

THE GOVERNMENT OF SOMALILAND



Ministry of Education and Science

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

Stakeholder Engagement Plan

28th of December 2023

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ABBREVIATIONS AND ACRONYMS

ABE	Alternative to Basic Education
COC	Code of Conduct
CEC(s)	Community Education Committee(s)
CRC	Convention of the Rights of the Child
CSOs	Civil Society Organization(s)
EGRA	Early Grade Reading Assessment
ESIA	Environmental and Social Impact Assessment
ESS	Environment and Social Standards
ECCE	Early Childhood Care and Education
EIE	Education in Emergency
ESA	Education Sector Analysis
ESSP	Education Sector Strategic Plan
GBV/SEAH	Gender-based Violence/Sexual Exploitation, Abuse and Harassment
GDP	Gross Domestic Product
GER(s)	Gross Enrolment Ratio(s)
GNI	Gross National Income
GoSL	Government of Somaliland
GRM	Grievance Redress Mechanism
FCRM	Feedback and Compliant Response Mechanism
IDA	International Development Association
IDPs	Internally Displaced People(s)
IP	Implementing Partner
KPIs	Key Performance Indicators
MDG(s)	Millennium Development Goal(s)
MDA(s)	Ministries, Departments and Agencies
MESAF	Ministry of Employment, Social Affairs and Family
MICT	Ministry of Information and Communication Technology
MOES	Ministry of Education & Science
MoECC	Ministry of Environment and Climate Change
MoEM	Ministry of Energy and Minerals
MoFD	Ministry of Finance Development
MoPND	Ministry of Planning and National Development
MoPWLH	Ministry of Public Works, Land and Housing
MoWD	Ministry of Water Resource Development
NDP	National Development Plan
NGO	Non-governmental Organization
OHS	Occupational Health and Safety
OOSC	Out of School Children
PCU	Project Coordination Unit
PDO	Project Development Objective
PIU	Project Implementation Unit
PWDs	People with Disabilities
RPF	Resettlement Planning Framework
SDG(s)	Sustainable Development Goal(s)
SEP	Stakeholder Engagement plan
SLNEP	Somaliland National Education Policy
SOPs	Standard Operating Procedures

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

1. INTRODUCTION

1.1. Background

1. Only about 50% of children aged between 6 and 13 years go to primary school in Somaliland, pointing to a bleak future for comparative literacy rates with other countries in the region in future. Due to the absence of an enabling environment (including schooling infrastructure), only few children can attend school in the country, with the primary school net enrolment rate reported to be around 63 to 65 percent for boys and 59 to 61 percent for girls. Somaliland ranks in the top 10 of the countries with the highest poverty rate in sub-Saharan Africa¹ mainly due to this dire economic situation, high levels of civil unrest and insurgencies, especially in the south, and the prevailing pastoralist and nomadic culture, which makes sending children to formal schools impractical and impossible for many families.

2. Having declared independence from Somalia in May 1991 and undergone a relatively successful process of post-conflict peace building and reconstruction over the course of three successful elections since 2002, the Government of Somaliland (GoSL) has developed the Somaliland National Policy of Education (SNPE, 2015-2030), articulating a commitment to provision of quality, affordable and competitive education to all citizens towards the achievement of the Sustainable Development Goals (SDGs). Herein, education is underscored as a tool for national economic development, transformation of lives at national, community and individual levels as well as promotion of peace between communities and national stability. With education in Somaliland managed by the Ministry of Education and Science (MoES) at the central level, the SNPE focuses on reconstruction and development of education in the country, main priorities including:

- Expansion of access and equity for all Somaliland children at all levels of education regardless of socio-economic background and physical status,
- An efficient and effective education system,
- Quality, relevance of education and learning outcomes,
- A strong and functional management system of education from the central to devolved levels, including disaster management and emergency response to mitigate adverse impacts on students.

