

**THE GOVERNMENT OF SOMALILAND**



**MINISTRY OF EDUCATION AND SCIENCE**

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**SOMALILAND EDUCATION FOR HUMAN CAPITAL DEVELOPMENT  
PROJECT (P172434)**

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

**28<sup>th</sup> of December 2023**

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## ACRONYMS AND ABBREVIATIONS

ABE	Alternative to Basic Education
CBO	Community-based organization
CEC	Community Education Committee
CoC	Code of Conduct
CPF	Country Partnership Framework
CSO	Civil society organization
DG	Director General
EA	Environmental Audit
ECCE	Early Childhood Care and Education
EHSGs	Environmental Health and Safety Guidelines
EiE	Education in Emergency
ESC	Education Sectoral Committee
ESCP	Environment and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
FCV	Fragility, Conflict & Violence
FGM/C	Female genital mutilation/circumcision
GBV/SEAH	Gender-based Violence/Sexual Exploitation, Abuse and Harassment
GCF	Green Climate Fund
GDP	Gross Domestic Product
GEF	Global Environment Facility
GHG	Greenhouse Gas
GIS	Geographic Information System
GNI	Gross National Income
GoSL	Government of Somaliland
GRM	Grievance Redress Mechanism
HADMA	Humanitarian Affairs and Disaster Management Agency
IA	Implementing Agency
ICR	Implementation Completion Report
IDA	International Development Association
IP	Implementing Partner
IPF	Investment Project Financing
IPV	Intimate partner violence
IVAs	Independent Verification Agents
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MESAF	Ministry of Employment, Social Affairs and Family
MICT	Ministry of Information and Communication Technology

MIS	Management Information System
MOECC	Ministry of Environment and Climate Change
MOES	Ministry of Education and Science
MoEM	Ministry of Energy and Minerals
MoFD	Ministry of Finance Development
MoPND	Ministry of Planning and National Development
MoPWLH	Ministry of Public works, Infrastructure and Reconstruction
NGO	Non-governmental Organization
OHS	Occupational Health and Safety
OP	Operational Policy
OPM	Office of the Prime Minister
PCU	Project Coordination Unit
PDO	Project Development Objective
PIU	Project Implementation Unit
PMU	Project Management Unit
PWDs	People with disabilities
RP	Resettlement Plan
RCRF	Recurrent Cost and Reform Financing
RFA	Road Fund Administration
RoSAB	Road Sector Administration Board
RPF	Resettlement Planning Framework
RVA	Rift Valley Institute
SCD	Systematic Country Diagnostic
SDG	Sustainable Development Goal
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SLNEP	Somaliland National Education Policy
SOPs	Standard Operating Procedures
SPVA	Somali Poverty and Vulnerability Assessment
SRA	Somaliland Road Authority
TA	Technical Assistance
ToR	Terms of Reference
TTL	Task Team Leader
TVET	Technical and Vocational Education and Training
UNDP	United Nations Development Program
UNHCR	United Nations High Commissioner for Refugees
WBG	World Bank Group

## EXECUTIVE SUMMARY

- 1. Introduction:** It is crucial to emphasize the clear distinction between Somalia and Somaliland, recognizing Somaliland's de facto separate status. Somaliland, situated in the Horn of Africa, declared independence from Somalia in 1991 following the collapse of the central government. Although it functions as a self-governing entity with its own political institutions, military, and currency, international recognition of Somaliland as an independent state remains limited. The country has demonstrated stability and effective governance, setting itself apart from the challenges faced by Somalia. Acknowledging Somaliland's unique status is fundamental in understanding the specific socio-political context and challenges addressed in any development framework or initiative within the country.
2. The Somaliland government has demonstrated a commitment to environmental and social concerns through its policies and strategies. Environmental sustainability and social well-being are integral components of the government's broader development agenda. The government emphasizes the importance of balancing economic growth with environmental conservation, recognizing the interconnectedness between a healthy environment and societal resilience. Policies addressing land use, natural resource management, and climate change adaptation underscore the government's dedication to fostering sustainable practices. Additionally, social inclusion and equity are focal points, with strategies aimed at addressing disparities in education, healthcare, and community resilience. Aligning with the Government of Somaliland's priorities, the Environmental and Social Management Framework (ESMF) is designed to complement these policies and strategies, ensuring a cohesive approach to development that prioritizes both environmental sustainability and social well-being in the region.
3. Only around 50% of children aged 6 to 13 attend primary school in Somaliland, signalling potential challenges in future literacy rates compared to neighbouring regions. The absence of an environment conducive to learning, including limited schooling infrastructure, restricts school attendance, with reported primary school net enrolment rates of approximately 63-65% for boys and 59-61% for girls. Somaliland, facing one of the highest poverty rates in sub-Saharan Africa, contends with economic hardships, civil unrest, and insurgencies, particularly in the south. The prevalent pastoralist and nomadic culture further complicates formal education, rendering it impractical and unattainable for many families.
4. According to the Somali Poverty and Vulnerability Assessment (SPVA), nearly 90 percent of Somali households – and by extension, those in Somaliland - are deprived of at least one fundamental dimension: access to income; electricity; education; or water and sanitation. The Somali civil war, the associated violence and collapse of state institutions has resulted in generations of children largely missing school, with the impact being even more profound in Somaliland owing to the historical context and severe challenges prevalent in the region. Literacy rates in Somaliland are relatively low, with completion rates for primary and secondary education being considerably lower as compared to those for low-income Sub-Saharan countries. Ergo, efforts to rebuild educational infrastructure, address gaps in primary and secondary school completion rates and vastly enhance access to quality education will be centralized in this ESMF.
- 5. The imperative for improving education sector in Somaliland.** There is a direct correlation between improving numeracy and literacy of children and enhancing not only lives and livelihoods but also the country's security outlook and prospects for stability. A recent study by Mercy Corps shows that children at school in Somaliland are less likely to support armed groups than those

missing out on education.<sup>1</sup> The study concludes that improving access to quality education, combined with civic engagement opportunities, pulled Somaliland’s youths away from supporting violent groups. This is attributed to the youths being more optimistic about their future job prospects, as well as systemic core outcomes of a well-structured education system, which imbues more confidence among youths (and children) in the use of nonviolent means to achieve change in their communities. In addition, new educational opportunities should seek to address the vast gender disparity that also plagues the education system, where only 25 percent of women aged between 15 and 24 are literate, compared to 38 percent for men (The Borgen Project, 2020).

6. ***The Somaliland Education for Human Capital Development Project.*** The proposed project, to be funded by the World Bank, will focus on increasing access to basic education, with an emphasis on girls, and improving teacher quality. The proposed interventions aim to create schooling opportunities in Somaliland at the lower primary education level. The project will support activities that promote literacy and numeracy in the country with the aim of ensuring that schooling leads to learning and that girls participate equally in schooling. The project is in line with the Government of Somaliland’s Education Sector Strategic Plan (ESSP). The project will specifically support in directly meeting four of the country’s priorities under ESSP:<sup>2</sup>

- Strengthen management capacities and systems at Government level, including improving fiduciary mechanisms and increasing budget allocations to the education sector;
- Support learners and strengthen societal resilience among communities affected by natural disasters and conflict;
- Continue expanding access to education for children, adolescents, and youth, especially those from disadvantaged groups such as minority groups, nomadic pastoralists, internally displaced persons (IDPs), orphans, children from single headed households and people with disabilities; and
- Improve the quality of learning outcomes, especially at early grade levels, and to ensure the market relevance of learning opportunities.

7. In the long-term, the project will also help in the achievement of peace and stability, as the interventions will help develop cohorts of school children whose education can contribute to “peacebuilding and state building processes.”

8. ***Development objectives.*** The Project Development Objective (PDO) of the project is: “In unserved areas, increase access to primary education with a focus on girls and improve quality of instruction.” The project aims to create schooling opportunities in Somaliland at the primary education level and to promote literacy and numeracy in the country. It seeks to ensure that the schooling leads to learning and that girls participate equally in schooling. Expected project outcomes are: (i) increased number of children enrolled in primary school; (ii) increased gender parity in the targeted districts; and (iii) improvements in teacher quality.<sup>3</sup> The nationwide Project will have the following 4 main components as described in the Table E1 below. However, initially Somaliland will only participate in Component 2 interventions, and project will finance establishment of PIU under Component 4.

<sup>1</sup> Mercy Corps and University of San Diego, 2018. If Youths are Given the Chance: Effects of Education and Civic Engagement on Somali Youth Support of Political Violence. Accessed on March 15, 2020, at [https://www.mercycorps.org/sites/default/files/2019-11/If%20Youth%20Are%20Given%20the%20Chance\\_LR\\_FINAL.pdf](https://www.mercycorps.org/sites/default/files/2019-11/If%20Youth%20Are%20Given%20the%20Chance_LR_FINAL.pdf)

<sup>2</sup> Further details of the ESSP can be obtained at: [https://www.globalpartnership.org/sites/default/files/federal\\_government\\_of\\_somalia\\_essp.pdf](https://www.globalpartnership.org/sites/default/files/federal_government_of_somalia_essp.pdf)

<sup>3</sup>Details on the project components can be found in the Project Appraisal Document (PAD).

**Table E1: Project components summary**

#	Component	Description
1.	Systems building	focus on the establishment and strengthening of capacity and institutional systems at the Ministry of Education and Science (MoES) at the national and local levels, to establish an effective education system with a strong stewardship role for the National Government
2.	Expansion of access to quality schooling for the disadvantaged	provide out-of-school children from disadvantaged backgrounds with access to good quality schooling opportunities at no cost to their families
3.	Enhanced instruction quality	leverage the high levels of internet and mobile telephony connectivity in Somaliland to provide a low marginal-cost, blended instructional model that enables teachers (both existing and those recruited under the project) to deliver learner-focused education.
4.	Project management	finance key project staff at the National level including a project director for overall management, project coordinator to work closely with the various implementing entities, M&E, fiduciary and safeguards staff. Funds will also be provided for office equipment and furniture to adequately resource project staff to manage implementation. Project staff will also be hired at the regional level to manage activities at that level and regularly supervise project activities.

9. **Environment and social Management Framework (ESMF).** The objective of this document is to guide environmental and social screening and assessment of the potential impacts from the project investments and propose broad mitigation measures. This ESMF ensures that the project activities scheduled for implementation are compliant with the relevant requirements national<sup>4</sup> policies, regulations and legislations (including any existing school construction and operation standards) as well as the World Bank Environment and Social Standards (ESSs).

10. This ESMF sets out the principles, rules, guidelines, and procedures to assess the environmental and social impacts of interventions to be funded by the project. Therefore, it directly applies to those activities that will be financed by the project or which are associated or implemented because of project interventions. This ESMF also highlights the appropriate World Bank's ESS and relevant existing Somaliland environmental and social regulations and policies which sub-projects and activities financed or related to this project must conform to.

11. The ESMF also contains an overview of the baseline environmental and social conditions in the states identified for support under the Somaliland education project, identifies and characterizes potential environmental and social risks and impacts that might arise out of the implementation of the project's activities ("sub-projects") and proposes mitigation and enhancement measures. This ESMF will, therefore, be the basis for the preparation of the site-specific Environment and Social Management Plans (ESMPs) including contractor ESMPs, as required during project implementation.

12. **Project Environmental and Social Baseline.** The project will support the construction of approximately 13-14 4-classroom schools in each of the two target districts (under Component 2). However, at the time of developing this ESMF the details of the physical infrastructure investments that will be supported is not yet defined. However, investments are likely to include:

- School construction;
- Construction of staff rooms for use by teachers;
- Construction of storage facilities; and
- Construction of ablution facilities for school-going children and teachers.

<sup>4</sup> Government of Somaliland

13. **Environmental Policy, Legal and Institutional Frameworks.** The key legal instrument for the management of environmental affairs in Somaliland is the Constitution, especially Article 12 (“Public Assets, Natural Resources and Indigenous Production”), Article 15 (“Education, Youth and Sports”), Article 18 (“The Environment and the Relief of Disaster”), Article 34 (“Duties of the Citizen”)

14. Article 12 of the Constitution states that “the care and safeguarding of property, endowments and public assets is the responsibility of the State and all its citizens and shall be determined by law”.

15. Article 15 of the Constitution states that “Education is in the public interest and is rooted in the experience and the special environment of the Somaliland society”.

16. Article 18 of the Constitution states that “the state shall give a special priority to the protection and safeguarding of the environment, which is essential to the wellbeing of the society, and to the care of the natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law”. The article proceeds to declare that “[the state shall undertake relief in disasters such as famine, storms, epidemics, earthquakes, and war.”

17. **Environmental Risks and Risk Rating.** Currently, the environmental risk rating is **‘Moderate’** due to the p school construction activities. The rating may be amended as more details become available. The schools to be supported in the project, including any new constructions, will be modelled along the Safe Schools standards as promoted by UNICEF and which are also related to the EHS standards and the school environment, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. These Standards focus on school designs for the protection of children and their educational prospects and are relevant for areas prone to armed conflicts. By following these Standards, the Government of Somaliland will ensure that it will provide access to water and sanitation in school facilities, ensure that the indoor air quality (IAQ) follows WHO guidelines, eliminate smoking in schools and ensure that children can safely walk to schools. This will also meet the recommendations established in the World Bank’s EHS Guidelines.

18. The envisaged environmental risks and impacts include loss of vegetation, soil erosion, land clearing, changes of land uses, risk from vehicular traffic, generation of liquid waste, and hazardous wastes (e.g., use oil, empty paint cans, etc.); risks associated with source of primary supply materials (materials for school construction, etc.); construction risks during COVID-19 pandemic. Other risks include solid waste generation and disposal issues; air and noise pollution; fire hazards; spread of communicable diseases among children; outbreak of pests and vermin; possible generation of e-waste, especially since the project will support digital delivery of educational materials; and open pits/quarries following extraction of construction materials. The physical components of the project are small-scale civil works that are linked to the construction schools and associated infrastructure. The impact of the civil works is expected to be small-scale, localized and reversible. Therefore, no significant or irreversible adverse environmental issues anticipated from the activities to be financed under this project. However, the project will explore the use of safety audits for the education sector, as is currently done among humanitarian and development partners in the country, to ensure project activities take into consideration key structural safety considerations in design and implementation.

19. **Social Policy, Legal and Institutional Framework:** Article 21 of the Constitution addresses issues of application of fundamental rights. Further, the Constitution has made commitments on women’s empowerment and gender mainstreaming. Article 36 (1,2,3,4) together with Article 20(2)

of the Constitution provides for the protection of women<sup>5</sup> against all forms of violence and provides for protection from sexual abuse, segregation, and discrimination. Article 20 (1,3,4,6) provides that all citizens have equal rights regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall have equal rights and duties before the law, and that the State must not discriminate against any person on the basis of age, race, colour, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth. Article 20 ("Work, Trade & the Welfare of Employees") stipulates that all employees have a right to payment appropriate for the work they undertake and are free to enter into agreements with their employers on an individual or collective basis" and that "Forced labour is prohibited". The Somaliland Rape Law Bill 2014 and the Somaliland Rape and Sexual Offences Act 2018 prohibit sexual violence, highlighting the importance of ending impunity for sexual violence.

20. The Somaliland Labour (Amendments & Additions) Law (No. 31/2020) mirrors the model of previous Somalian employment laws, including the Labour Code No. 65 (1972), but goes further to introduce new provisions such as the positive quota for recruitment of employees from the excluded communities. Article 605 of the Civil Code (1973) defines labour contracts (as agreeing labour or work in consideration for remuneration), covers general principles underlying contractual obligations, and liability for tort acts committed by employees.

21. The main law governing conditions of employment of civil servants is the 1996 Somaliland Civil Service Law (No. 7/96). This covers permanent civil servants but does not apply to local government employees and to members of the armed forces, the police, or corrections corps.

22. The Somaliland Penal Code is divided into three "books", pertaining to (i) Offences in General – covering general principles such as non-retroactive application of law, jurisdiction, offences committed abroad and extradition; (ii) Crimes – encapsulating crimes against personality of the state, against public administration, against the course of justice, against public order, against public safety, against national economy, industry and commerce, against property, and against the person and safety of individuals, to mention but a few, and (iii) Contraventions.

23. The Somaliland National Gender Policy includes strategies to eradicate harmful traditional practices such as female genital mutilation/cutting (FGM/C) and child marriage and to improve services for the management of GBV/SEAH cases. Being that Islam is the state religion, gender roles in Somaliland are influenced by "Islamic principles of gender relations", with Article 36(1) of the Constitution providing that "the rights, freedoms and duties laid down in the Constitution are to be enjoyed by men and women, save for matters which are specifically ordained in Islamic Sharia". In the National Development Plan II (2017), the government "committed to increasing the proportion of seats held by women in the national parliament to 20%", with this gender quota being approved by Cabinet in 2019 but rejected by the upper house of elders. The Somaliland National Gender Policy has five thematic areas, one being on women's political participation and decision-making, and is coordinated by the Ministry of Employment, Social Affairs and Family (MESAF), the preeminent ministry on gender affairs in Somaliland. This was further elaborated in 2012 into a National Gender Action Plan, complete with strategies and activities for implementation, but no budget was provided.

24. **Social Risks and Risk Rating.** The social risk rating is adjudged as **'High'**. The project is designed to have a positive social impact, purposely targeting poor and disadvantaged populations

<sup>5</sup> LOGICA, Gender and Conflict Note Somalia, March 2013, p. 2, accessed at: [http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/03/31/000333037\\_20140331154002/Rendered/PDF/862980BRI0Box30gica0DissNoteSomalia.pdf](http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/03/31/000333037_20140331154002/Rendered/PDF/862980BRI0Box30gica0DissNoteSomalia.pdf)

including IDPs, minority groups, rural and pastoralist/nomadic communities. A preliminary assessment of potential social risks and impacts establishes that there are direct risks from project activities related to civil works from construction of schools, which could lead to land acquisition, restrictions on land use, resettlement, and labour influx. In addition, the use of local labour and the reliance on community partnerships and management could lead to cases of child labour and forced labour.

25. The risks of gender-based violence (GBV/SEAH), including sexual exploitation and abuse (SEA) and sexual harassment (SH), is currently assessed as **'High'** based on the existing high rates of GBV/SEAH in the country, extending from conflict and shocks such as droughts, floods and other climate-related challenges, and social norms that entrench gender inequalities in the country. In addition, because the project's scope and focus will be on predominantly rural sites, the proposed scope of works, and the absence of appropriate institutional structures to manage risks and weak mitigation systems and lower absorption capacity, has raised the risk rating.

26. The project will be implemented in areas of fragility due to endemic poverty, acute drought, floods and protracted conflict and insecurity which may make direct access to beneficiaries challenging and amplify risks related to lack of effective stakeholder engagement, community participation, grievance redress and application of other risk mitigation protocols. Other cumulative risks include systemic weaknesses related to MOES's capacity for preventing adverse social impacts on the project and mitigating and offsetting impacts of social harm whenever they occur.

27. **Overall Risk Rating.** The engineering capacity of the client is nascent but growing in regard to construction of small-scale civil works. However, the client's ability to apply World Bank Environmental and Social Standard (ESS) is limited, due to a dearth of appropriate technical capacity for safeguards at the MOES and lack of experience managing environmental and social safeguards. In addition, the country risks are extensive due to political and security considerations; the limited ability for the World Bank to supervise environmental and social risk management and lack of standards and institutions in Somaliland for managing environmental and social risk. Therefore, the overall environmental and social risk rating is **"High"** under World Bank's Environmental and Social Risk Classification system (ESRC).

28. **Applicable Environmental and Social Standards (ESSs).** Due to limited environmental and social laws and regulations at both national and state levels in Somaliland, the project will apply the World Bank Environment and Social Framework (ESF)<sup>6</sup>. Eight ESSs are considered relevant to the activities implemented under the project:

- ESS 1: "Assessment and Management of Environmental and Social Risks and Impacts"
- ESS 2: "Labour and Working Conditions"
- ESS 3: "Resource Efficiency and Pollution Prevention and Management"
- ESS 4: "Community Health and Safety"
- ESS 5: "Land Acquisition, Restrictions on Land Use and Involuntary Resettlement"
- ESS 6: "Biodiversity and Sustainable Management of Living Natural Resources"
- ESS 8: "Cultural Heritage"
- ESS 10: "Stakeholder Engagement and Information Disclosure"

29. Where potential environmental and social risks and impacts are anticipated, the project in priority order: take measures to avoid, minimize, mitigate, manage or compensate adverse impacts.

<sup>6</sup> For better understanding of the World Bank's ESF, please visit <https://projects.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

In addition, the project will enhance positive impacts in project selection, location, planning, design, implementation and management.

30. **Potential Environmental and Social Benefits of the Project.** The anticipated social benefits of the project include:

- inclusion of out-of-school children in schooling and improvements in learning will lead to a larger number of students completing lower primary education;
- availability of larger number of cohorts transitioning into secondary schooling;
- improving girls’ participation in schooling by introducing incentives for increasing and maintaining girls’ enrolment in school will improve the gender situation in Somaliland;
- encouraging the recruitment of female teachers and prioritizing support for female teachers will ensure more women participation in the education sector in Somaliland, with positive downstream outcomes;
- inclusion of training modules in promoting girls’ education and creating safe, inclusive school environments with specific attention to identifying and addressing violence, including GBV/SEAH in schools, will ensure safer environments for children at school;
- employment opportunities for the community members through construction, rehabilitation and maintenance of the school infrastructure; and
- in the long term, the project will contribute towards development of social cohesion and national stability.

31. The project will have environmental benefits, including the following:

- provision of improved, quality school infrastructure including WASH facilities will lead to improved hygiene standards, less exposure of school-going children to communicable diseases; and
- the formalised schooling environment will provide a basis for incorporating environmental education and stewardship into the school curriculum and activities, resulting in higher levels of environmental stewardship.

32. **Mitigation Measures and Monitoring.** To address potential adverse environmental and social risks and impacts, an environmental and social screening process has been proposed under this ESMF. This will be applied in such a way as to ensure that potential negative risks and impacts of the project are prevented or mitigated appropriately, while enhancing positive impacts. This will be the responsibility of the GoSL social and environmental specialists as well as implementing partners and contractors. The community education committees (CECs) and the social accountability committees will play a key role in ensuring that the proposed mitigation measures are implemented.

33. To facilitate the mitigation of risks several key ESF instruments including this ESMF will be prepared and activated in the life of the project, as summarized in Table E2.

**Table E2: Key project ESF instruments**

#	Document	Purpose
1.	Stakeholder Engagement Plan (SEP)	Sets out inclusive and effective mechanisms for engagement of stakeholders at all levels including feedback and complaints mechanism and transparency. The SEP include a project side Grievance Redress Mechanism (GRM), Inclusion Plan and an Information Disclosure Plan.
2.	Labour Management Procedures	Guides how direct and indirect workers will be sourced and managed fairly and humanely and in a manner that reduces harm on other workers, students and the community.

#	Document	Purpose
3.	GBV Prevention and Protection Plan	Articulates the key risks and key mitigation measures for workers, students and the community, as well as the identification of GBV/SEAH Service Providers and reporting and referral protocols in the event of cases. It outlines communication and training requirements for communities and all project related staff, including project workers, teachers, and school administrators. An Accountability and Response Framework will elaborate the adoption of mitigation measures, including awareness raising, training and use of code of conducts (CoC), and collaboration with local communities and GBV/SEAH-related service providers
4.	Security Management Plan	Outlines measures to minimize security risks in the project including the protection of schools, students, workers and communities and to ensure that security personnel employed as part of the project do not use undue force or impact negatively on communities.
5.	Resettlement Policy Framework (RPF)	Outlines how land acquisition and/or restriction on land use, which might result in involuntary physical and/or economic displacement will be managed and guidance on the preparation of Resettlement Plans (RPs), as needed. It will also provide the protocols for voluntary land donations and agreements.

34. **Stakeholder engagement plan (SEP):** Engagement and consultations on the project design and the planned activities and implementation arrangements have been held with key institutional stakeholders including the relevant Government agencies, development partners and other cooperating agencies and community representatives. The SEP will be updated and refined during project implementation as needed. The SEP outlines information disclosure requirement, the project Grievance Redress Mechanism (GRM), and a plan for inclusion of disadvantaged groups.

35. **Grievance Redress Mechanism.** The MOES will set up a project specific GRM for people to report concerns or complaints, if they feel unfairly treated or are affected by any of the subprojects. The mechanism will amongst other things: provide information about project implementation; provide a forum for resolving grievances and disputes at the lowest level; resolve disputes relatively quickly before they escalate to an unmanageable level; facilitate effective communication between the project and affected persons; and win the trust and confidence of project beneficiaries and stakeholders and create productive relationships between the parties.

36. The GRM will be implemented at the different levels of the project, including community, district, and GOSL. It will ensure that trusted and accessible mechanisms are available to all stakeholders including VMGs, and that all complaints are logged and followed up. More details of the GRM can be found in the SEP.

37. **Project Implementation Arrangements.** The proposed project will be implemented by the Somaliland Ministry of Education and Science (MoES), in coordination with regional education officials. A Project Implementation Unit (PIU) will be set at the national level to manage and oversee implementation in the respective districts. The Somaliland PIU will include Project Manager/Coordinator, a full time Social Safeguard/GBV/SEAH Specialist and a part time Environmental Safeguards Specialist, in addition to a Communication Specialist, a Financial Management Specialist, a Procurement Specialist, and a Gender/SEAH Specialist. All the positions will be competitively recruited, and diversity will be encouraged. These staff members will be provided with capacity building support in environmental and social safeguards. MOES will work closely with the other ministries and departments including World Bank funded projects and development partners. The school management and community education committees will lead the project at community level, with the social accountability committees providing an independent structure to ensure transparency, promote inclusivity and collecting and raising grievances at the community level.

38. Technical capacities in the MOES are limited, as such, an external third party (an NGO or agency with requisite skills as will be spelt out in the terms of reference) may be appointed to support the ministry to carry out training or capacity building on environmental or social aspects of the project. Measures need to be taken to enhance the safeguards capacity to improve environmental and social performance during project implementation. This may include safeguards training for staff or communities or CECs or social accountability committees.

## 1. INTRODUCTION AND PROJECT CONTEXT

### 1.1. Project Context

1. Situated in the Horn of Africa, the territory of the Government of Somaliland covers the same area as that of the former Somaliland Protectorate and is located between Latitude 8° to 11° 30' north of the equator and Longitude 42° 45' to 49° East; and consists of the land, The Government of Somaliland is bordered by the Gulf of Aden to the north; Somalia to the east; the Federal Republic of Ethiopia to the south and the west; and the Republic of Djibouti to the north west. The region's terrain consists mainly of plateaus, plains, and highlands. Climatically, hot conditions prevail year-round, with periodic monsoon winds and irregular rainfall.

2. The Government of Somaliland, which is a de facto country, and separate from Somalia, is faced with two critical challenges: (i) establishing sustainable internal peace; and (ii) paving the way for shared economic growth and prosperity. Among the most critical sectors for the emerging state is the education sector. However, after enduring several decades of civil strife, the education system in the Government of Somaliland is in a dire state. Years of internal conflict virtually wrecked the education system, resulting in a sector "characterized by poor-quality education, insufficient numbers of qualified teachers and inadequate resources," according to the United States Agency for International Development (USAID, 2020). Country-wide, more than three million children, aged between 6 and 13 years, are reportedly out of school. The absence of a conducive environment, including appropriate educational facilities, restricts access to schooling in the Government of Somaliland, resulting in a primary school enrolment rate of around 30 percent on average, further declining to 18 percent in the more remote and less secure southern regions.

3. Somaliland, a self-declared independent region located in the northern part of Somalia (Fig. 1), faces significant challenges in the context of quality of life and poverty, sharing similar socioeconomic conditions to Somalia due to geographic proximity and its history.

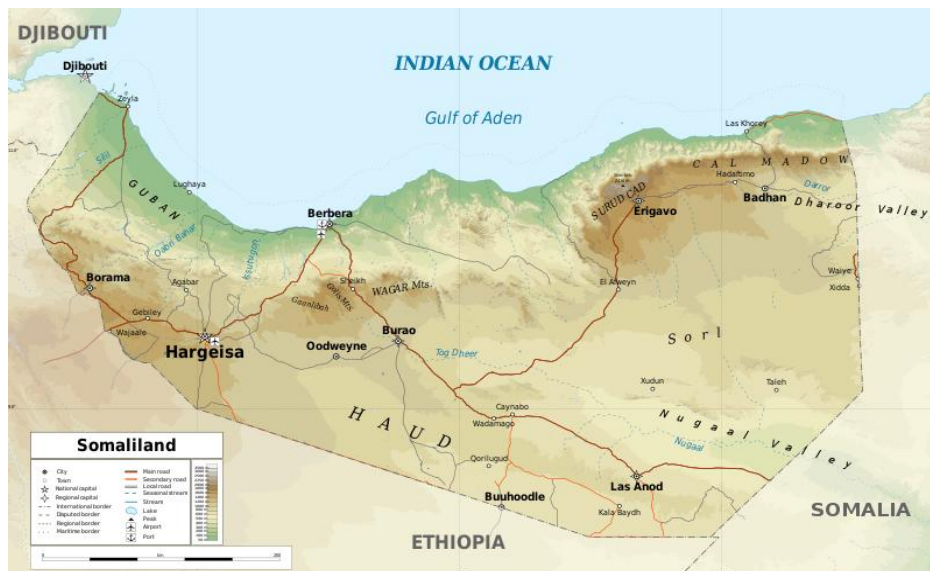


Figure 1: Map of Somaliland

4. With a gross domestic product (GDP) of about USD 7.2 billion as of 2022, the poverty rate in Somaliland is a pressing issue, further exacerbating the numerous social and environmental

challenges, inclusive of inadequate infrastructure, environmental degradation and limited access to basic services including but not limited to education and health. Quality of life in Somaliland is considerably low, mirroring the vast challenges faced by its population. Data obtainable from the Global Data Lab denotes that the human development index (HDI) of Somalia is the lowest in the world at 0.361 (2019), which by extension, places the Government of Somaliland at an even worse and perilous position. Further, the prevailing nomadic culture in Somaliland poses additional obstacles to development efforts, with the nomadic lifestyle of the population hindering access to formal education, social services, and healthcare. Here, families' abilities to engage in alternative economic activities is hindered by the prioritization of traditional livelihoods such as pastoralism and livestock herding. Additionally, pockets of insecurity and sporadic conflicts hinder implementation of development projects in Somaliland, further exacerbating social and environmental challenges. Although unrecognized internationally, the political dynamics and administrative framework in Somaliland shall be accounted for in this ESMF to bolster coordination and effective implementation, especially in cognizance of the untapped potential for sustainable development that exists in the region, owing to its natural resources (minerals and fisheries), strategic location and crucially, an entrepreneurial and resilient population.

5. According to the Somali Poverty and Vulnerability Assessment (SPVA), nearly 90 percent of Somali households – and by extension, those in Somaliland - are deprived of at least one fundamental dimension: access to income; electricity; education; or water and sanitation. The Somali civil war, the associated violence and collapse of state institutions has resulted in generations of children largely missing school, with the impact being even more profound in Somaliland owing to the historical context and severe challenges prevalent in the region. Literacy rates in Somaliland are relatively low, with completion rates for primary and secondary education being considerably lower as compared to those for low-income Sub-Saharan countries. Ergo, efforts to rebuild educational infrastructure, address gaps in primary and secondary school completion rates and vastly enhance access to quality education will be centralized in this ESMF.

6. Somaliland's Education Sector Strategic Plan (2017-2021) goes beyond a mere statement of objectives and activities of the education subsectors, calling for prominence to be given to the themes of education financing, curriculum development, out of school children, governance, internal and external efficiency, gender and equity, as well as the role of these in sustaining the main subsectors and their contribution to provision of quality education and training services. The proposed project's interventions will have implications for each of these themes.

## **1.2. The Somaliland Education for Human Capital Development (SEHCD) Project**

7. The Somaliland education project has a tentative project budget of US\$3 million, which will be spent on Component 2. The proposed project aims to not only increase access of disadvantaged children to education opportunities in the two targeted districts in Somaliland that have the lowest enrolment rate in the country, (initially the 2 districts of Oodwayne and Xuddun), but also, create schooling opportunities in Somaliland at the lower primary education level and thereby promote literacy and numeracy in the country. It will ensure that the schooling leads to learning and that girls participate equally in schooling. Over the project's life, dependent on the dedication of adequate investments by government and its development partners, the proposed project is expected to increase the number of children enrolled in lower primary school, increase gender parity at the targeted level and increase the share of students attaining grade level competency in key subjects.

8. The theory of change in education holds that short-term but high-potential interventions can rapidly increase schooling opportunities, with a deliberate focus on the most disadvantaged communities in Somaliland, specifically those residing in rural areas and girls. The project proposes

to leverage Somaliland’s strengths, specifically its high mobile penetration and relatively advanced internet telephony system to test innovative approaches to enhancing teacher quality and provide effective teaching and learning materials to students using digital technology. The project will also support the development of a robust system for regularly and reliably collecting data on sector outcomes. In addition, the project will focus specifically on building systems to collect information systematically and regularly on student learning achievements.

### 1.3. Project Development Objective and Components

9. **Project Development Objective.** The Project Development Objective (PDO) of the Somaliland education project is: “In unserved areas, increase access to primary education with a focus on girls and improve quality of instruction.”

10. The project will have 4 components in total. These components are, Component 1 “Systems building”, Component 2 “Expansion of access to quality schooling for the disadvantaged”, Component 3 “Enhanced instruction quality”, and Component 4 “Project management”. However, at this stage Somaliland will only participate in interventions of Component 2, and Project will finance establishment of PIU under Component 4, as described below.

*Component 2:* “Expansion of access to quality schooling for the disadvantaged” will focus on supply-side constraints faced by school going-age children who do not have access to education due to a dearth of schools or who are inhibited from enrolling in local non-state schools due to their inability to pay school fees. The component will provide out-of-school children from disadvantaged backgrounds in the initially targeted 2 districts in Somaliland (namely Oodwayne and Xuddun) with access to good quality schools by (i) incentivizing nonstate providers to enroll children free of cost; and (ii) building new schools that provide a minimum package of support that includes teachers, classrooms and school grants to meet recurrent expenditures of these new schools. Approximately 26 (2x13) new schools are planned to be built in Somaliland, which will likely result in approximately 104 new classrooms. All schools will be designed with functioning WASH facilities that are girls-friendly. About 750 qualified teachers will be hired to provide instruction to around 8,320 pupils that will be enrolled in the new schools, 50 percent of whom will be girls. Funding will be available to Somaliland for implementation of activities under Component 2 in the two targeted Somaliland districts (Oodwayne and Xuddun). Approximately US\$ 3 million of the total allocation for this component will be available to Somaliland to implement activities to increase access of disadvantaged children to education opportunities. In case these funds are not accessed by the time of the project's midterm review they will be reallocated to jurisdictions that demonstrate strong implementation performance. Activities under Component 2 will include:

- *School location planning.* School sites will be selected based on the findings of a needs assessment survey. Communities that have large numbers of primary-aged girls and boys that do not have a school (public or non-state) within a 30-minute walk will be prioritized. This survey will assess land tenure, social issues such as conflict over land, and presence of VMGs, environmental factors and community support for new schools and will determine the size of the school to be built (number of classrooms). During survey administration, community-based organizations will be consulted for advice on school location planning and demand for schooling.
- *Community mobilization.* Communities will be mobilized through Village Development

Committees (VDC) in places where there is no CEC to play a key role in selecting the CEC as per the government CEC policy. The CEC which will be responsible for (i) placement, construction and management of the new schools (ii) responsible for day-to-day supervision of the school, including of decision-making on school management related issues and monitoring teacher attendance in line with government’s policy on CECs; (iii) enrolling students including meeting minimum targets for girls enrolment and following up on steps to reduce drop-outs; (iv) identifying potential teachers from their communities, with preference for female teachers; (v) locating and arranging sites for schools and maintenance of school facilities; and (vi) submitting periodic reports, including via a mobile app when possible, to District Education Officers on student, teacher, and school matters.

- *School construction.* New schools with a proportional allocation of gender-separated washrooms and water delivery points for each school will be constructed. Construction specifications for the new classrooms and schools<sup>7</sup> will conform to the government’s school prototypes, align with agreed standards (safe, disability-inclusive, resilient, and climate-smart), and incorporate a modular approach as appropriate to suit local needs so as to ensure optimal coverage and minimal distances for children to travel. The MOES, with the support of its construction supervision contractor, will establish guidelines for phasing in the construction and opening of the schools over 4 years. All new schools will be provided with furniture for students, teachers, and administrators, as well as a core set of equipment for teaching and learning, such as white boards or instructional technology for the larger schools.

