation measures.	Quarterly FGS and FMS Secretariat reports.
Number of government agencies, civil society organizations, private sector and other stakeholder groups that have been involved in consultations on the project implementation phase by FMS on a quarterly basis.	Minutes and reports of consultations disaggregated according to FMS, sector and gender.
Number of engagements (e.g. meeting, workshops, consultations participants sex and age disaggregated) with stakeholders during the project implementation phase (on an annual basis).	Minutes reports and other documentation of consultations.
Percentage of stakeholders who rate as satisfactory the level at which their views and concerns are taken into account by the project (responsible party for measuring this indicator is MoF and this will be undertaken by the Secretariat to conduct the Mid-Term and Terminal Evaluation).	Impact and satisfactory assessments as part of project evaluation.

Percentage of SEP activities implemented, key barriers to participation identified with stakeholder representatives and number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness.	Annual FGS and FMS Secretariat reports.
Percentage of complaints that are satisfactorily resolved and not resolved within timelines disaggregated by FMs and gender (according to the complainants (during stakeholder surveys and evaluation.	Stakeholder meetings and surveys by FMS, type of stakeholder and gender.

List of Annexes

Annex 1: Template to capture minutes/records of consultation meetings

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps

Annex 2: List of Participants during Stakeholder Mapping and Consultations

The list of participants is not publicly disclosed to align with data protection provisions.

Annex 3: Grievance Management Related Templates

a.   Grievance Documentation and Acknowledgement Form

State: ………………………… Institution: …………………………………………..

Name of Complainant:

Contacts: Phone………………………..
Email address …………………

Date of Complaint: ……………………………. (dd-mm-yyyy)

Documents comprising the complaint: (petition, supporting documents etc.)
1)
2)

Summary of Complaint:

Name and Signature of the Complainant:
                                       ……………………………………………………………………………

Name and Signature of Officer receiving the complaint:

b.   Grievance Redress Log

GRIEVANCE LOG				Person Completing								
Project				<u>Contact</u>								
Geographical Location												

Serial No	Name/or Ref	Contact	Date received	Channel	Description of complaint	Referred to (Name& Position)	Tel no	Date	Action taken/greed resolution	Outcome	Feedback Given Y/N	Date resolved
1												
2												
3												

c. Grievance Committee Meeting Recording Format

State:

Date of the Meeting: _____; Complaint Register No. _____

Venue of meeting: _____

Details of Participants:

Complainant(s) if present	Committee Members
1) 2)	1) 2) 3)

Summary of Grievance:

Summary of key discussions:

Decisions taken in the meeting / Recommendations of GRC:

Issue solved / Unsolved _____

Signature of Chairperson of the meeting: _____

Name of Chairperson: _____

Date: dd-mm-yyyy

d. Grievance Resolution Form

State:

1. Name of Complainant……………………………………..……………….

2. Date of Complaint………………………………………………..……..

3. Summary of the Complaint:

4. Summary of Resolution

5. Date of Redress of the Grievance: (dd-mm-yyyy)

Signature of the grievance committee chairperson

Name: _____

Date: dd-mm-yyyy

Signature of the Complainant in acceptance of the resolution to his /her grievance _____

Name: _____

Annex 4: BULSHO Grievance Uptake Channels

No	Institution/State	Uptake Channels
— National Level physical and contact address to submit verbal and written complaints		
1	FGS MOIFAR	• GM Focal Person contacts - TBD • Location of Anonymous complaints boxes - TBD • Toll Free line - TBD • E-mail address - TBD • Physical address - TBD • Post Office Box - TBD Social Media (X, Facebook) - TBD
State Level address to submit verbal and written complaints.		
2	Hirshabelle	• GM Focal Person contacts -TBD • Location of Anonymous complaints boxes - TBD • Toll Free line - TBD • E-mail address - TBD • Physical address - TBD • Post Office Box - TBD • Social Media (X, Facebook) –TBD
3	Galmudug	• GM Focal Person contacts-TBD • Location of Anonymous complaints boxes - TBD • Toll Free line - TBD • E-mail address - TBD • Physical address - TBD • Post Office Box - TBD • Social Media (X, Facebook) –TBD
4	Puntland	• GM Focal Person contacts -TBD • Location of Anonymous complaints boxes - TBD • Toll Free line - TBD • E-mail address - TBD • Physical address - TBD • Post Office Box - TBD • Social Media (X, Facebook) –TBD
5	Jubbaland	• GM Focal Person contacts - TBD • Location of Anonymous complaints boxes - TBD • Toll Free line - TBD • E-mail address - TBD • Physical address - TBD • Post Office Box - TBD • Social Media (X, Facebook) –TBD
	You may add other States as necessary	
Village Level physical address to submit verbal and written complaints		
	Village 1	• GM Focal Person contacts - TBD • Location of Anonymous complaints boxes - TBD • Physical address - TBD
	Village 2	• GM Focal Person contacts - TBD • Location of Anonymous complaints boxes - TBD • Physical address - TBD
	You may add other Villages as necessary	