1.2. Somaliland Education for Human Capital Development Project

3. In Somaliland, the World Bank has allocated around US\$3 million to implement activities aimed at increasing access of disadvantaged children to education opportunities in the two initially targeted districts of Oodwayne and Xuddun, which have primary Gross Enrolment Ratios (GERs) of 9.4% and 3.4% respectively. The Project design includes systemic interventions in the areas of Access, Quality, System building and Management as well as a targeted program to be implemented in the predetermined locations to address some of their most pressing needs in education.

4. The project aims to create schooling opportunities in Somaliland at the lower 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 increased number of children enrolled in lower primary school, increased gender parity at the targeted level and an increase in the share of students attaining grade level competency in key subjects. In Somaliland, for instance, girls are at a distinct disadvantage, being underrepresented with a gender parity index of 0.83, with large distances to school leading to increased risks of

¹ World Bank, 2019. Somalia Poverty and Vulnerability Assessment: Findings from Wave 2 of the Somali High Frequency Survey. Accessed on March 15, 2020, at <https://openknowledge.worldbank.org/handle/10986/32323>

gender-based violence and further exacerbating girls' access to education services. Moreover, learning levels in Somaliland are quite low, with an EGRA² conducted by 'Save the Children' (2016) showing that Somaliland specifically characterized by very low reading fluency levels, speaking to the need to ensure that learning occurs in early grades.

5. The project's development objective (PDO) is to increase access to primary education in underserved areas, with a focus on girls, and improved quality of instruction. The proposed Project would be implemented over a period of five years (from 2023 to 2028), organized around four components. 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 the Project will finance establishment of PIU under Component 4. These are described as 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 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. The Project will initially finance the construction of 13 4-classroom schools per each district (total 26 schools in Somaliland). The final number of new schools and size of school to be constructed will depend upon the findings of the assessment conducted in the districts. All schools will be designed with functioning WASH facilities. About 750 qualified teachers will be hired to provide instruction to approximately 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 described below to increase access of disadvantaged children to education opportunities in the targeted districts in Somaliland. 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.

Component 4: "Project management": At the Government of Somaliland's level, the Project will finance the establishment of a Project 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/Gender Specialist.

1.3. Purpose of the SEP

6. The Government of Somaliland recognizes that the Somaliland education project's stakeholder profile is quite diverse and heterogeneous and that their expectations and orientation as well as capacities to interface with the project are different. This differential necessitates systematic efforts which are best realized by the development of a Stakeholder Engagement Plan (SEP). This plan will enable the project team to develop an approach for reaching each of the

² The "Save the Children" EGRA Report referenced is available [here](#).

different and important sub-groups that are necessary for the ultimate success of the project. Overall, this SEP will serve the following purposes:

- 1) Promote meaningful and inclusive stakeholder engagement: This SEP aims to ensure that all pertinent stakeholders, including affected communities, civil society organizations, CECs, government agencies, and private sector entities, can participate in project-related discussions and decision-making processes for the Somaliland Education for Human Capital Development (SEHCD) project.
- 2) Enhance transparency and information sharing: This SEP will establish mechanisms for providing stakeholders with timely and relevant information about the project, including its objectives, potential impacts, and mitigation measures. It outlines the channels and methods for disclosure and ensures that information is accessible to all stakeholders.
- 3) Facilitate effective consultation and participation: This SEP specifies the methods and approaches for consulting with stakeholders and gathering their input and feedback. It will include public consultations, focus group discussions, workshops, and other participatory mechanisms to ensure that stakeholder views and concerns are considered in project design and implementation.
- 4) Address grievances and conflicts: This SEP outlines the procedures and mechanisms for handling and addressing stakeholder grievances, disputes, or conflicts related to the project, ensuring that affected individuals and communities have access to appropriate channels for raising concerns and seeking resolution.
- 5) Build stakeholder capacity and awareness: This SEP includes capacity-building activities aimed at enhancing stakeholders' understanding of the project, its environmental and social aspects, and their rights and responsibilities. It may involve training programs, workshops, or awareness campaigns to enable stakeholders to actively engage in project processes.

7. The World Bank's Somaliland SEP aligns with international best practices for stakeholder engagement, including those outlined in World Bank's Environmental and Social Framework (ESF), the International Finance Corporation (IFC) Performance Standards and the Equator Principles. The SEP is tailored to the specific context of each project, considering local circumstances, cultural sensitivities, and the needs and preferences of various stakeholders.