*Component 4:* “Project management” will finance key project staff at the national level including a project director for overall management, project coordinator to work closely with the various implementing entities, M&E, fiduciary and safeguards staff. Funds will also be provided for office equipment and furniture to adequately resource project staff to manage implementation. At the Government of Somaliland’s level, the Project will finance the establishment of a Steering Committee, a Technical Committee and a Project Implementation Unit (PIU). The Project component of Somaliland will be managed by a dedicated PIU staff, who will comprise of a Project Coordinator, a Financial Management Specialist, a Procurement Specialist, a Communication Specialist, a M&E Specialist, an Environmental Safeguards Specialist, a Social Safeguards Specialist, and a GBV/SEAH Specialist, as well a Gender Specialist.

#### 1.4. Project Beneficiaries

11. While the project supports country-wide policy and system development, such as the platforms for teacher development and content delivery to student and Early Grade Reading Assessment (EGRA), the focus will be on the educationally most disadvantaged parts of the country through Component 2 of the project to create supply of schooling opportunities with quality. Under the project, priority will be given to districts in which children do not attend school because of either an inadequate supply of school places or because they experience social hardships that inhibit their demand for schooling. Districts will be selected based on current education access rates; those with Gross Enrolment Rates (GER) below 10% would be considered eligible, with priority given to districts that engage directly in social safety net support programs, thereby ensuring demand-side support that enables children to attend school. Districts that are not accessible due to security reasons for adequate supervision by the World Bank will be excluded at this stage.

<sup>7</sup>Approximately 26 new primary schools, providing altogether 104 classrooms.

12. It is anticipated that two districts from Somaliland – namely Oodwayne and Xuddun - will be selected, tentatively and if security conditions allow. Thereafter, an assessment of schools will be carried out to prioritize school sites for construction. These new schools will be in areas where there are no existing schools in a 30 min radius thus, they are expected to be in rural areas. This assessment will likely be carried out by a consortium of organizations working in the different districts using a participatory methodology. The assessment will screen out areas where there is contested land or multiple claims on land. Consultations with all residents, users and residents on the siting of the school and agreements on land will be an important aspect of site selection. Consideration will be made of geographical spread, and inclusivity ensuring that in any district all schools are not selected in one clan's area. The assessment will also explain the objectives and criteria of the project and provide information about stakeholder engagement plans and GRM focal points. The assessment will also help identify the existence and capacity of potential construction companies and their capacity to comply with E&S requirements as well as measures to prevent elite capture by involving CECs and where not available the village development committee (VDC) and other representative community structures.

13. The project in Somaliland will benefit approximately approximately 8,320 primary school-aged students in the 2 selected districts, given the possibility of operating in two shifts a day. Benefits will accrue through improved access to new schools near communities enabling children to attend school. The project targets the areas with the lowest access rates to maximize coverage from investments. Component 2 will directly benefit these students through the establishment of new schools, provision of teachers and school grants for teaching and learning materials and support for poor households to send their children to non-state schools free of charge.

14. The Project will benefit students throughout the country through the availability of digital content and improved instruction and teacher quality. In addition, a total of approx. 750 teachers are expected to benefit from professional development through a blended training program. The indirect beneficiaries include traders, salesmen, IT companies, contractors, and primary suppliers.

15. The GoSL will be responsible for sustaining the investments in the education sector beyond the project financing period. This would be done by absorbing the established schools and the teachers into National Education structures. The ongoing restructuring and strengthening of the education sector will consider the structures being established through this and other education projects.

16. The project envisages both direct and indirect beneficiaries. The direct beneficiaries will include school-going children, teachers, parents, communities targeted for support, and MOES.

## 2. SCOPE AND METHODOLOGY OF THE ESMF

### 2.1. Purpose and Scope of the ESMF

17. This ESMF has been developed because specific subprojects, that is the actual schools to be constructed using project funds, will only be identified during implementation of the project. The purpose of the ESMF is to ensure that the sub-projects executed under the project address and identify measures to avoid and minimize negative environmental and social impacts, as much as possible. Where these cannot be avoided, the impacts are adequately identified, assessed and necessary mitigation measures designed and implemented following relevant, existing Somaliland environmental and social legislation (where available) and the World Bank's ESS.

### 2.2. ESMF Justification

18. The ESMF clarifies appropriate ESS, processes, and mitigation principles, organizational arrangements and design criteria to be applied to subprojects (see Annex 1 on the list of ESS). These standards, principles, instruments and other documents are to be prepared during project implementation by the lean Somaliland Project Implementation Unit (PIU) in the project-supported localities in Somaliland.

19. The Somaliland PIU will use and refer to this ESMF during project implementation and monitoring of component 2 activities as agreed in the MoU on functional assignments. Where appropriate, site specific Environmental and Social Management Plans (ESMPs) will detail how voluntary land donation, inclusion and consultation requirements have been met will be prepared during project implementation following the guidelines provided in this ESMF (see Annex 4). It remains the responsibility of the E&S safeguards officers within the PMUs to ensure that the necessary mitigation plans are developed and adhered to by the various implementing agencies.

20. The specific objectives of this ESMF are to:

- Ensure that the implementation of the project, for which the exact locations of the sub-project sites are not definitively identified at this stage, will be carried out in an environmentally and socially sustainable manner;
- Provide information about scope of adverse environmental and social risks and impacts expected during sub-project planning, construction and operation, describe the approach to mitigation and monitoring actions to be taken' and cost implications;
- Clarify the roles and responsibilities for the project: GoSL PIU, District Education Officers (DEOs), and Community Education Committees (CECs), and other representative community structures, contractors, and operators, and other stakeholders regarding environmental and social due diligence, management of risks and impacts, and monitoring; and
- Provide the project implementers with an E&S screening process and risk management procedures that will enable them to identify, assess and mitigate potential environmental and social impacts of subproject activities, including through the preparation of site-specific ESMPs, where applicable (the screening checklist is presented in Annex 2).

### **2.3. ESMF Principle**

21. This ESMF will guide the PIU in Somaliland in implementing the project in line with World Bank ESF and Somaliland government E&S management standards.

### **2.4. Methods**

22. The ESMF was prepared through literature review and stakeholder discussions. The MOES-based project preparation team in Somaliland, with close coordination with the World Bank, undertook a review of relevant national legislation, policies, and guidelines, including the World Bank ESS related to this Project. Key informant interviews were carried out and stakeholder consultations workshops were conducted in June and July 2023, including an informant consultation on the E&S instruments prepared for Somaliland, which was recently conducted on the 12<sup>th</sup> of October 2023.

### 3. POLICY, LEGISLATIVE AND INSTITUTIONAL FRAMEWORKS

#### 3.1. Overview

23. This section describes the existing policy, legislative and institutional framework that will be important for consideration in the design, implementation, monitoring and evaluation of the project. This section details the existing framework in the GoSL.

24. The World Bank has undertaken a systemic study in the Government of Somaliland, identifying existing gaps in environmental regulations, policies and legislation, with a view of capacity enhancement.

#### 3.2. Somaliland National Laws, Policies and Legislations

##### 3.2.1 Constitution of the Government of Somaliland

25. The key legal instrument for the management of environmental affairs in Somaliland is the Constitution, especially Article 12 (“Public Assets, Natural Resources and Indigenous Production”), Article 15 (“Education, Youth and Sports”), Article 18 (“The Environment and the Relief of Disaster”), Article 34 (“Duties of the Citizen”). Article 12 of the Constitution states that “the care and safeguarding of property, endowments and public assets is the responsibility of the State and all its citizens and shall be determined by law”. Article 15 of the Constitution states that “Education is in the public interest and is rooted in the experience and the special environment of the Somaliland society”. Article 18 of the Constitution states that “the state shall give a special priority to the protection and safeguarding of the environment, which is essential to the wellbeing of the society, and to the care of the natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law” The article proceeds to declare that “[t]he state shall undertake relief in disasters such as famine, storms, epidemics, earthquakes, and war.” Article 33 (“Protection of the Environment”) states that “Every person has the right to a clean and healthy environment. The State shall take the necessary measures to protect the environment from destruction, pollution, and ecological degradation” whereas Article 34 stipulates that “every person shall have the duty to care for, protect and save the environment”.

26. Article 12 (“Public Assets, Natural Resources, and Indigenous Production) exhorts “the land is a public property commonly owned by the nation, and the state is responsible for it”, and that “the central state is responsible for the natural resources of the country and shall take all possible steps to explore and exploit which are available in the nation’s land or sea”. However, there are no standing environmental and/or social safeguards in terms of legislated and or drafted regulations. The Article also affirms that the GoSL shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem.

27. Article 21 of the Constitution addresses issues of application of fundamental rights. Further, the Constitution has made commitments on women’s empowerment and gender mainstreaming. Article 36 (1,2,3,4) together with Article 20(2) of the Constitution provides for the protection of women<sup>8</sup> against all forms of violence and provides for protection from sexual abuse, segregation and discrimination. Article 20 (1,3,4,6) provides that all citizens have equal rights regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall

<sup>8</sup> LOGICA, Gender and Conflict Note Somalia, March 2013, p. 2, accessed at: [http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/03/31/000333037\\_20140331154002/Rendered/PDF/862980BRI0Box30gica0DissNoteSomalia.pdf](http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/03/31/000333037_20140331154002/Rendered/PDF/862980BRI0Box30gica0DissNoteSomalia.pdf)

have equal rights and duties before the law, and that the State must not discriminate against any person on the basis of age, race, colour, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth. Article 20 ("Work, Trade & the Welfare of Employees") stipulates that all employees have a right to payment appropriate for the work they undertake and are free to enter into agreements with their employers on an individual or collective basis" and that "Forced labour is prohibited". The Somaliland Rape Law Bill 2014 and the Somaliland Rape and Sexual Offences Act 2018 prohibit sexual violence, highlighting the importance of ending impunity for sexual violence.

28. On human rights, Article 24(4) of the Constitution states that crimes against human rights such as torture, extra-judicial killings, mutilation, and other similar acts shall have no limitation periods. Every labour law shall comply with gender equality. Article 20(2) stipulates that the conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law. Every labour law and practice shall comply with gender equality in the workplace, with Article 8(1) stipulating that "all citizens of Somaliland shall enjoy equal rights and obligations under the law and shall not be accorded precedence on grounds of color, clan, birth, language, gender, property, status, opinion, etc".

### **3.2.2 The Somaliland Labour (Amendments & Additions) Law (No. 31/2020)**

29. This Law mirrors the model of previous Somalian employment laws, including the Labour Code No. 65 (1972), but goes further to introduce new provisions such as the positive quota for recruitment of employees from the excluded communities. Article 605 of the Civil Code (1973) defines labour contracts (as agreeing labour or work in consideration for remuneration), covers general principles underlying contractual obligations, and liability for tort acts committed by employees.

30. The main law governing conditions of employment of civil servants is the 1996 Somaliland Civil Service Law (No. 7/96). This covers permanent civil servants but does not apply to local government employees and to members of the armed forces, the police, or corrections corps.

31. Article 59(4) of the Regions and Districts Law (No. 22/2022, as amended) states that local government (and water agencies) employees shall have a separate law which shall be prepared by the Ministry of Interior and approved by the "councils". The Somaliland 1997 Interim Constitution and the final 2000 Constitution both included a provision allowing the continued use of pre-1993 Somali Republic laws which are not in conflict with the Somaliland Constitution, fundamental human rights and freedoms and Sharia, until new laws are promulgated.

32. Under this Law, disciplinary acts are covered under Article 51, dismissal and resignation under Articles 36 and 37, duties of employees and employers, including appraisals, under Articles 33 – 35, employees' grievances and cases under Article 39, fundamental employment rights – inclusive of equality and non-discrimination on grounds of gender, colour, religion, political opinion, clan origin and/ or HIV/AIDS under Article 7, Health and Safety under Articles 41-45, Hours of Work under Articles 8 – 10, non-employment of minors under Article 38, Regulations under Article 56, Salary and emoluments under Articles 20 – 23, and matters recruitment, including that of foreign employees, under Articles 31 and 32, to mention but a few.

### **3.2.3 The Somaliland Penal Code**

33. The Somaliland Penal Code is divided into three "books", pertaining to (i) Offences in General – covering general principles such as non-retroactive application of law, jurisdiction, offences committed abroad and extradition; (ii) Crimes – encapsulating crimes against personality of the state, against public administration, against the course of justice, against public order, against

public safety, against national economy, industry and commerce, against property, and against the person and safety of individuals, to mention but a few, and (iii) Contraventions.

### **3.2.4 The Somaliland Agricultural Land Ownership Law (No. 08/99)**

34. Article 4 provides that already owned lands shall be registered at the Ministry of Agriculture within one year from the effective date of this Act, with maximum agricultural land to be given as private property being 8 hectares of rainfed land, and 4 hectares of irrigated land. However, this provision doesn't apply to government/ company properties (Article 5). Further, Article 8 speaks to ownership for the public interest, establishing that any cultivated land may be confiscated – reasons for which are listed in Article 12 - and the confiscation shall be compensated. Rights of the landowner are provided for in Article 10, with responsibilities of said owner being (i) improving the land by increasing productivity, (ii) paying for employees and guaranteeing worthy work as per the Labor Law, and (iii) paying required land taxes (Article 11).

### **3.2.5 The Somaliland Family & Personal Law**

35. Since the re-assertion of Somaliland's sovereignty in 1991, all matters concerning family and personal issues – including marriage, divorce, succession – are dealt with in accordance with Islamic (Shafi) principles, augmented by customary law in limited aspects, and in select cases in court, the 1975 Somali Family Law. District Courts have jurisdiction with all Islamic law issues, inclusive of family and personal law issues, as provided for under Article 6(3) of the Somaliland Organisation of the Judiciary Law.

### **3.2.6 Somaliland National Gender Policy**

36. Being that Islam is the state religion, gender roles in Somaliland are influenced by “Islamic principles of gender relations”, with Article 36(1) of the Constitution providing that “the rights, freedoms and duties laid down in the Constitution are to be enjoyed by men and women, save for matters which are specifically ordained in Islamic Sharia”. In the National Development Plan II (2017), the government “committed to increasing the proportion of seats held by women in the national parliament to 20%”, with this gender quota being approved by Cabinet in 2019 but rejected by the upper house of elders. The Somaliland National Gender Policy has five thematic areas, one being on women's political participation and decision-making, and is coordinated by the Ministry of Employment, Social Affairs and Family (MESAF), the preeminent ministry on gender affairs in Somaliland. This was further elaborated in 2012 into a National Gender Action Plan, complete with strategies and activities for implementation, but no budget was provided.

### **3.2.7 Somaliland Environmental Management Act**

37. The livelihoods of the Somaliland population, specifically the rural communities, are dependent on environmental resources, with the livestock economy, dependent on availability of grazing areas and forage produced from fragile ecosystems, accounting for 60% of the GDP. Ergo, management, conservation and protection of the environment is crucial to the country's development. The Environment management Act (Law No 79/2018) is the main legislation which safeguards the environment, promoting sustainable utilization, exploitation, conservation and management of environmental and natural resources. Further, the Constitution (2001) provides for protection and safeguards of the environment and natural resources, supplemented by legislative framework that includes the National Water Act 2010, Mining Act 2018, and the Solid Waste Management Act 81/2018. Notably, the Ministry of Environment and Climate Change (MOECC) is tasked with environmental and social impact assessment, as well as monitoring of environmental compliance and enforcement.

### **3.2.8 Somaliland National Education Policy (SLNEP 2015-2030)**

38. The Government of Somaliland is fully committed to realizing the international policy of “equal access to quality education” in the context of schooling its children, including accommodating the assessment tools, resource material and services needed. Further, the National Education Policy is inclusive and geared towards the development of full potentialities of every child through diversification of instruction to skilfully respond to the needs of every student through a child-centred pedagogical approach with a flexible and adaptable curriculum. Also, the government is committed to expanding girls’ education and disadvantaged groups to offer them basic education that will ensure effective social integration and give them greater power to take control and make genuine choices in their personal and public lives. The SLNEP has six basic pillars, including teachers, curriculum, textbooks, assessments, management, and quality assurance while considering standards and the environment of institutions.

39. The project will contribute to the achievement of priority pillars in a number of these strategic areas, including “resilience and EiE”, “ECCE,” and “primary education.”

### 3.2.9 Somaliland National Construction Standards

40. Presently, there are no building codes or regulations in Somaliland, with the construction industry characterized by domination by the private sector except for the road construction where donor agencies – Kingdom of the Netherlands, UKaid and the Ministry of Foreign Affairs of Denmark - are the major sources of financial contributions for projects. Following the Borama Peace Conference that led to the passage of the Constitution in 1999, the Somaliland construction sector was boosted for significant expansion of activities in March 2000 when the Somaliland Road Authority (SRA), Road Sector Administration Board (RoSAB), and the Road Fund Administration (RFA) were officially established by Presidential decree. The goal was to add value to the construction sector and other sub-industries, with the SRA representing the operational body responsible for road construction and maintenance, the RFA coordinating the funding of the road construction and maintenance activities through the Road Fund, and the RoSAB – representing the Board of Directors – being accountable for activities of both the SRA and RFA. The project will ensure that children with disabilities are included in the Project.

### 3.3. Institutional Capacity for Environmental Management

41. ***The Government of Somaliland.*** The Government of Somaliland has a Ministry of Environment and Climate Change (MOECC), which bears the lead responsibility for developing the Climate Change sector, protecting, conserving, and managing the environment through sustainable development aimed at eradicating poverty, improving living standards, and ensuring that a protected and conserved environment is available. Further, the MOECC is responsible for carrying out environmental impact assessments (EIAs) or overseeing the EIA process, playing a crucial role in ensuring that development projects and activities comply with environmental regulations and guidelines to minimize negative impacts on the environment. Further, the Environment Management Act (LR 79/2018) of Somaliland provides that the MOECC shall prepare and adopt guidelines for Environmental and Social Impact Assessment (ESIA) on proposed actions which may affect the country’s natural and social environment, as provided for under the ESIA Operational Guidelines<sup>9</sup> which serve as the basic administrative directive.

42. The MOECC has a number of priorities, including institutional capacity development; climate change adaptation; biodiversity management, national rangeland rehabilitation, ecological

<sup>9</sup> These ESIA Operational Guidelines are available [here](#).

improvement and management; reduction of charcoal production and increasing of alternative energy. Specifically,

43. The Ministry of Environment and Climate Change (MoECC) is the principal institution to be consulted before, during and after the implementation of all interventions under the Somaliland education project, in so far as they relate to possible environmental and social risks and impact. This ministry is mandated to supervise, and co-ordinate all matters relating to the environment. The MoECC will likely want to review and approve the safeguards documents such as ESMPs and Resettlement Plans (RPs) during minor civil works implementation.

44. The Ministry of Planning and National Development (MoPND) is responsible for conducting comprehensive assessments of Somaliland’s development needs, setting development goals and targets, and preparing national development plans. It works closely with other government ministries, development partners and relevant stakeholders to ensure effective coordination and alignment of development efforts.

### **3.4. International Conventions and Agreements Abided to by Somaliland.**

45. There are a number of international treaties, agreements and conventions that the Government of Somaliland abides to. These conventions and agreements are aimed at halting environmental degradation and improving the sustainable use of natural resources and are relevant for the Somaliland education project in various ways. Among the important international conventions related to natural resource use and management that the Government of Somaliland is a signatory to include:

- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES);
- Convention on the Conservation of Migratory Species of Wild Animals;
- Regional Convention for the Conservation of the Red Sea and the Gulf of Aden Environment;
- Protocol concerning Regional cooperation in Combating Pollution by Oil and other Harmful Substances in Cases of Emergency;
- UN Convention on the Law of the Sea;
- Protocol concerning Protected Areas and Wild Fauna and Flora in the Eastern Africa region;
- Protocol concerning Co-operation on Combating Marine Pollution in cases of Emergency in the Eastern African region;
- Convention for the protection, Management and Development of the Marine and Coastal Environment of the Eastern African Region (Nairobi Convention); and
- Six ILO fundamental conventions (See the LMP for more details).

The Government of Somaliland has also signed and ratified the following international and regional agreements:

- Treaty Banning Nuclear Weapon Tests in the Atmosphere, in Outer Space and Under Water;
- Treaty on Principles Governing the Activities of States in the Exploration and Use of Outer Space including the Moon and other Celestial Bodies;
- African Convention on the Conservation of Nature and Natural Resources;

- Bamako Convention on the Ban of the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa; and
- Treaty Establishing the African Economic Community.

46. The Government of Somaliland has made efforts to align its labor laws and practices with international labor standards, including those promoted by the International Labour Organization, including the following 19 conventions – including three abrogated conventions:

- i. Forced Labour Convention, 1930 (No. 29)
- ii. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- iii. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- iv. Abolition of Forced Labour Convention, 1957 (No. 105)
- v. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- vi. Worst Forms of Child Labour Convention, 1999 (No. 182)
- vii. Medical Examination of Young Persons (Sea) Convention, 1921 (No. 16)
- viii. Workmen's Compensation (Accidents) Convention, 1925 (No. 17)
- ix. Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)
- x. Seamen's Articles of Agreement Convention, 1926 (No. 22)
- xi. Repatriation of Seamen Convention, 1926 (No. 23)
- xii. Underground Work (Women) Convention, 1935 (No. 45)
- xiii. Right of Association (Non-Metropolitan Territories) Convention, 1947 (No. 84)
- xiv. Labour Inspectorates (Non-Metropolitan Territories) Convention, 1947 (No. 85)
- xv. Labour Clauses (Public Contracts) Convention, 1949 (No. 94)
- xvi. Protection of Wages Convention, 1949 (No. 95)
- xvii. Recruiting of Indigenous Workers Convention, 1936 (No. 50)<sup>10</sup>
- xviii. Contracts of Employment (Indigenous Workers) Convention, 1939 (No. 64)<sup>11</sup>
- xix. Penal Sanctions (Indigenous Workers) Convention, 1939 (No. 65)<sup>12</sup>

### 3.5. World Bank ESS

47. **Relevant ESSs.** The World Bank's ESSs seek to avoid, minimize or mitigate the adverse effects of development projects it is financing through the Investment Project Financing (IPF) modality. The compliance with these Standards is required among others, to assure that the project is eligible for World Bank support. Due to the limitation of applicable national environmental and social laws and regulations, the project will apply the World Bank ESF and the attendant standards. Eight ESSs will be relevant to the project activities are:

- ESS 1: "Assessment and Management of Environmental and Social Risks and Impacts"
- ESS 2: "Labour and Working Conditions"
- ESS 3: "Resource Efficiency and Pollution Prevention and Management"
- ESS 4: "Community Health and Safety"
- ESS 5: "Land Acquisition, Restrictions on Land Use and Involuntary Resettlement"
- ESS 6: "Biodiversity and Sustainable Management of Living Natural Resources"
- ESS 8: "Cultural Heritage"
- ESS 10: "Stakeholder Engagement and Information Disclosure"

<sup>10</sup> Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

<sup>11</sup> Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

<sup>12</sup> Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

48. More details on the ESSs and how they apply to the Somaliland education project are enumerated in Table 1.

**Table 1: Summary of applicable World Bank E&S Standards (ESSs)<sup>13</sup>**

Standard	Relevant?	Explanation on application
<b>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</b>	Yes	<p>This Standard sets out the MOES’s responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of Somaliland education project in order to achieve environmental and social outcomes consistent with the ESSs.</p> <p>As a result, this ESMF has been prepared, in conjunction with other, appropriate safeguards documentation, including:</p> <ul style="list-style-type: none"> <li>• Resettlement Policy Framework (RPF)</li> <li>• Labour Management Procedures (LMP)</li> <li>• Stakeholder Engagement Framework (SEF), which includes an Inclusion Plan and a Grievance Redress Mechanism (GRM)</li> <li>• GBV Action Plan</li> <li>• Security Management Plan</li> </ul> <p>The project will be expected to conduct Environmental Social Impact Assessments (ESIAs) and develop ESMPs for subprojects as determined necessary (see Annexes 3 &amp; 4 on ESIAs and ESMPs, respectively)</p>
<b>ESS2 Labour and Working Conditions</b>	Yes	<p>While the exact labour use (including the number of project workers, their characteristics and timing of workforce mobilization) is to be determined during the implementation of each subproject, the project workers engaged or employed will include:</p> <ul style="list-style-type: none"> <li>• <b>Direct workers</b> (such as consultants hired in the PIU, PMUs, MOES, and supervision consultants if required)</li> <li>• <b>Contracted workers</b> (such as skilled permanent staff of the primary contractor (construction company), skilled workers engaged by sub-contractors (such as heavy machine operators), and unskilled community members engaged by the contractor (such as host community members and IDPs including female workers), as well as staff of third-party monitors working with the project)</li> <li>• <b>Primary supply workers</b> (such as workers to produce essential school construction materials such as aggregates and building blocks on an ongoing basis for the project)</li> <li>• <b>Community workers:</b><sup>14</sup> these may include members social accountability committees who will promote transparency and accountability for the project at community level. And will be clarified in the labour management procedures.</li> <li>• <b>Government civil servants</b> such as State education officers in the ministries and departments, and district police officers. The civil servants will remain subject to the terms and conditions of their existing public sector employment, but comply with OHS requirements including security and GBV/SEAH prevention</li> </ul> <p>Potential labour risks and mitigation measures</p> <ul style="list-style-type: none"> <li>• OHS risks (such as moving equipment and heavy machines, noise,</li> </ul>

<sup>13</sup>More details at <http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources>

<sup>14</sup>There will be a need to confirm if the members of these committees will be voluntary or will be considered project workers.

Standard	Relevant?	Explanation on application
		<p>vibration, welding, chemical hazard, working environment temperature, working at height and safety and hygiene in worker camps)</p> <ul style="list-style-type: none"> <li>• Child labour</li> <li>• Forced labour</li> <li>• Labour influx</li> <li>• Labour disputes over terms and conditions of employment</li> <li>• Discrimination and exclusion of disadvantaged groups (including in payment terms)</li> <li>• Security risks (workers’ exposure to attacks and children’s security while at school)</li> <li>• GBV/SEAH</li> </ul> <p>The Labour Management Procedures (LMP) developed for the project, will contain relevant mitigation measures to be incorporated into procurement documents</p>
<p><b>ESS3 Resource Efficiency and Pollution Prevention and Management</b></p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Because of the nature and relatively moderate scale of the civil works, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction.</li> <li>• The risks related to ESS3 include the normal impacts of civil works (i.e., dust, noise, erosion, surface water sedimentation, pollution from construction wastes and water use), as well as waste from worker campsites, unfilled quarries and burrow pits.</li> <li>• To address these short-term impacts, this ESMF includes standard operating procedures (SOPs) and good construction management practices, including those proposed in WB Environmental and Health Safety Guidelines (EHSs).</li> </ul>
<p><b>ESS4 Community Health and Safety</b></p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Community health and safety impacts will be minor, temporary, and confined to the area immediately surrounding the construction or rehabilitation of schools and classrooms and associated buildings such as ablution facilities and staffrooms.</li> <li>• Anticipated risks and impacts include community health and safety risks associated with construction/rehabilitation work, such as traffic safety, community exposure to diseases (including COVID-19), hazardous materials and emergency preparedness.</li> <li>• Open quarries due to sourcing of materials for construction</li> <li>• To address these short-term impacts, the ESMF includes SOPs and good construction management practices, including those proposed in WB EHSs.</li> <li>• To address potential risks associated with the security personnel to be hired by contractors, the project will develop and implement a Security Management Plan.</li> <li>• Assessment of project related GBV/SEAH/SEA will be conducted during project preparation.</li> <li>• Given the assessment of GBV/SEAH risks for Somaliland generally, and considering context of pervasive insecurity, the project will adopt a robust approach to address potential GBV/SEAH/SEA risks.</li> <li>• Relevant mitigation measures to address these risks include integrating Codes of Conduct (CoCs) with GBV/SEAH-related protections, community consultations and mapping activities to identify potential service providers, and establishment of GRM with procedures and channels to enable safe, confidential and ethical reporting of GBV/SEAH incidents) are articulated in this ESMF.</li> </ul>

Standard	Relevant?	Explanation on application
		<ul style="list-style-type: none"> <li>Additional considerations include the development of a GBV Action Plan and elaboration of provisions for Third Party Monitoring.</li> <li>The project will also look to include provisions of capacity building and training of relevant stakeholders including contractors, primary suppliers, third party monitors and project workers, in addition to capacity building for the MOES.</li> <li>GBV/SEAH/SEA risks will be monitored throughout project implementation through regular re-assessment with risk screening tool, particularly as new schools and sub-project locations are determined, and through regular monitoring engagement.</li> <li>Contractors and primary suppliers will be debarred for 2 years if they fail to comply with GBV/SEAH obligations.</li> </ul>
<b>ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	Yes	<ul style="list-style-type: none"> <li>The resettlement impacts of each sub-project are likely to be moderate due to the limited size and nature of the individual physical works. It is notable that schools will be constructed in public land or land donated by the community after an ascertainment that it is not contested and agreed to by representative of residents and users of the land and appropriate government departments</li> <li>The physical displacement will be minimized and duly compensated.</li> <li>The economic displacement will largely relate to encroachment on private or community lands or temporary impact during the construction, which will be also minimized. More details are presented in the RPF.</li> </ul>
<b>ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>	Yes	<ul style="list-style-type: none"> <li>While a few locations in a few municipalities may contain some land with inherent environmental sensitivity relevant to ESS6, the subproject screening process in the ESMF will exclude such sensitive areas.</li> <li>The ESMF includes specific measures to avoid or minimize negative impact on critical or protected areas if the sub-project screening process does not otherwise exclude these areas.</li> </ul>
<b>ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</b>	No	ESS7 is not relevant to the project, as the people in the project area are not considered as Indigenous Peoples as defined under ESS7.
<b>ESS8 Cultural Heritage</b>	Yes	<ul style="list-style-type: none"> <li>There is the potential for chance find of cultural or archaeological significance during construction or rehabilitation of schools and associated infrastructure, and the existence of some historic buildings in the school neighbourhood that could potentially be impacted from the construction.</li> <li>The ESMF has been updated to comply with ESS8, and the subproject specific ESMPs will address these issues through the inclusion of chance find procedures.</li> <li>More details are available in Annex 5 of this ESMF.</li> </ul>
<b>ESS9 Financial Intermediaries</b>	No	Not relevant to this project
<b>ESS10 Stakeholder Engagement and Information</b>	Yes	<ul style="list-style-type: none"> <li>Key stakeholders include beneficiaries, parents, teachers and school committees, including CECs, SAC, other project-affected communities, host communities, state and municipal authorities responsible for education, religious and local leaders, civil society organizations (CSOs),</li> </ul>

Standard	Relevant?	Explanation on application
<b>Disclosure</b>		<p>and other development partners.</p> <ul style="list-style-type: none"> <li>• As discussed in ESS1, the potential disadvantaged groups to be considered for stakeholder engagement include: <ul style="list-style-type: none"> <li>○ IDPs, refugees and returnees;</li> <li>○ Poor households (such as female headed, widows, older persons, orphans, persons living with severe illness);</li> <li>○ Persons with disabilities;</li> <li>○ Illiterate community members;</li> <li>○ Nomadic pastoralists; and</li> <li>○ Minority groups</li> </ul> </li> <li>• The project will take differentiated measures to include these groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, discrimination of written materials or graphics or provision of free municipal transport.</li> <li>• More details on the consultation, information disclosure, inclusion plan and the GRM are presented in the SEP.</li> </ul>

49. The project will comply with the ESSs, where potential risks and impacts are anticipated. Where possible, the project will put premium on implementing alternative measures to avoid, minimize, mitigate, manage, or compensate adverse environmental impacts. Avoidance measures will be prioritized over mitigatory or compensatory measures consistent with the mitigation hierarchy. Additionally, the project will enhance positive impacts in project selection, location, planning, design, implementation, and management.

### 3.6. World Bank Group EHS Guidelines

50. WBG has guidelines for Environment, Health, and Safety (EHS) that serve as useful references for general issues as well as sector-specific activities. Projects financed by the WBG are expected to comply with these guidelines as required by the policies and the standards. The EHSGs are mainly on OHS, community health and safety as well as on construction and decommissioning. It contains guidelines cross-cutting on environmental (waste management, ambient air quality, noise, and water pollution), OHS issues among others, applicable to all the industry sectors.

51. The applicability of the EHS Guidelines should be tailored to the hazards and risks established for each project based on the results of an environmental assessment, which should be carried out as part of the ESMPs before civil works. The EHS Guidelines are available at the World Bank's website.<sup>15</sup>

### 3.7. Gap Analysis

52. The activities in the Somaliland Education Project need to comply with both existing Somaliland laws and regulations and World Bank ESSs. This sub-section compares the national public sector environmental and social management rules, regulations and standards to World Bank's Standards. The main objective of this assessment is to help implement this ESMF more effectively at the Government level in Somaliland through an understanding of existing gaps.

53. Table 2 summarizes a comparison focusing on the World Bank policies relevant to the project and gaps identified in existing Somali laws and regulations.

<sup>15</sup> See <http://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

**Table 2: GAP analysis for Environmental and Social Standards – August 2020**

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
ESS1 (“Assessment and Management of Environmental and Social Risks and Impacts”)				
EIA instruments	Range of instruments to satisfy the Bank include EIAs, regional or sectoral EAs, EMPs, etc.	Instruments for environmental assessment have not been delineated adequately at the GoSL.	EIAs not incorporated into national laws and are weakly captured at State level in Somaliland.	ESMF to guide the borrower.
Environmental impact screening	Screening procedures developed for projects involving sub-projects, as is likely to be the case in the Somaliland Education Project.	There are no clear procedures for screening under the statutes of Somaliland.	Screening procedures are absent in Somaliland.	ESMF to guide the borrower.
Social impact screening	Screening procedures developed for projects involving sub-projects, as is likely to be the case in the Somaliland Education Project.	There are no clear procedures for screening under the statutes of Somaliland.	Screening procedures are absent in Somaliland.	ESMF to guide the borrower.
Public consultations	The Bank requires the Borrower to initiate consultations with project-affected persons and other interested parties including CSOs.	Procedures for public consultations not explicitly stated.	Procedures for public consultations not explicitly stated.	The project SEP to guide the borrower.
Monitoring of environmental and social data	Bank requires regular monitoring of environmental and social safeguards data to evaluate the success of mitigation and to foster corrective measures at the earliest possible juncture.	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental and social data.	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental and social data.	ESMF to guide the borrower.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
Institutional arrangements	Requirement by the Bank for specific description of institutional arrangement and implementation schedule for monitoring and mitigation measures.	<ul style="list-style-type: none"> <li>MOES as the project implementing partner.</li> <li>Ministry of Environment and Climate Change (MOECC) to be responsible for oversight of environmental matters.</li> </ul>	<ul style="list-style-type: none"> <li>MOES has capacity for technical implementation of project interventions but will require Safeguards support.</li> <li>Ministry of Environment and Climate Change (MOECC) may be responsible for coordinating institutional responses under this ESMF, but the institutional information is not available and its remit is unknown, as is the technical capacities.</li> </ul>	The PMU to work with the respective ministries and agencies responsible for management of environmental and social matters for development projects as the focal points for administration of this ESMF.
<b>ESS2 (“Labour and Working Conditions”)</b>				
Management of different types of project workers	The Bank puts emphasis on the identification and characterization of different types of workers (project workers, direct workers, contracted workers, community workers, primary supply workers) to manage different types of labour risks.	The <b>Somaliland Labour (Amendments &amp; Additions) Law (No. 31/2020)</b> is the specific labour law governing all aspects of labour and working conditions, which covers the contract of employment, terms and condition, remuneration, and OHS, trade unions and labour authorities. The provisions of the <b>Somaliland Labour (Amendments &amp; Additions) Law (No. 31/2020)</b> apply to all employers and employees in all project municipalities. The <b>Somaliland Labour (Amendments &amp; Additions) Law (No. 31/2020)</b> is applicable to	The <b>Somaliland Labour (Amendments &amp; Additions) Law (No. 31/2020)</b> is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.	ESMF and the Labour Management Procedures (LMP) to guide the borrower.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		all project workers of the Somaliland Education Project.		
Labour standards	Several provisions made under ESS2 to safeguard the workers, promote safety at work and ensure that they have a viable means of communicating grievances and receiving redress.	<ul style="list-style-type: none"> <li>Article 36 (1,2,3,4) together with Article 20(2) of the Constitution provides for the protection of women against all forms of violence and provides for protection from sexual abuse, segregation and discrimination. On human rights, Article 24(4) of the Constitution states that crimes against human rights such as torture, extra-judicial killings, mutilation, and other similar acts shall have no limitation periods. Article 20(2) stipulates that the conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law.</li> <li>Every labour law shall comply with gender equality.</li> <li>The <b>Somaliland Labour (Amendments &amp; Additions) Law (No. 31/2020)</b> encapsulates a number of issues - disciplinary acts are covered under Article 51, dismissal and resignation under Articles 36 and 37, duties of employees and</li> </ul>	The implementation of the existing articles in practice may not be very strong.	<p>The Project will not allow any forced and child labour. It will hold all contractors liable to the implementation of the LMP.</p> <p>The PIU will have overall responsibility to monitor the implementation of the LMP.</p> <p>The Project will fully comply with WB ESS 2. This is set out in the LMP (see annex 1).</p>

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>employers, including appraisals, under Articles 33 – 35, employees’ grievances and cases under Article 39, fundamental employment rights – inclusive of equality and non-discrimination on grounds of gender, colour, religion, political opinion, clan origin and/ or HIV/AIDS under Article 7, Health and Safety under Articles 41-45, Hours of Work under Articles 8 – 10, non-employment of minors under Article 38, Regulations under Article 56, Salary and emoluments under Articles 20 – 23, and matters recruitment, including that of foreign employees, under Articles 31 and 32I.</p>		
<b>ESS3 (“Resource Efficiency and Pollution Prevention and Management”)</b>				
Pollution prevention and management	This ESS requires the Borrower to undertake a health and safety risk assessment of any existing pollution which may affect communities, workers and the environment, especially in the school environment which will be the main arena for project	<ul style="list-style-type: none"> <li>• There are no known national construction standards for schools, however the MOES intends to apply the UNICEF Safe Schools Standards and commitments related to school EHS standards.</li> <li>• No known national statutes in support of periodic environmental audits.</li> <li>• No national pollution</li> </ul>	There are no supporting legislative frameworks for pollution prevention and management.	ESMF to guide the borrower on pollution prevention and management.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
	implementation.	standards known at the time of developing this ESMF.		
Management of hazardous wastes	<p>The Bank requires the Borrower to undertake specific measures to manage both hazardous and non-hazardous wastes. Specific emphasis is given in this ESS with respect to transportation and disposal, obtain chain of custody documentation to the final destination. Approved disposal sites are required for this ESS.</p>	<ul style="list-style-type: none"> <li>No known national legislation or policies on management of hazardous wastes.</li> <li>Constitution of the Government of Somaliland - Article 33 of the Constitution states that " Every person has the right to a clean and healthy environment. The State shall take the necessary measures to protect the environment from destruction, pollution, and ecological degradation". <ul style="list-style-type: none"> <li>Article 34 stipulates that "every person shall have the duty to care for, protect and save the environment.</li> <li>Article 18 of the Constitution ("The Environment and the Relief of Disaster") states that "the state shall give a special priority to the protection and safeguarding of the environment, which is essential to the wellbeing of the society, and to the care of the</li> </ul> </li> </ul>	There are no approved hazardous waste disposal sites in Somaliland.	ESMF to guide the borrower on the management of both hazardous and non-hazardous wastes.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law". The article proceeds to declare that "the state shall undertake relief in disasters such as famine, storms, epidemics, earthquakes, and war".</p>		
<b>ESS4 ("Community Health and Safety")</b>				
Health of community members	<p>The ESS anticipates that the project will put measures in place to anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances. Further, it provides for the avoidance or minimization of community exposure to project-related traffic and road safety risks, diseases and hazardous materials.</p>	<ul style="list-style-type: none"> <li>• The Somaliland Penal Code is divided into three "books", pertaining to</li> <li>• (i) Offences in General – covering general principles such as non-retroactive application of law, jurisdiction, offences committed abroad and extradition.</li> <li>• (ii) Crimes – encapsulating crimes against personality of the state, against public administration, against the course of justice, against public order, against public safety, against national economy, industry and commerce, against property, and against the person and safety of individuals, to</li> </ul>	<p>The Somaliland Penal Code fails to protect survivors and prosecute perpetrators for GBV/SEAH/SEA crimes.</p> <p>The crimes under Book II and provisions under Book III (Contraventions) are too narrowly defined to satisfy not only international law standards of protection from sexual and GBV/SEAH, but also, the World Bank's ESS4 requirements pertaining to safety of structures and services, traffic and road safety, exposure to health issues, management and safety of hazardous materials and emergency preparedness.</p>	<p>The LMP, SEP and the GBV Action Plan developed for this project will guide the reduction of harm to communities affected by the project.</p>

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>mention but a few, and</p> <ul style="list-style-type: none"> <li>(iii) Contraventions.</li> </ul>		
Security personnel	<p>ESS4 states that when the Borrower retains security personnel to safeguard workers and property, it will assess the risks posed by these security arrangements to those within and outside the project sites.</p> <p>The Borrower will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.</p>	<p>District police will likely provide security services in the implementation of the Somaliland Education Project.</p> <p>The civil servants in Somaliland are governed by the Constitution, Civil Service Law, the Civil Service Commission Law, the Code of Conduct for Civil Servants, Financial Regulations, and the Labor Code and Employment Act.</p> <p>However, there are no security protocols guiding their deployment, and there is possibility of violence meted out on civilians or workers or even the possibility of rent-seeking.</p>	<p>While the security protocols guiding the deployment and use of force are broadly unknown, the project will coordinate with the law enforcement authorities in each municipality to manage associated risks.</p>	<p>The project to be guided by the ESMF and relevant provisions of ESS4 on the deployment of security personnel to construction sites in schools where security risks are deemed 'high'.</p> <p>The project will also develop and implement a Security Management Plan.</p>
ESS5 (“Land Acquisition, Restrictions on Land Use and Involuntary Resettlement”)				
Physical and economic displacement	<p>ESS5 covers the involuntary taking of land, resulting in loss of shelter or loss of assets: a hierarchy has been provided that seeks to minimize losses to affected persons. It forbids forced evictions.</p>	<ul style="list-style-type: none"> <li>Constitution of the Government of Somaliland, Article 26 states that every person has the right to own, use, enjoy, sell and transfer property</li> <li>The Provisional Constitution defines land as public property. The government has created means to transfer some land into private ownership by</li> </ul>	<p>There is a lack of detailed legislation governing land use and ownership. Evictions are reported to be commonplace in Somaliland.</p> <p>There are no functional national or state policies guiding involuntary resettlement of persons that may be affected by the project.</p>	<p>RPF to guide the borrower.</p>

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>granting ownership for urban and agricultural land.<sup>16</sup> Formal legal frameworks now exist alongside customary land management.</p> <ul style="list-style-type: none"> <li>• The State may compulsorily acquire property only if doing so is in the public interest. Any person whose property has been acquired in the name of the public interest has the right to just compensation from the State as agreed by the parties or decided by a court.</li> <li>• Compensation is provided only for occupants of temporary structures. Affected persons are to be settled in suitable land and their eviction and settlement costs be paid for by the local government.</li> </ul>	More details are provided in the RPF.	
<b>ESS6 (“Biodiversity Conservation and Sustainable Management of Living Natural Resources”)</b>				
Biodiversity restoration	In accordance with the mitigation hierarchy provided in ESS1 and with the requirements of this ESS, Borrower is required to ensure that biodiversity expertise is utilized to develop	<ul style="list-style-type: none"> <li>• Somaliland has not developed a National Biodiversity Strategy and Action Plan (NBSAP), which ought to call for action to be taken to manage biodiversity hotspots.</li> </ul>	Consequently, no draft management plan is available for Somaliland.	The project to be guided by the ESMF and relevant provisions of ESS6 on biodiversity restoration where the project interfaces with biodiversity and

<sup>16</sup> IGAD, Somalia. Land Governance Country Profile, Assessment of Land Governance Framework, Training & Research Land Governance Institutions, accessed at: <https://land.igad.int/index.php/countries/39-countries/somalia/40-somalia-profile?showall=1>

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
	and implement a Biodiversity Management Plan.			other environmentally sensitive areas.
<b>ESS8 (“Cultural Heritage”)</b>				
Management of risks on tangible and intangible cultural heritage, including legal protection to cultural heritage sites	This ESS requires the Borrower to manage risks on tangible and intangible cultural heritage, including identification of the presence of all listed legally protected cultural heritage areas affected by the project.	No information is available at hand on how the government of Somaliland intends to manage cultural heritage.	There are no explicit laws or regulations known to be delineating sites as places of cultural importance.	ESMF to guide the Borrower, including on matters pertaining to chance find procedures.
<b>ESS10 (“Stakeholder engagement and information disclosure”)</b>				
Meaningful engagement of stakeholders in the project activities from planning to implementation levels	The World Bank anticipates that the project will establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, project-affected parties. Further, the project will promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them. The project affected persons	Provisional Constitution of the Government of Somaliland: Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information.	The law on the right of access to information currently only exists as a draft	The Project will implement stakeholder consultations throughout the lifetime of the project, as per the SEP.  The PIU will ensure that a grievance mechanism for the project is in place, in accordance with ESS10 as early as possible in project development to address concerns from project affected persons.

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
	<p>should be provided with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.</p>			

## 4. PROJECT BIOPHYSICAL AND SOCIO-ECONOMIC SETTING

54. This section focuses on the existing biophysical and socio-economic environments in the proposed states. Physio-geographically, Somaliland is a country of limited contrasts, but for the purposes of the Somaliland Education Project, this ESMF will treat the project sub-regions as two relatively distinct continuities:

- Oodwayne (semi-arid agroecology),
- Xuddun (semi-arid agroecology).

55. Ecologically sensitive sub-regions within the regions will be identified where possible.

### 4.1. Introduction

56. The proposed project will be implemented in a context of ecologically fragile environments, in some places (such as Puntland) characterized by a high number of arid-adapted flora (including the deciduous species of *Acacia* and *Commiphora* in addition to *Euphorbia* and *Aloe* variants forming understory) and fauna (such as the Dorcas gazelle, Beisa oryx, gerenuk, the Somali wild ass - *Equus africanus somaliensis* and the Somali warthog, *Phacochoerus aethiopicus delamarei*) species, many of them endemic. Some of these species used to thrive in the country's national parks and game reserves, which were relatively well protected in the reign of former central government. Following the collapse of the former regime, the parks have all but disappeared, and it was extremely difficult to gather any information on their current state, actual boundaries, management, etc.

57. Many of the species aforementioned are categorized as Critically Endangered (CR), Endangered (EN) or Vulnerable (VU) in international conventions and agreements, such as the World Conservation Union's Red List of Threatened Animals.<sup>17</sup> Some of the endangered flora and fauna species, according to the IUCN Red List, include *Aloe eminens*, *Aloe hildebrandtii*, *Aloe grisea*, *Mirafra ashi*, *Mirafra sharpie*, *Aloe ambigens*, *Aloe albovestita*, *Dirachma somalensis*, *Aloe scobinifolia*, *Aloe cremnophila*, *Aloe gracilicaulis*, *Aloe gillettii*, *Aloe bella*, *Cleopatra rugosa*, *Aloe peckii*, *Ceratonia oreoethauma* subsp. *somalensis*, *Hildegardia gillettii*, *Elapsoidea chelazzii*, *Linaria johannis*, and *Vigna monantha*. Somalia has ratified the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES), but few if any practical measures are being taken to ensure its implementation. Like for the fisheries, the wildlife is also subject to illegal, unreported and unregulated trapping and trafficking.

58. As a precaution, it will be critically important for the PIU to engage with communities, contractors, civil society and other government MDAs to ensure that the project does not affect existing biodiversity.

### 4.2. Climate

59. All the proposed project states share similar characteristics, climate-wise. There is generally warm and arid climate across most parts of Somaliland, although precipitation and the wind can be highly variable in places at certain times of the year (on account of proximity to the equator). Typically, the Somaliland climate is hot and semi-arid to arid, with two annual rainy seasons *Gu'* (which spans from April to June), and *Deyr* (which takes place from October to November). There are variations in spatial distribution of rainfall, with about 500 mm recorded annually in the northern

<sup>17</sup> See <http://www.animalinfo.org/country/somalia.htm>

highlands and between 300 and 500 mm in the southern regions. The coastal plains register only between 50 and 150 mm.

60. Annual potential evapotranspiration (PET) is high, exceeding 2,000 mm in the northern basins and can be as high as 3,000 mm in the Gulf of Aden. Over the dry period, the vegetation is sustained mainly through the shallow aquifers found along the dry riverbeds (*tog* or *wadis*) across the country. Fertile flood plains and continuous recharge from the Juba and Shabelle Rivers, both originating from Ethiopian highlands, also provide sustained development growth along the riverine areas.

### 4.3. Ecosystems

61. Somaliland’s environmental complement, especially the vegetation resources, offers contrasting experiences, and this is due to the spatial and temporal precipitation distribution. There are two main eco-regions in Somaliland – in the deserts and xeric shrublands biome - whose distribution is determined by the spatial and temporal distribution of the two annual rainfall seasons:

- The dominant xeric grasslands and shrub-lands,
- Somali montane xeric woodlands,
- Somali acacia-commiphora bushlands and thickets.

62. Farms in the south-central region, urban centres and other settlements account for the remaining percentage of dry landmass.

### 4.4. Socio-economic Environment

#### 4.4.1 Geography, Landmass and Population

63. The Government of Somaliland, with a landmass of about 176,6119 km<sup>2</sup> (53,100 square miles) has a population estimated to be 4.9 million people (2018), with a population growth rate of 3.14%/ year, a GDP<sup>18</sup> of USD 2.573 billion (2017), GDP/ capita of USD 499.8<sup>19</sup> according to the World Bank, just ahead of Burundi, Democratic Republic of the Congo and Niger, life expectancy of 50.40 years (2014), and literacy rate of 48%. The population density is estimated at 28.27 persons per km<sup>2</sup>, one of the lowest in East Africa. The median age in Somaliland is estimated to be 16.7 years. The population’s livelihoods are connected to either livestock husbandry, smallholder dryland agriculture, itinerant commerce or remittances from diaspora.

#### 4.4.2 Poverty in the Government of Somaliland

64. The United Nations classifies the Government of Somaliland as a least developed country. The socio-economic situation of the country is described as “very poor”<sup>20</sup>, with a World Bank study showing that for every four people living in urban areas in Somaliland, one is living in poverty. Poverty cuts across sectors, location, group and gender, and its forms and causes vary, with 37 percent of rural and 30 percent of the urban population being classified as poor according to the Somaliland Household Survey (2013). An understanding of Somaliland’s geography, recent trends in its economy and consequences of civil strife is important to determining the nature and extent of its poverty. According to a World Bank study<sup>21</sup>, access to health services in urban areas compares well to other regional countries, but in rural areas, most births are at home without a skilled attendant.

<sup>18</sup> This population date for Somaliland is available [here](#).

<sup>19</sup> Somaliland’s GDP/ capita is available [here](#).

<sup>20</sup> See <http://extwprlegs1.fao.org/docs/pdf/som169866.pdf> for a copy of the Plan

<sup>21</sup> This World Bank study is available [here](#).

Mothers are more likely to die giving birth, and babies more likely to die before their first birthday, as compared to neighbouring Ethiopia or Djibouti.

65. Somaliland's economy is largely consumption-based and dominated by livestock, agriculture while it is also supported by remittances from the diaspora and large aid flows. Remittances and aid flows were estimated at USD 1.4 billion in 2018<sup>22</sup>, about 50% of Somaliland's GDP. Livestock production plays a key role by constituting 60 - 65 percent of GDP, and 85 percent of foreign export earnings<sup>23</sup>. Other notable products exported, apart from live animals, include scrap metal, gemstones, animal skins, gold, fishing products and frankincense. Approximately over half of Somaliland's population depends on pastoralist and agro-pastoralist activities<sup>24</sup>, employing over 70% of the population, meaning that people remain highly vulnerable to natural disasters.

#### 4.4.3 Human Development

66. The Government of Somaliland scores very low on UNDP's HDI. Although it has not been ranked for a few years, different indicators reveal low scores. For example, life expectancy at birth lies at 50.40 years with a global average of 56 years<sup>25</sup> in low human development countries<sup>26</sup>; and the mortality rate under the age of 5 is at 132 per 1000 life births, while the global average is 39<sup>27</sup>.

#### 4.4.4 Education

67. The school enrolment rates in Somaliland are among the lowest in the world. In the education sector, the primary net enrolment rate in Somaliland has been reported to be around 63-65 percent for boys and 59-61 percent for girls, and while transition from primary to secondary school remains a great challenge, the net enrolment rate for secondary education is lower with estimates ranging from 16-20 percent for boys, and 10-14 percent for girls. Further, as per a World Bank study<sup>28</sup> only about half of 6- to 13-year-olds go to primary school in Somaliland, further pointing to a bleak future for comparative literacy rates with other countries in the region in the future.

68. According to UNDP data, literacy in Somaliland is 48 percent among the adult population. There are significant differences in the literacy rate between age brackets. For example, youth literacy (literacy rate among individuals aged 15-24) is relatively higher than adult literacy at 65-70%

69. In Somaliland, despite efforts made by the Somaliland government, CSOs and the international community to address various challenges to promote inclusive and safe education for all, child recruitment, compulsory military training, segregation of boys' and girls' classes and concerns over attacks on education institutions remain key challenges in the provision of education for all children. Furthermore, there are inadequate water and sanitation facilities, limited classrooms, and supplies, as well as a shortage of teachers in overcrowded schools. Additional enrolments of IDP children makes the situation even more dire. Absence of school feeding programs in famine and drought prone zones disrupts school attendance as well and drops the nutrition status of children.<sup>29</sup> Access to education is particularly difficult for nomadic/pastoralist populations, with only 16 percent of nomadic population age 6 and above being enrolled in school.<sup>30</sup>

<sup>22</sup> The Danish Institute for International Studies published an article highlighting the remittances for Somaliland [here](#).

<sup>23</sup> The 2021 Somaliland GDP report is available [here](#).

<sup>24</sup> The Somaliland Ministry of Investment and Industrial Development provides a breakdown of the livestock statistics for Somaliland [here](#).

<sup>25</sup> UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

<sup>26</sup> UNDP, Human Development Report 2019, p.38.

<sup>27</sup> WHO, Children. Reducing Mortality, factsheet, accessed at: <https://www.who.int/news-room/fact-sheets/detail/children-reducing-mortality>

<sup>28</sup> This World Bank study is available [here](#)

<sup>29</sup> Ditto, p. 25-26

<sup>30</sup> Ditto, p. 30

#### 4.4.5 Water and Sanitation Hygiene

70. Access to basic water supply is estimated at 83 percent in urban areas and 28 percent in rural areas. About 88% of the population lacks access to universal sanitation facilities in urban areas and 20 percent in rural areas. According to an African Development Bank<sup>31</sup> (AfDB) report, these key problems are exacerbated by (i) continued conflict, (ii) low rainfall and a very complex hydrogeology of the country, (iii) centrality of pastoralist livelihoods to the economy, and (iv) weak or absent local government institutions. There is further a lack of a harmonized legal and policy framework and policies in place and inconsistency with implementation.<sup>32</sup>

71. Frequent droughts have had negative impacts on the water sector, while conflicts have weakened the water supply and sanitation services. WASH facilities have been destroyed as a result of conflict, and there is a lack of sufficient WASH facilities for the large number of IDPs. Furthermore, the population pressure causes over pumping of ground water, and the wearing out of equipment.<sup>33</sup> Even though various aid programs have supported the development of latrines, UNICEF reports that there is little impact on increased use of latrines or improved sanitation and hygiene more so in the rural areas. There is further a lack of sustainability of latrines and little indication of behavioural change among the population. Widespread displacement and recurrent emergencies contribute to this dire picture. Diseases like cholera are therefore widespread in Somaliland, with a total of 164,000 cases reported between 2006 and 2015.<sup>34</sup>

#### 4.4.6 Agriculture, Livestock and Livelihoods

72. Only about 1-2 percent of Somaliland's land can be described as arable and suitable for crop production, seeing as the region faces significant challenges due to its arid and semi-arid climate, limited rainfall and dryland conditions. Somaliland's agricultural sector, which accounts for 20-25 percent of the GDP relies on the state of health of the country's natural capital (vegetation and water resources). It is worth noting that the livestock sub-sector alone accounts for between 30 percent of agricultural GDP and more than 85 percent of export earnings (*ibid*) and grows 6 percent annually.

73. The economy of Somaliland mainly depends on livestock production, which has historically and culturally been the mainstay of livelihood for most of the people. The livestock production system in Somaliland is predominantly pastoral and agro pastoral, with the industry providing 29.5 percent of GDP in Somaliland and employing 27 percent and 20 percent of the female and male workforce, respectively in Somaliland.

74. Livestock is the source of livelihood for pastoralists, contributes to the Government revenues, and provides employment to a wide range of professionals and other service providers. Somaliland has a long history of live animal export to the Arabian Gulf states through Berbera port on the Red Sea.

75. The movement of these pastoralists is often organized and follows a regular pattern in which clan-based groupings have their traditional grazing areas and/or common watering points and temporary camps. In some parts of the country, pastoralists co-habit with farmers to access crop residues for their animals. In other places, the pastoralists take advantage of heavy rains and floods for agricultural purposes, planting crops in areas cleared for the production of forage or grain.

<sup>31</sup> This African Development Bank report is available [here](#).

<sup>32</sup> UNICEF Somalia Country Office, Water, Sanitation & Hygiene (WASH) Profile, February 2020, p.2, accessed at: <https://www.unicef.org/somalia/media/1251/file/Somalia-wash-profile-February-2020.pdf>

<sup>33</sup> Ditto, p. 2

<sup>34</sup> Ditto, p. 3.

76. Somaliland is prone to flooding. Weeks of flooding at a time have destroyed physical, productive, and social service delivery infrastructure. Physical infrastructure, such as roads were turned into rivers, and agricultural land was fully destroyed, and livestock lost.

77. According to FAO, since 2016, Somaliland has faced climate shocks for multiple agricultural seasons. The region has been adversely affected by recurrent climate-related challenges, including droughts, erratic rainfall patterns, and extreme weather events. Drought, specifically, leads to water scarcity, reduced agricultural productivity and loss of livestock, further exacerbated by land degradation, limited adaptive capacity and climate change.

#### **4.4.7 Labour and Employment**

78. According to an assessment by Somaliland’s Ministry of Employment, Social Affairs and Family, In the labour sector, 75 percent of the population in Somaliland is unemployed, 30% of the unemployed being females and 20% being young males. Moreover, only 26% of 15- to 55-year-olds in rural Somaliland and 33% in urban Somaliland are employed (wage or self-employment). As per the World Bank<sup>35</sup>, Somaliland’s GDP (2012) was estimated to have been USD 1.4 billion, with 30% being derived from the livestock industry, 20% from wholesale and retail trade (including the informal sector), 8% from crops and 6% from real estate activities. Somaliland’s trade deficit in 2012 was approximately USD 496 million, financed through a combination of remittances and external aid, with the country ranked 180<sup>th</sup> in the world for gross fixed capital formation as a percentage of GDP. Also, Somaliland has very low employment to population ratios, with 17% for females and 28% for males. In addition, as ILO points out, the legal and judicial systems governing employment are still weak; and there are few private or public insurance institutions; in addition, there are no labour inspection systems. This indicates that workers can be exposed to hazardous work without adequate protection, and child labour is a common practice in Somaliland.<sup>36</sup>

79. In view of child labour and trafficking, in Somaliland culture, girls and boys are expected to take part in household chores from around the age of five years, especially in rural areas. The distribution of such tasks is highly gendered, and the burden skewed towards girls. Boys are usually responsible for maintaining income-earning and food-producing animals such as cattle and goats, while girls attend more to cooking, cleaning and resource gathering responsibilities. In situations of extreme poverty, girls may work in domestic roles or engage in survival sex. Poverty-driven child labour is not generally considered to be a violation of children’s rights and children are forcibly recruited within Somaliland and used as labour in agriculture, livestock herding, construction, sexual servitude, domestic service, and sexual exploitation.

#### **4.4.8 Land Issues**

80. Land conflicts in Somaliland have risen to be one of the key factors of instability at the community and inter-community level. Private land ownership is fostered in Somaliland, with individuals and entities bearing the right to own and control land within the legal framework of the country. Land ownership and property rights are crucial components of the legal system as they contribute to economic development, investment and social stability. Formal legal frameworks now exist alongside customary land management, and the government of Somaliland recognizes and protects private land ownership rights and has implemented measures to strengthen land administration, ensure secure land tenure for individuals and communities, and resolve land disputes.

#### **4.4.9 Cultural Heritage**

<sup>35</sup> The World Bank’s assessment can be found [here](#).

<sup>36</sup> ILO, Decent Work Programme, Somalia 2011-2015, p. 12.

81. Somaliland has a rich, non-homogeneous cultural heritage steeped in history, traditions, and diverse ethnicities. It encompasses music, language, dance, cuisine, art and traditional practices. The protracted conflicts and the civil war in Somalia, however, have had significant impacts on the loss of tangible and intangible cultural heritage in Somaliland. Deliberate efforts must be made to protect cultural heritage. Unfortunately, the country's legislation around these issues has not yet been developed and does not legally enforce the protection and preservation of cultural artefacts, cultural heritage, and distinct sub-national identities. Infrastructure development projects should, therefore, support the protection of places of cultural and religious significance, including graveyards, religious buildings, and historical sites.

#### **4.4.10 Security and Conflict Environment**

82. Somaliland's security and conflict environment is accentuated by a variety of factors, inclusive of relative stability compared to other regions and corresponding challenges. Somaliland has managed to maintain a relatively peaceful and stable environment within its self-declared borders, with its own security forces and institutions that have successfully maintained law and order and prevented large-scale violence. Somaliland declared its independence from Somalia in 1991 following the collapse of the central Somali government, but while it operates as a de facto state with its own political institutions, legal system, and security forces, it has not achieved international recognition as an independent country. The country is affected by conflicts and tensions in neighbouring regions, with clashes between clans and occasional border disputes with neighbouring Puntland – a semi-autonomous region in Somalia – creating localized tensions. Notably, the town of Las Anod<sup>37</sup> has recently been the victim of conflict defined by increasingly polarised and irreconcilable narratives about the causes of fighting, with the Somaliland administration blaming terror groups for instigating violence whilst traditional Las Anod authorities claiming that they are defending their community from rising insecurity and fighting for self-determination.

83. Like other coastal regions in Somalia, Somaliland has been impacted by piracy, although international efforts including naval patrols have improved security measures and significantly reduced piracy activities in the region. Ongoing efforts are however required to prevent resurgence in future.

84. The social impacts and potential aggravation of resource-related conflicts is well documented in a range of pastoralist and agro-pastoralist assessments carried out in the Somaliland region.<sup>38</sup> Access to water and pasture is a fundamental source of both conflict and co-operation between clans and civil authorities throughout the Somali region. In terms of conflict, extensive trans-boundary movements of livestock and limited access to the combination of water and pasture is one of the primary drivers of conflict across the Horn of Africa and within Somaliland. Following decades of low investment in Somaliland, water points with adequate surrounding pasture are especially scarce, claimed by clans, fiercely guarded and intrinsically linked to resource conflict.

85. Somaliland has largely been spared from the activities of extremist groups like the Islamist group Al-Shabaab, which primarily operates in and still controls areas in Southern and Central Somalia, providing harsh treatment, forced recruitment vis-à-vis the local populations. It infiltrates other areas and conducts deadly attacks on citizens. Most importantly, Al-Shabaab has introduced a harsh tax system in its areas of control and beyond. It has also started to expand on other administrative functions, such as the provision of justice.<sup>39</sup> Al-Shabaab remains a key source of violence, attacking government facilities, personnel, security forces, and members of international

<sup>37</sup> A full account of the security situation in the Las Anod area is captured in an article published by the Danish Institute for International Studies available [here](#).

<sup>38</sup>Lewis 1961; Lewis 1998; DfID 2005; Gomes 2006 Access to water for pastoral resources management

<sup>39</sup>Security Council, S/2019/858, p.3

organizations. However, there is potential risk of Al-Shabaab’s influence spreading to Somaliland, calling for vigilance and cooperation with regional and international partners to counter this threat.

86. It is notable that different armed groups maintain checkpoints along key entry points of the country to extract fees from travellers. People are thereby associated with their clans, and have difficulties moving and working in areas in which their clans are not prominent. Even government checkpoints can be little efficient, as they are subject to corruption.<sup>40</sup> There’s presence of entry and exit checkpoints<sup>41</sup> at each district within Somaliland, in addition to checkpoints on all roads leading in and out of Hargeisa City. However, these do not adversely hamper accessibility or mobility of residents.

87. Somaliland therefore remains trapped in continued fragility, which is protracted by insecurity, endemic corruption, fledgling government capacity, predatory armed groups and spoiler networks. This poses significant security risks for the population, but also for the planned project activities. These include terrorist attacks, hijackings, abductions, and killings. The state security apparatus is however very weak and is underpinned by clan dimensions as well. There are sometimes blurred lines between the state security apparatus, local militia or other armed factions.

#### 4.5. Vulnerability and Social Exclusion

88. Internal Displacement: Somaliland has been affected by internal displacement due to conflicts and environmental factors such as climate change and drought. Displaced populations often face social exclusion and vulnerabilities, characterized by limited access to basic services, legal protections and livelihood opportunities. During the drought in 2017, people dependent on livestock and agriculture had to abandon their rural homes to find new opportunities, migrating predominantly to urban areas. Drought conditions are contributing to already pronounced rates of acute and protracted displacement.

89. In the context of gender inequality, displaced women and girls in Somaliland are among the most disadvantaged populations and face multiple constraints including lack of access to adequate shelter, livelihoods and access to critical resources, including land, as well as stunted participation in the decision-making processes. The attendant separation of many women and girls from community and familial support structures, as well as from traditional livelihoods activities, also contributes to an increased reliance particularly of women on marginal, inconsistent, and hazardous livelihood strategies, which often increase exposure to violence. This further necessitates protection of this demographic from gender-based violence, as will be championed through this project.

90. IDPs commonly settle in informal urban settlements, where access to services and conditions is poor, and where they often become victims of forced eviction, sexual harassment, exploitation and forced labour. Conditions of displacement often compound existing conditions of vulnerability and poverty. They are therefore part of the poorest strata in Somaliland and are often in dire need of access to food, water, sanitation, health services, shelter and education.<sup>42</sup> Generally, the socio-economic and human development indicators for IDPs are worse than those of non-IDPs. While 1 in 4 Somalilanders are poor, over three in four IDPs live under 1.90 \$ per day.<sup>43</sup>

<sup>40</sup>J. Sanya and I. Mwenda, Mogadishu. When Checkpoints don’t work, Horn International Institute for Strategic Studies, accessed at: <https://horninstitute.org/mogadishu-when-checkpoints-dont-work/>

<sup>41</sup> More details on the accessibility of Somaliland is available in the Somalia Key Socio-Economic Indicators: Country of Origin Information Report available [here](#).

<sup>42</sup>Internal Displacement Monitoring Center 2020, p. 30.

<sup>43</sup>The World Bank, Somali Poverty and Vulnerability Assessment, Findings from the Wave 2 of the Somali High Frequency Survey, April 2019, p.73

91. Somaliland is blighted by various health challenges, inclusive of inadequate healthcare infrastructure, limited access to healthcare services and high prevalence of communicable diseases, especially among marginalized communities and those with limited resources. Moreover, access to quality education remains a challenge in Somaliland, with many children in rural and marginalized areas facing barriers to education owing to lack of qualified teachers, cultural norms, and limited school infrastructure, all of which perpetuate social exclusion and limit opportunities for personal and economic development.

92. Marginalized groups in Somaliland, including minority clans, IDPs, and people with disabilities, usually experience higher levels of vulnerability and social exclusion, further perpetuated by their limited access to resources, discrimination, and lack of social inclusion mechanisms. These groups are often discriminated against and/or excluded against in services and jobs and typically do not participate effectively in government or other institutions, and therefore have their voices less represented.

#### 4.6. Gender

93. Somaliland has one of the highest gender inequalities in the world. The country has an extremely high maternal mortality, rape, FGM/C and child marriage rates, while violence and GBV/SEAH/SEA against women and girls is common. The participation and roles of women in politics and decision-making is minimal, which perpetuates limited female roles and inequality. Despite women’s rights being ostensibly protected in Somaliland constitution, the implementation of these provisions is lagging behind.

94. Women make up the lion’s share of the workforce in agriculture and pastoralism (both of which constitute nearly 85 percent of the local economy). Gender disparity is higher in upper grades due to economic constraints and early marriage. A Gender Gap Assessment<sup>44</sup> carried out by OXFAM (2019) revealed that the gender gap index in Somaliland is 0.45, indicating that women are severely disadvantaged through having fewer economic opportunities, de facto non-representation in political decision-making processes and lower educational attainments.

95. Available economic opportunities, however, are still quite limited for both men and women and female-headed households remain among the most disadvantaged populations. Unemployment rates remain particularly high for women, and especially female IDPs who often remain reliant on charity through social protection mechanisms and contributions from the diaspora in the form of remittances. Women who are engaged in income generating activities are often engaged in the informal sector and further bear the double domestic burden of earning an income and taking care of the home. The consequences of this burden often fall to girls in the family, who are expected to contribute to the maintenance of the home, often at the expense of the girls’ education and skills development<sup>45</sup>. Further, as much as Somaliland’s economy offers limited opportunities for formal employment, the OXFAM Gender Gap Assessment<sup>46</sup> (2019) found that women are twice as likely as men to be unemployed but actively looking for a job, at 30.1% of the female labour force compared to 16.4% among men.

96. While there is lack of statistical data about women in Somaliland, the available evidence shows that Somaliland women are still far from enjoying equal rights and treatment. While the Social Institutions & Gender Index for 2014 places Somalia on the 6<sup>th</sup> lowest position in the world, with ‘very high’ discriminatory family codes, ‘very high’ levels of restricted physical integrity, and a

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<sup>44</sup> The OXFAM gender gap assessment for Somaliland is available [here](#).

<sup>45</sup> Interagency Working Group on Disaster Preparedness for East and Central Africa.

<sup>46</sup> The OXFAM gender gap assessment for Somaliland is available [here](#).

‘very high’ level of restricted resources and assets, the situation in Somaliland is relatively more dire.<sup>47</sup> The continuation of practices, such as polygyny, early and forced marriages, FGM, and wife inheritance, continues to undermine development towards increased gender equality. Lack of access to services, such as education and health, or lack of access to agricultural production or other livelihoods and employment opportunities has kept most of the female population of Somaliland disempowered.

97. Insecurity for women is still the number one issue that prevents gender equality and women’s empowerment from being a feasible objective. Somaliland has ranked prominently as one of ‘the worst countries to be a woman’<sup>48</sup> and one of the ‘worst countries to be a mother’<sup>49</sup>. Women continue to suffer disproportionately from clan-fights and extremist interventions, with gender-specific barriers impeding their access to the job market while pervasive clannism/ favouritism over qualification posing a major barrier to employment. Formal security forces have proven to be weak in their willingness to protect women, and the justice system has failed survivors of conflict related GBV/SEAH<sup>50</sup>, as well as the many survivors of domestic violence and FGM. Protracted conflict and fragility have increased fundamentalist religious interpretations, including the acceptance of pharaonic-type FGM/C by the younger generation.<sup>51</sup>

98. The ongoing fragility, conflict and natural disaster like floods are responsible for an increasing number of IDPs within Somaliland, including a high proportion of women. They are often subject to poor security arrangements, which leave women and girls particularly vulnerable. In this context, as well as outside IDP camps, GBV/SEAH (particularly rape) is widespread, including as a tool between social units in conflict.<sup>52</sup> The UN has consistently reported that between 75-85% of GBV/SEAH incidents collected through the Gender-Based Violence Information Management System (GBV/SEAHIMS) are perpetrated against IDPs.<sup>53</sup>

99. Available information indicates that SGBV/SEAH in the country is very high. Sexual violence against women has been used as a tool of war, including *leheyste-galmo*, a form of sexual hostage-taking as well as child marriage, FGM/C (98% of female population in Somaliland), rape and intimate domestic violence (IPV) which already existed but were normalized after conflict.<sup>54</sup>

100. Rape is increasing in prevalence, becoming more violent and taking on a more normalized form. There are reports of an increase of gang rape and “date rape” as a youth phenomenon driven by frustrations associated with lack of opportunity and access to marriage.<sup>55</sup> Rape case reports indicate that it primarily affects younger women between the ages of 11–25 years as well as children, both girls and boys. In Somaliland and IDP areas, perpetrators are often ‘uniformed’.<sup>56</sup>

<sup>47</sup>OECD Development Center, Social Institutions and Gender Index, 2014, accessed at:

[http://genderindex.org/ranking?order=field\\_sigi\\_value14\\_value&sort=asc](http://genderindex.org/ranking?order=field_sigi_value14_value&sort=asc)

<sup>48</sup> See: <http://www.theguardian.com/world/interactive/2011/jun/15/gender-afghanistan>

<sup>49</sup> Save the Children, ‘The Urban Disadvantage. State of the World’s Mothers 2015’, Fairfield 2015, p.9.