8. By implementing a robust SEP for the SEHCD project, the World Bank aims to foster transparency, accountability, and effective participation, thereby enhancing the sustainability and development outcomes of its projects while considering the interests and concerns of diverse stakeholders.

1.4. Scope and Structure of the SEP

9. The scope of this SEP shall be as outlined in the World Bank's ESS10 – Stakeholder Engagement and Information Disclosure.³ The engagement will be planned as an integral part of the project's environmental and social assessment and project design and implementation. The project is to cover two main districts in Somaliland, namely Oodwayne and Xuddun.

10. This document has 10 chapters. The first chapter serves as an "Introduction" and provides a brief description of the project and the context in which the SEP is being prepared. Chapter 2 lists the regulatory framework in Somaliland and the World Bank's ESF, which provides a legitimacy for SEP. A summary of the consultations held so far is presented in Chapter 3. All the three chapters

³ More details about the World Bank's Environmental and Social Framework, as well as the ESS10, is available at the following URL: <http://pubdocs.worldbank.org/en/672051511809507014/ESS10-FactSheet-WB-ESF.pdf>

serve as a backdrop.

11. Stakeholder Identification, Mapping and Analysis is elaborated in the chapter 4. Institutional analysis and impact assessments are presented in Chapters 5 and 6. Stakeholder Engagement Plan is presented in the next chapter, 7.

12. Implementation Arrangements for executing the SEP is presented in Chapter 8. Grievance Redressal Mechanism (GRM) follows in Chapter 9. Monitoring, documentation and reporting are presented last, in Chapter 10.

2. REGULATORY CONTEXT

13. The key legislation for this project can be subdivided into two groups; (i) Legislation, policies and other legal frameworks on the education sector; and (ii) Legislation on access to information.

2.1. Right to Education in Somaliland

14. Article 15 (Education, Youth and Sports) of the Somaliland constitution avers that “The state shall pay particular attention to the advancement, extension and dissemination of knowledge and education as it recognizes that education is the most appropriate investment that can play a major role in political, economic and social development. Education is in the public interest and is rooted in the experience and the special environment of the Somaliland society”. Further, Article 15 (5) underscores that “The state shall accord a first priority to primary education and shall endeavor to spread primary education to the regions and the districts”. Also, Article 15 (6) stipulates that “the eradication of illiteracy and the (provision) of adult education is a national obligation, and that the efforts of the public and the state shall be combined to fulfill this obligation”. Article 19, on the other hand, declares that “the state shall be responsible for the health, care, development and education of the mother, the child, the disabled who have no one to care for them, and the mentally handicapped persons who are not able and have no one to care for them”.

15. The Government of Somaliland has prepared the Education Sector Strategic Plan (2017-2021).⁴ This Plan calls for investment by Somaliland’s development partners in the following strategic areas:

- Resilience and education in emergency (EiE)
- Early childhood care and education (ECCE)
- Primary education
- Secondary education
- Alternative to basic education (ABE)
- Technical and vocational education and training (TVET)

16. The proposed project will contribute to the achievement of priority pillars in a number of these strategic areas, including “resilience and education in emergency”, “early childhood care and education,” and “primary education.”

2.2. Access to Information in Somaliland

17. Somaliland has the following citizen/stakeholder engagement legislations that address issues pertaining to application of fundamental rights and participation in policy development and decision-making. 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 women⁵ 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

⁴ See “ <https://www.globalpartnership.org/sites/default/files/2018-07-gpe-somaliland-esp-2017-2021.pdf>” for further details of the ESSP

⁵ 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

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.

18. Somaliland currently does not have dedicated and/ or clear-cut national legislative provisions on the citizen and stakeholder engagement in the more specific investment programs and projects. In those cases, it relies on the relevant provisions of the donor organizations.