<sup>50</sup> Implementation of the Beijing Platform for Action. Beijing +20 Review. Somalia Country Report 2014, p. 14

<sup>51</sup> See, for example, NAFIS Network/MOLSA, Assessment of the Prevalence, Perception and Attitude of Female Genital Mutilation in Somaliland, 2014.

<sup>52</sup>See, for example, UNICEF ‘Sexual Violence as a Weapon of War, accessed at:

<http://www.unicef.org/sowc96pk/sexviol.htm>

<sup>53</sup>Somalia Humanitarian Country Team, 2019, Humanitarian Needs Overview, accessed at:

[https://reliefweb.int/sites/reliefweb.int/files/resources/Somalia\\_2019\\_HNO.PDF](https://reliefweb.int/sites/reliefweb.int/files/resources/Somalia_2019_HNO.PDF); UNFPA, September 2016, Somalia Gender Based Violence Sub-Cluster Bulletin, accessible at <https://somalia.unfpa.org/en/publications/somalia-gender-based-violence-sub-cluster-bulletin>; UNFPA, December 2016, Somalia: Gender Based Violence Sub-cluster Bulletin, accessed at [https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec\\_GBv/SEAH%20Bulletin%20%283%29.pdf](https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec_GBv/SEAH%20Bulletin%20%283%29.pdf); UNFPA, August 2015, Somalia: Gender Based Violence Sub-cluster Bulletin, accessible at <https://reliefweb.int/report/somalia/somalia-GBV/SEAH-sub-cluster-bulletin-1-january-august-2015>

<sup>54</sup>Expanding Access to Justice Program, Gender Assessment, 2019.

<sup>55</sup>Ditto.

<sup>56</sup>For example, security and law enforcement officials, AMISOM, gang-members and/or freelance militia

101. An initial assessment conducted by UNFPA and its implementing partners in flood-prone regions identified damages and access challenges to the health facilities and GBV/SEAH one-stop centers which support vulnerable women and girls including pregnant women and survivors of GBV/SEAH. Hence, the need for SRH and GBV/SEAH services to the affected populations. At least 20,340 women and girls are estimated to be at risk of GBV/SEAH as the displacement weakens traditional family and community protection mechanisms. Recurrent floods, drought, protracted conflict and armed attacks in Somaliland have resulted in insecurity, major protection challenges, food insecurity and also extremely weakened basic socio-economic services.<sup>57</sup>

102. There are significant barriers with access to justice. Fear of reprisals or punishment deters survivors of GBV/SEAH from reporting incidents. Survivors are often reluctant to pursue cases against the perpetrator due to the social stigma associated with rape and other forms of GBV/SEAH. In Somaliland, survivors, lawyers, witnesses, journalists, and family members have been threatened, harassed, and arrested for reporting GBV/SEAH offences. Legal aid providers regularly receive death threats towards their staff. Fear of reprisals to staff, survivors, witnesses, and medical personnel is a particular problem if perpetrators are from the security forces.

103. Most domestic and sexual violence cases are dealt with through the customary and Sharia legal systems. Anecdotal evidence indicates that some customary practices result in double victimization of women and girls, denial of justice for many survivors, and impunity for perpetrators. The customary justice system is focused on clans. Justice is delivered for the clan rather than for the survivor of the sexual violence. Traditional approaches to dealing with rape seek resolution or compensation through negotiation between clan members. Restitution is paid to the clan and not to the survivor. Once restitution is paid, the perpetrator of the sexual violence is free from further punishment and the case is considered finalized. In some cases, the woman or girl is forced to marry the perpetrator of the violence as a form of “restitution” ordered by customary courts. The customary system is widespread, and many families and clans choose it over formal justice systems.<sup>58</sup>

104. In view of inheritance and access to resources, women are exposed to housing, land and property violations, especially land-grabbing and denials of inheritance. The fact that, after marriage,<sup>11</sup> women will likely enter a different family limits women’s inheritance. Investing in women is perceived as a misuse of scarce resources in times of poverty and conflict. Therefore, women rarely inherit valuable assets such as land and income-producing animals. Also, women are not considered principals; they are not *diya*-paying members and thus do not usually share in *diya* receipts, even if they relate to a violation against them. This creates important vulnerabilities for women, while a woman must be protected by her clan members by convention, as a *non-diya* paying member and one who cannot contribute to clan security in times of conflict, women will always be less valuable and more dispensable.<sup>59</sup>

105. On the other side of gender, since the war in 1991, many men lack the resources to fulfil their gender specific expectations and responsibilities. Men have become vulnerable and are at risk of revenge killing a war-related phenomenon that affects male mobility and work opportunities which puts pressure on women to act as breadwinners. Men have been forced to leave outside of their clan territory, which makes them leave in constant fear without the protection of the clan.<sup>60</sup> Interventions for women and children should consider the well-being of the family. A positive engagement with the issues confronting Somaliland men should be part of any attempt to address the needs of women and children.

<sup>57</sup>UNFPA Flood Response Situation Report, November 2019.

<sup>58</sup>UNDP 2018

<sup>59</sup>Expanding Access to Justice in Somalia Program 2019.

<sup>60</sup>J. Garder and J. El-Bushra, The impact of war on Somali men and its effects on the family, women and children.

106. The rate of FGM/C in Somaliland is estimated at 98 percent, with girls between the ages of five and eleven (5 and 11) having undergone it, as noted by Plan International<sup>61</sup>. This harmful practice carries serious health consequences, and it increases the likelihood of dying during childbirth. Nearly 50 percent of the girls are forced to marry before they turn 18. Being married robs them of their childhood and increases the likelihood of early pregnancy and school dropout. Existing protection services are inadequate, especially in remote and in warring communities: there is widespread failure to promote and protect the rights of children<sup>62</sup>.

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<sup>61</sup> Citing of the figures provided here is captured in a Plan International web article, available [here](#).

<sup>62</sup> UNICEF, Child Protection, 2020, accessed at: <https://www.unicef.org/somalia/child-protection>

## 5. CONSULTATIONS AND PUBLIC DISCLOSURE

### 5.1. Introduction

107. The World Bank ESS10 “Stakeholder Engagement and Information Disclosure” recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. This Standard requires public consultation with relevant stakeholders (potential project beneficiaries, affected groups and local NGOs) about the project environmental and social impacts, and take their views into account when developing the project.

108. The analytical underpinnings of the Somaliland Education Project are based largely on the National Development Plan (2020-2024), which has a chapter dedicated to the required improvements in the relevance and efficiency of the human capital development through education in Somaliland. The design and priorities of the project were discussed at the WBG office in Nairobi, Kenya in June 2023 and involved important stakeholders including representatives of the Somaliland Ministry of Education & Science and local education groups. Engagements and consultation on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant Government and implementing agencies as summarized in Table 3.

**Table 3: Stakeholder planning meeting**

Agenda discussed	Participants	Key points discussed
Ministry of Finance Development (MoFD)	DG	Funding formula for the project, efficient use of the resources and accountability
Ministry of Employment, Social Affairs and Family (MESAF)	DG	Policy direction and guidance on all labour administration
Ministry of Energy and Minerals (MoEM)	DG	Safety and health of potential workers
Ministry of Public Works, Land and Housing (MoPWLH)	DG	<b>How the Ministry can support the project in the area of construction standards</b> , land acquisition policies and restrictions on land use
Ministry of Information and Communication Technology (MICT)	DG	ICT in education, infrastructure building, etc.
Ministry of Environment and Climate Change (MoECC)	Director	How the ministry would provide necessary advice on the area of regulation, forest protection, minimization of air pollution, preservation of bio-diversity etc.

### 5.2. Brief Summary of Previous Stakeholder Engagement Activities

109. With the notable absence of the Somaliland team, a virtual stakeholder consultation on the SEP was held on 3 December 2020 for the parent project, which was attended by 40 participants representing the Federal and State Governments, civil society organizations (CSOs), development partners and the World Bank (about 6 of the participants were women). A stakeholder consultation on the ESMF and RPF was held on February 2021, attended by 55 participants representing the Federal and State Governments, civil society organizations (CSOs), development partners and the

World Bank. Tables 4&5 presents a summary of the key issues raised and how they have been incorporated in the instruments. The list of participants is presented in Annex 6.

**Table 4: Summary of key issues raised during SEP consultations on 3rd December 2020**

#	Concern	Responses
1.	Transparent criteria for selection of schools to be supported by the project	The national poverty index will be used to select the districts and beneficiary schools. The focus will be on the poorest parts of the country with low education enrolment. The criterion is described in Section 1.4 of this ESMF.
2.	Inclusion of the poor and disadvantaged including learners with disability	The selection of the districts and the areas to be supported by the project is aimed at supporting communities that are poor and disadvantaged. The Inclusion Plan, presented in section 5 of this ESMF, outlines how the various disadvantaged groups will be involved in all stages of the project. The grievance redress mechanism (GRM), described in section 6 sets out ways through which the communities will be able to channel their complaints and get redress.
3.	Recruitment and retention of female school teachers in schools	The community education committees will be enlisted to take part in the recruitment process. The selection of female teachers, that are resident in the communities will be key to ensuring that they are kept in the education system. There will also be incentives to attract and retain female teachers
4.	Trusted grievance redress mechanism	The project will establish a GRM as outlined in the SEP. Measures will be put in place to make sure it is trusted and accessible.
5.	Gender based violence (GBV/SEAH) and other crimes	The risk of GBV/SEAH is articulated in Section 6.5 of this ESMF. A standalone GBV Action Plan will be developed before disbursement, to manage GBV/SEAH and sexual exploitation and abuse (SEA).
6.	Coordination and management of the project	There will be a PMU and PIUs will have responsibility to coordinate with other projects, arms of government and non-state actors.
7.	Sustainability of the interventions beyond project funding	The GoSL will absorb the costs of managing the investments from the project beyond the project funding. This is indicated in Section 1.4 of this ESMF.

**Table 5: Summary of key issues on ESMF and RPF held on 9th February**

	Issues Raised	Mitigation measures
1.	Min of Environment asked how this Environmental and social guideline will be in line with currently drafted Government guidelines which is ESIA regulations.	The project will be implemented in line with the EIA regulations as per the ESMF
2.	Are there specially trained investigators of SEA. If not, the Ministry should consider as some of the cases may need special attention.	This will be considered in the GBV Action Plan
4	The need for confidentiality in reporting GBV/SEAH issues and protection of victim identity and avoiding stigma	There will be multiple reporting lines including toll lines, messaging and focal persons trained in these issues. And ensure confidentiality in the process.
5	There is a teacher recruitment processes in the Teacher Policy. The onus is on FMS and MOES to implement the policy proposals.	To be referred to in the LMP
6	The society knowledge gap on issues of GBV/SEAH	Awareness of the society on the GBV issues.
7	Land ownership and acquisition	To sensitize the community about the project to have community buy inn and to have land agreement drawn from other project experience like the one used in other projects ( Byole), to use government land where

	Issues Raised	Mitigation measures
		possible. And use existing schools in urban centers where land is expensive.
8	Security for the teachers and students on issues of GBV	Developing a comprehensive approach and sensitize the community on the issue.
	Ministry of labour mentioned that there is a new labour law ready for submission to the cabinet for approval, and there a number of HR policies that might need to be updated including issues of child labour and OHS. Suggestion that there should be SOPs that should be followed strictly by all stakeholders. Secondly a simple community/stakeholder feedback mechanism to be developed to allow all project staffs and stakeholders to provide feedbacks/complains to the management.	These gaps will be considered in the LMP  Annual stakeholder consultation meetings will be held at GoSL level.
	Land disputes are a significant risk for school construction. There is need for thorough investigation. It is important that the land should be Government land to avoid collusion and land being taken away from the public. The participants also mentioned the importance of land donation or acquisition being documented in a proper way, and hardly will that cause an issue especially in rural areas if the community is well informed and issues explained to them. The process differs from one region to the other, like in Puntland the interior ministry declares what is to be public properties and the mayors are also involved. The donation document must be notarized and witnessed by several parties. The participants also mentioned that it is useful to draw from past and current experiences including the Biyole project in matters of land acquisition. The community engagement is important and also all the neighbouring parties should be involved, which would reduce or eliminate cases of land contestation. It was mentioned if there is a clear process guiding resettlement.	These issues have been considered in the RPF
	Concern over accessibility for students with physical impairment and if the project intends to support students with special needs, particularly when doing construction.	The schools will be accessible to those with physical disabilities and will follow the guidelines approved by the ministry on the construction standards that include all public utilities to be accessible.
	Concerns that the school ownership would be taken over by private entities	Schools will be owned by the MOES and only in cases where land acquisition or donation is not possible like the Banadir region and the GER is low, the government might engage the private schools to accept poor students.

110. As more momentum has been achieved on crafting project components relevant to the case of Somaliland, the project management team, though not fully staffed, has embarked on engaging concerned stakeholders in a series of consultations, aiming at collecting views and concerns related to the E&S aspects of the intended interventions. The most recent consultation was held virtually on 12<sup>th</sup> of October 2023. The meeting was attended by a total number of 17 people (3 female, 15 male) representing different line MDAs, NGOs, and IPs, the full list can be found in annex 6.

111. The participants were introduced to the Project components in SL and had the chance to discuss content of E&S safeguards instruments, including: ESMF, RPF, LMP, and SEP. In summary, the meeting included the following key discussion points.

**Table 6: Summary of key issues on SL's E&S aspects and possible mitigation measures**

#	Issues identified	Potential Impacts/Risks	Proposed measures
1	Land disputes & conflict	<p><b>Project delays:</b> If there are disputes over the land where a school is to be built, the project could be delayed or even cancelled.</p> <p><b>Increased costs:</b> Resolving land disputes can be expensive, which could increase the cost of the project.</p> <p><b>Social unrest:</b> If land disputes are not handled carefully, they could lead to social unrest and violence.</p>	<p><b>a)</b> Carryout a proper assessment / conduct thorough land due diligence prior to construction to identify and resolve any potential land ownership or access issues.</p> <p><b>b)</b> Engage with affected communities early and often to ensure that their concerns are addressed.</p>
2	Transparency in selection of schools /districts supported	<p><b>Corruption:</b> If the selection process is not transparent, there is a risk of corruption and favouritism.</p> <p><b>Inequity:</b> If schools are selected without clear criteria, it could lead to inequity in accessing to education.</p> <p><b>Inefficiency:</b> If schools are not selected based on their needs, it could lead to inefficient use of resources.</p>	<p><b>a)</b> Develop and implement clear and transparent criteria for the selection of schools/districts to be supported by the project.</p> <p><b>b)</b> Make this information publicly available and provide opportunities for stakeholders to provide feedback.</p>
3	Sustainability of the project	<p><b>Financial sustainability:</b> If the project is not financially sustainable, it may not be able to continue operating after the World Bank funding ends.</p> <p><b>Institutional sustainability:</b> The project needs to be embedded in the government's systems and supported by the local community in order to be sustainable in the long term.</p>	<p><b>a)</b> Ensure that the project is designed to be sustainable over the long term. This includes considering factors such as teacher training, curriculum development, and maintenance of school facilities.</p>
4	Labour conditions and project management	<p><b>Exploitation of workers:</b> Workers may be exploited if they are paid unfair wages or forced to work long hours in unsafe conditions.</p> <p><b>Corruption:</b> Mismanagement of the project could lead to corruption and embezzlement of funds.</p> <p><b>Delays and cost overruns:</b> Mismanagement could also lead to delays and cost overruns.</p>	<p><b>a)</b> Ensure that all workers involved in the project are treated fairly and paid a decent wage. Comply with all applicable labour laws and regulations.</p>
5	Gender Based Violence (GBV) issues	<p><b>Physical and sexual violence:</b> Girls and women may be at risk of physical and sexual violence in and around schools.</p> <p><b>Bullying and harassment:</b> Girls may also be at risk of bullying and harassment from their classmates and teachers.</p> <p><b>Early marriage and pregnancy:</b> Gender-based violence can lead to girls being forced into early marriage and pregnancy, which can disrupt their education and have other negative</p>	<p><b>a)</b> Develop and implement a GBV prevention and response plan. This plan should include measures to raise awareness of GBV, provide support to survivors, and hold perpetrators accountable.</p>

#	Issues identified	Potential Impacts/Risks	Proposed measures
		consequences for their lives.	
6	Recruitment and retention of female teachers	<p><b>Discrimination:</b> Female teachers may face discrimination in hiring and promotion.</p> <p><b>Lack of support:</b> Female teachers may lack the support they need to succeed, such as access to childcare and transportation.</p> <p><b>Safety concerns:</b> Female teachers may be concerned about their safety in and around.</p>	<p>a) Offer competitive salaries and benefits to female teachers. Provide opportunities for professional development and advancement.</p> <p>b) Create a supportive work.</p>
7	Inclusion of low income/poor children	<p><b>Fees and other costs:</b> Low-income families may not be able to afford the fees and other costs associated with attending school.</p> <p><b>Distance to school:</b> Schools may be too far away for some children to reach, especially in rural areas.</p> <p><b>Lack of support at home:</b> Low-income and disadvantaged children may lack the support they need at home to succeed in school.</p>	<p>a) Target support to schools in low-income and marginalized communities; provide financial assistance to students from low-income families.</p> <p>b) Introduction of affordable offline educational tablets for those children who have no schools in their vicinity and particularly for nomads.</p>
8	Equity and equality	<p><b>Discrimination:</b> Students may be discriminated against on the basis of their gender, ethnicity, disability, or other factors.</p> <p><b>Unequal access to resources:</b> Schools in disadvantaged areas may have fewer resources than schools in more affluent areas.</p> <p><b>Low-quality education:</b> Students in disadvantaged areas may receive a lower quality education than students in more affluent areas.</p>	<p>a) Ensure that all children have equal access to quality education, regardless of their gender, socioeconomic status, or other factors.</p> <p>b) Collect data to monitor progress towards this goal and identify any areas where additional support is needed.</p>
9	Grievance Redress Mechanism	<p><b>Unresolved grievances:</b> If there is no reliable grievance redress mechanism, students, teachers, and other stakeholders may have no way to resolve their concerns.</p> <p><b>Loss of trust:</b> A lack of reliable grievance redress mechanism can lead to a loss of trust in the project and the World Bank.</p> <p><b>Increased risk of conflict:</b> Unresolved grievances can increase the risk of conflict and violence.</p>	<p>a) Establish a grievance redress mechanism that is accessible, effective, and accountable. This mechanism should allow stakeholders to raise concerns about the project and seek redress for any grievances.</p>

112. MOES teams will continue engaging in extensive consultations with all relevant stakeholders including local administrators in the selected project areas, community leaders, education officers and business entrepreneurs. Information gathered through these consultations will be used to update the SEP as necessary.

### 5.3. The Project SEP

113. The SEP identifies the key stakeholders to be consulted and the means of communication. It also identifies the frequency of engagement. The social specialists assigned to the SEHCDP will be responsible for the implementation of the SEP and the monitoring elements, with assistance from the communication and M&E officers. Key stakeholders identified include learners, parents, school committees, including CECs, Social Accountability Committees other project-affected communities, host communities, federal, state and municipal authorities responsible for education, religious and local leaders, civil society organizations (CSOs), and other development partners. The Project will take differentiated measures to include such groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, simple written materials or use of graphics or provision of free municipal transport. Annex 6 of this ESMF also provides a proposed stakeholder engagement strategy for the SL Project.

114. The stakeholder engagement plan will be monitored and evaluated on an annual basis to ensure that it is effective and meeting its objectives. The monitoring and evaluation will focus on the following:

- The level of stakeholder participation in the plan's activities.
- The quality of the stakeholder engagement activities.
- The impact of the stakeholder engagement on the implementation of the Education for Human Capital Plan.

115. The findings from the monitoring and evaluation will be used to improve the performance of the project in terms of responding to the expectations of stakeholders.

#### 5.3.1 Inclusion plan

116. An Inclusion Plan is also included in the SEP, aimed at ensuring that all people are involved in project decision making and benefit from the investments. The following disadvantaged groups have been identified by the project:

- i. Minority casts and groups;<sup>63</sup>
- ii. Internally displaced persons;
- iii. Those who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities;
- iv. Nomadic pastoralists, adults and children living with mental and/or physical disabilities;
- v. Widows;
- vi. Single heads of households;
- vii. The elderly;
- viii. Persons with chronic illnesses; and
- ix. Orphans.

117. Social accountability committees will have representation of these groups and promote inclusion. Teachers and communities will be trained on inclusion of minority groups, people with mental and physical disabilities etc.

#### 5.3.2 Grievance Redress Mechanism

118. Transparency and accountability will be core elements of the SEHDP. The goal of the GRM is

<sup>63</sup> This shall include all groups falling outside the big four clans and not genealogically associated with them in a specific district or geographical area including the ethnic, occupational groups.

to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve the project impacts.

119. Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.<sup>64</sup> One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances’.<sup>65</sup> This GRM should facilitate the SEHDP to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SEHDP will provide mechanisms to receive and facilitate resolutions to such concerns.

120. **Types of grievances:** Complaints may be raised by staff, partners, consultants, contractors, members of the community where the program is operating or members of the general public regarding any aspect of program implementation. Potential complaints include:

- i. Fairness of contracting;
- ii. Fraud or corruption issues;
- iii. Inclusion;
- iv. Social and environmental impacts;
- v. Payment related complaints;
- vi. Quality of service issues;
- vii. Poor use of funds;
- viii. Workers' rights;
- ix. Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and sexual harassment;
- x. Forced labour, including human trafficking and use of prison labour;
- xi. Child labour; and
- xii. Threats to personal or communal safety.

121. As per World Bank standards, the GRM will be operated in addition to GBV/SEA and GBV Action Plan, which includes reporting and referral guidelines (there will be a stand-alone GBV Action Plan developed for this project). The GRM will also operate in addition to specific workers’ GRMs, which are laid out in the LMP.

122. The GRM is designed to ensure that grievances and perceived injustices are handled by the project, and that the project aides mitigating general conflict stresses by channelling grievances that occur between people, groups, communities, government actors, beneficiaries, project staff, NGOs, CSOs, contractors or primary suppliers. Aggrieved parties need to be able to refer to institutions, instruments, methods and processes by which a resolution to a grievance is sought and provided. The GRM therefore provides an effective avenue for expressing concerns, providing redress, and allowing for general feedback from community members.

123. The GRM aims to address project-related concerns in a timely and transparent manner and effectively. Information on the GRM will be readily available to all project-affected parties. The GRM

<sup>64</sup>Under ESS2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labour Management Plans (LMPs). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanism, which will be defined in a separate GBV/SEA and GBV Action Plan.

<sup>65</sup> World Bank, Environmental and Social Framework, 2018, p. 131.

is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties. The availability of these GRM does not prevent recourse to judicial and administrative resolution mechanisms.

124. MOES will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with the laws of GoSL and the World Bank Environmental and Social Standards through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all grievances will be with the Social specialists at the GoSL level who will receive grievances by phone, text or email to publicized toll free mobile phone lines and email addresses at the GoSL level. The social specialists will acknowledge, log, forward, follow up grievance resolution and inform the complainant of the outcome. The complainant has the right to remain anonymous, thus their name and contacts will not be logged and whistleblower protection for complaints raised in good faith will be ensured. The GoSL social specialist will carry out training of all PMT staff and Ministry of Education staff involved with the project, and contractors on receiving complaints and referral and complaints handling and reporting and will oversee awareness raising on the GRM at national level.

125. A grievance redress committee (GRC) will be established at FMS and GoSL levels chaired by the project manager, and the relevant staff will be included as necessary depending on the complaint (procurement, finance, monitoring and evaluation (M&E), GBV advisor and communication). The social specialist will compile minutes for the meetings and follow up the grievance resolution process. The GRC will meet monthly to review minor complaints, progress on complaints resolution, review the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the system and the project. Immediate meetings will be held in case of significant complaints to be addressed at the MOES/PIU level. Significant complaints will be outlined in the GM manual. For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, the FMS social specialist should immediately inform the GoSL social specialist or head of the PMU, who will inform the World Bank within 48 hours as per the Environmental and Social Incident Response Toolkit (ESIRT) requirements.

126. Due to limited capacity in the Government system, the States may enlist the support of CBOs working in the project areas to support the GRM activities or NGOs/an independent call centre to receive and help process complaints on an as-needed basis. All contractors and suppliers will be expected to sensitize their workers on the Project GRM and have a focal person to receive complaints regarding the construction and their workers and put in place complaints structures specific to the workers (as detailed in the LMP).

127. At community level social accountability committees with strong representation of disadvantaged groups will receive complaints directly from the community, contractors or school and forward to the FMS social specialist to support resolution and follow up. Figure 1 presents the structure to be adopted by the project in managing grievances.

### PROJECT GRIEVANCE MECHANISM

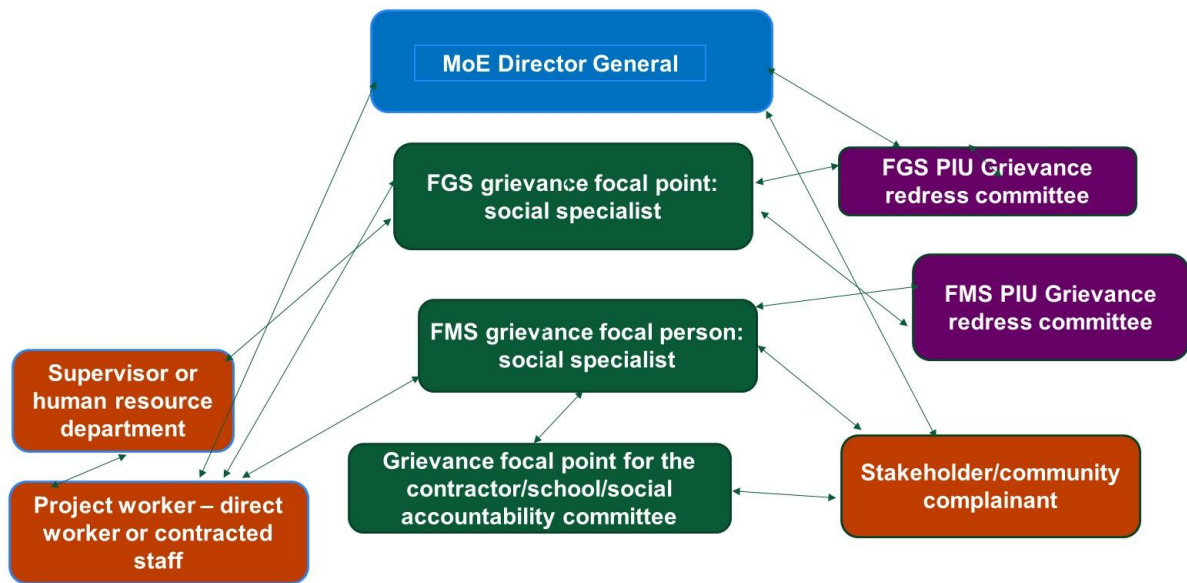


Figure 2: Grievance structure for the project

**(i) Receive and register complaints**

128. The beneficiaries will have multiple ways of channelling complaints on any aspect of the project. This will be through email, mobile phones, community meetings, and websites. There will also be opportunities for in-person reports at the community level through contractors or project staff, CECs, SACs or community leaders. All complaints will be channelled to the relevant social specialist, who will log them into the Complaints Register (see a template in Annex 2).

**(ii) Acknowledge, assess and assign**

129. An acknowledgement of receipt will be sent to the complainant within 7 days of receipt of the complaint. The social specialist will assess the complaint in conjunction with the PM and forward it to the relevant level of implementation (e.g., MOES at the State level). If the grievance cannot be easily resolved, the social specialist in conjunction with the project manager will call a meeting of the Grievance Redress Committee (made up of relevant members of the project team) will develop a course of action. The GRC will meet every 2 months to review the functioning of the GRM and the Grievance log. All cases will be treated with utmost confidentiality.

130. Incident reporting. Severe incidents, those that caused an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers, e.g., fatality, GBV, forced or child labor*, will be reported by the IP to the PMU and the WBG within 24 hours (details on this process are described in the Labour Management Procedures).

131. Where grievances are of sexual nature and can be categorized as GBV/SEA or GBV Action Plan, the IP will handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEA and GBV Action Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEA will be required for all GRM operators and relevant project staff.

132. For all other grievances, the respective PIU will determine whether the grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first port of call will have in-depth knowledge of communal socio-political structures, hence will be able to address the appropriate individuals, if the case can be solved at the local level.

133. At all times, the PIUs will provide feedback promptly to the aggrieved party, for example through the phone or through the community structures established for addressing GRM. Feedback will also be communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback will be given to the concerned persons bilaterally.

134. Records of all feedback and grievances reported will be established by the PIU. All feedback will be documented and categorized for reporting and/or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible and for only for non-GBV related complaints, will include the name of the person reporting, district, State, cooperating partner where applicable, project activity, and the nature of the complaint or grievance.

**(iii) Propose a response**

135. The GRM focal point will propose the mechanism to be followed to resolve the grievance within 21 days and share findings with relevant stakeholders. Where an incident is reported, the IP will, in addition, follow the incident management protocol to resolve the issue. Verification and management of GBV/SEAH related grievances will follow specific, differentiated processes outlined in the GBV Action Plan.

**(iv) Agreement of a response between the Complainant and the GRM Team**

136. Where a negotiated grievance solution is required, the GRC will invite the aggrieved party

(or a representative) and decide on a solution, which is acceptable to both parties and allows for the case to be closed – based on the agreement of both parties.

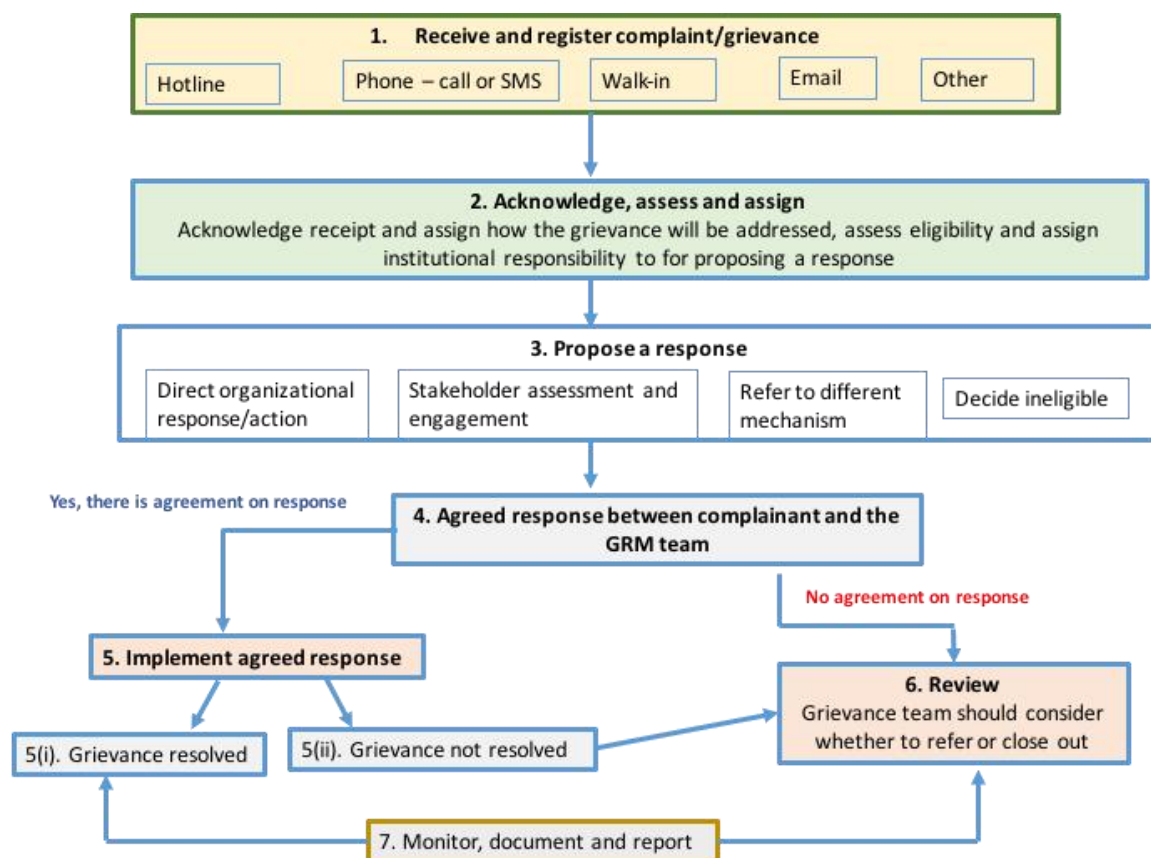
137. After deciding a case, the GRC will provide an appeals mechanism to the aggrieved party, which is constituted through the PMU. This is important in cases in which the aggrieved party is dissatisfied with the solution provided by the GRC. In these instances, the PMU will step in and provide an appeals mechanism. The appeal should be sent to the PMU directly (a phone number will be provided), where it will be reviewed by the PMU GRM Team and will be decided on jointly with the PIU Coordinator. Where aggrieved parties are dissatisfied with the response of the PMU, they can report cases directly to the World Bank or use the available national grievance resolution mechanisms (see below).

**(v) Implement the response**

138. The GRM focal point will follow up on the recommended response mechanisms and ensure the resolution of the complaints. In case the resolution is successful, the case will be closed out but in cases where the complainant is dissatisfied with the response, the GRM focal point will guide the individual or group to seek alternative grievance resolution mechanisms including mediation, arbitration and judicial processes.

**(vi) Review the Grievances**

139. The GRM team will conduct a review of the cases reported on a monthly basis and agree on the next steps on cases that have not been closed out. The GRM focal point will record the actions recommended by the GRM team and file a monthly report to the PIU. Most importantly, all cases filed will need to be logged and monitored by the contractors and primary suppliers. Figure 2 presents the process to be adopted by the project in managing grievances.



**Figure 3: Grievance process for the project**

#### 5.4. Monitoring and Reporting of GRM

140. The PMU, specifically the Social Specialist, will be responsible for monitoring the access to and implementation of the GRM by all project teams at the national, state levels. The Specialist will include the GRM in his/her supervision and monitoring missions to the field and conduct spot checks on its implementation, or, where access is difficult recruit local teams to do so.

141. The contractors and primary suppliers will provide analytical synthesis reports on a quarterly basis to the PMU, which will include the number, nature and status of grievances. These reports will form the basis of all regular reports from the PMU to the World Bank.

142. The PMU will further provide an excel sheet summary of the feedback and grievances reported, which will be linked to the Project's Management Information System (MIS) and to the M&E Results Framework. The summary will also include a breakdown of different categories complaints such as those related to GBV/SEA. The viability of having a separate GBV/SEA/H GRM will also be considered. The project team will further maintain a documented record of stakeholder engagements, including a description of the stakeholders consulted, a summary of the feedback/grievances received during community consultations. The PMU will extract lessons from the GRM and conduct an analysis on the overall grievances and share the results with all contractors and key project team members.

## **GBV and SEA**

143. Cases of GBV/SEA can be reported through the general Project GRM. However, additional channels for reporting GBV/SEA complaints will be identified and integrated into the GRM (details are provided in the GBV Action Plan). The GBV survivor has the freedom and right to report an incident to anyone: community member; project staff; GBV case manager; or service provider. Given to the sensitive nature of GBV complaints, the GRM will provide different ways to submit grievances such as phone, text message and email. All relevant staff of the PMU will receive training on handling GBV complaints and referral systems, ideally during the project initiation phase and as part of the staff welcome package. The GRM Operators will be trained on key protocols including referral, reporting and informed consent protocols to receive those cases in an appropriate manner and immediately forward them to the GBV/SEA referral system. The GRM Operator will ensure appropriate response by: (i) providing a safe caring environment and respect the confidentiality and wishes of the survivor; (ii) if survivor agrees, obtain informed consent and make referrals; and (iii) provide reliable and comprehensive information on the available services and support to GBV survivors.

144. The GRM proposes the following key features on preventing GBV/SEA: (i) establish quotas for women in community level grievance management to facilitate safe reporting; (ii) provide multiple channels to receive complaints (channels to be determined after community consultation); (iii) resolve complaints at the point of service delivery to reduce information and transaction costs and gender sensitive independent channels for redress; and (iv) communicate GRM services at the community level to create GBV/SEA awareness and enable project-affected persons to file complaints.

145. Beneficiaries and communities will generally be encouraged to report all GBV/SEA cases through the dedicated GBV/SEA referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information. The GBV/SEA referral system will guarantee that survivors have access to necessary services they may need, including medical, legal, counselling, and that cases are reported to the police should the survivor choose to do so. Formal processes for disclosing, reporting, and responding to cases of GBV/SEA will be articulated within the GBV/SEA and GBV Action Plan.

146. If a GBV/SEA case is reported through the Project GRM, the GRM Operator will report the case within 24 hours to the PMU, and the PMU is obliged to report this case to the WB within 24 hours. Furthermore, cases of SH will be reported through the workers' GRM, if it concerns a direct worker or a worker from a sub-contractor, NGO partner or even a community worker following a survivor-centered approach. The PIUs will be in charge of holding sensitization sessions for contractors and primary suppliers regarding the Code of Conduct obligations and awareness raising activities in communities. All reporting on GBV/SEA will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

### **GRM Appeals and Escalation Mechanisms**

147. Where agreement on grievance resolution has not been reached, the project team will offer the complainant with appeal options and processes available in the country. The approaches will include an Independent Panel; internal or external offices or individuals with appreciable degree of independence, and third-party fact-finding, facilitation, and mediation missions as applicable. Depending on the grievance, the appeal may entail offering the aggrieved person the option to seek redress through statutory referral institutions operational in the country.

## **5.5. WBG's Grievance Redress Service (GRS)**

148. **World Bank Somalia Office:** Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank Somalia office at: [somaliaalert@worldbank.org](mailto:somaliaalert@worldbank.org).

149. **World Bank Grievance Redress Service (GRS):** If no response has been received from the World Bank Somalia office the grievance can be raised with the World Bank Grievance Redress Service email: [grievances@worldbank.org](mailto:grievances@worldbank.org). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

## 6. POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS, IMPACTS AND MITIGATION

### 6.1. Introduction

150. This section highlights the environmental and social risks and impacts along with associated mitigation measures for the expected negative environmental and social risks and impacts linked to the proposed, albeit small-scale civil works, especially during the construction and rehabilitation of classrooms, schools, ablution facilities, staff rooms, storage facilities and another schooling infrastructure. The risks and impacts during the operational phase of the supported schools are also covered. The schools to be supported in the project, including any new constructions, will be modelled along the Safe Schools standards as promoted by UNICEF and its partners, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. The Safe Schools Standards focus on school designs for the protection of children and their educational prospects in areas prone to armed conflicts. The schools to be supported in the project, including any new constructions, will be modelled along the Safe Schools standards as promoted by UNICEF. These UNICEF standards focus on the EHS standards and the school environment, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. These Standards focus on school designs for the protection of children and their educational prospects and are relevant for areas prone to armed conflicts. By following these Standards, the Somali government will ensure that it will provide access to water and sanitation in school facilities, ensure that the indoor air quality (IAQ) follows WHO guidelines, eliminate smoking in schools and ensure that children can safely walk to schools.

151. Based on stakeholder consultations and on account of the fact that the project length is relatively limited, it is envisaged that the project will have minor deleterious environmental impacts. The potential positive socio-economic benefits that may be registered as a result of this project are also described.

152. An Environmental and Social Commitment Plan (ESCP) has been prepared for the project. The ESCP requires compliance with all provisions of the following environmental and social instruments, which have been prepared and/or are under preparation for this project:

- This ESMF, which has been prepared in accordance with the procedures set in place by the World Bank;
- The Resettlement Policy Framework (RPF) will be prepared in accordance with ESS5 of the ESF. The Framework will ensure that appropriate measures are in place to address any issues that might arise from potential land acquisition and/or economic displacement under the project;
- The Stakeholder Engagement Plan (SEP) will be developed, encompassing stakeholder identification and analysis summary, plans for engagement (e.g., type, regularity, etc.), communication activities and grievance redress mechanisms. The SEP outlines both the initial and ongoing process by which stakeholders will be engaged to ensure the design of the project aligns with stakeholders current and ongoing needs. Consultations will be done on the SEP with a variety of actors in the education sector in Somaliland, with the corresponding comments received analysed and addressed;
- The Labour Management Procedures (LMP) will be developed and cleared prior to disbursement of funds for Component 2 of the project. The LMP will outline requirements for construction companies and primary suppliers including a mechanism to prevent child and forced labour and reporting requirements on serious incidents;

- GBV/SEAH Action Plan will be developed to address risks related to sexual exploitation abuse and harassment; and
- Security Management Plan will be developed and cleared before disbursement of Component 2.

153. The ESCP also requires compliance with ESIA's and ESMPs, Resettlement and Livelihood Plans (RPs and LPs), sub project specific SEPs and contractor LMPs, which will be prepared for subprojects under the project.

## 6.2. The ESMF Procedures

154. Step 1: Environmental and Social Screening. Screening is the process of identifying whether a closer, more comprehensive, and formal assessment of environmental and social impacts is necessary or not. The procedure is used to determine whether a proposed sub-project activity within the larger Education project is likely to have significant effects on the environment and social systems. The subproject screening process will also exclude sensitive areas, including biodiversity hotspots and seasonal water streams, to ensure that ecological processes are not interfered with.

155. An environmental and social screening checklist is hereby provided for the benefit of the project implementing teams in the seven project districts. The project teams, and especially the environmental and social safeguards, are required to closely go through the screening tool to determine the next steps, including the environmental and social instruments that need to be prepared. Please see Table 6.

**Table 7: Environmental and social screening tool for the Somaliland Education Project**

Impact occurrence		Yes <sup>66</sup>	No <sup>67</sup>	Details
<i>Will sub-project activities entail the ...</i>	logging of natural stands of forests?			
	consumptive use of wetlands?			
	use of marine resources?			
	consumptive use of natural grasslands?			
	poaching, removal, alteration or disturbance of any animal species?			
<i>Will project activities, after their implementation, result in the ...</i>	modification of physical features of the terrain, leading to alteration of site hydrology?			
	flow of leachate into the soil?			
	spilling of oil and other petroleum products and the contamination of surface and subsurface soil biota			
	generation of hazardous wastes (solid and liquid)?			
	groundwater contamination or deterioration of water quality?			
	soil erosion?			
	siltation of waterways?			
	flash floods?			
increased levels of air pollution, including dust, particulate matter, and emissions of noxious fumes?				

<sup>66</sup> Tick if "yes"

<sup>67</sup> Tick if "no"

Impact occurrence		Yes <sup>66</sup>	No <sup>67</sup>	Details
<i>Project procurement</i>	Will the project procure, or does the project intend to procure, products that are in the World Health Organization (WHO) Classes IA and IB, or formulations of products in Class II or pesticides or other chemicals specified as “Persistent organic pollutants” under the Stockholm Convention or that are banned in Somaliland? <i>Please check the WHO website for more information</i> <a href="http://www.who.int">http://www.who.int</a>			
<i>Environmental conventions and treaties</i>	Will sub-project activities contravene major international and regional conventions on environmental issues? <i>Please consult the project’s ESMF listing for a list of these conventions.</i>			
<i>Unexpected environmental impacts</i>	Will there be other unexpected environmental impacts that may occur as a result of implementation of the proposed sub-projects?			
<i>Environmental-related grievances</i>	Is the project likely to receive any environmental and/or social related grievances as a result of the sub-projects?			
<b>Social screening checklist</b>				
Land availability and ownership	Is land available for school construction? Are the community members willing and ready to hand it over for school construction?			
Presence of a CEC at the school level	Does the area have a functional CEC or the readiness to form one?			
Involvement of disadvantaged groups in discussions and decision making	Are there structures in place to engage people considered disadvantaged in decision making (e.g., women, youth, persons with disabilities, IDPs, etc.?)			

156. Step 2: Development of E&S instruments. Based on the findings of the environmental and social screening, the team will proceed to the next step of development of environmental and social instruments in the event that significant environmental and social impacts are anticipated. The team will therefore prepare the following environmental and social documents:

- a. Site-specific Resettlement Plans (RPs); and
- b. Environmental and Social Management Plans (ESMPs).

157. Step 3: Review and approval. The draft environmental and social instruments prepared will be submitted to the project TTLs, who will review and in turn forward these draft documents to the World Bank ESF team supporting this project. The Bank will internally review the submitted instruments carefully and will likely have suggestions for quality improvement, including enhancing

the proposed. environmental and social mitigation measures. After Bank clearance, the project team can go ahead and implement the sub-projects, including allowing contractors to move on and commence civil works.

158. Step 4: Implementation, monitoring and reporting. In this instance, the project teams in the various FMS's will ensure that specific requirements on contractor management, including incorporating ESHS requirements, are incorporated into bidding document and contracts. Contractors are duty bound to ensure that they report as accurately as possible on incidents and accident in the course of the construction and operation of the schools supported by the project. The contractor and primary suppliers will be required to ensure that they follow the national guidelines and World Bank requirements, including maintaining an accurate labour registry of all contracted workers, with age verification conducted. Minimum working age under the project is 18 years.

159. Also, under Section 6.1, several E&S instrument, including ESMF, RPF, SEP, LMP, GBV Action Plan and SMP are said have been or being in the process of being prepared. It needs to clearly state the specific timeline for each instrument.

### 6.3. Environmental and Social Screening

160. Screening is the first step in the ESMP preparation process. All proposed subprojects, that is, new school construction activities grouped into district cohorts, will be subjected to the screening process to determine and assign them an environmental and social risk rating category and further identify potential environmental and social impacts. The process will also identify critical issues that might be triggered and/or exacerbated by the subprojects and would need further detailed investigations during environmental and social assessments. This process will also help in advising what safeguards tools (ESMPs, RPs, LPs etc.) will be required for the various subprojects. Most importantly, it will help in re-aligning, re-designing and where not possible dropping out subprojects that have high risks and the potential to negatively impact on the environment, natural habitat and physical and cultural resources, forests, and the health and wellbeing of the communities.

161. The environmental and social screening will involve:

- reconnaissance of the subproject areas (including the siting of the schools) and their surroundings;
- the absence or existence of any VDC/CEC in the village/district, their capacity, effectiveness as per the CEC policy and the existing gaps;
- identification of the major subproject activities to be implemented;
- preliminary assessment of the impacts of these activities on the ecological, physicochemical and socio-economic environment of the subproject surrounding areas; and
- potential impacts on the individuals, households and communities living in the project area; and
- an understanding of the community including disadvantaged groups as well as the land ownership and management system and community structures including the existence of CECs and VDCs and representativeness.

162. A template form for environmental and social screening for sub-project activities is presented in Annex 2. This will be reviewed and updated as needed during the implementation process. Key environmental and social risks identified as crosscutting for the project include labour and OHS. The project investments will be considered in the environmental and social assessments. Specific environmental and social risks for each project component are mainly linked to processes and capacity of key stakeholders for environmental and social risk management.

#### 6.4. Environmental and Social Risks Rating

163. Assessment of risks for subprojects will be determined according to their environmental and social risk levels. The risk level is to be estimated based on the intrinsic environmental and social risks associated with:

- the type of interventions to be carried out (e.g., during the construction of schools); and
- the specific type of infrastructure proposed.

164. The physical components of the project are civil works related to the construction of schools and upgrading offices to be used for project activities. The impact of the civil works is expected to be small-scale, localized and reversible. There are, therefore, no significant or irreversible adverse environmental issues anticipated from the activities to be financed under the project.

165. The engineering capacity of the client is nascent and growing with regards to construction of small-scale civil works. However, the client's ability to apply World Bank ESS is limited due to lack of appropriate technical capacity for safeguards at the MOES. In addition, the country risks are extensive due to political and security considerations; the ability for the World Bank to supervise environmental and social risk management is limited. Construction specifications for the new classrooms and schools will conform to the government's school prototypes, align with agreed standards (safe, inclusive, resilient, and climate-smart), and incorporate a modular approach as appropriate to suit local needs to ensure optimal coverage and minimal distances for children to travel. The project will align with the World Bank's ESS1, as it includes specific requirements related to construction activities, putting emphasis on ensuring that such buildings are accessible to persons with disabilities (PWDs), i.e., PWD-friendly, through "universal design," which ensures usability by all people, to the greatest extent possible, without the need for adaptation or specialized designs. Further, ESS1 adherence will emphasize the importance of complying with applicable laws, regulations and international best practices related to construction activities.

166. The overall environmental and social risk rating is "**High**" under World Bank's Environmental and Social Risk Classification system (ESRC).

#### 6.5. Environmental Risks and Impacts Envisaged

167. There are environmental risks and impacts associated with the implementation of the project activities for the proposed initiative. The environmental risk rating is "**Moderate**" at this time due to the potential environmental risks from school construction and IT support. The rating may be amended as more details become available. The new schools will be modelled along the Safe Schools Standards as promoted by UNICEF and its partners, meaning that the schools will be designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. The Safe Schools Standards focus on school designs for the protection of children and their educational prospects in areas prone to armed conflicts. The schools to be supported in the project, including any new constructions, will be modelled along the Safe Schools standards as promoted by UNICEF. The Standards include commitments related to the EHS standards and the school environment, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts, and which are in agreement with the World Bank's EHS Guidelines. These Standards focus on school designs for the protection of children and their educational prospects and are relevant for areas prone to armed conflicts. By following these Standards, the Somaliland government will ensure that it will provide access to water and sanitation in school facilities, ensure that the indoor air quality (IAQ) is in compliance with WHO guidelines, eliminate smoking in schools and ensure that children can safely walk to schools.

168. The envisaged environmental risks and impacts during the construction phase are likely to include:

- a. Land clearing and loss of vegetation: This refers to the removal of vegetation and trees during the construction phase, leading to potential ecological impacts and loss of biodiversity.
- b. Soil erosion and sedimentation: Construction activities can cause soil erosion and sedimentation, which may result in the degradation of soil quality and water bodies due to the displacement of sediments.
- c. Risks from vehicular traffic: Construction projects often involve increased vehicular traffic, which can pose risks such as accidents, congestion, and noise pollution.
- d. Change of land use: The construction phase may involve a change in land use, potentially altering the natural landscape and affecting surrounding ecosystems.
- e. Generation of liquid waste and hazardous waste: Construction activities can produce liquid waste and hazardous materials, including used oil and empty paint cans, which require proper disposal to prevent environmental contamination.
- f. Risks associated with primary supply materials: The sourcing and use of materials for school construction may involve environmental risks, such as the extraction of non-renewable resources or the use of materials with high carbon footprints.
- g. Worker occupational health and safety: This refers to the risks and hazards faced by workers during the construction phase, including potential accidents, exposure to harmful substances, or unsafe working conditions.
- h. Construction risks during COVID-19 pandemic: Construction activities may be affected by the COVID-19 pandemic, leading to additional health and safety risks for workers and the need for compliance with relevant protocols.
- i. Solid waste generation and disposal: Construction projects generate significant amounts of solid waste, which need proper management and disposal to prevent environmental pollution.
- j. Air and noise pollution: Construction activities can result in air pollution due to dust, emissions from machinery, and noise pollution from equipment, impacting the surrounding environment and communities.

169. The envisaged environmental risks and impacts during the operational phase are likely to include:

- a. Potable water supply: The operational phase may face challenges related to the availability and quality of drinking water, which is crucial for the health and well-being of students and staff.

- b. Wastewater disposal: Proper management of wastewater generated within the educational facilities is essential to prevent contamination of water sources and maintain environmental health.
- c. Solid waste collection and disposal: Effective collection and disposal systems for solid waste within the school premises are necessary to prevent environmental pollution and maintain cleanliness.
- d. Indoor air quality: Ensuring good indoor air quality within educational buildings is important for the health and comfort of students and staff, requiring proper ventilation systems and control of pollutants.
- e. Transportation (including traffic): The transportation activities associated with the operational phase, such as student commuting and staff transportation, may contribute to traffic congestion and associated environmental impacts.
- f. Outbreak of pests and vermin: Schools may face challenges related to pests and vermin, which can impact the learning environment and pose health risks. Proper pest control measures need to be in place.
- g. Spread of communicable and infectious diseases among children: The proximity of students in educational settings increases the risk of the spread of communicable and infectious diseases, necessitating effective hygiene practices and disease prevention measures.
- h. E-waste: The project's support for digital delivery of educational materials may lead to the generation of electronic waste (e-waste), which requires proper management and disposal to prevent environmental contamination.
- i. Other potential hazards beside fire: Besides fire, there may be other potential hazards that need to be identified and addressed to ensure the safety and well-being of students, staff, and the surrounding environment. These may include structural, electrical, sanitation and hygiene, natural, chemical, security and/ or psychological hazards.

170. Although there are no significant or irreversible adverse environmental issues anticipated from the investments, the project will explore the use of safety audits for the education sector, as is currently done among humanitarian and development partners in Somaliland, to ensure project activities take into consideration key structural safety considerations in design and implementation.

## 6.6. Social Risks and Impacts Envisaged

171. The social risk rating is adjudged as **'High'**. While the scale and nature of the civil works are limited, some social risks and impacts may be significant. The project is designed to have positive social impacts by purposely targeting disadvantaged populations including IDPs, rural, and pastoralist/nomadic communities. A preliminary assessment of potential social risks and impacts establishes that there are direct risks from project activities related to civil works from construction of schools, which could lead to land acquisition, restrictions on land use, resettlement, and labour influx. In addition, the use of local labour and the reliance on community partnerships and management could lead to cases of child labour and forced labour.

172. The envisaged social risks and impacts during the construction phase of the project include:

- a. Open pits following extraction of construction materials: After extracting materials for school construction, open pits may be left behind, which should ideally be filled or restored within a specific timeframe to minimize potential hazards.
- b. Root cause analysis: This involves identifying the underlying causes of any environmental incidents or issues during the construction phase to address them effectively.
- c. Corrective action plan on signboard, guards: A corrective action plan is required to address any deficiencies or non-compliance related to signboards and guards, ensuring proper safety measures are in place.
- d. Compensation to the affected family based on a clear rationale: If families are affected by the construction activities, compensation should be provided based on a transparent and well-defined rationale to address any negative impacts they may experience.
- e. Risk assessment and correct application of ESHS management procedures: It is essential to conduct a risk assessment and ensure the proper application of Environmental, Social, Health, and Safety (ESHS) management procedures to mitigate potential risks and ensure compliance with relevant standards.
- f. Medium- and long-term mitigation measures: This involves implementing measures to mitigate and minimize environmental impacts in the medium- and long-term, such as enhancing safety measures, conducting regular audits, and providing additional training to personnel.
- g. Progress monitoring and reporting: Regular monitoring and reporting of construction activities and their environmental impacts are necessary to track progress, identify any deviations from the plan, and ensure compliance with environmental regulations and project requirements.

173. The risks of GBV/SEAH/SEA and sexual harassment, are currently assessed as **“High”** based on the existing high rates of GBV/SEAH in the country, extending from conflict and shocks such as droughts, floods and other climate-related challenges, and social norms that entrench gender inequalities in Somaliland. In addition, because the project’s scope and focus will be on predominantly rural sites, the scope of works, and the absence of appropriate institutional structures to manage risks and weak mitigation systems and lower absorption capacity ramps up the risk rating. Specifically,

- a. Labour-related issues, including terms and conditions, safe workplace, occupational health and safety (OHS), and others, need to be addressed in both the construction and operation phases of the Somaliland education project, in accordance with World Bank's Environmental and Social Standards (ESS).
- b. In reference to ESS2, the project should ensure that labour-related issues are adequately addressed. This includes establishing appropriate terms and conditions of employment, such as fair wages, working hours, and benefits for workers involved in the construction and operation phases. It is crucial to provide a safe workplace for all workers, implementing measures to prevent accidents, injuries, and occupational health risks. Compliance with OHS regulations and standards should be a priority to safeguard the well-being of workers.

- c. Furthermore, considering the impacts on community health and safety, as outlined in ESS4, the project needs to identify and assess potential risks to the health and safety of the local community. This includes evaluating and mitigating any adverse effects arising from the construction and operation phases that could affect the surrounding communities, such as air and water pollution, traffic congestion, or noise impacts.
- d. In accordance with ESS8, the project should also consider the impacts on cultural resources. It is essential to assess and mitigate any potential adverse effects on cultural heritage sites, sacred areas, or traditional practices during the construction and operation phases. Respecting and preserving cultural resources is vital for maintaining the cultural identity and values of the local community.
- e. Given the high rates of gender-based violence/ sexual exploitation and abuse/harassment (GBV/SEAH/SEA) in Somaliland, the project must prioritize the prevention and mitigation of these risks. This includes establishing appropriate institutional structures, strengthening mitigation systems, and enhancing the capacity to manage and address GBV/SEAH/SEA risks effectively.
- f. The rural focus of the project, the scope of works, and the existing challenges in managing risks further amplify the importance of addressing and managing these labour-related issues and risks associated with GBV/SEAH/SEA appropriately.

174. The project will be implemented in areas of fragility due to endemic poverty, acute drought, floods and protracted conflict and insecurity which may make direct access to beneficiaries challenging and amplify risks related to lack of effective stakeholder engagement, community participation, grievance redress and application of other risk mitigation protocols. Other cumulative risks include systemic weaknesses related to MOES's capacity and the capacity of the FMS MOESs' for preventing adverse social impacts on the project and mitigating and offsetting impacts of social harm whenever they occur.

175. To address the potentially adverse environmental and social risks and impacts, an environmental and social screening process has been proposed under this ESMF. This will be applied in such a way as to ensure that potential negative risks and impacts of the project are identified, prevented or mitigated appropriately while enhancing the positive impacts. As an additional mitigation measure, schools will be designed according to the Safe School Standards. Promoted by UNICEF and its partners, Safe School Standards ensure that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. The Safe Schools Standards focus on school designs for the protection of children and their educational prospects in areas prone to armed conflicts. The Standards put emphasis on school crisis and emergency preparedness training for both students and teachers, which encompass environmental crisis prevention/mitigation, early intervention (which is part of ongoing school safety), immediate response/intervention, and long-term recovery. The Standards include commitments related to the EHS standards and the school environment, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. Taken together, adhering to the Standards and the EHS commitments will help the Somali government ensure that it will provide access to water and sanitation in school facilities, ensure that the indoor air quality (IAQ) is in compliance with WHO guidelines, eliminate smoking in schools and ensure that children can safely walk to schools. This is in tandem with the guiding principles of the World Bank's ESF.

176. To mitigate these risks during project implementation, key ESF instruments will be prepared and activated in the life of the project. These are as follows:

- The LMP will guide how project related labour will be sourced and managed in a manner that reduces harm on all categories of workers;

- The SEP will set out effective and transparent management of consultation and information disclosure processes. The SEP will include a Grievance Redress Mechanism (GRM) and Inclusion Plan as key components;
- A GBV/SEAH Action Plan, which will articulate the key risks and mitigation measures to address GBV/SEAH/SEA risks, identification of GBV/SEAH Service Providers and reporting and referral protocol in the event cases emerge, and communication and training requirements for communities and all project related staff, including project workers, teachers, and school administrators. It will also elaborate the adoption of mitigation measures including an Accountability and Response Framework which will define the use of Code of Conduct (CoC) for project workers, collaboration with local communities and GBV/SEAH-related service providers;
- Security Management Plan which will highlighting measures to minimize security risks such as protection of project construction workers, if any;
- An ESCP, which will summarize the Borrower’s commitments and obligations to adopt and implement these measures during project implementation; and
- A Resettlement Planning Framework (RPF), which will contain the protocols for voluntary land donations and will be a key guide in terms of the processes and procedures for land acquisition and resettlement, should this be necessary.

## 6.7. Environmental and Social Benefits

177. The implementation of subprojects under the overall Somaliland Education Project as proposed will have a number of social and environmental benefits. The social benefits include:

- inclusion of out-of-school children in schooling and improvements in learning will lead to a larger number of students completing lower primary education;
- availability of larger number of cohorts of students transitioning into secondary schooling;
- improving girls’ participation in schooling by introducing incentives for increasing and maintaining their enrolment in school will improve the gender situation in Somaliland;
- encouraging recruitment of female teachers and prioritizing support for female teachers and schools will ensure more women participation in the education sector in Somaliland, with positive downstream outcomes;
- inclusion of training modules in promoting girls’ education and creating safe, inclusive school environments with specific attention to identifying and addressing violence, including gender-based violence in schools, will ensure safer environments for children at school;
- employment opportunities for the community through construction, rehabilitation and maintenance of the school infrastructure; and
- overall, the project will contribute towards the development of social cohesion and national stability in the longer-term.

178. The project will have the following key environmental benefits:

- provision of improved, quality school infrastructure which will lead to less exposure of school-going children to communicable diseases; and
- the formalized schooling environment will provide a basis for incorporating environmental education and stewardship into the school curriculum, resulting in higher levels of environmental stewardship.

## 7. ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

### 7.1. Environment and Social Risks Mitigation

179. Table 7 presents the mitigation measures proposed for negative environmental and social risks and impacts anticipated for the Somaliland education project.

180. Before the implementation of activities on the ground, the government of Somaliland will oversee the development of two Environmental and Social Management Standards per district. A standard (base) ESMP will be developed with environmental and social mitigation activities for school construction, while a different standard ESMP will be developed to take care of possible environmental and social risks occurring during school operation and maintenance activities. Both ESMPs should be developed at the initiation of the project. Sample TORs for an ESMP are provided in Annex 4.

181. The standard construction ESMP then will then modified/enhanced based upon the subproject screening (and any other additional activity) and be used as a requirement for construction contractors (including a base for their C-ESMP). Similarly, the standard operation phase ESMP will also be modified/enhanced based upon the actual conditions (design, location, services, etc.) of an individual school prior to the end of construction. These standard ESMPs will be presented to the World Bank for review and clearance and will help ensure consistency and adequacy (completeness, details) among individual schools/subprojects.

**Table 8: Environmental and social risks and impacts mitigation**

Potential negative environmental and social risks and impacts	Proposed mitigation measures
<b>CONSTRUCTION PHASE</b>	
Possible loss of terrestrial biodiversity during land clearing for construction or rehabilitation of classrooms, especially in the southern regions of the country, including loss of natural vegetation (both flora and fauna), soil erosion and sedimentation, change of land use	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures during the construction phase of the Somaliland education project are as follows:</p> <ul style="list-style-type: none"> <li>- Avoid environmentally sensitive areas when scouting for gravel extraction and backfill materials for school infrastructure works, in line with the EHS Guidelines that emphasize avoiding impacts on sensitive ecosystems.</li> <li>- Incorporate EHS requirements into contracts with contractors and suppliers, as recommended by the EHS Guidelines. This ensures that environmental and social considerations are explicitly included in contractual agreements.</li> <li>- Contractors and Project Management Units (PMUs) should seek advice and clearance from appropriate government agencies regarding the location of sensitive environments. This aligns with the EHS Guidelines' emphasis on engaging with relevant authorities to ensure compliance and protection of sensitive areas.</li> <li>- Minimize the removal of existing vegetation within the project site and restore/rehabilitate areas temporarily cleared of vegetation, in accordance with the EHS Guidelines. This measure promotes the conservation and restoration of natural habitats.</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
	<ul style="list-style-type: none"> <li>- Use appropriate indigenous species (trees, shrubs, grass, cover crops) for rehabilitating temporarily disturbed/cleared/denuded areas. This aligns with the EHS Guidelines' recommendation to prioritize the use of native vegetation for restoration purposes.</li> <li>- Minimize the cleared area to only the land needed for the construction of facilities, as stated in the EHS Guidelines. This reduces the overall environmental impact and preserves the natural landscape to the greatest extent possible.</li> <li>- Minimize the clearance/cutting of indigenous and rare tree species, in accordance with the EHS Guidelines' emphasis on preserving biodiversity and protecting endangered flora.</li> <li>- Carefully select construction sites, avoiding sensitive and/or breeding areas, as recommended by the EHS Guidelines. This ensures the protection of critical habitats and minimizes disturbances to wildlife.</li> <li>- Include vegetative regeneration as a condition in contracts for physical works, aligning with the EHS Guidelines' recommendation to include requirements for ecological restoration in project contracts.</li> </ul>
<p>Air quality problems, including:</p> <p>(a) increased levels of air pollution caused by the operations of construction vehicles and heavy equipment in schools and</p> <p>(b) increased greenhouse gases emission due to the operations of construction vehicle and equipment</p> <p>(c) Air quality impacts also during school operations due to poor indoor air quality</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Ensure that project and contractor vehicles and other equipment undergo scheduled preventive maintenance for proper exhaust emission, in line with the EHS Guidelines' emphasis on controlling air emissions. Regular maintenance helps reduce the environmental impact of vehicle emissions and ensures compliance with emission standards.</li> <li>- Construction truck drivers should observe established speed limits when working in the school set-up, aligning with the EHS Guidelines' recommendation to control traffic-related impacts. Adhering to speed limits helps minimize noise, dust, and safety risks associated with construction vehicles, ensuring the well-being of students, staff, and the surrounding community.</li> <li>- Avoid the burning of biomass as much as possible and use fire only in situations where it is the least environmentally damaging option. This aligns with the EHS Guidelines' focus on pollution prevention and control. Minimizing biomass burning reduces air pollution, protects air quality, and avoids potential health risks associated with smoke and emissions.</li> </ul>
<p>Noise, dust and vibration from construction and maintenance</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
equipment	<ul style="list-style-type: none"> <li>- Dampen school construction sites at least once a day to reduce dust levels, in accordance with the EHS Guidelines' recommendation for dust control measures. Dampening helps minimize airborne dust particles, protecting air quality and reducing potential health risks for workers and nearby communities.</li> <li>- Use modern, well-maintained equipment fitted with noise enclosures, aligning with the EHS Guidelines' focus on noise pollution control. The use of noise enclosures helps reduce noise levels generated by construction activities, minimizing disturbance to students, staff, and the surrounding community.</li> <li>- Implement strict controls on the timing of activities, such as prohibiting night-time working, in line with the EHS Guidelines' emphasis on minimizing disturbance to the local community. These controls help mitigate noise and disruption during sensitive hours, ensuring a conducive learning environment and respecting the well-being of the community.</li> <li>- Observe seasonal sensitivity, particularly during breeding and animal migration seasons, as recommended by the EHS Guidelines. This measure ensures the protection of local biodiversity and ecosystem integrity by avoiding construction activities that could disrupt critical periods for breeding or animal movement.</li> </ul>
Hazards from vehicular traffic, especially from construction traffic	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Signage: Implement clear and visible signage at construction sites, in accordance with the EHS Guidelines' recommendation for effective communication and hazard identification. Signage helps provide guidance, warnings, and information to ensure the safety of workers, pedestrians, and motorists.</li> <li>- Traffic calming measures where possible: Incorporate traffic calming measures, as feasible, to mitigate potential negative impacts on traffic flow and safety. These measures align with the EHS Guidelines' emphasis on minimizing disruption and ensuring the smooth movement of vehicles and pedestrians around the construction site.</li> <li>- Deploying signalmen for traffic coordination: Utilize trained signalmen to manage traffic flow and coordinate construction activities, in line with the EHS Guidelines' recommendation for traffic management. Signalmen help maintain safe and efficient traffic movement, reducing the risk of accidents and congestion during construction.</li> </ul>
Poor management of occupational health and safety could lead to accidents, injuries and diseases, especially among casual labourers	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Conform to international standards and regulations governing civil works and other infrastructure development, ensuring compliance with established norms and requirements for construction activities. This aligns with the EHS Guidelines' emphasis on following applicable laws and regulations to protect the environment and ensure safety.</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
<p>hired from the community in the area (<i>see also OHS measures proposed in the LMP</i>)</p>	<ul style="list-style-type: none"> <li>- Provide rest and recreational facilities and time for workers, in accordance with the EHS Guidelines' recommendation for worker well-being. Rest and recreation help maintain worker health, productivity, and morale, contributing to a safe and supportive working environment.</li> <li>- Adhere to comprehensive health and safety and risk management plans and reporting systems, aligning with the EHS Guidelines' focus on robust health and safety management practices. These plans and systems ensure that potential risks are identified, addressed, and monitored throughout the construction phase.</li> <li>- Ensure the availability of First Aid kits at the working sites and camps, including temporary camps, as recommended by the EHS Guidelines. First Aid kits provide essential medical supplies and equipment to address injuries or illnesses promptly and effectively.</li> <li>- Provide training for construction workers in First Aid, fire prevention, and Personal Protective Equipment (PPE) use, in line with the EHS Guidelines' emphasis on worker training and competence. Proper training equips workers with the necessary skills and knowledge to respond to emergencies and protect their own safety.</li> <li>- Implement strict incidents register to document and track any incidents or accidents that occur during construction. This register helps identify trends, assess risks, and take appropriate measures to prevent similar incidents in the future.</li> <li>- Arrange with nearby suitable hospitals or health clinics to treat project staff and workers who are sick or have been victims of accidents in the civil works sites or camps, aligning with the EHS Guidelines' recommendation for access to healthcare services.</li> <li>- Contractors should develop an Emergency Response Plan for each supported school in the project, outlining procedures for addressing emergencies and ensuring the safety of individuals on-site.</li> <li>- Orient ambulance drivers and emergency response teams on alternative routes and instruct traffic aides to assist medical and emergency response teams, when necessary, to facilitate swift and efficient emergency response.</li> <li>- Establish a Code of Conduct (CoC) to be followed by all construction supervisors and workers, including disciplinary action in case of gross violation of the guidelines. This promotes adherence to safety protocols and fosters a culture of responsible behaviour on the construction site.</li> </ul>
<p>Land acquisition and resettlement issues (including physical and economic displacement)</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Comply with the Resettlement Policy Framework (RPF): Follow the guidelines outlined in the RPF, which includes the preparation and implementation of land</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
	<p>agreements, Resettlement Plans (RPs), and Livelihood Restoration Plans (LPs) subject to World Bank approval. These measures aim to address the potential social impacts associated with land acquisition and resettlement.</p> <ul style="list-style-type: none"> <li>- Prepare and implement land agreements, RPs, and LPs subject to World Bank approval for each of the sub-projects. This aligns with the EHS Guidelines' recommendation for comprehensive planning and management of land acquisition and resettlement processes to minimize social disruption and ensure the well-being of affected communities.</li> <li>- Ensure all resettlement issues are resolved prior to the start of construction. This measure aligns with the EHS Guidelines' emphasis on resolving resettlement concerns and providing adequate compensation and support to affected individuals or communities before initiating construction activities.</li> </ul>
Possible loss of cultural heritage during construction works	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- The Project Implementation Unit (PIU) should ensure that contractors carefully follow the protocols and procedures to protect tangible and intangible cultural heritage. This includes measures such as protecting community graves, avoiding disruption to cultural or religious events, and developing cultural heritage mitigation plans as per Environmental and Social Standard 8 (ESS8), as outlined under Annex 1 (World Bank Environmental and Social Standards).</li> </ul>
Possible social tensions and conflicts as a result of activities such as displacement, marginalization of community groups (see also the LMP on management of labour-related risks)	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Comply with the Resettlement Policy Framework (RPF): Follow the guidelines outlined in the RPF, ensuring that all relevant procedures and requirements are met throughout the project implementation.</li> <li>- Prepare and implement a Resettlement Plan (RP) for each of the districts: Develop and implement specific plans for addressing the resettlement needs and concerns of affected communities in each district, in accordance with the World Bank's guidelines.</li> <li>- Ensure all resettlement issues are resolved prior to the start of construction: Address and resolve any resettlement-related issues and concerns, including compensation, land acquisition, and livelihood restoration, before initiating construction activities.</li> <li>- Ensure continual community consultation and representation of disadvantaged groups: Engage in ongoing consultations with affected communities, ensuring their active participation in decision-making processes. Pay particular attention to including and representing disadvantaged groups.</li> <li>- Document all public consultation meetings: Maintain comprehensive documentation of all public consultation meetings, including records of discussions, decisions, and outcomes. This promotes transparency, accountability, and effective communication with the community.</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
	<ul style="list-style-type: none"> <li>- Establish a functioning Grievance Redress Mechanism (GRM): Set up a system for receiving, addressing, and resolving grievances from community members and workers. The GRM should be responsive and capable of promptly addressing concerns raised by the stakeholders.</li> <li>- Proper selection of construction workers: Prioritize the hiring of qualified individuals from project-affected households, local residents, and internally displaced persons (IDPs) for construction work. This promotes local employment and contributes to the socioeconomic development of the project area.</li> <li>- Orientation for construction workers on local customs and traditions: Provide orientation and training to construction workers regarding the local customs, traditions, and cultural sensitivities of the project area. This fosters understanding, respect, and positive interactions with the local community.</li> </ul>
<p>Negative social implications attributable to labour influx</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Contractor to prepare and enforce a No Sexual Harassment Policy: The contractor will develop and implement a policy that prohibits sexual harassment in accordance with national law where applicable. This policy will provide clear guidelines and procedures for preventing and addressing incidents of sexual harassment.</li> <li>- Education on preventing and responding to GBV/SEAH: All workers, nearby communities, and stakeholders will receive training and awareness sessions on preventing and responding to GBV/SEAH. This education aims to promote a safe and respectful work environment and ensure that individuals are equipped with the knowledge and skills to address these issues effectively.</li> <li>- Community education on GBV/SEAH and sexual offenses: The community surrounding the school construction site will be educated about GBV/SEAH and sexual offenses, emphasizing prevention measures and available support services. This awareness campaign will address the potential risks associated with labour influx during construction and promote community involvement in preventing and responding to these issues.</li> <li>- Strategies involving male involvement: Strategies will be employed to engage men in preventing and responding to GBV/SEAH. This approach recognizes the importance of male participation and accountability in addressing gender-based violence and promoting gender equality.</li> <li>- Partnerships with government agencies and NGOs: Partnerships will be established with relevant government agencies and non-governmental organizations (NGOs) to ensure that survivors of GBV/SEAH and sexual offenses have access to survivor-centred services such as medical care, psychosocial support, legal redress, and safety. These partnerships will enhance the support available to survivors.</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
	<ul style="list-style-type: none"> <li>- Gender-disaggregated facilities: The project will provide gender-disaggregated data and ensure the availability of separate bathing, changing, and sanitation facilities for men and women. This promotes privacy, dignity, and safety for all individuals involved in the project.</li> <li>- Zero tolerance on GBV/SEAH and discrimination: The project will maintain a zero-tolerance approach to sexual harassment, all forms of GBV/SEAH, and discrimination throughout all project phases. This commitment sends a clear message that such behaviours will not be tolerated.</li> <li>- Grievance redress mechanisms: Effective grievance redress mechanisms, including non-retaliation measures, will be established to provide a platform for workers to report incidents of GBV/SEAH and seek resolution. These mechanisms ensure that grievances are addressed promptly and without fear of reprisal.</li> </ul>
<p>Discrimination against disadvantaged groups Several disadvantaged groups have been identified including minority groups, IDPs, nomadic pastoralists, persons with disabilities, female headed households and orphans or children from single headed households that may not be actively engaged in the project activities and may not benefit equally from the interventions</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Implement the Inclusion Plan included in the Social and Environmental Plan (SEP): The project will adhere to the Inclusion Plan outlined in the SEP, which aims to promote the participation and engagement of disadvantaged people and groups in the project. This plan will ensure that their needs and interests are considered and addressed.</li> <li>- Generate a comprehensive and updated list of disadvantaged people and groups: The project will create a list that identifies disadvantaged individuals and groups within the respective community. This list will serve as a reference for ensuring their inclusion and targeting specific interventions to address their needs.</li> <li>- Monitor and update the list of disadvantaged groups: The project will continually monitor and update the list of disadvantaged groups to ensure its accuracy and relevance. This will help in designing and implementing appropriate measures to address the specific challenges faced by these groups.</li> <li>- Monitor the implementation of the Inclusion Plan: The project will closely monitor the implementation of the Inclusion Plan and make necessary adjustments based on identified needs and emerging issues. This monitoring process ensures that the plan remains effective and responsive to the evolving circumstances.</li> <li>- Establish a social accountability committee: A social accountability committee will be established to oversee the project's social and environmental performance and ensure the active participation of project stakeholders. The committee's role will be communicated to all stakeholders, fostering transparency, accountability, and inclusivity in decision-making processes.</li> <li>- Educate the community and the general public on the Grievance Redress Mechanism (GRM): The project will conduct awareness campaigns to educate the community and the general public about the existence and functioning of</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
	<p>the GRM. This communication effort ensures that individuals are aware of their rights, understand how to raise concerns or grievances, and have access to a mechanism for resolving issues.</p>
<p>GBV/SEAH/SEA There are already high levels of GBV/SEAH that might increase during project implementation since the project seeks to increase the number of female teachers and increase female students to about 50% of the school population. There is risk of GBV/SEAH/SEA during the construction phase</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Comply with the provisions of the GBV/SEAH Action Plan: The project will adhere to the provisions outlined in the Gender-Based Violence/Sexual Exploitation and Abuse/Harassment (GBV/SEAH) Action Plan provided in Annex 8. This plan outlines specific actions and measures to prevent and respond to GBV/SEAH incidents.</li> <li>- Sensitize the school community: Comprehensive sensitization programs will be conducted to raise awareness among learners, teachers, management administrative staff, and workers about GBV/SEAH/SEA. These initiatives will educate them on recognizing, preventing, and addressing such issues, fostering a safe and respectful school environment.</li> <li>- Provide training to project workers: All project workers, including direct staff, contractors, suppliers, and community members engaged in the project, will receive training on GBV/SEAH/SEA. This training will enhance their understanding of appropriate behavior, reporting mechanisms, and their role in preventing and responding to incidents.</li> <li>- Include GBV/SEAH/SEA provisions in the Codes of Conduct (CoCs): The CoCs, which are to be read, understood, and signed by each project worker, will incorporate provisions specifically addressing GBV/SEAH/SEA. This inclusion reinforces the project's commitment to zero tolerance for such behavior and ensures that all workers are aware of their responsibilities.</li> <li>- Sensitize the surrounding communities: In addition to sensitizing the school community, efforts will be made to raise awareness among the communities living around the schools. This community-level sensitization will promote a shared understanding of GBV/SEAH/SEA and the importance of preventing and addressing such issues collectively.</li> <li>- Monitor and refine GBV/SEAH/SEA activities: Throughout the project implementation period, there will be ongoing monitoring and refinement of activities related to GBV/SEAH/SEA. This monitoring process allows for the identification of gaps, challenges, and areas for improvement, ensuring that the project's response to GBV/SEAH/SEA remains effective and responsive.</li> </ul>
<p>Lack of or inadequate public participation This will mainly arise due to the country's fragility and high levels of insecurity</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Ensure inclusive communication: Measures will be implemented to identify and reach disadvantaged groups and rural populations with project information in a timely manner. Communication channels that are accessible to these communities, such as community radios, will be utilized to disseminate project updates and relevant information.</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
	<ul style="list-style-type: none"> <li>- Translate and disseminate information in local languages: To ensure effective communication, project information will be translated into local languages. This will facilitate understanding and engagement with the project among community members who may have limited proficiency in the official language.</li> <li>- Hold community meetings: Regular meetings will be conducted with beneficiary communities to provide updates on the project's progress and address any communal concerns. These meetings serve as a platform for dialogue, allowing community members to voice their questions, feedback, and suggestions.</li> <li>- Inform local leaders: Local leaders will be identified and equipped with comprehensive information about the project and the Grievance Redress Mechanism (GRM). They will act as key conduits of information, disseminating project updates and GRM details within their communities.</li> </ul>
<p><i>Security threats</i> The project will be implemented in rural and remote areas that are prone to security threats from known and unknown militia</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Refer to the Security Management Plan: The project will develop and implement a Security Management Plan that outlines the measures to ensure the safety and security of project workers, equipment, and facilities. This plan should comply with national laws and regulations related to security.</li> <li>- Coordinate with Ministry for Internal Affairs: Close coordination and collaboration will be maintained with the Ministry for Internal Affairs, which is responsible for security matters. This ensures that the project aligns with national security policies and receives necessary support and guidance.</li> <li>- Monitor and respond to security threats: Continuous monitoring of the security situation will be carried out, and appropriate actions will be taken based on identified threats or risks. This may involve implementing additional security measures, adjusting work schedules, or providing necessary training and support to project workers to enhance their safety.</li> </ul>
<b>OPERATION PHASE</b>	
<p>Issues with potable water supply</p>	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Ensure installation of potable water supply facilities: School construction designs should incorporate the installation of appropriate potable water supply facilities. This includes the provision of safe and accessible drinking water for school children, teachers, and other stakeholders. The design should adhere to relevant national standards and guidelines for water quality and safety.</li> <li>- Consider operation costs for safe water provision: The operation costs of the schools should include expenses related to the provision of safe and potable water. This ensures that there are allocated funds to cover the maintenance, treatment, and regular testing of water sources to ensure their continued safety and availability. It also includes costs associated with necessary infrastructure maintenance, such as plumbing and water storage facilities.</li> </ul>
<p>Poor management</p>	