2.3. World Bank Environmental and Social Standard on Stakeholder Engagement

19. The main World Bank Environmental and Social Standards (ESS) for Stakeholder Engagement is ESS10 - Stakeholder Engagement and Information Disclosure. ESS10 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. The objectives of ESS10 can be summarized as follows:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties,
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance,
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them,
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format,
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.

20. The Government of Somaliland will engage with stakeholders throughout the Project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on Project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. The GoSL will engage in meaningful consultations with all stakeholders. To ensure this is a success, the MoES will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

21. The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

22. The Government of Somaliland will maintain and disclose as part of the environmental and social assessment and management framework, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a

brief explanation of how the feedback was considered, or the reasons why it was not. In the background of these regulatory requirements, this SEP has been prepared.

3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1. Planning Consultations

23. The analytical underpinnings of the Project are based largely on the Government of Somaliland's National Development Plan (2017-2021)⁶ which had a special chapter dedicated to the required improvements in the relevance and efficiency of the education and human capital sector in Somaliland.

24. On the other hand, the design and priorities of the Education for Human Capital Development project has been discussed at a joint planning between the World Bank office in Nairobi, Kenya in January 2020 and involved important stakeholders including the MoES, line ministries and local education groups, see Table 1 below and Annex 1 for key participants and issues raised at the planning meeting.

Table 1: Summary of planning consultations undertaken for Somaliland

Agency/ Representation	Key points raised and discussed
Ministry of Education and Science (MoES)/ Director General	As the main catalyst, the MoES will play a central role in coordination and implementation.
Ministry of Planning and National Development (MoPND)/ Director General	Provision of guidance in financial and public development matters under the project.
Ministry of Finance Development (MoFD)/ Director General	Funding formula for the project; efficient use of the resource and accountability
Ministry of Employment, Social Affairs and Family (MESAF)/ Director General	Policy direction and guidance on all labor administration, Safety and health of potential workers.
Ministry of Energy and Minerals (MoEM)/ Director General	Inputs on policy making and monitoring, providing technical support in relation to energy and mineral resources to promote social and economic development of the country
Ministry of Public Works, Land and Housing (MoPWLH)/ Director General	How they can support the project in the area of construction standards, land Acquisition policies and restrictions on land use
Ministry of Environment and Climate Change (MoECC)/ Director General	Focal point for multi-lateral environmental agreement (MEAs). The ministry will be involved in the areas of regulation, forest protection, minimization of air pollution, rural development, and preservation biodiversity.
Ministry of Information and Communication Technology (MICT)/ Director General	The MICT will be pivotal in formulation and development of policies in Somaliland, in addition to overseeing all matters ICT in education and Infrastructure building

⁶ See this URL for more details on the Ninth National Development Plan of Somaliland - <https://mopnd.govsomaliland.org/article/ndpii-1>

Agency/ Representation	Key points raised and discussed
Ministry of Water Resource Development (MoWD)/ Director General	Technical support in relation to easy access to clean, adequate, and affordable drinking water and WASH facilities in an environmentally friendly and sustainable manner in schools

25. The World Bank Project Teams and the MoES teams will engage extensive consultations in Somaliland with all relevant stakeholders during each visit in the Project preparation process, including local administrations in the selected Project areas, community elders, educations officers and business entrepreneurs. Oodwayne and Xuddun regions in particular will be targeted under this Project.

3.2. Brief Summary of Previous Stakeholder Engagement Activities

26. A virtual stakeholder consultation on the SEP was held on 3 December 2020 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 Environmental and Social Management Framework (ESMF) and RPF was also held on February 2021, and attended by 55 participants representing the Federal and State Governments, Civil Society Organizations (CSOs), development partners and the World Bank. Tables 2&3 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 2.

Table 2: Summary of key issues raised during SEP consultations on 3rd of 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).

#	Concern	Responses
6.	Coordination and management of the project	There will be a PIU, which 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 3: Summary key issues on ESMF and RPF held on 9th of February 2021

#	Issues Raised	Mitigation measures
1.	Ministry 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.
3.	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.
4.	There is a teacher recruitment process in the Teacher Policy. The onus is on FMS and MOES to implement the policy proposals.	To be referred to in the LMP
5.	The society knowledge gap on issues of GBV/SEAH	Awareness of the society on the GBV issues.
6.	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 (Biyooole), to use government land where possible. And use existing schools in urban centers where land is expensive.
7.	Security for the teachers and students on issues of GBV	Developing a comprehensive approach and sensitize the community on the issue.
8.	Ministry of labour mentioned that there is a new labour law ready for submission to the cabinet for approval, and there are 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.