Potential negative environmental and social risks and impacts	Proposed mitigation measures
of OHS, as well as risks to community health and safety	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Establish continuous liaison with host communities: The project should establish and maintain regular communication with the host communities. This includes sensitizing them on safety and health issues related to construction sites. By engaging with the communities, their concerns can be addressed, and they can be informed about the measures taken to ensure safety during construction.</li> <li>- Install appropriate safety and warning signage: Safety and warning signage should be installed in schools where construction works are in progress. These signs should effectively communicate potential hazards and safety precautions to all individuals present in the area. Local language and images should be used to ensure clear understanding by the community members.</li> <li>- Control access to potentially dangerous work areas: Access to potentially dangerous work areas should be limited to authorized personnel only. Controlled access measures, such as barriers or gates, should be in place to prevent unauthorized entry and reduce the risk of accidents or injuries.</li> <li>- Provide sanitation and waste management facilities: Proper sanitation and waste management facilities should be provided at all construction sites. This includes adequate toilet facilities and waste disposal systems to maintain a clean and hygienic environment.</li> <li>- Establish a system for receiving and responding to safety concerns: A system should be established to receive and respond to safety concerns raised by the communities. This can include designated contact persons or complaint mechanisms to ensure that any safety issues or incidents are promptly addressed.</li> <li>- Train School Community Education Committees (CECs) on EHS monitoring: School CECs should receive training on environmental, health, and safety (EHS) monitoring during school operations. This enables them to actively participate in monitoring and ensuring compliance with EHS guidelines, promoting a safe and healthy learning environment.</li> </ul>
Inefficient solid, hazardous and liquid waste and e-waste collection and management during operation and maintenance phases, leading to waste disposal problems, and resulting in polluting soils, surface and shallow	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Preparation of waste management plan: A waste management plan should be prepared for each waste stream, outlining strategies for waste reduction, reuse, recycling, and proper disposal. This plan should follow the waste hierarchy, prioritizing waste minimization and resource recovery.</li> <li>- Implementation of waste management plan: The waste management plan should be implemented in accordance with the Operation Phase Environmental and Social Management Plan (ESMP). This ensures that waste management practices are consistently followed and monitored throughout the project's operation phase.</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
groundwater, especially during the rainy seasons	<ul style="list-style-type: none"> <li>- Provision of garbage receptacles by School CECs: School Community Education Committees (CECs) should provide garbage receptacles in strategic places within the school compound. These receptacles should be regularly emptied, and the waste properly deposited in designated disposal areas, promoting a clean and hygienic school environment.</li> <li>- Reuse of suitable spoils: Whenever possible, spoils that meet material specifications should be reused. This reduces the need for additional resource extraction and minimizes waste generation.</li> <li>- Composting organic and degradable waste: Organic and degradable waste should be composted in suitable containers. This process converts the waste into nutrient-rich compost, which can be used for crop production. Providing the compost to interested farmers promotes sustainable agricultural practices.</li> </ul>
Outbreaks of diseases and poor indoor air quality	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Adequate school designs for a pest-free learning environment: School designs should ensure that adequate measures are in place to prevent and control pests and vermin. This includes provisions for proper ventilation to maintain air quality and discourage pest infestation.</li> <li>- Periodic fumigation activities: Periodic fumigation should be included in the Operation Phase Environmental and Social Management Plan (ESMP). This helps to control pests and vermin, ensuring a safe and healthy learning environment for students and staff.</li> <li>- Provision of sanitation and waste management facilities: Proper and adequate sanitation and waste management facilities should be provided in all schools. This includes toilets, handwashing stations, and waste disposal systems. These facilities promote hygiene, prevent the spread of diseases, and support a clean and safe environment.</li> <li>- Establish a system for receiving and responding to safety concerns: A system should be established to receive and address safety concerns raised by the communities. This ensures that any potential safety hazards or risks identified by the community are promptly addressed, fostering a collaborative approach to safety management.</li> </ul>
GBV/SEAH/SEA As the project seeks to increase the number of female teachers and increase female students to about 50% of the school population, GBV/SEAH/SEA risks during	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Comply with the provisions of the GBV/SEAH Action Plan: The project must adhere to the provisions outlined in the GBV/SEAH (Gender-Based Violence/Sexual Exploitation, Abuse, and Harassment) Action Plan, as detailed in Annex 8. This plan provides guidance and strategies for preventing and responding to incidents of GBV/SEAH within the project.</li> <li>- Sensitize the school community: Conduct sensitization programs to raise</li> </ul>

Potential negative environmental and social risks and impacts	Proposed mitigation measures
operation of the schools	<p>awareness among learners, teachers, management staff, and workers about GBV/SEAH and Sexual Exploitation and Abuse (SEA). These programs aim to educate individuals about identifying and preventing such incidents, promoting a safe and respectful environment within the schools.</p> <ul style="list-style-type: none"> <li>- Provide training to project workers: Ensure that all project workers, including direct staff, contract workers, supplies personnel, and community members, receive comprehensive training on GBV/SEAH/SEA. This training equips them with knowledge and skills to recognize, report, and respond appropriately to any incidents that may occur.</li> <li>- Include GBV/SEAH/SEA provisions in the CoCs: The project's Code of Conduct (CoC) should incorporate specific provisions related to GBV/SEAH/SEA. This ensures that all project workers are aware of the expected behaviours and responsibilities in relation to preventing and addressing these issues.</li> <li>- Sensitize the communities living around the schools: Extend sensitization efforts beyond the school community to include the communities living in the vicinity of the schools. Raise awareness about GBV/SEAH/SEA, emphasizing the importance of creating a safe and supportive environment for all community members.</li> </ul>
LMP, SEP, SMP and RPF	<p>To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), the proposed mitigation measures are as follows:</p> <ul style="list-style-type: none"> <li>- Compliance with relevant instruments: It is essential to ensure that the project complies with the provisions outlined in the relevant environmental, health, and safety instruments. These may include national laws, regulations, and policies, as well as any specific guidelines or requirements set forth by the World Bank or other relevant authorities.</li> <li>- Continued community sensitization: Ongoing efforts should be made to sensitize the communities involved in the project on the key provisions of the environmental, health, and safety instruments. This includes raising awareness about the importance of compliance, as well as educating community members on their rights and responsibilities regarding environmental and social protection.</li> <li>- Document updates based on monitoring reports and project amendments: Regular monitoring of project activities and their environmental and social impacts is crucial. Monitoring reports should be used to identify any deviations from the planned mitigation measures or any emerging risks or impacts. Based on these reports, necessary updates should be made to the project documents, including the Environmental and Social Management Framework (ESMF), to ensure their alignment with current project conditions and requirements.</li> </ul>

## 7.2. Gender Mainstreaming and GBV/SEAH Action Plan

### 7.2.1 Gender Mainstreaming

182. The rights of women are protected in the Constitution of Somaliland. Women have the right to education, they are allowed to work, own property, hold public office, and receive inheritance. However, there are risks that disparities between men and women may possibly occur during project implementation, in areas such as exclusion from stakeholder engagement activities, priority in recruitment of workers, differentiated pay rates for similar work done, safe working environment, health and sanitary facilities in the workplace, and exposure to GBV/SEAH/SEA.

183. To address such risks, the project will take a number of differentiated measures to include female members in stakeholder engagement processes (including consultation events and grievance redress committees); inclusion in the CECs and the social accountability committees, provision of job opportunities in subprojects' civil works; and fair working conditions (including provision of maternity leave and nursing breaks where relevant, and sufficient and suitable toilet and washing facilities, separate from men and women workers). These measures are also included in the LMP and SEP. Gender mainstreaming can be incorporated into the project with lessons from the Africa Region Gender Action Plan (GAP).<sup>68</sup> This plan lays out the World Bank Africa Region's strategy for addressing gender inequality. The plan's objective is to advance development for both men and women through operations grounded in robust evidence and informed country dialogue.

### 7.2.2 Management of GBV/SEAH/SEA Risks

184. Given that GBV/SEAH in Somaliland is a significant contextual challenge, a preliminary assessment of project-related GBV/SEAH/SEA has been conducted during project preparation (based on the risk assessment tool). Consequently, the project will adopt a robust approach to address potential GBV/SEAH/SEA risks. Relevant mitigation measures to address these risks will be included in the ESMP as follows:

- The CoC for all categories of project workers will have GBV/SEAH/SEA-related protections;
- Plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and GBV/SEAH/SEA provisions;
- Sensitize the school communities on GBV/SEAH/SEA – learners, teachers, management and administration;
- Mapping and collaboration with GBV/SEAH service providers;
- A Reporting matrix that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centred response;
- An Accountability Response Framework that outlines how the PMUs/contractors/suppliers will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators;
- Establishment of special channel/procedures for safe, confidential reporting of GBV/SEAH incidents that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward;
- GBV/SEAH requirements to be clarified in bidding documents (including requirements for CoCs, training of workers, and how GBV/SEAH related costs will be covered in the contracts); bid evaluation to include consideration for GBV/SEAH response proposals; and
- Make additional funds available to implement measures to address GBV/SEAH/SEA risks and impacts that may arise during project implementation.

185. The project will also include provisions of capacity building and training of relevant stakeholders, including contractors and project workers, in addition to capacity building for government partners. GBV/SEAH/SEA risks should be monitored throughout project implementation

<sup>68</sup> See <http://siteresources.worldbank.org/INTAFRICA/Resources/AFR-Gender-Action-Plan-FY13-17.pdf> for more details

through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement. Contractors and primary suppliers who do not observe the GBV/SEAH requirements will be debarred for a period of two years. This section is also presented in Annex 8 of this ESMF and relevant provisions have been incorporated into the ESMP of each subproject.

### 7.3. Resettlement Policy Framework for the Somaliland Education Project

186. Resettlement is broadly defined as the process by which those adversely affected are assisted in their efforts to improve, or at least to restore their incomes and living standards. In general, resettlement associated with the Somaliland education project is likely to be mainly associated with the acquisition of land for the construction of schools. This would likely lead to the following impacts:

- i. Loss of land-based livelihoods;
- ii. Loss of access to communal resources and associated loss of livelihood;
- iii. Loss of economic immovable assets;
- iv. Decreased income earning ability;
- v. Food insecurity; and
- vi. Unemployment.

187. Resettlement can also lead to the loss of access to communal resources: [SEP]

- i. Loss of land for grazing; [SEP]
- ii. Loss of access to water; [SEP]
- iii. Loss of medicinal plants; and [SEP]
- iv. Loss of trees for charcoal production and firewood. [SEP]

188. These impacts can result in further indirect impacts, including the marginalization of the population concerned, degradation of health standards, loss of access to resources for disadvantaged communities such as pastoralists and minority groups, disturbance to the way of life of affected populations, conflicts with host communities, and potential food shortages. Given the type of investments, however it is not likely that resettlement because of the project will be extensive. The requirements of the RPF will, however, still apply, as this does not depend on the scale or complexity of the resettlement required.

189. Whenever and where the implementation of the Somaliland education project results in physical and economic displacement of persons and entities, a RP will be prepared and implemented after approval by the PIU and the World Bank.

### 7.4. Security Management Plan

190. At the sub-project level, an SMP will be developed to describe the procedures and protocols related to the security for the project and ensure that the security arrangements of the project are in line with the World Bank ESF. The Plan will also describe the pre-requisite security arrangements (policies, resources, and equipment) which will be necessary before the implementation of the project, including those of the contractors and primary suppliers before they are awarded service-delivery contracts. In addition, the Plan will further outline the roles and responsibilities of each project partners – including the relevant government ministries - in managing and maintaining the security of the project beneficiaries, materials and equipment throughout the implementation period.

191. Prior to the development of the SMP, wide consultations will be conducted under the leadership of the MOES with security teams in the GoSL and World Bank experts with experience in developing SMPs. The SMP will be a stand-alone instrument.

## 7.5. Environmental and Social Monitoring of Contractors

192. The PIU and supervision consultants, with the support of municipal and district officers, will monitor the contractors' compliance on the following environmental and social issues for their subprojects.<sup>69</sup>

- To align with the World Bank's general Environmental, Health, and Safety Guidelines (EHS Guidelines), specific attention should be given to Occupational Health and Safety (OHS) practices in the project's Environmental and Social Management Framework (ESMF). This includes the preparation of a site-specific OHS plan, which outlines measures to address safety-related aspects such as the number of hours worked, recordable incidents, and corresponding Root Cause Analysis. The plan should also encompass lost time incidents, medical treatment cases, first aid cases, high potential near misses, and the remedial and preventive activities required. These activities may involve revising job safety analysis, procuring new or different equipment, and providing skills training to ensure a safe working environment for all project personnel. By incorporating these OHS practices, the project aims to promote a culture of safety and prevent workplace accidents and injuries.
- Environmental incidents and near misses: environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
- Major works: those undertaken and completed, progress against project schedule, and key work fronts (work areas).
- Environmental and social requirements: non-compliance incidents with permits and national law (legal noncompliance), project commitments, or other environmental and social requirements including the C-ESMP.
- Environmental and social inspections and audits: by contractors, engineers, or others, including authorities - to include date, inspector or auditor's name, sites visited, and records reviewed, major findings, and actions taken.
- Workers: number of workers, indication of origin (expatriate, local, non-local nationals, IDPs), gender, age with evidence that no child labour or forced labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- Training on environmental and social issues: including dates, number of trainees, and topics.
- Footprint management: details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
- Details of any security risks: details of risks the contractor/supplier may be exposed to while performing the work - threats may come from third parties external to the project.
- Worker grievances (based on the workers' grievance management system): details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken grievances listed should include those received since the preceding report and those that were unresolved at the time of that report and time taken to resolve grievances.
- External stakeholder grievances: grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender disaggregated.

<sup>69</sup> The following list should be used in a manner proportional to the size, risk and impacts of each sub-project.

- Major changes to contractor’s environmental and social practices.
- Deficiency and performance management: actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or plans for actions to be taken—these should continue to be reported until municipalities/PMU determines the issue is resolved satisfactorily.
- Incidences of GBV/SEAH/SEA reported and handled through the referral systems, number of perpetrators prosecuted.

## 7.6. Environmental and Social Liabilities of Contractors

193. Contractors and primary suppliers will be legally and financially accountable for any environmental or social damage or prejudice caused by their staff, and thus are expected to put in place controls and procedures to manage their environmental and social performance. A breakdown for the cost of noncompliance for each mitigation measure will be enclosed in bidding documents (see Annex 9 on environmental stewardship for contractors). These will include:

- Mitigation measures to be included in the contract will be specified in the subproject ESMP;
- Deductions for environmental non-compliance will be added as a clause in the Bill of Quantities (BOQ) section;
- Environmental penalties shall be calculated and deducted in each submitted invoice;
- Any impact that is not properly mitigated will be the object of an environmental/social notice by Somali authorities;
- For minor infringements and social complaints, an incident which causes temporary but reversible damage, the contractor/supplier will be given a notice to remedy the problem and restore the environment;
- If the contractor/supplier fails to remedy the environmental impact during the allotted time, the PIU will stop the work and give the contractor/supplier a notification indicating a financial penalty according to the non-complied mitigation measure that was specified in the bidding document;
- All workers signed CoC;
- All worker’s grievances recorded and resolved;
- Through stakeholders’ engagement plans ensure that the process of hiring local labour is agreed with all the stakeholders and clearly understood; and
- Human rights are observed for all the workers.

## 8. ROLES AND RESPONSIBILITIES OF THE IMPLEMENTING ENTITIES

### 8.1. Introduction

194. The successful implementation of the ESMF for the project depends on the commitment of the different arms of government in Somaliland, the education sector and related institutions, and the capacity within the institutions to apply or use the ESMF provisions effectively, and the appropriate and functional institutional arrangements, among others. This section describes the detailed roles and responsibilities of the key institutions involved in the implementation of the ESMF by project components.

### 8.2. Overall Project Management

195. Overall project implementation and coordination will be led by the MOES. The MOES will collaborate with all partners to implement Component 2 of the project, as well as other applicable components of the Project.

196. A lean Somaliland Project Implementation Unit (PIU) will be responsible for implementation and monitoring of Component 2 activities as agreed in the MoU on functional assignments, and shall comprise of coordinators, procurement, social development, and monitoring staff. Functions related to financial management (FM) shall be implemented under the common approach using arrangements established under RCRF and other World Bank-supported projects. The PIU will be responsible for day-to-day project management activities, including monitoring and reporting on project progress to all the relevant stakeholders (please see the table on Information Disclosure). For this purpose, the PIU will organize, at regular intervals, workshops involving representatives of all stakeholders to present project progress and seek stakeholder input. The costs for all these activities are budgeted under the Component 2 and may be adjusted on need basis.

197. The implementation of this project will be vested with the MOES at the State level and the communities at the local level. It is notable due to capacity gaps inherent at all implementation levels and the need to synergize with ongoing activities, the PIU will coordinate its activities with other partners such as development partners, NGOs and CBOs in the delivery of some of the interventions. Table 5 presents a synopsis of the responsibilities and partners per component.

**Table 9: Leadership of various sub-components and activities**

Component	Sub-component	Implementer	Potential partners /collaborators
1. <b>System building:</b> The focus will be on establishing and strengthening systems at the GoSL level to successfully implement the government's ESSP and enhance sustainability of investments in the sector	1.1: Strengthening government's stewardship role and policy formulation	MOES	- MOES -Development partners -NGOs/CBOs
	1.2: Implementation of national sample-based student learning assessment systems	MOES	- MOES -Development partners -NGOs/CBOs
	1.3: Strengthening monitoring and evaluation	MOES	- MOES -Development partners -NGOs/CBOs
2. <b>Expansion of access to quality schooling for the disadvantaged:</b> The focus will be to provide out-of-school children from disadvantaged	2.1: Constructing and furnishing new schools	MOES	-MOES -CECs -Development partners -NGOs/CBOs -Ministry of Public Works, Land and Housing (MoPWLH)

Component	Sub-component	Implementer	Potential partners /collaborators
backgrounds with access to good quality schools			-Ministry of Environment and Climate Change (MoECC)
	2.2 Recruiting and paying the salaries of teachers	MOES	-MOES -CECs -Development partners -NGOs/CBOs -Ministry of Public Works, Land and Housing (MoPWLH) -Ministry of Energy and Minerals (MoEM) -Ministry of Finance Development (MoFD)
	2.3 School grants to the newly established schools to meet recurrent expenditures	MOES	-MOES -CECs -Development partners -NGOs/CBOs -Ministry of Finance Development (MoFD)
	2.4 Incentivizing non-State schools to expand access to the most disadvantaged children	MOES	-MOES -CECs -Development partners -NGOs/CBOs -Ministry of Employment, Social Affairs and Family (MESAF)
3. Enhanced instruction quality: This component will leverage the high levels of connectivity in Somaliland to enhance the quality of education services	Development of a 2-year Teachers Professional Development Program (TPDP) - blended teacher training	MOES	-Ministry of Information and Communication Technology (MICT) - MOES -Development partners
4. Project Management	The project will build capacity at all levels of implementation GoSL, States and community levels	MOES	-Development partners

### 8.3. Responsibility for the ESMF

198. The PIU will oversee safeguards' due diligence, and compliance monitoring of the project at GoSL level. With regards to Safeguards, the PIU will:

- Employ one social specialists/GBV officer and one part time environmental officer at GoSL level;
- Screen all subprojects for E&S risks and approve checklists and statutory forms for environmental and social screening;
- Ensure that the project design, specifications and budget adequately reflect the recommendations of the ESIA/ESMPs;
- Co-ordinate application, follow up processing and obtain requisite clearances and approvals from the World Bank for the Contractor ESMPs submitted by the individual subprojects;

- Prepare regular monthly/quarterly/semi-annual and annual progress reports on their responsibilities;
- Develop, organize and deliver appropriate E&S safeguards related training courses for the PMU staff, contractors, local government/community representatives and others involved in the project implementation;
- Review and approve the contractors' ESMPs (C-ESMPs) using this ESMF as a guide;
- Liaise with the contractors, the supervision consultants, third party monitors, primary suppliers and the PI/PMUs/MDAs on implementation of the ESMPs;
- Liaise with various Government agencies on environmental, resettlement and other regulatory matters;
- Continuously interact with relevant NGOs/CBOs and community groups;
- Establish dialogue with the affected communities and ensure that the environmental and social concerns and suggestions are incorporated and implemented in the project;
- Ensure the implementation of all plans developed for the project including the LMP, SEP (that contains the Inclusion Plan and the GRM), ESMPs, GBV/SEAH Action Plan, and SMP;
- Review the performance of the project in terms of the progress in E&S safeguards, through an assessment of the periodic internal monthly and quarterly environmental and social monitoring reports; provide summaries of the same and initiate necessary follow-up actions; and
- Provide support and assistance to the Government MDAs and the World Bank during Project Review Missions.
- Provide monthly reports on E&S compliance to the PMU safeguards specialists.

### **Safeguards Officers**

199. The Safeguards officers at the PIU will specifically:

- Screen all subprojects for E&S risks;
- Review all ESMPs, reports and documents prepared by environmental and social consultants to ensure compliance to the World Bank ESS;
- Ensure that the project design, specifications and budget adequately reflect the recommendations of the ESIA/ESMPs;
- Co-ordinate application, follow up processing and obtain requisite clearances and approvals from the World Bank for the Contractor ESMPs submitted by the individual subprojects;
- Prepare regular monthly/quarterly/semi-annual and annual progress reports with statutory requirements;
- Develop, organize and deliver appropriate E&S safeguards related training courses for the PMU staff, contractors, local government/community representatives and others involved in the project implementation;
- Review and approve the Contractors' ESMPs using thus ESMF as a guide;
- Liaise with the Contractors, primary suppliers and the PI/PMUs/MDAs on implementation of the ESMPs;
- Liaise with various Government agencies on environmental, resettlement and other regulatory matters;
- Continuously interact with relevant NGOs/CBOs and community groups;
- Establish dialogue with the affected communities and ensure that the environmental and social concerns and suggestions are incorporated and implemented in the project;
- Ensure the implementation of all plans developed for the project including the LMP, SEP (that contains the Inclusion Plan and the GRM), ESMPs, GBV/SEAH Action Plan, and SMP;

- Review the performance of the project in terms of the progress in E&S safeguards, through an assessment of the periodic internal monthly and quarterly environmental and social monitoring reports; provide summaries of the same and initiate necessary follow-up actions; and
- Provide support and assistance to the Government of Somaliland and the World Bank during Project Review Missions.

#### 8.4. Roles and Responsibilities of the MOES

200. The MOES is the lead implementing agency of the project. Its roles and responsibilities are as enumerated below:

- Take the lead in reviewing of draft ESMPs for the government, receiving comments from stakeholders during public hearing of the project,
- Provide overall leadership during public consultations with critical education sector stakeholders, in order to gain their support/cooperation/consensus in established policy direction; and
- Ensure that the Somaliland Education Project implementers comply with all relevant environmental laws and policies.

#### 8.5. World Bank Roles and Responsibilities

201. The World Bank will:

- Provide guidance on the compliance to Bank's ESS;
- Perform compliance monitoring of the project to ensure that the ESS are complied with and conduct regular project review missions;
- Maintain an oversight role, review and approve the project's ESMF, and environmental and social assessment instruments such as any ESIA or ESMPs of sub-projects, if any;
- Conduct regular supervision missions to check on the performance of the project and assess its compliance to agreed grant covenants;
- Recommend measures for improving the performance of the project PMUs; and
- Recommend the holding of appropriate training activities intended to improve the capacity of PCU and PIU as necessary.

#### 8.6. Updating the ESMF

202. This ESMF will be used for screening of sub-projects and as a guide for the preparation, review and approval of environmental assessment instruments (ESIA and ESMP). It will also be a reference in the implementation of the subprojects and their respective ESMPs. Since there may be new developments, guidelines or national legislations issued after its (ESMF) approval and posting on the World Bank website, the ESMF may need to undergo updating from time to time.

#### 8.7. Disclosure of Safeguards Instruments

203. This ESMF has been prepared in consultation with the relevant stakeholders in Somaliland. Copies of this ESMF and other safeguard instruments developed later (including GBV/SEAH Action Plan, RPF and ESMPs), prepared for the subprojects to be financed under the project, should be consulted upon disclosed in compliance with relevant country regulations and the World Bank ESSs. A summary of the safeguard instruments will be translated into Somali language and disclosed in all project sites. It will also be disclosed in two daily newspapers for 21 days, or as required by country laws, while the MoES will also disseminate the same on the official MoES government portal/ website.

## 9. SAFEGUARDS CAPACITY NEEDS ASSESSMENT AND TRAINING PLAN

204. Once the PIU safeguards specialists are on board, a capacity assessment and implementing plan will be developed, possibly by an independent consultant. Given there are very few experienced safeguards specialists in Somaliland particularly at GoSL level, it is likely that capacity will have to be developed from scratch.

205. The training and capacity building plan (summarized in Table 9) will include general ESF training and project implementation facilitated by World Bank consultants and the RCRF senior social specialist and other government specialists and consultants. Specialist training and capacity building support may also need to be carried out by independent capacity building specialists and agencies including for contractors and social accountability committees and GRM.

**Table 10: Planned capacity building activities**

Session	Timeframe	For whom
E&S requirements for contractors	Once requests for proposals are issued	Potential implementing partners.
E&S requirements for MOES and action planning	Once GoSL and FMS staff are in place.	PCIU and FMS PMT staff including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
GRM	Month 1	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
GBV/SEAH	Month 2	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
LMP and code of conduct	Month 3	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
OHS requirements	Month 4	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
Inclusion plan	Month 5	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
E&S reporting	Month 6	Social and environmental specialists
Monitoring of E&S requirements	Month 7	Social and environmental specialists, M&E specialists
Virtual tools for E&S monitoring	Month 8	Social and environmental specialists, M&E specialists
Other sessions as required		

## 10. MONITORING PLAN

### 10.1. Regular Monitoring and Inspection for Compliance

206. The goals of monitoring are to measure the success rate of the activities, determine whether activities have managed negative impacts, and whether further interventions are required or if monitoring is to be extended in some areas. The goal of inspection activities is to ensure that subproject activities comply with the plans and procedures laid out in the ESMF and in activity-specific instruments.

207. The PIU will have responsibilities for project-related environmental and social monitoring and implementation as laid out in this ESMF, as well as the SEP, LMP, RPF, GBV/SEAH Action Plan and SMP. The Project Coordinator of the PMU will bear the overall responsibility for the implementation of the environmental and social mitigation measures, as well as for monitoring and inspections for compliance. The Environmental and the Social Specialists in the PMU will address the day-to-day tasks regarding the implementation of the ESMF and associated instruments. The PIU managers and PIU safeguards staff have responsibility for day-to-day monitoring and capacity building of contractors E&S requirements. The supervision consultant will be responsible for monitoring the contractors ESMP implementation. GIS tagged tools e.g., kobotoolbox will be used to monitor construction and E&S measures on a day-to-day basis so that pictures of the sites, construction and logbooks can be sent to the Somaliland Government at regular intervals. Independent Verification Agents (IVA) will also include environmental and social risk mitigation measures in their project monitoring activities.

208. The ESMF is the overall document that guides the development of site specific ESMPs. All implementers will be responsible for their own site/activity specific screening, impact assessments, development of site/activity specific ESMPs, monitoring of impacts, and administration of mitigation measures in regard to their respective sub-component activities. They further commit to integrate stakeholder inputs into their regular monitoring and reporting activities. All implementers are committed to report all screening results (see reporting format in 2), results of ESAs, site/activity specific ESMPs, to the PIU.

209. The PMU Environmental and Social Specialists will assess the compliance of all implementers' activities against the ESMF and their subsequent ESMPs and will report possible non-compliance to the Project Coordinator of the PMU. Indicators are identified in both documents and used as a baseline for assessing progress on implementation. The PIU will also independently conduct its own monitoring, verification, and inspection of the activities of all implementers to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts. Performance will be integrated into quarterly reports to the WBG (see Annex 10).

210. The World Bank will supervise and assess the environmental and social performance through review of the biannual monitoring reports and through site visits where possible.<sup>70</sup> A summary of the key E&S aspects to be covered during project reporting is provided in Annex 10.

211. The GRM will further help track complaints and effectiveness of interventions, including those with environmental and social impacts. Furthermore, Independent Verification Agents (IVAs) will be deployed to monitor overall project implementation, including the implementation of environmental and social risk mitigation measures. The IVAs will report non-compliance to the PMU and directly to the World Bank.

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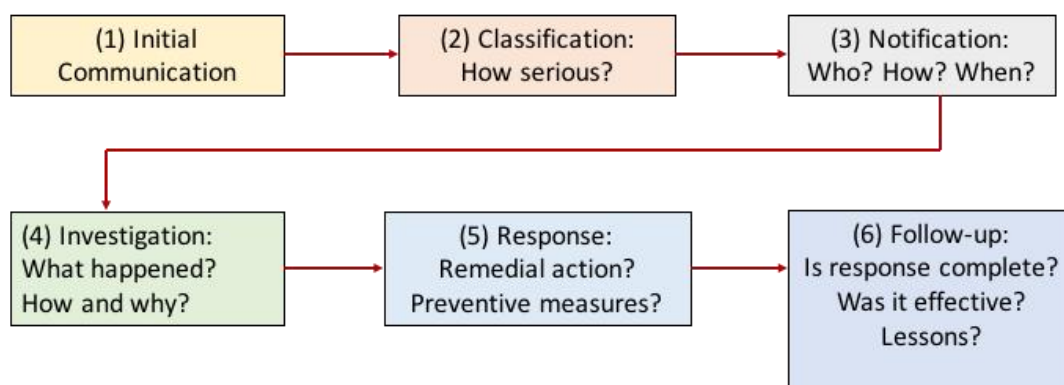
<sup>70</sup> Frequency will be determined by the need but expected to be more frequent at early stages of project implementation.

212. Upon completion of the Project, the PMU shall undertake an assessment of the success of the ESMF and include relevant information in the Implementation Completion Report (ICR). This ICR will be followed by the Bank’s own ICR. If either of these assessments reveals that any key objectives of the ESMF were not achieved, follow-up measures shall be developed to remedy the situation. This is also applicable for site-specific ESMPs.

213. Implementation (work plan) progress shall be reported by the contractors to the FMS PIU and verified by the PIU through regular project site visits. The PIU in turn will keep the PMU and the WB properly updated on implementation progress. It is also expected that there will be a supervision consultant to supervise activities in the implementation of E&S instruments.

## 10.2. Incident and Accident Reporting

214. Incident reporting will follow the process indicated in Figure 4.



**Figure 4: Incident reporting process**

215. Incidents should be categorized into ‘indicative’, ‘serious’ and ‘severe’. Indicative incidents are minor, small or localized that negatively impact a small geographical area or a small number of people and do not result in irreparable harm to people or the environment. A ‘significant’ incident is one that causes significant harm to the environment, workers, communities, or natural resources and is complex or costly to reverse (see Annex 11 for World Bank incident classification guide). A ‘severe’ incident causes great harm to individuals, or the environment, or presents significant reputational risks to the World Bank.

216. Severe incidents (an incident *that caused significant adverse effect on the environment which affected communities, the public or workers, e.g., fatality, GBV/SEAH, forced or child labour*) will be reported within 24 hours to the PIU and the World Bank. Further guidance on reporting of serious and indicative incidents is provided in Annex 11.

217. Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the implementer has to handle the case appropriately, and refer the case to the GBV/SEAH referral system, defined in the GBV/SEAH Action Plan. Contractors and primary suppliers who do not adhere to the GBV/SEAH provisions will be debarred for 2 years.

## 11. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN AND BUDGET

218. This section describes the specific E&S due diligence provisions necessary to avoid, minimize, or mitigate project activities with potential risks, and monitor their outcomes. This process also includes identification of institutional responsibilities (implementation, supervision, monitoring and evaluation, and reporting) along the lifetime of the interventions, timing of actions, how these provisions will be monitored and reported on, and identification of budget requirements. The objectives of the ESMP are:

- i. To identify measures and plans to prevent, reduce, mitigate and/or compensate adverse impacts and enhance positive impacts; including the environmental, health and safety aspects of the project's interventions/activities, risks and negative impacts of the project;
- ii. To provide an estimation of the budgetary costs for implementing the mitigation measures alongside the implementing agencies responsible for addressing project impacts;
- iii. Develop environmental and social monitoring plan, corresponding to measures proposed in the mitigation plan, for project activities/sub-projects and the implementation of mitigation measures with estimated cost. The monitoring plan has included the parameters to be monitored, methods to be used, frequency of measurements, responsibility and budget;
- iv. To identify the responsibilities and capacity assessment for each of the participating implementing agencies responsible for addressing project impacts; description of institutional arrangements and reporting procedures; and
- v. To prepare clear ESMP in such a manner that environmental and social requirements e.g., mitigation measures and monitoring plan related to project activities (sub-projects) could be incorporated in the bidding/contract documents.

219. This section describes the specific E&S risk management due diligence provisions necessary to avoid, minimize, or mitigate project activities with potential risks, and monitor their outcomes. This process also includes identification of institutional responsibilities (implementation, supervision, monitoring and evaluation, and reporting) along the lifetime of the interventions, timing of actions, how these provisions will be monitored and reported on, and identification of budget requirements. The objectives of the ESMP are:

- i. To identify measures and plans to prevent, reduce, mitigate and/or compensate adverse impacts and enhance positive impacts; including the environmental, health and safety aspects of the project's interventions/activities, risks and negative impacts of the project;
- ii. To provide an estimation of the budgetary costs for implementing the mitigation measures alongside the implementing agencies responsible for addressing project impacts;
- iii. Develop environmental and social monitoring plan, corresponding to measures proposed in the mitigation plan, for project activities/sub-projects and the implementation of mitigation measures with estimated cost. The monitoring plan has included the parameters to be monitored, methods to be used, frequency of measurements, responsibility and budget;
- iv. To identify the responsibilities and capacity assessment for each of the participating implementing agencies responsible for addressing project impacts; description of institutional arrangements and reporting procedures; and
- v. To prepare clear ESMP in such a manner that environmental and social requirements e.g., mitigation measures and monitoring plan related to project activities (sub-projects) could be incorporated in the bidding/contract documents.

**Table 11: ESMP and Budget – Somaliland Education Project**

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
<b>Project Planning, construction and equipping of schools</b>							
Construction of schools	Inadequate consultations with local communities and other stakeholders	<ul style="list-style-type: none"> <li>Identify disadvantage groups in each of the participating districts.</li> <li>Establish and maintain continuous liaison with the communities including disadvantaged groups to sensitize them on the project objectives and design.</li> <li>Use innovative communication means to reach the communities with information on the project.</li> <li>Establish GRM structures in the communities that would sensitize the communities on the project GRM.</li> <li>Maintain a system of receiving and responding to any project concerns by the communities</li> </ul>	# of disadvantaged groups per districts # of meetings held # of participants structured along vulnerability	#Meeting reports -Site visits	Continuous	Social specialist	
Construction of schools	Land and resettlement issues	Comply with the RPF, including the following: <ul style="list-style-type: none"> <li>Ascertaining land ownership and claims before commitments to construct a school.</li> <li>Get agreement from residents and users of the land and relevant departments on the use of land for the new schools.</li> <li>Preparation and implementation of RPs subject to WB approval, for each of the sub-projects with resettlement requirements</li> <li>Ensure all resettlement issues are resolved prior to the start of construction.</li> <li>Require contractors to give preferential hiring to qualified members of project affected</li> </ul>	-Land donation/ endowment agreements -RPs for each subproject -List of people displaced and resettled # of land related complaints captured through the GRM	-Site visits -Project documents	Monthly	Social specialist	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		households					
Construction of schools	Localized noise and vibration	<ul style="list-style-type: none"> <li>• Selecting equipment with lower sound power levels e.g., the use of hand drilling machines</li> <li>• Installing suitable mufflers on engine exhausts and compressor components in cases where the service provider uses generators.</li> <li>• Post safety signage including “men/women at work” signs, prominently displayed.</li> <li>• Provide fit to work PPEs (ear plug/earmuffs) for all workers involved in the areas with elevated noise levels.</li> <li>• Coordinate with the office users/staff as to determining timing and more importantly what specific noise controls and mitigations may be needed at the site.</li> <li>• Installing acoustic enclosures (sound nets) for equipment casing radiating noise i.e., generator</li> <li>• The contractor should use equipment that is/are in good working condition and are periodically serviced.</li> <li>• Dampening the soil where possible to reduce dust vortexes and soil erosion</li> </ul>	Recorded number of complaints cases by the project workers and community members, nuanced by type of complaint.	-Site visits -Document review	Monthly	Environment Expert	
Construction of schools	Fire hazards	<ul style="list-style-type: none"> <li>• Provide fire hazard training to construction workers.</li> <li>• Install fire hydrants.</li> <li>• Provide fire extinguishers.</li> <li>• Designate areas as “assembly points”</li> <li>• Establish, where possible, live fire breaks in form of appropriate vegetation</li> </ul>	- # of fire extinguishers installed - # of fire hydrants installed - # of assembly points designated	- Site visits - PIU reports - Third-party monitor reports	Continuous during construction	Environment Expert	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
Construction of schools	Dust Emission	<ul style="list-style-type: none"> <li>• Suppress dust during construction by water spraying and dampening where necessary.</li> <li>• Practice good general housekeeping at the work site; sweep off the drilled-out materials.</li> <li>• Post safety signage including “men/women at work” (or “work in progress”) signs.</li> <li>• Provide fit to work PPEs for all workers involved in the renovation and installation activities</li> </ul>	# of complaints on dust emissions	-Site visits -Document review - Photography	Monthly	Environment Expert	
Construction of schools	Open pits following extraction of construction materials for school construction can result in injuries, especially for children. The pits can also become breeding grounds for mosquitoes and other vermin	<ul style="list-style-type: none"> <li>• Ensure that all quarries are registered.</li> <li>• Contractors should commit to backfilling the open pits before handing over the sites.</li> </ul>	-Quarry certificates -Agreements with contractors # of complaints on open quarries	-Site visits -Document review - Photography	Monthly	Environmental Expert	
Construction of schools	Outbreak of pests and vermin	<ul style="list-style-type: none"> <li>• Spacing out school-going children</li> <li>• Periodic fumigation of school infrastructure</li> </ul>	# No of fumigation events conducts	- Site visits - Inspection reports - Third-party monitor reports	Twice a year	MOES	
Construction of schools	Generation of solid waste	<ul style="list-style-type: none"> <li>• The contractor shall ensure provision of waste bin at the site to handle waste generated.</li> <li>• Efficient use of materials to as much as possible avoid and minimize waste production.</li> </ul>	# of waste bin at the site	Site Visit Project progress reports	Monthly	Environment Expert	-

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> <li>• Ensure waste are recycled/reused before opting to dispose.</li> <li>• Use of durable, long-lasting materials that shall not need to be replaced often.</li> <li>• Ensure waste is collected and disposed in accordance to Somali Government Regulations</li> </ul>		review			
Construction of schools	Occupational health and safety: slip/fall, elevated noise, dust and electrocution	<ul style="list-style-type: none"> <li>• The contractor shall provide the workers with the required PPE and always enforce on use while at the work sites.</li> <li>• The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality.</li> <li>• Carry out Job Risk Assessment (analysis of hazards likely to occur and precautions need to be undertaken) before executing the construction.</li> <li>• Use of safety signage “MEN/WOMEN AT WORK” to warn contractor workers and visitors to worksites.</li> <li>• Provision of adequate signage and communication of risk to workers and communities</li> <li>• Training and use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards</li> <li>• Electrical works should be performed by trained and qualified experts.</li> <li>• Ensure that electrical equipment is properly connected before switching on sockets.</li> <li>• In case on any spillage at working areas, this should be cleaned off immediately, anti-slip</li> </ul>	<ul style="list-style-type: none"> <li>-Accident logs</li> <li>-First Aid Kits</li> <li>-Fire extinguishers</li> </ul>	<ul style="list-style-type: none"> <li>-Site visit</li> <li>-Document reviews</li> <li>- photography</li> </ul>	Monthly	Environment & Social Expert	-

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		hazard warning when mopping floors should be provided to reduce on chances on slip and falls					
	Spread of infectious diseases - in particular COVID-19	<ul style="list-style-type: none"> <li>• Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms.</li> <li>• Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing.</li> <li>• All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs.</li> <li>• Mandatory provision and use of appropriate PPE such as masks shall be required for all project personnel including workers and visitors.</li> <li>• Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks.</li> <li>• Avoid congregation of more than 15 workers at one location. Where more than one person is gathered, maintain social distancing of at least 2 meters</li> <li>• Restriction of the number of people accessing the work areas</li> <li>• Fumigation of offices and work areas</li> </ul>	# of reported cases at site # availability of IPC strategies for hand and water hygiene, use of PPE -Training reports	Site Visits Document review Grievance/ incident log	Monthly	Social Expert, CPHO	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> <li>Train all workers in respiratory hygiene, cough etiquette and hand hygiene</li> <li>Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MOES offices</li> </ul>					
	Spread of infectious diseases - in particular HIV/AIDS	<ul style="list-style-type: none"> <li>Sensitize workers and communities on HIV/AIDS prevention and management.</li> <li>Place signage at the work sites/schools on HIV/AIDS prevention</li> <li>For site camps: provide signage for workers on HIV/AIDS at all the camps.</li> <li>Provide HIV testing facilities at worksites those with many workers not sure about the threshold)</li> </ul>	# of sites with communication posters/ information on HIV/AIDS # of communities reached with information on HIV/AIDS # of people who know about where to get HIV/AIDS services	Site Visits Document review	Monthly	Environment & Social Expert	
	Labour disputes	<ul style="list-style-type: none"> <li>Fair terms and conditions shall be applied for workers (guided by relevant laws and WB ESS2)</li> <li>The project shall facilitate the development and operationalization of GRMs for project workers (direct workers and contracted workers) to promptly address their workplace grievance (as provided for in the LMP)</li> <li>The project shall respect the workers' rights of labour unions and freedom of association</li> </ul>	# of reported cases of disputes by workers	-Site visits -Workers' GRM -Document review	Monthly Reports	Social Expert	
	Insecurity – construction sites	<ul style="list-style-type: none"> <li>All work sites and camps shall be protected by security personnel.</li> </ul>	# of reported insecurity	Site visits SMP reports	Quarterly	E&S Expert, Security	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> <li>All visitors to construction and camp sites (as appropriate) will be required to fill a visitors' form providing all personal details and purpose of the visit.</li> <li>A data file with information regarding the visitor will be recorded and kept by the MOES.</li> <li>Security induction must be done to all project workers.</li> <li>The SMP, developed for this project, will be implemented by all parties involved in the project implementation</li> </ul>	incidents, # of training offered project workers # of workers trained	Project documents		personnel involved in the project activities	
	Traffic Hazards	<ul style="list-style-type: none"> <li>Use of competent drivers with defensive driving technics</li> <li>MOES and MOESs' at the district level shall regularly inspect vehicle safety and maintenance.</li> <li>All fleet handling deliveries shall observe speeds limits to a maximum of 80km/h out of major towns but 30kms in towns.</li> <li>All drivers and loaders should sign the CoC</li> <li>Drivers (especially going to high insecurity areas) should follow guidance on safe emergency driving</li> </ul>	# of accidents recorded, #Vehicle inspection reports -Trip Management Plans	-Field visits -Document review	Quarterly	-E&S Experts -SMPC -Contractors -Drivers	
<b>Operational Phase of the Project</b>							
School operation and maintenance	Security threats	<ul style="list-style-type: none"> <li>The security personal shall be oriented on good conduct and required to sign a code of conduct as per the SMP.</li> <li>All students and workers shall be oriented on security matters.</li> <li>The SMP shall be shared with the key project teams (school managers and MOES officers) on</li> </ul>	# of reported cases at site, -Types of work site and camp protocols Trainings offered to staff.	-Field visits -Document review - photography	Quarterly	E&S Experts, Security Personnel	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<p>a need-to-know basis.</p> <ul style="list-style-type: none"> <li>All visitors to school be required to fill a visitor form providing all personal details and purpose of the visit.</li> <li>Every school administrator shall keep a record of all his employees and workers and their personal details including phone numbers and address.</li> <li>Regular security induction and drills must be done for all staff and students.</li> <li>A search of personal luggage shall be performed by the guards at the access control point to ensure no access of all the prohibited items into the project site</li> </ul>					
	Potable water supply problems	<ul style="list-style-type: none"> <li>Ensure that school construction designs include the installation of appropriate potable water supply facilities.</li> <li>School operation costs to consider expenses related to provision of safe and potable water for school children, teachers, and other stakeholders</li> </ul>	% of school children with access to safe potable water	Field visit TPM reports Safeguards monitoring reports	Quarterly	Env. Specialist	
	Poor management of ESHS risks, as well as risks to community health and safety	<ul style="list-style-type: none"> <li>Establish and maintain continuous liaison with the host communities including sensitization on ESHS risks and mitigation measures.</li> <li>Use of local language and images for ESHS signage shall be encouraged.</li> <li>Ensure proper and adequate provision of sanitation and waste management facilities at all schools.</li> <li>Maintain a system of receiving and</li> </ul>	# of ESHS incidents occurring	Field reports	Half yearly	CECs	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<p>responding to any safety concerns in the schools by the communities.</p> <ul style="list-style-type: none"> <li>School CECs to be trained on EHS monitoring during school operations</li> </ul>					
	Inefficient solid, hazardous and liquid waste and e-waste collection and management during operation and maintenance phases, leading to waste disposal problems, and resulting in polluting soils, surface and shallow groundwater, especially during the rainy seasons	<ul style="list-style-type: none"> <li>Preparation of waste management plan for each waste stream and implementation of the waste hierarchy, as part of the Operation Phase ESMP</li> <li>Prepare and implement a simple waste management plan subject to the concurrence of the respective PMUs in the FMS</li> <li>School CECs to provide garbage receptacles in strategic places within the school compound area, and regularly collect and properly deposit of these wastes in the designated disposal areas.</li> <li>As much as practicable, reuse spoils that meets material specifications.</li> <li>When practicable, compost organic and degradable waste in suitable container, and provide this to interested farmers for their crop production</li> </ul>	<p># of waste management plans</p> <p>Volume of total waste generated.</p> <p>% of waste collected</p>	Field reports TPM reports	Half yearly	PIU	
	Outbreaks of diseases and poor indoor air quality	<ul style="list-style-type: none"> <li>Ensure that school designs adopted provide adequate learning environment free of pests and vermin, with ample ventilation provided.</li> <li>Periodic fumigation activities, to be prescribed in the Operation Phase ESMP</li> <li>Ensure proper and adequate provision of sanitation and waste management facilities at all schools.</li> </ul>	# fumigation events conducted	Safeguard reports School progress reports	Half yearly	MOES PIU	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> <li>Maintain a system of receiving and responding to any safety concerns by the communities</li> </ul>					
Project beneficiaries – pupils	Discrimination and exclusion of disadvantaged groups	<ul style="list-style-type: none"> <li>The project will implement the inclusion plan contained in the SEP.</li> <li>The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship.</li> <li>Hold sensitization meetings on resources planning and conflict resolution mechanisms.</li> <li>Institutionalization of inclusion of all categories in processes and decision making</li> <li>There will also be enough and suitable toilet and washing facilities, separate from men and women workers, boy youths and girl youths as the community cultures demand.</li> <li>The contracts with third parties will include non-exclusion requirements which will also be part of the monitoring system.</li> <li>All stakeholders will be informed and sensitized on the GRM and available channel for redress.</li> </ul>	#Procedure of project targeting	Field visits Document review	Quarterly	Social Expert	
Project beneficiaries	Sexual Exploitation and Abuse (SEA)	<ul style="list-style-type: none"> <li>Sensitization of project workers and the MOES staff and benefiting communities.</li> <li>Instituting separate Grievance Redress Committee to handle cases among others sexual abuses,</li> <li>Involving local authorities and police where appropriate in handling sexual abuses; and</li> <li>All project staff should be trained against SEA</li> </ul>	# of reported cases # of cases handled to conclusion Existence of SEA Plan	Field Visit Document review	Quarterly	Social Expert	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		awareness programs for workers and the beneficiary community.					
	Spread of HIV/AIDS and STIs	<ul style="list-style-type: none"> <li>• Carry out periodic HIV/AIDS awareness for workers and staff,</li> <li>• Carry out voluntary HIV/AIDS testing for workers; and</li> <li>• Workers should sign the CoC and abide by its provisions for HIV/AIDS awareness and prevention.</li> </ul>	# HIV/ AIDS campaign done #Training record available	Field visits Document review	Quarterly	Social Expert, CBO	
Selection of female teachers to be recruited, trained and deployed to schools	Compromised selection process	<ul style="list-style-type: none"> <li>• Generate criteria for selection of female teachers to be engaged by the project.</li> <li>• Disclose up to the community level the selection criteria.</li> <li>• Disseminate the GRM process to the lowest level to ensure that community members know where to channel to and how to channel their grievances</li> </ul>	-Template for selecting the female teachers -GRM template distribution -Site visits -Project documents #Grievances on teacher selection	Field visits Project reports	Quarterly	Social Expert	
	Forced recruitment of female teachers	<ul style="list-style-type: none"> <li>• Provide a form for recruited female teachers to indicate their consent.</li> <li>• Disseminate the GRM process to the lowest level to ensure that community members know where to channel to and how to channel their grievances.</li> <li>• Monitor the process and identify any challenges among the female teachers</li> </ul>	#Completed consent forms #Grievances related to the recruitment process -Teachers' performance	Field visits Project reports GRM reports	Quarterly	Social Expert	
Training of teachers (blended training)	Compromised selection process	<ul style="list-style-type: none"> <li>• Ensure the development of a criteria for selection of teachers to benefit from the training.</li> <li>• Disclose, at the county level, information on</li> </ul>	-Selection criteria -No. of teachers trained	Training procedures	Quarterly	E&S Experts,	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		those selected for training					
	GBV/SEAH/SEA/SH	<ul style="list-style-type: none"> <li>• Monitor and report on the behaviour of project workers at all levels.</li> <li>• Ensure the people engaged in project activities understand the GBV/SEAH referral pathway.</li> <li>• Ensure all learners and community members have access to the GRM contacts; and</li> <li>• All workers should sign the CoC (see the LMP).</li> </ul>	# of reported cases # of cases handled to conclusion # Existence of GBV/SEAH/SEA Plan	Field Visit Document review	Quarterly	Social Expert	-
Selection of project beneficiaries	Lack of or inadequate public participation and consultation	<ul style="list-style-type: none"> <li>• Ensure that measures are put in place to identify and reach the HUTLCs and rural populations with project information.</li> <li>• Use communication channels that are accessible to marginal populations including use of community radios, translating information in local languages; and</li> <li>• Identify and equip local leaders with information on the project more generally and the GRM for further dissemination in their communities.</li> </ul>	-Record of Public participation -Meetings minutes # of complains recorded	-Field visits -Document review	Quarterly	Social Expert	
Project implementation	Inadequate capacity - Environment - Social - GBV/SEAH - Communication - Monitoring and evaluation	<ul style="list-style-type: none"> <li>• Undertake a training needs assessment for the MOES, MOES and implementing partners.</li> <li>• Identify suitable and tailor-made courses for the technical teams.</li> <li>• Facilitate capacity building efforts for the team.</li> <li>• Monitor the performance and provide continuous technical support to the PIU</li> </ul>	-Training needs assessment report -Training protocols -List of staff trained	-Field visits -Review of project reports	Quarterly	Project Coordinator	
Project Implementation	Inadequate and/or inefficient management of logistics	<ul style="list-style-type: none"> <li>• Standardization of inventory management tools and mechanisms</li> <li>• Checking needs for support in all schools more</li> </ul>	Clear procedure for opening bid, Adherence to the	Field Visit Document review	Quarterly	Project Coordinator  Social expert	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<p>so those in remote areas</p> <ul style="list-style-type: none"> <li>• Empowering implementing partners to take over the supply of inputs for the activities for which they are responsible.</li> <li>• Independent responsibility of each partner for its activities (logistical support: accommodation, means of communication and IT, transport, etc.)</li> <li>• Strengthening the package of shared logistics services for efficient response</li> </ul>	Implementation manual				
	Spread of Infectious Disease – COVID-19	<ul style="list-style-type: none"> <li>• Train all school staff and school-going children on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms.</li> <li>• Ensure that the schooling infrastructure (including chairs and desks) are well spaced apart and are frequently sanitised.</li> <li>• Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing.</li> <li>• Mandatory provision and use of appropriate Personal Protective Equipment (PPE) such as masks shall be required for all project personnel including suppliers, workers and visitors.</li> <li>• Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the schools and during breaks.</li> <li>• Avoid concentration of more than 15 persons</li> </ul>	# of reported cases at site, # availability of IPC strategies for hand and water hygiene, use of PPE	Field Visit Document review, and photography	Quarterly	Environment and Social Expert, CPHO	Variable

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<p>at</p> <ul style="list-style-type: none"> <li>• Fumigation of offices, work areas, store and project vehicles delivering food to the schools.</li> <li>• Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and</li> <li>• Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MOES offices /schools.</li> </ul>					
Operation & Management of ICT Equipment	Generation of E-Waste with associated toxic chemicals leading to Air Pollution, pollution of ground water	<ul style="list-style-type: none"> <li>• Procure electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste.</li> <li>• Recycle all E-waste through the licensed e-waste recycling companies.</li> <li>• Return Obsolete devices to the supplier depending on warranty period/agreement.</li> <li>• Establish an E-Waste Temporal Collection Centre at MOES; including collection bins/receptacles.</li> <li>• Contract the services of NEMA Licensed E-Waste Firm to collect E-wastes from MOES and dispose of in an environmentally sound manner.</li> <li>• Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management; and</li> <li>• The contractor for the installation of the ICT equipment shall adhere to the provisions in the</li> </ul>	<ul style="list-style-type: none"> <li>-Clearly labelled E-waste bins / receptacles</li> <li>-Warrant for the ICT Equipment</li> <li>-Temporary E-waste collecting facility at MOES and other offices</li> <li>-Training records for E-Waste handling,</li> <li>-E-Waste disposal Certificates</li> <li>-Waste License for contracted Firm</li> </ul>	Field Visit Document review, Photography	Annually	Project Coordinator  Environment expert at PIU	

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		E-Waste Management Plan (Annex I).					

## ANNEXES

### ANNEX 1: WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS

#### **ESS1: Assessment and Management of Environmental and Social Risks and Impacts<sup>\*71</sup>**

This Standard sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing (IPF), in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

#### **ESS2: Labour and Working Conditions\***

This Standard recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

#### **ESS3: Resource Efficiency and Pollution Prevention and Management\***

This Standard recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life cycle.

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

This Standard addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.

#### **ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement\***

Involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

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

This Standard recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development and it recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. ESS6 also addresses sustainable management of primary production and harvesting of living natural resources and recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples, whose access to, or use of, biodiversity or living natural resources may be affected by a project.

#### **ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

This Standard ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ESS7 is also meant to avoid adverse

<sup>71</sup> The asterisk sign (\*) denotes that this Standard is applicable in the Somaliland Education Project

impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.

**ESS8: Cultural Heritage\***

This Standard recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. ESS8 sets out measures designed to protect cultural heritage throughout the project life cycle.

**ESS9: Financial Intermediaries (FIs)**

This Standard recognizes that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction. FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects, and monitor portfolio risk, as appropriate to the nature of intermediated financing. The way in which the FI will manage its portfolio will take various forms, depending on a number of considerations, including the capacity of the FI and the nature and scope of the funding to be provided by the FI.

**ESS10: Stakeholder Engagement and Information Disclosure\***

This Standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

More information on these Standards is available at

<http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf#page=53&zoom=80>

**ANNEX 2: INDICATIVE SCREENING CHECKLIST**

No	ITEM	DETAILS		
<b>INTRODUCTION</b>				
1	Project Name	Somalia Education for Human Capital Development Project		
2	Project Location			
3	Project Description (brief) including risk classification and recommendations about additional ES studies/assessments			
4	Does the Project require any:	Yes	no	<i>If yes, extent in ha.</i>
	Reclamation of land, wetlands			
	Clearing of grazing lands			
	Felling of trees			
5	Minimum land area required for the proposed development (ha)			
6	Available total land area within the identified location (ha)			
7	Expected construction period			
8	Responsible contact person, contact information			
9	Present land ownership	<i>State:</i>	<i>Private:</i>	<i>Other:</i>
10	Are there Multiple land claims or conflict over land			
11	Lack of community support	YES	No	
15	Is there a Village Development Committee or Community Education Committee or other representative community structure?	Yes	No	
16	How effective and representative is the CEC/VDC etc?			
17	How are they selected and/or appointed?			
18	Are there minority clans in the area?			
19	Are there IDPs in the area? If Yes, how do you describe the how the host community treat them?			

20	What survivor centric health, psychosocial, and legal services exist in the area?					
21	Are there any cases of forced or child labour for constructions?					
<b>ENVIRONMENTAL IMPACT AND MITIGATION/ENHANCEMENT DURING CONSTRUCTION PERIOD</b>						
	<b>Impacts</b>	H <sup>72</sup>	M <sup>73</sup>	L <sup>74</sup>	N/A	Mitigation/Enhancement
15	Soil erosion, soil subsidence, and sedimentation					
16	Water pollution					
17	Potable water supply issues					
18	Noise pollution					
19	Solid waste generation					
20	Liquid or e-waste waste generation					
21	Traffic hazards					
22	Loss of vegetation cover					
23	Habitat loss or fragmentation					
24	General disturbance to animal behaviour					
25	Interference with normal movement of animals					
26	Irreversible/irreparable environmental change					
27	Air pollution					
28	Existing environmental liabilities (e.g., waste materials disposed on site, soil contamination)					
<b>ENVIRONMENTAL IMPACT AND MITIGATION/ENHANCEMENT DURING OPERATIONAL PERIOD</b>						
29	Potable water supply issues					
30	Waste disposal issues					
31	Indoor air quality					
32	Traffic hazards (transportation)					
33	Outbreaks of pests and diseases					
34	Outbreaks of communicable diseases					
35	Other potential hazards (including fire, droughts, etc.)					
36	Consider adjoining land uses and activities (i.e., what is immediately next to the school site, and whether there are any sensitive receptors (homes, health clinics, religious facility) nearby					

<sup>72</sup> High<sup>73</sup> Medium<sup>74</sup> Low

<b>COMMUNITY ENGAGEMENT</b>						
24	Number and nature of public consultation meetings conducted so far	Type of Meeting	Number of Meetings	Nature of Participants	Participants	
					Male	Female
<b>CONTACT DETAILS OF OFFICIALS AND RECOMMENDATIONS</b>						
	Name of the person completing form					
	Designation and contact information					
	List of team members					
	Signature and date					
	Name of officer who checked this form					
	Designation and contact information					
	Remarks					
	Signature and Date					

**ANNEX 3: GENERIC CONTENTS FOR SITE-SPECIFIC SUB-PROJECT ESMP****INTRODUCTION****Purpose of the ESMP**

There is need to carry out an environmental and social impact assessment which will have to comply with the environmental procedures of .....and with the environmental guidelines of the financing institutions, World Bank. The main objective of this study is to develop an Environmental and Social Management Plan (ESMP) for planned project activities within the that will provide the decision makers in the Ministry of Education, Government of Somaliland, with sufficient information to justify acceptance, modification or rejection of the proposed sub-projects (“schools”) for financing and implementation.

The purpose of the Environmental and Social Management Plan (ESMP) is to define and reach an agreement with the World Bank concerning mitigation/enhancement, monitoring, consultative and institutional strengthening measures to be undertaken during sub-project implementation and operations. The ESMP format shall be flexible to ensure the integration of project specific mitigating, enhancing and monitoring requirements. For instance, the ESMP shall integrate or at least refer to any initiatives, such as resettlement plans, that contribute to enhance the project environmental or social performance.

In addition, the ESMP format shall permit adjustments and revisions to reflect new developments and findings along project implementation and operations. The ESMP's scope and level of details shall be proportional to the number and complexity of the measures required to ensure the project's environmental and social sustainability. The following components constitute the minimal contents of an ESMP.

- General Information
- Estimated Starting date of implementation
- Project completion date
- Date of operation
- Period covered by the plan

**Objectives of the ESMP**

This section shall specify that the ESMP aims to bring the project into compliance with applicable Somaliland national environmental and social legal requirements and the World Bank's Environmental and Social Framework. Other objective of the ESMP is to outline the mitigating/enhancing, monitoring, consultative and institutional measures required to prevent, minimize, mitigate or compensate for adverse environmental and social impacts, or to enhance the sub-project beneficial impacts. It shall also address capacity building requirements to strengthen environmental and social capacities if necessary.

**Project context**

The ESMP shall briefly describe project activities and major environmental and social components that will likely be affected positively or negatively by the project. The information provided shall be concise as the project's ESMF covers in detail this topic. In fact, for this section, cross-references to the ESMF are recommended. Moreover, the context section shall outline existing interrelations between ecological and social processes. These interrelations among components shall be mentioned to be considered in the impact assessment and the development of mitigation/enhancement measures.

**Beneficial and Adverse Impacts**

This section shall focus on beneficial impacts that can be enhanced to improve the project's environmental and social performance as well as on adverse impacts that require mitigation measures to be minimized or compensated. The impact description in the ESMP shall be brief and refer to the project's ESMF for further details.

**Enhancement and Mitigation Program**

This section shall propose feasible and cost-effective measures to address the impacts previously defined, in order to accrue project benefits (enhancement measures) or to reduce potentially adverse environmental and social impacts to acceptable levels (mitigation measures). Each measure shall be described in detail, providing all technical information required for its implementation (design, equipment description and operating

procedures, as appropriate).

### **Monitoring Program**

A monitoring program aims to ensure that mitigation and enhancement measures are implemented, that they generate intended results and that they are modified, ceased or replaced when inappropriate. Moreover, it allows to assess compliance with national environmental and social policies and standards as well as with the international policies and guidelines. A monitoring program shall include two parts: surveillance and monitoring activities.

**Surveillance activities:** The surveillance aims to ensure that the proposed mitigation and enhancement measures are effectively implemented during the construction and operational phases.

**Monitoring activities:** These activities consist in measuring and evaluating the project impacts on some environmental and social components of concern and to implement remedial measures, if necessary. The program shall define as clearly as possible the indicators to be used to monitor the mitigation and enhancement measures that need to be assessed during project implementation and/or operation. The monitoring program shall also provide technical details on monitoring activities such as methods to be used, sampling of schools, frequency of measurements, detection limits, and definition of thresholds that will signal the need for corrective actions.

Where it is required, monitoring should address both emission and ambient levels of pollutants and solid waste generated by the support schools, where these may be detrimental to human health. World Bank guidelines presents general ambient quality standards, the figures presented are ambient guidelines only. As Somaliland has no national ambient air quality standards, the Bank's standards can be used to substitute for the country's non-existent quality standards.

### **Consultations**

The implementation and monitoring of some mitigation or enhancement measures may require that consultative mechanisms be used. In such cases, the ESMP shall first identify for which measures consultations will be undertaken as well as the goals and expected outcomes of these consultations. Then the ESMP shall specify the target groups, appropriate consultative processes, consultation frequency, reporting methods and result disclosure procedures.

### **Complementary initiatives**

The ESMP shall integrate or at least refer to all initiatives that are proposed to improve the project environmental or social performance. As the project's ESMF includes such initiatives, these shall be briefly presented in this section. Moreover, these complementary initiatives shall be taken into account in determining the responsibilities, institutional arrangements, cost estimates and implementation schedule.

### **Responsibilities and Institutional Arrangements**

The implementation of enhancement and mitigation measures as well as the completion of the monitoring program require to clearly establish responsibilities among the project implementation team at the GoSL level. Ultimately the Ministry of Education at the GoSL level is responsible for monitoring and reporting on achieved results, but it may need to be assisted in the implementation of the ESMP by the FMS project team and external consultants. Consequently, the ESMP shall identify the responsibilities of the World Bank, the implementing ministry, and other stakeholders in applying the ESMP, particularly the monitoring program. In addition, the ESMP shall propose support to the implementing unit if it has insufficient capacities to fulfil its obligations. This support could be provided through various means including technical assistance, training and/or procurement.

### **Estimated Cost**

This section estimates the capital and recurrent cost associated with the various proposed measures (enhancement and mitigation), the monitoring program, consultations, complementary initiatives, and institutional arrangements. The financing for implementing the ESMP shall be part of project financing.

#### **Implementation Schedule and Reporting**

The ESMP shall include an implementation schedule considering all activities related to the proposed measures

(enhancement and mitigation), the monitoring program, consultations, complementary initiatives and institutional arrangements. Moreover, the implementation schedule shall be developed by phases and in coordination with the overall project implementation plan. To ensure early detection of critical environmental and social conditions and to provide information on the mitigation progress and results, reporting deadlines shall be specified in the implementation schedule and reporting procedures shall be presented in this section.

**ANNEX 4: PROTECTION OF CULTURAL PROPERTY**

Cultural property includes monuments, structures, works of art, or sites of significance points of view, and are defined as sites and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This includes cemeteries, graveyards and graves. Under ESS 8, there will be aspects of important, intangible cultural heritage, which need consideration, especially in the ancient city of Mogadishu. Under Somaliland Education Project, for example, the construction should not disturb events or ceremonials in nearby mosques or Islamic schools.

The initial phase of the proposed Somaliland Education Project interventions pose limited risks of damaging cultural property since projects will largely consist of small investments in school infrastructure and other relatively minor public works. Nevertheless, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents.

**Chance Find Procedures**

Chance find procedures will be used as follows:

- Stop the construction activities in the area of the chance find;
- Delineate the discovered site or area;
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums take over; and
- Notify the supervisory Engineer who in turn will notify the responsible local authorities and the Ministry of Culture immediately (within 24 hours or less).

Responsible local authorities and the Ministry in charge of Department of Archaeology and Museums would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the Department of Archaeology and Museums (within 72 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values.