#	Issues Raised	Mitigation measures
9.	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 neighboring 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
10.	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.
11.	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.

27. 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 12th of October 2023. The meeting was attended by a total number of 18 people (3 female, 15 male) representing different line MDAs, NGOs, and IPs, the full list can be found in annex 2.

28. 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 4: 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	Project delays: If there are disputes over the land where a school is to be built, the project could be delayed or even cancelled. Increased costs: Resolving land	a) Carryout a proper assessment / conduct thorough land due diligence prior to construction to identify and resolve any potential land ownership or access issues.

#	Issues identified	Potential Impacts/Risks	Proposed measures
		disputes can be expensive, which could increase the cost of the project. Social unrest: If land disputes are not handled carefully, they could lead to social unrest and violence.	b) Engage with affected communities early and often to ensure that their concerns are addressed.
2	Transparency in selection of schools /districts supported	Corruption: If the selection process is not transparent, there is a risk of corruption and favoritism. Inequity: If schools are selected without clear criteria, it could lead to inequity in accessing to education. Inefficiency: If schools are not selected based on their needs, it could lead to inefficient use of resources.	a) Develop and implement clear and transparent criteria for the selection of schools/districts to be supported by the project. b) Make this information publicly available and provide opportunities for stakeholders to provide feedback.
3	Sustainability of the project	Financial sustainability: If the project is not financially sustainable, it may not be able to continue operating after the World Bank funding ends. Institutional sustainability: 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.	a) 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.
4	Labour conditions and project management	Exploitation of workers: Workers may be exploited if they are paid unfair wages or forced to work long hours in unsafe conditions. Corruption: Mismanagement of the project could lead to corruption and embezzlement of funds. Delays and cost overruns: Mismanagement could also lead to delays and cost overruns.	a) Ensure that all workers involved in the project are treated fairly and paid a decent wage. Comply with all applicable labour laws and regulations.
5	Gender Based Violence (GBV) issues	Physical and sexual violence: Girls and women may be at risk of physical and sexual violence in and around schools. Bullying and harassment: Girls may also be at risk of bullying and harassment from their classmates and teachers. Early marriage and pregnancy: Gender-based violence can lead to girls being forced into early marriage and pregnancy, which can disrupt their education and have other negative consequences for their lives.	a) Develop and implement a GBV/SEAH prevention and response plan. This plan should include measures to raise awareness of GBV/SEAH, provide support to survivors, and hold perpetrators accountable.
6	Recruitment and retention of female teachers	Discrimination: Female teachers may face discrimination in hiring and promotion. Lack of support: Female teachers may lack the support they need to succeed, such as access to childcare and transportation. Safety concerns: Female teachers may be concerned about their safety in and around.	a) Offer competitive salaries and benefits to female teachers. Provide opportunities for professional development and advancement. b) Create a supportive work.

#	Issues identified	Potential Impacts/Risks	Proposed measures
7	Inclusion of low income/poor children	<p>Fees and other costs: Low-income families may not be able to afford the fees and other costs associated with attending school.</p> <p>Distance to school: Schools may be too far away for some children to reach, especially in rural areas.</p> <p>Lack of support at home: 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>Discrimination: Students may be discriminated against on the basis of their gender, ethnicity, disability, or other factors.</p> <p>Unequal access to resources: Schools in disadvantaged areas may have fewer resources than schools in more affluent areas.</p> <p>Low-quality education: 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>Unresolved grievances: If there is no reliable grievance redress mechanism, students, teachers, and other stakeholders may have no way to resolve their concerns.</p> <p>Loss of trust: A lack of reliable grievance redress mechanism can lead to a loss of trust in the project and the World Bank.</p> <p>Increased risk of conflict: 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>

29. MoES teams will continue engaging in extensive consultations with all relevant stakeholders including all regional representatives of the MoES, the 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.

4. STAKEHOLDER MAPPING, SEGMENTIZATION AND ANALYSIS

4.1. Principles of Stakeholder Engagement

30. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** public consultations for the project will continue during the whole project lifecycle from preparation through implementation. Stakeholder engagement will be free of manipulation, interface, coercion, and intimidation,
- **Informed participation and feedback:** information will be provided and widely distributed among all stakeholders in an appropriate format; conducted based on timely, relevant, understandable and accessible information related to the project; opportunities provided to raise concerns and assure that stakeholder feedback is taken into consideration during decision making,
- **Inclusiveness and sensitivity:** stakeholder identification will be undertaken to support better communications and building effective relationships. The participation process for the projects is inclusive. All stakeholders are always encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, particularly women headed households, youth, elderly and the cultural sensitivities of diverse ethnic groups.

4.2. Stakeholder Mapping, Analysis and Impact Assessment

31. ESS10 recognizes two broad categories of stakeholders: one, "Project-affected parties" and "Other Interested parties". The former includes "those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities". They are the individuals or households most likely to observe changes from environmental and social impacts of the project. Project affected parties are described in the Table 5 below.

Table 5: Description of Project-Affected Parties (PAPs)

Stakeholder group	Description	Issues	Significance

Stakeholder group	Description	Issues	Significance
Somalilander youths	<p>Young people with no skills and no schooling</p> <p>Unemployed young people engaged in seasonal pastoralism, agriculture or menial work.</p> <p>Mostly unemployed</p>	<p>Expectations of receiving education or other benefits from the project, inclusive of employment opportunities</p> <p>Expectation to be exposed to youth networking activities under the Somaliland Education project.</p> <p>Expectation to have access to capacity building mechanisms to foster skills development and education.</p> <p>Expectation to be involved in the decision-making process to shape peacebuilding, inclusivity, stability, poverty reduction and economic participation in Somaliland under the Education project.</p>	High
Somalilander Teachers	<p>People who teach or instruct, specifically employed in schools.</p>	<p>Expectation to be involved in active learning through mapping of educational content and activities in the Somaliland Education project.</p> <p>Expectation to be engaged in the fostering of multiculturalism in the project, for example, through encouraging inclusivity, non-discrimination of marginalized demographics, and dispelling of stereotypes.</p> <p>Expectation to be involved in the decision-making aspects of the Somaliland Education project, especially through project-based learning and incorporation of student choices in the classroom curriculum.</p>	High
Somalilander Parents	<p>Fathers and/ or mothers who give birth to, nurture or act as guardians to a child/ children.</p>	<p>Expectation to be consulted/ involved in their children's educational activities under the project.</p> <p>Expectation to contribute towards the Somaliland Education project's social sustainability through active participation in implementation.</p>	High
Somalilander CECs ⁷	<p>Community Education Committees (CECs) are groups through which education programs</p>	<p>Expectation of playing central role in the Somaliland community's development and recovery.</p> <p>Expectation of being sounding board for</p>	High

⁷ The role of CECs is underscored in an "Inter-Agency Network for Education in Emergencies" study available [here](#).

Stakeholder group	Description	Issues	Significance
	originate, encompassed of parents, teachers and local leaders, as determined by previous experience, function, group structure and membership.	<p>the project to foster inclusivity, sustainability, and greater equity.</p> <p>Expectation to be stakeholder in decision-making regarding larger educational issues in Somaliland.</p> <p>Expectation to be engaged/ participate in the project in a protection and advocacy role (for community and children's rights).</p>	

32. The term "Other interested parties" (OIPs) refers to "individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include government officials, the private sector, women's organizations, other civil society organizations, and cultural groups". Other key interested stakeholders of this project are described in Table 5 below. Stakeholder analysis will help to know the perceptions, interests, need, and influence of actors on the project. Identifying the appropriate consultation methodology for each stakeholder throughout the project lifecycle is necessary.