Decisions on how to handle the finding shall be taken by the responsible authorities and the Ministry in charge of Department of Archaeology and Museums. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage.

Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Ministry in charge of Department of Archaeology and Museums.

Construction work could resume only after permission is given from the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums concerning safeguard of the heritage.

These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered are observed.

Relevant findings will be recorded in World Bank Project Supervision Reports and Implementation Completion Reports will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

**ANNEX 5: SUGGESTED TEMPLATE FOR SCHOOL CONSTRUCTION ESMP (IN ADDITION TO CONTRACTOR C-ESMP)**

Please annex CESMP, voluntary land donation/agreement documentation, screening form, community meeting minutes

Proposed sub-project: \_\_\_\_\_

Village/district/state: \_\_\_\_\_

Overview of the school site location and key features within 200m of works (to understand impacts) \_\_\_\_\_

Population resident on or regularly using the land/sub-project or claimants of the land:

<b>Village/ (facility users can be by people resident more than one location)</b>	<b>No of individuals resident or regularly using the project area for their livelihood</b>	<b>No. of direct users of the sub-project area (individuals)</b>	<b>Number of people from that village/consulted on the sub-project (design, siting, social and environmental impacts)</b>

**Has there been any conflict over this land? If so please describe, what measures the project will take to ensure that it does not exacerbate conflict.**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**1. Consultations with the community on the site selection (to ensure broad agreement, ownership and risk identification and mitigation)**

	<b>Date</b>	<b>Village</b>	<b>Total number of people involved</b>	<b>No. of women</b>	<b>No. of youth</b>	<b>No. of minority group or IDP representatives (please specify group/s)</b>	<b>Main concerns raised and how they will be addressed</b>	<b>Challenges in consulting with people e.g., migration, conflicting event, insecurity</b>
<b>Initial discussions</b>								
<b>Safeguards screening meeting</b>								

<b>Other – meetings (specify)</b>								
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**2. Environmental and social impacts and mitigation measures identified by the community (only put those not captured in the ESMP)**

Social and environmental impacts of sub-project	Mitigation measures	Costing	Time frame	Responsible agency

**3. Has a safeguards field visit been undertaken to the site? Y/N Date of visit:**  
 \_\_\_\_\_ Title of visiting officer: \_\_\_\_\_

**4. Is the contract signed by the contract explicitly binds the contractor to incorporate the CESMP in his operations?**

**5. Has the ESMP been incorporated into the collective and individual contract for the works; and is a safeguards compliance report required before payment?**  
 \_\_\_\_\_  
 \_\_\_\_\_

**6. Type of land required for sub-investment and documentation:**

<b>a. Government land</b>	Title deed/confirmation document attached?	YES/NO/EXPLANATION
<b>b. Community land</b>	Voluntary land donation form and community minutes attached?	YES/NO/EXPLANATION
<b>c. Private land</b>	Voluntary land donation form and conversion document attached?	YES/NO/EXPLANATION

**7. Voluntary land donation:**

a) **How many people either live on or regularly use the land where the project will be implemented (including those who might use it as a drought fall back area) by location and how many and who agreed to the voluntary donation of this land for this public facility?**  
 \_\_\_\_\_

b) **Explain how the requirements for voluntary land donation have been met (and attach minutes, VLD form and signed participants list):**

Requirements for voluntary land donation	Explanation and evidence
1. The land required to meet technical project criteria must be identified in conjunction with the affected community?	
2. What are the likely impacts of proposed activities on donated land and how were these explained to the	

community?	
3. Area of land compared to area owned (no more than 10 percent of the area of any holding can be donated). %	
4. How will the users and occupiers of the land benefit from this sub-project?	
5. What are the conditions of benefiting from this sub-project – connection fees, service charges etc.	
6. How was the community made aware that refusal was an option and confirmed in writing that they are willing to proceed with the donation? (e.g., at the consultation and in the voluntary land donation document)	
7. What evidence is there that the act of donation was undertaken without coercion, manipulation, or any form of pressure on the part of public or traditional authorities (e.g., photos/videos of community consultation etc.)?	
8. Do all the users and occupants of this land understand that by donating this land it may be gazetted as public land	
9. How was it explained that they have a right to compensation for land and the available compensation options (in-kind compensation, land for land compensation or cash compensation, and the implications of cash compensation)?	
10. Were monetary or non-monetary benefits or incentives requested as a condition for the donation and were these provided?	
11. How do you know that the land being donated will not reduce the remaining land area to a level below that required to maintain the donor's livelihood at current levels and will not require the relocation of any household?	
12. Will any structures be moved or any access to land be limited because of the sub-project (describe structures and locations)?	
13. If so, how will they be compensated/facilitated and/or their livelihoods restored?	
14. How was consent provided by all individuals occupying or regularly using the land?	
15. Was there anyone who did not give agreement and why?	
16. How was it established that the land to be donated was free of encumbrances or encroachment and was it registered in an official land registry?	
17. All users and occupants of the land have genuinely understood (in local language with sufficient time) and agreed that all conditions for voluntary land donations have been met (refer to consultations above and attach minutes)	

- 8. GRM: Has the GRM process and contact information for focal points been disseminated to the community? If so, how and to whom (numbers and groups). If not, when will this be done?**

9. Have the SAC members been introduced to the community and their functions explained to the locals? \_\_\_\_\_

10. GBV/SEAH: Has awareness been carried out on GBV/SEAH, service providers and confidential survivor centric GBV/SEAH complaints mechanism? If so, how and to whom (numbers and groups). If not, when will this be done? \_\_\_\_\_

11. Describe the involvement and inclusion of women and minority groups or nomadic pastoralist representative in management? \_\_\_\_\_

## ANNEX 6: CONSULTATION MEETINGS HELD WITH KEY STAKEHOLDERS AND ENGAGEMENT STRATEGY

### A. CONSULTATION MEETING ON SEP: Date 3/12/2020 Time: 10 am – 12 pm

#### List of participants for the IDA project stakeholder meeting Meeting Mode: Zoom

No	Name	Institution
1.	Shweta Sandilya	UNICEF
2.	Mengistu Koricha	Save the Children
3.	R. Drake Warrick	Creative Associates
4.	William Babumba	DRC
5.	Suleiman Ahmed	DRC
6.	Ahmed Dirshe	Concern WW
7.	Dr. Mohamed Hassan Nur	Mogadishu University
8.	Dahir Hassan	SIMAD University
9.	Dr. Salad	Jazeera University
10.	Abdirashid Mohamed	SCC
11.	Dahir Shire	DAN
12.	Abdikadir Isse Farah	FENPS
13.	Abdifitah Aden Abdi	WARDI
14.	Abdisahal Mohamed	Himilo Foundation
15.	Aweis Haji Hassan	Ayuub NGO
16.	Beryl Auma	World Vision
17.	Adan Mohamed	EFASOM
18.	Mohamed Idle	AET
19.	Mohamud Ahmed Rage	MOES
20.	Abdi Gashan Egal	MOES
21.	Suaad Abdulle	MOES
22.	Abdinur Jama	MOES
23.	Abdifitah Mohamed	ESC Coordinator
24.	Shueyb Youb	ARC
25.	Mohamed Abdulkadir Nur	MOES
26.	Abdirizak Mohamed	MOES
27.	Ousman Abdullahi	World Bank
28.	Abdirahman Zeila	World Bank
29.	Huma Ali Waheed	World Bank
30.	Farhiya Farah	World Bank
31.	Mahdi Mohamud Abdi	EFASOM
32.	Ahmed Hassan Mohamed	Himilo Foundation
33.	Ismail Mohamed Ali	GPE Coordinator
34.	Ahmed Hassan Yusuf	DG-MOES
35.	Raymond S. Kirwa	World Bank
36.	Mary Amuyunzu-Nyamongo	World Bank
37.	Ahmed Kormeere	MOES
38.	Ismail Abdi	MOES

**B. CONSULTATION MEETING ON ESMF AND RPF: Date 9th February 2021, 9am -12pm**  
**List of participants for the IDA project stakeholder meeting Meeting Mode: Zoom**

No.	Name	Title & Institution
1.	Salad Abdulle	MoLSA – Director of Planning
2.	Mohamud Rageh	MOES- Director of Planning
3.	Abdifitah Abdi Mohamed	Education Sector Coordinator
4.	Vanessa Tilstone	Social specialist, World Bank
5.	Shweta Sandilya	UNICEF
6.	Haile Gashaw	UNICEF – WASH
7.	Huma Waheed	World Bank -TTL
8.	Khalif Hassan Dalmar	Director of Environment & Climate Change – OPM
9.	Jose M. Bendito	Chief of Social Policy, UNICEF Somalia.
10.	Mohamed Dhugad	Alight (formerly ARC) Area Rep
11.	Ahmed Yusuf	Director General of Environment, Office of the Prime Minister.
12.	Dahir Shire	Head of operations and Programs- DAN
13.	Fouzia Warsame	DCOP of USAID Bar Ama Baro
14.	Peter Quamo	UNICEF Education
15.	Musa.I Dugow	SOS Children's Village Somalia
16.	Mohamud Sheikh Abdi	INISKOY Program Manager Baidoa Base
17.	Abdihakim Abdullahi Jama	FENPS
18.	Joy Khangáti	CARE
19.	Mahad KAARSHE	WFP
20.	Farhia Mohamud	Somali Public Agenda
21.	Oscar Boije	UNICEF
22.	Ismail Abdi	MOES- TA Teacher Development
23.	Lugard Ogaro	Mercy Corps, Director of Programs
24.	Mohamed Dahir Moalim	Social Safeguard Specialist, RCRF, South West State
25.	Mohamed Moge Mohamed	Social Specialist, RCRF, Jubaland
26.	Mandeq Abukar	Concern Worldwide
27.	Abdinasir Abdullahi	DG. Ministry of Energy and Water Resources, Galmudug
28.	Hussein Hassan	RCRF Project Manager SWSS
29.	Christophe Hodder	UN Environmental Advisor
30.	Mohamed-Abdullahi	MARDO
31.	Mohamed Hared	Juba Foundation
32.	Dr. Abdiwali Ahmed	DG Galmudug MoH
33.	Yarow Mohamed Abdi	Juba Foundation
34.	Siyad Abdirahman	Rural education and agriculture development organization READO
35.	Christophe Hodder	IO/UNEP, Environment Advisor
36.	Naima Nor Abdi	FENPS
37.	All Aweys	Ayuub NGO
38.	Shair Luli	GBV consultant World Bank Somalia
39.	Paul Owora	World Vision Somalia
40.	Adam Mohamed	National Coordinator of EFASOM
41.	Mahdi Mohamud	MOES
42.	Abdishakur Isse Hashi	Social specialist RCRF Galmudug State
43.	Ahmed Hussein Iman	Project Coordinator, SOMALI NON-STATE ACTORS (SONSA)
44.	Mohamed Abulkadir Nur	MOES
45.	Abdirahman Zeila	Environment Specialist, World Bank
46.	Jaafar Muhammed	Social Specialist, World Bank
47.	Mohamed Mohamud	Directorate of Environment and Climate Change, Office of the PM
48.	Peggy Ayako Kwendo	World Bank

49.	Abdinur Ahmed Jama	MOES
50.	Amin Mukhar Ahmed	DG- Hirshabelle Ministry of Education
51.	Ahmed Nur	DG- Galmudug Ministry of Education
52.	Abdi Ibrahim	TIDES NGO – Executive Director, Garowe, Puntland
53.	Abdiaziz Nur Mohamed	MOES – TVET & Non-formal Director
54.	Mohamed Mohamud	(DECC-OPM)
55.	Mohamed	Civil Society Platform

### C. Virtual consultation meeting on SL’s retrofitted E&S instruments of the Project, held on the 12<sup>th</sup> of October 2023 – Participants list

#	Name of Participants	Organization	Title
1	Hussein Abdi Awil	Ministry of Education and Science	Director of Planning and Policy
2	Said Mohamed Jama	Ministry of Education and Science	Consultant- GPE Focal Person
3	Abdilqadir Essa	Ministry of Education and Science	Consultant -Decentralization
4	Abdiraheem Ismail Mohamed	YOVENCO (LNGO)	MEAL Officer
5	Khadra Ibrahim Abdalla	SL Women Development – (KARAAMO)	Chairperson
6	Abdirahman H Egeh	Ministry of Education & Science	Consultant
7	Kayse Hussein Nour	Save the Children (INGO)	Acting Education Program Manager
8	Ahmed Omar Quule	Somaliland National College of Education	Director of SLNEC
9	Nimco Farah	Ministry of Education & Science	Director of Gender Department
10	Ibrahim Ali Macaleesh	Care International	Education Coordinator
11	Ahmed Ismail Abdi	Ministry of Education and Science	Director of Non-formal Education
12	Guleed Osman Abdikarim	TALO-WADAAG	Education Manager
13	Mohamed Omar Abdi	ALIGHT (INGO)	Education Coordinator
14	Ahmed Abdillahi	AET (INGO)	Country Director
15	Abdillahi Hassan	Havoyoco (LNGO)	Chairperson
16	Abdirahman Hussein	Save the Children	Education Coordinator
17	Liibaan M Jibriil	Ministry of Education & Science	Director of Human Resources
18	Sucaad Mohamed Abdi	Ministry of Education & Science	Director of Formal Education

### D. Stakeholder Analysis, Engagement Strategy and Activities

Following the Stakeholder Consultation meeting and the subsequent discussion with stakeholders regarding the impact and mitigation of the implementation of Education for Human Capital Development, the below table outlines a brief analysis of each stakeholder group, and stakeholder strategies and activities:

Stakeholder Analysis				Stakeholder Engagement Strategy	
No.	Stakeholder Group	Interests and Concerns	Influence	Engagement Activities	Frequency
1	Government of Somaliland	To improve the quality of education and increase access to education for all children	High	- Regular meetings with the Minister of Education and the Minister of Finance to discuss progress on the	Quarterly
2	Ministry of	To implement the			

Stakeholder Analysis				Stakeholder Engagement Strategy	
No.	Stakeholder Group	Interests and Concerns	Influence	Engagement Activities	Frequency
	Education	Education for Human Capital Plan and achieve its objectives		Education for Human Capital Plan and challenges that are being faced. - Quarterly workshops to review the implementation of the plan and develop action plans to address any gaps.	
3	Ministry of Finance	To provide adequate funding for the education for Human Capital Plan			
4	Regional and local governments	To deliver education services efficiently and effectively	Medium	- Annual workshops to train regional and local government officials on the Education for Human Capital Plan and how to implement it effectively. - Regular visits to schools to monitor progress and provide support.	Annually
5	Teachers and school leaders	To improve their teaching and leadership skills	Medium	- Professional development programs on the latest teaching and learning methods. - Focus groups to gather feedback on the Education for Human Capital Plan and identify areas for improvement.	Twice a year
6	Parents and students	To have access to high quality education	Medium	- Community meetings to inform parents and students about the Education for Human Capital Plan and how it will benefit them. - Feedback surveys to gather feedback on the plan and identify areas for improvement.	Annually
7	Civil society organizations	To promote accountability and transparency in the education	Medium	- Regular meetings with civil society organizations to discuss the Education for Human Capital Plan and how they can contribute to its implementation. - Joint advocacy initiatives	Quarterly

Stakeholder Analysis				Stakeholder Engagement Strategy	
No.	Stakeholder Group	Interests and Concerns	Influence	Engagement Activities	Frequency
				to promote the importance of education and human capital development.	
8	Private sector	To invest /participate in the implementation of education and skills development	Medium	<ul style="list-style-type: none"> <li>- Roundtables and business forums to discuss the private sector's role in education and human capital development.</li> <li>- Public-private partnerships to support the implementation of the Education for Human Capital Plan.</li> </ul>	Annually
9	Development partners	To support the government in implementing the Education for Human Capital Plan	Medium	<ul style="list-style-type: none"> <li>- Joint planning and monitoring missions to ensure that the Education for Human Capital Plan is aligned with other development initiatives in the country.</li> <li>- Regular meetings to discuss progress on the plan and any challenges that are being faced.</li> </ul>	Twice a year

## ANNEX 7: GENDER MAINSTREAMING AND GBV/SEAH ACTION PLAN

### Gender mainstreaming

The rights of women are protected in the Constitution of Somaliland. Women are given the right to education, allowed to work, own properties, hold public office, and receive inheritance. However, there are risks that disparity between men and women may possibly occur in the Somaliland Education Project in the course of its implementation, in areas such as exclusion from stakeholder engagement activities, priority in hiring, pay rates for similar work done, safe working environment, health and sanitary facilities in the workplace and office and others.

To address such risks, the project will take several differentiated measures to include female members in stakeholder engagement processes (including consultation events and grievance redress committees); provision of job opportunities in subprojects' civil works; equal pay and fair working conditions (including provision of maternity leave and nursing breaks where relevant, and sufficient and suitable toilet and washing facilities, separate from men and women workers). These measures are also included in the LMP and SEF.

Gender mainstreaming can be incorporated into the project with lessons from the Africa Region Gender Action Plan (GAP).<sup>75</sup> This plan lays out the World Bank Africa Region's strategy for addressing gender inequality. The plan's objective is to advance development for both men and women through operations grounded in robust evidence and informed country dialogue.

### Management of GBV/SEAH risks

While incidence of GBV/SEAH in Somaliland is a significant contextual challenge, preliminary assessment of project-related Sexual Exploitation and Abuse (SEA)/GBV/SEAH (based on the risk assessment tool) has been conducted during project preparation. Given the significant GBV/SEAH risks the context of pervasive insecurity, the project will adopt a robust approach to address potential GBV/SEAH risks. Relevant mitigation measures to address these risks will be included in the ESMP as follows:

- 1) Code of conduct (CoC) for project workers with SEA/GBV/SEAH-related protections;
- 2) Plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA provisions;
- 3) Mapping and collaboration with GBV/SEAH service providers;
- 4) A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response;
- 5) An Accountability Framework that outlines how the PMU/PIU/contractor/primary suppliers will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators;
- 6) Establishment of special channel/procedures for safe, confidential reporting of GBV/SEAH incidence that connect to the project GRM, and enable training of GRM operators on how to respond to cases that come forward;
- 7) GBV/SEAH requirements to be clarified in bidding documents (including requirements for CoCs, training of workers, and how GBV/SEAH related costs will be covered in the contract); bid evaluation to include consideration for GBV/SEAH response proposal; and
- 8) Make additional funds available to implement measures to address GBV/SEAH and SEA risks and impacts that may arise during Project implementation.

The project will also include provision of capacity building and training of relevant stakeholders, including contractors and project workers, in addition to capacity building for government partners. GBV/SEAH risks should be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement.

<sup>75</sup> See <http://siteresources.worldbank.org/INTAFRICA/Resources/AFR-Gender-Action-Plan-FY13-17.pdf> for more details



*ANNEX 8: INDICATIVE ENVIRONMENTAL STEWARDSHIP FRAMEWORK FOR CONTRACTORS***ENVIRONMENTAL STEWARDSHIP FOR SCHOOL INFRASTRUCTURE DEVELOPMENT FOR SOMALILAND EDUCATION PROJECT**

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
<b>Pre-construction/Construction Phase</b>			
1	Land Use	<p>Passage of contractor's vehicles through grazing reserves or cultivated and forested land resulting in a permanent loss of the resources.</p> <p>The environmental effects can amplify if proper operation and maintenance schedules are not followed.</p>	<p>Plan and file Vehicular Traffic Movements (VTMs) to as much as possible avoid trekking through grazing reserves or cultivated, thus minimizing loss of resources.</p>
2	Material Use	<p>Excess extraction of local resources, such as wood, sand, soil, boulders, etc.</p> <p>Degradation of forests, erosion, and landslide at steep locales due to boulder, stone extraction.</p> <p>Change in river and stream ecosystem due to unchecked sand extraction</p>	<p>Extract materials only on need basis</p> <p>Avoid sensitive areas, such as steep slopes.</p> <p>Always follow engineer's directions</p>
3	Slope Stability	<p>Extraction of forest products and cutting of trees in the steep slopes increases soil erosion and landslide due to loss of soil binding materials.</p> <p>Wrong alignment can trigger slope failure.</p> <p>Haphazard disposal of construction waste can disturb slopes.</p> <p>Improper drainage facilities can result in erosion and landslides</p>	<p>Extract carefully and secure the topsoil within 25 cm from the surface.</p> <p>Limit down grading of the infrastructure such as temporary road to 50</p> <p>If down grading exceeds 70, construction of side drainage is necessary.</p> <p>Keep optimum balance in extraction and filling of soil works, geo-hazardous assessment and mapping.</p> <p>Use designated disposal site and avoid side-casting of spoil.</p> <p>Provide proper drainage.</p> <p>Use bio-engineering on exposed slopes</p>
4	Wildlife	<p>Wildlife habitats at forests, shrub-lands along water infrastructure corridor are affected by the infrastructure construction activities.</p> <p>Wildlife and human conflicts increase as wildlife might destroy the crops or attack the construction workers</p>	<p>Avoid as much as possible areas with high biodiversity.</p> <p>Efficient movement of machinery and other traffic</p> <p>Control poaching activities and regulate movement of labour force and their dependents into the forest area.</p> <p>District Forest or Range Office and its subsidiary body should be involved in</p>

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
			monitoring the activities of the construction workers and officials to minimize wildlife harassing, trapping and poaching
5	Drainage	Higher flow rate of surface water and water logging induce landslides, erosion.  Hard pan setting in school environment to contribute to enhanced surface runoff.	It is strongly recommended that the cross-drainage outlets must be channelled to the confirmed natural drains.  If horizontal slope exceeds 5%, construction of flow control device necessary every 20 m.  Construction of walkways for use by children and teachers in the schools
6	Protection of Vegetation	Protected areas and highly forested areas  Degradation of forest areas  Degradation of agricultural land	Use minimum and efficient use of wood products for construction.  Initiate plantation at damaged and damage prone areas  Increase liability of local forest user groups  Avoid protected areas or densely forested areas
7	Disposal of Construction Wastes	Dumping of wastes along the infrastructure such as roads or elsewhere	Selected spoil dumping sites should be used.  After disposal, the area should be levelled and compacted.  It is recommended to conserve the soil by planting indigenous plants including grasses.  Wastes could also be used as levelling materials along the infrastructure
8	Disposal of Sanitary Wastes	Unmanaged sanitary waste disposal creating health problems and public nuisance	Proper sanitation area needs to be demarcated.  Check for hygiene of work force
9	Impacts on amenities	Infrastructure such as road crossings at water supply, irrigation lines may be disturbed or damaged	Avoid as much as possible the crossing over such amenities
10	Pollution	Dust generation from construction activities, construction vehicular movement increases air pollution.  Noise pollution likely from construction machinery operation and vehicular movement  Sanitary problems likely at the	Possibly construction period should be during any of the two rainy seasons when soil moisture content is highest in Somaliland (March-May or October-December)  Enforce speed limit of vehicles and construct the infrastructure such as road

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
		construction and workforce quarters.	according to volume and size of traffic movement
<b>Operation Phase</b>			
1	Encroachment	Unmanaged settlement, constructions near the new schools	Community zoning recommended, with enforcement
3	Pollution/Vehicle Emission	Dust generation from vehicular movement increases air pollution. Noise pollution likely from vehicular movement and enhanced student numbers	Enforce speed limit of vehicles. Maintain traffic size movement. Discourage use of horns
4	Aesthetics	Infrastructure such as water construction is likely to increase landscape scars. In addition, if the construction spoils are disposed of improperly, the ground vegetation would be destroyed which will be visible from a distance	Such damage cannot be avoided but can be minimized through re-plantation of indigenous species and greenery development
5	Issues with potable water supply and sanitation problems	Water supply and availability problems arising from the huge numbers of school-going children	<ul style="list-style-type: none"> <li>• Ensure that school construction designs include the installation of appropriate potable water supply facilities.</li> <li>• School operation costs to consider expenses related to provision of safe and potable water for school children, teachers, and other stakeholders</li> </ul>
6	Poor management of ESHS, as well as risks to community health and safety	Critical ESHS issues arising from the increased student numbers	<ul style="list-style-type: none"> <li>• Establish and maintain continuous liaison with the host communities including sensitization on safety and health issues on construction sites</li> <li>• Install and maintain appropriate safety and warning signage in schools where constructions works are in progress.</li> <li>• Use of local language and images for signage shall be encouraged.</li> <li>• Ensure that all potentially dangerous work areas have controlled access limited to authorized persons only.</li> <li>• Ensure proper and adequate provision of sanitation and waste management facilities at all construction sites.</li> <li>• Maintain a system of receiving and responding to any safety concerns by the communities.</li> <li>• School CECs to be trained on EHS monitoring during school operations</li> </ul>
7	Waste management problems at	Inefficient solid, hazardous, and liquid waste and e-waste collection and management during operation and	<ul style="list-style-type: none"> <li>• Preparation of waste management plan for each waste stream and implementation of the waste</li> </ul>

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
	schools	maintenance phases, leading to waste disposal problems, and resulting in polluting soils, surface and shallow groundwater, especially during the rainy seasons	<p>hierarchy, as part of the Operation Phase ESMP</p> <ul style="list-style-type: none"> <li>• Prepare and implement a simple waste management plan subject to the concurrence of the respective PMUs in the FMS</li> <li>• School CECs to provide garbage receptacles in strategic places within the school compound area, and regularly collect and properly deposit of these wastes in the designated disposal areas.</li> <li>• As much as practicable, reuse spoils that meets material specifications.</li> <li>• When practicable, compost organic and degradable waste in suitable container, and provide this to interested farmers for their crop production</li> </ul>
8	Outbreaks of diseases and poor indoor air quality	<p>Increased prevalence of communicable diseases</p> <p>Outbreaks of pest and vermin infestation</p> <p>General lack of cleanliness</p>	<ul style="list-style-type: none"> <li>• Ensure that school designs adopted provide adequate learning environment free of pests and vermin, with ample ventilation provided.</li> <li>• Periodic fumigation activities, to be prescribed in the Operation Phase ESMP</li> <li>• Ensure proper and adequate provision of sanitation and waste management facilities at all schools.</li> <li>• Maintain a system of receiving and responding to any safety concerns by the communities</li> </ul>

*ANNEX 9: SUMMARY OF KEY E&S ASPECTS DURING THE REPORTING PERIOD*

**PROJECT STATUS, E&S INCIDENTS, E&S CHANGES, E&S INITIATIVES**

**PROJECT STATUS**

PROVIDE A BRIEF DESCRIPTION OF ANY NEW DEVELOPMENTS IN RELATION TO OPERATIONS AND FACILITIES OVER THE REPORTING PERIOD.

**E&S INCIDENTS**

PLEASE PROVIDE A SUMMARY OF ALL THE NOTIFIABLE E&S INCIDENTS, PER CTA DEFINITIONS.

PLEASE EXPAND OR COLLAPSE THE TABLE WHERE NEEDED.

DATE	INCIDENT DESCRIPTION	CLASS	REPORTS SENT TO LENDERS	CORRECTIVE ACTIONS / REMEDIAL PLAN

**E&S CHANGES**

PLEASE PROVIDE A SUMMARY OF ALL THE NOTIFIABLE E&S CHANGES.

PLEASE EXPAND OR COLLAPSE THE TABLE WHERE NEEDED.

DATE	CHANGE DESCRIPTION	REPORTS SENT TO LENDERS	IMPLEMENTATION STATUS

**IMPROVEMENTS/INITIATIVES REGARDING E&S PERFORMANCE**

BRIEFLY DESCRIBE IMPROVEMENTS/INITIATIVES IMPLEMENTED DURING THE REPORTING PERIOD ON MANAGEMENT OF E&S ASPECTS (E.G., ENERGY/WATER SAVINGS, SUSTAINABILITY REPORTS, WASTE MINIMIZATION, ETC.)

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

**E&S IMPACT / RISK ASSESSMENT**

HAVE ANY SUPPLEMENTAL ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY IMPACT/RISK STUDIES BEEN CONDUCTED DURING THE REPORTING PERIOD? (PLEASE PROVIDE COPIES)

**Compliance with Environmental and Social Management Plans**

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

**ESS2. Labor and Working Conditions**

**HUMAN RESOURCES MANAGEMENT**

HAVE ALL DIRECT WORKERS SIGNED COCS AND RECEIVED ORIENTATION?

Yes

No

PLEASE PROVIDE DETAILS.

	# community workers	# direct workers	# Female direct workers	Turnover	# Contracted workers <sup>76</sup>
Previous period					
Reporting period					

PROVIDE THE FOLLOWING INFORMATION REGARDING THE WORKFORCE:

IS THERE A FUNCTIONING AND ACCESSIBLE WORKER GRM

LIST THE WORKER-RELATED GRIEVANCES AND THEIR STATUS

**OCCUPATIONAL HEALTH AND SAFETY**

DESCRIBE THE MAIN CHANGES IMPLEMENTED IN TERMS OF OCCUPATIONAL HEALTH AND SAFETY (OHS) DURING THE REPORTING PERIOD, E.G., REVISION OF THE OHS MANAGEMENT PROCEDURES, ACTION PLANS FOR TECHNICAL IMPROVEMENTS, LEADING/LAGGING INDICATORS USED/INTRODUCED, IDENTIFICATION OF HAZARDS, NEW CONTROLS, ETC.

PLEASE ATTACH HEALTH & SAFETY AUDIT REPORTS AVAILABLE FOR THE REPORTING PERIOD.

COPIES ATTACHED WITH THIS REPORT

COPIES AVAILABLE UPON REQUEST

NOT

AVAILABLE

**ACCIDENT STATISTICS MONITORING**

Report TOTAL numbers for each parameter	This reporting period			Last reporting period (not cumulative) <sup>76</sup>		
	COMMUNITY WORKERS	DIRECT WORKERS	CONTRACTED WORKERS	COMMUNITY WORKERS	DIRECT WORKERS	CONTRACTED WORKERS
Total number of workers						
Total man-hours worked – annual						
Total number of lost time occupational injuries <sup>77</sup>						
Total number of lost workdays <sup>78</sup> due to injuries						
Lost time injury frequency <sup>79</sup>						
Fatalities						

<sup>76</sup> See ESS2 definitions.

<sup>76</sup> To be provided after the project has been operational for at least two consecutive years.

<sup>77</sup>A *lost-time injury* (LTIs) is the incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

<sup>78</sup>*Lost workdays* are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

<sup>79</sup> The number of *lost time injuries* (LTIs) recorded for Project workers per million man-hours worked by them. LTI Frequency Rate = injuries per million hours worked = # of lost time accidents x 1,000,000 hours / total man-hours worked).

Vehicle collisions <sup>80</sup>						
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PROVIDE DETAILS FOR THE NON-FATAL LOST TIME INJURIES DURING THIS REPORTING PERIOD.

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

PROVIDE DETAILS FOR FATAL ACCIDENTS DURING THIS REPORTING PERIOD, IF ANY, (AND PROVIDE COPIES OF ACCIDENT INVESTIGATION AND RESPECTIVE CORRECTIVE PLAN).

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

**OHS TRAINING**

DESCRIBE HEALTH AND SAFETY TRAINING PROGRAMS CARRIED OUT IN THE REPORTING PERIOD.

DATE	TYPE OF AUDIENCE	DESCRIPTION OF TRAINING (AND DURATION)	NUMBER OF ATTENDEES

**WORKPLACE MONITORING**

PLEASE PROVIDE COPY OF ANY WORKPLACE MONITORING REPORTS DEVELOPED FOR THE REPORTING PERIOD.

**ESS3. Resource Efficiency and Pollution Prevention**

**ENVIRONMENTAL MONITORING**

PROVIDE COPY OF ENVIRONMENTAL MONITORING DATA REPORTS FOR THIS REPORTING PERIOD, COLLECTED CONSISTENT WITH THE ESMPs FOR THE SUB-PROJECTS.

BRIEFLY DESCRIBE ENVIRONMENTAL MITIGATION MEASURES IMPLEMENTED DURING THE REPORTING PERIOD TO COMPLY WITH E&S REQUIREMENTS.

**RESOURCES EFFICIENCY: ENERGY AND WATER**

PROVIDE DATA ON ENERGY AND WATER CONSUMPTION DURING THE REPORTING PERIOD. IF THE DATA REQUESTED ARE AVAILABLE IN ANOTHER FORMAT, THEY CAN BE SUBMITTED INSTEAD.

DESCRIBE THE CONCESSIONAIRES' RESOURCES EFFICIENCY MEASURES/EFFORTS BEING IMPLEMENTED TO MINIMIZE FUEL, ENERGY, AND WATER CONSUMPTION.

**HAZARDOUS AND NON-HAZARDOUS WASTE<sup>81</sup>**

<sup>80</sup> Vehicle Collision: When a vehicle (device used to transport people or things) collides (comes together with violent force) with another vehicle or inanimate or animate object(s) and results in injury (other than the need for First Aid) or death.

<sup>81</sup> Waste types include but are not limited to chemical containers, chemical sludge, containers/pallets, dewatered sludge, domestic waste, ferrous and non-ferrous scrap, hospital waste, laboratory waste, liquids, off-specification raw materials, paint waste, sludge, solids, truck and auto tires, waste fuel hydrocarbons, waste hydraulic fluids, waste lubricating hydrocarbons, waste solvents, waste treatment sludge, contaminated soil, creosote sleepers etc.

**EROSION CONTROL, SLOPE STABILITY AND REINSTATEMENT**

PLEASE DESCRIBE STATUS AND ACTIONS IMPLEMENTED IN TERMS OF EROSION CONTROL, SLOPE STABILITY, AND REINSTATEMENT WITHIN THE PROJECT'S FOOTPRINT AND AREA OF INFLUENCE.

**ESS4 Community Health, Safety and Security**

**COMMUNITY HEALTH AND SAFETY**

PLEASE LIST AND DESCRIBE ANY INITIATIVES IMPLEMENTED IN RELATION TO COMMUNITY HEALTH AND SAFETY DURING THE REPORTING PERIOD.

PLEASE PROVIDE THE LIST AND DESCRIPTION OF THE ACTIONS, THE EXPECTED OR ACTUAL DATES OF IMPLEMENTATION, PROGRESS/STATUS, RESULTS OBTAINED. YOU CAN USE A TABULAR FORMAT (AS BELOW) OR PROVIDE THE INFORMATION AS AN ATTACHMENT OF THE REPORT.

DURING THE REPORTING PERIOD, HAVE ANY EMERGENCY DRILLS BEEN CONDUCTED WITH PARTICIPATION OF THE LOCAL AUTHORITIES, PUBLIC EMERGENCY ORGANIZATIONS, LOCAL COMMUNITIES? ARE THE COMMUNITIES AWARE OF THE EMERGENCY RESPONSE PLANS?

**ACCIDENT REPORTING**

PROVIDE DETAILS FOR THE NON-FATAL CASUALTIES, INVOLVING THIRD PARTIES, DURING THIS REPORTING PERIOD.

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

PROVIDE DETAILS FOR FATAL ACCIDENTS DURING THIS REPORTING PERIOD (AND PROVIDE COPIES OF ACCIDENT INVESTIGATION AND RESPECTIVE CORRECTIVE PLAN).

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

**GBV/SEAH/SEA ACTION PLAN**

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

**ESS5 Land Acquisition and Involuntary Resettlement**

REPORT ANY ACTIVITIES THAT HAVE BEEN REQUIRED INVOLUNTARY RESETTLEMENT

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

**Biodiversity Management**

PLEASE REPORT ON THE MITIGATION MEASURES INCLUDED IN THE ESMF AND ESMPs

AS NEEDED, USING THE TABLE BELOW DESCRIBE ANY **NEW ACTIVITIES OR EXPANSIONS** THAT HAVE INCREASED THE PROJECT FOOTPRINT INTO NEW **AREAS OF HABITAT** DURING THE REPORTING PERIOD.

New activity/expansion	Total area covered	Habitat type
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ESS8 Cultural Heritage

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REPORT IF CHANCE FIND PROCEDURES HAVE BEEN APPLIED IF NOT, PLEASE INDICATE NOT RELEVANT.

ESS 10 Stakeholder Engagement and Information Disclosure

*ANNEX 10: WORLD BANK INCIDENT CLASSIFICATION GUIDE*

**Indicative**

- Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people
- Does not result in significant or irreparable harm
- Failure to implement agreed E&S measures with limited immediate impacts

**Serious**

- An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources
- Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents
- Failure to remedy Indicative non-compliance that may potentially cause significant impacts
- Is complex and/or costly to reverse
- May result in some level of lasting damage or injury
- Requires an urgent response
- Could pose a significant reputational risk for the Bank.

**Severe**

- Any fatality
- Incidents that caused or may cause great harm to to the environment, workers, communities, or natural or cultural resources
- Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed
- Failure to remedy Serious non-compliance that may potentially cause severe impactsIs complex and/or costly to reverse
- May result in high levels of lasting damage or injury
- Requires an urgent and immediate response
- Poses a significant reputational risk to the Bank.