33. There are several groups of people and social groups who are interested in the Project on different levels. For this Project, these may be identified as following:

- People, community, and social groups who will be directly or indirectly be affected by the project: This group mainly includes Education sector coordination body, parents, local authorities, school head teachers and elders in the selected areas who will benefit from the proposed investments or be affected by the funding formula.
- People, groups and organizations who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project. This group mainly includes governmental entities such as the Ministry of Planning and National Development (MoPND), Ministry of Finance Development, Ministry of Employment, Social Affairs and Family Ministry of Energy and Minerals , Ministry of Water Resource Development (MoWD), Ministry of Environment and Climate Change (MoECC) as focal point for multi-lateral environmental agreement (MEAs) etc.
- It is expected that the number of the vulnerable groups benefiting from this project will increase because of the project. The MoES will reach out to these groups and associations representing these groups to raise awareness about the benefits of the project and to ensure an inclusive approach to project implementation. The main groups of stakeholders identified so far are listed in below. The list can be updated and modified during Project development or implementation.

1. Ministry of Finance Development (MoFD),
2. Ministry of Employment, Social Affairs and Family (MESAF),
3. Ministry of Energy and Minerals (MoEM),
4. Ministry of Planning and National Development (MoPND),
5. Ministry of Public Works, Land and Housing (MoPWLH),
6. Ministry of Information and Communication Technology (MICT),

7. Ministry of Environment and Climate Change (MoECC), and
8. Ministry of Water Resource Development (MoWD).

34. The Table 6 below summarizes the potential role, interests and influence for each of the above-mentioned stakeholders.

Table 6: Description of Project Interested Parties

Stakeholder	Potential role of Stakeholder	Interest	Influence
Ministry of Education and Science (MoES)	It is the main driver and lead of the process	High	High
Education Sector Coordination body	This community is expected to play a significant role in overall outreach to regional and district educational parties, in addition to establishing a useful connection between end-beneficiaries and managing authorities	High	High
Ministry of Planning and National Development (MoPND)	It is a major shareholder in driving national dialogue in Somaliland, especially in relation to financial and public development under the Somaliland Education Project.	High	High
Ministry of Finance Development (MoFD)	Issues related to the funding formula for the project; efficient use of the resource and accountability	High	High
Ministry of Employment, Social Affairs and Family (MESAF)	They will support in providing policy direction and guidance on all labor administration, particularly area of protection and development of the labor force to contribute to the socio-economic development of the GoSL	Medium	Medium
Ministry of Energy and Minerals (MoEM)	It will be involved in policy making and monitoring, meanwhile providing technical support in relation to energy and mineral resources in order to promote social and economic development of the country.	Medium	Medium
Ministry of Public Works, Land and Housing (MoPWLH)	It will be supporting the project in area of delineating construction standards and sound management of public fixed assets	Medium	Medium
Ministry of Environment and Climate Change (MoECC)	As focal point for multi-lateral environmental agreement (MEAs). The ministry will be involved in the areas of regulation, forest protection, minimization of air pollution, rural development, and preservation biodiversity.	High	High
Ministry of Information and Communication Technology (MICT),	The MICT will be pivotal in formulation and development of policies in Somaliland, in addition to overseeing all matters of ICT in education and Infrastructure building	High	High
Ministry of Water Resource Development (MoWD)	The MoWD will be central in ensuring that Somalilander citizens under the education project have easy access to clean, adequate, and affordable drinking water and WASH facilities in an environmentally friendly and sustainable manner.	High	High

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1. Stakeholder Engagement Action Plan

Stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle. The Table 7 below presents key stakeholder engagement activities to take place during the project preparation stage throughout implementation and closure.

Table 7: Somaliland Stakeholder Engagement Action Plan

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Beneficiaries including disadvantaged individuals and groups		
Verification of existing location/sites for projects	PIU, project consultants (social specialists) and other stakeholders: - MoES - MoPWLH	Affected groups, CSOs, community leaders/elders	<ul style="list-style-type: none"> Public announcements Face-to-face meetings (adhering to government guidelines on COVID-19) Virtual meetings using Webex/Skype/zoom 	<ul style="list-style-type: none"> First-hand assessment of the local people's perceptions of potential project benefits and risks Ensuring information dissemination, support, facilitation, and clearance.
Screening of the proposed projects	PIU consultants (social specialists) and other stakeholders: - MoES - MoECC - MESAF - MoPWLH	<ul style="list-style-type: none"> Affected groups (IDPs, pastoralist / nomadic communities) CSOs Community leaders/elders Key informants 	<ul style="list-style-type: none"> Public announcements Face-to-face meetings (adhering to government guidelines on COVID-19) Virtual meetings using Webex/Skype/zoom 	<ul style="list-style-type: none"> Identification of concerns on project impacts, feedback from would-be affected persons Ensuring information dissemination, support, facilitation, clearance, and ownership
In-depth study of risks and benefits taking into consideration, inter alia, the conditions that led to community consensus	PIU, project consultants (social specialists), NGOs /CSOs and other knowledgeable persons. In addition to wider participation from: - MoES - MoPND - MoECC - MESAF - MoPWLH	<ul style="list-style-type: none"> Would-be affected individuals and groups Locally-based CSOs/NGOs Community leaders/elders Key informants 	<ul style="list-style-type: none"> Formal/informal interviews Focus group discussions Discussion on specific impacts, alternatives, and mitigation; etc. 	<ul style="list-style-type: none"> More concrete views of project impacts and feedback on possible alternative mitigation and development measures Ensuring information dissemination, support, facilitation, and clearance.

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Beneficiaries including disadvantaged individuals and groups		
Environmental and Social Assessment (ESIA)	PIU (social specialists) -Consultants. In addition to wider participation from: - MoES - MoECC - MESAF - MoPWLH - Education Sector Coordination bodies	Adversely affected individuals, households and groups	<ul style="list-style-type: none"> • Structured survey • Questionnaires covering quantitative and qualitative information 	<ul style="list-style-type: none"> • Inputs for disadvantaged groups and identification of issues that could be incorporated into the design and implementation of the project • Ensuring information dissemination, support, clearance, and ownership.
Implementation and updates (progress, budget and finance)	PIU (social specialists) -Consultants -Locally based NGOs/CSOs. In addition to wider participation from: - MoES - MESAF - MoPWLH - MoECC - MoWD - MICT - Education Sector Coordination bodies	<ul style="list-style-type: none"> • Individuals and groups of disadvantaged groups, • Community leaders/elders and other stakeholders 	<ul style="list-style-type: none"> • Implementation Monitoring committees (formal or informal) 	<ul style="list-style-type: none"> • Quick resolution of issues, effective implementation of the Inclusion Plan • Ensuring information dissemination, support, facilitation, clearance, and ownership.
Monitoring and Evaluation, including monitoring of management of E&S risks and impacts, and final E&S evaluation.	- PIU (social specialists) -Consultants -NGOs & CSOs. In addition to wider participation from: - MoES - MoFD - MoPND	<ul style="list-style-type: none"> • Individuals and groups of disadvantaged groups • Community leaders/elders and other stakeholders 	<ul style="list-style-type: none"> • Formal participation in review and monitoring 	<ul style="list-style-type: none"> • Identification and resolution of Implementation issues, effectiveness of Inclusion Plan • Ensuring information dissemination, support, and clearance.

5.2. Information Disclosure Approach

35. The Table 8 below provides a preliminary summary of the suggested information to be disclosed based on the project design and topics that might be of interest to stakeholders. The table is a living document that may be modified and changed following input and suggestions from project stakeholders:

Table 8: Tabular Matrix Highlighting Information Disclosure Approach for Somaliland

Information to be Disclosed	Method of Disclosure	Timing/ Frequency	Target Stakeholders	Responsible Stakeholder
Component 1 – if included for Somaliland				
Establishment and strengthening of capacity and institutional systems at the Ministry of Education and Science	Project Reports, Progress Updates	Quarterly	Ministry of Finance Development (MoFD)	Project Manager
Strengthening government's stewardship role	Project Updates, Policy Documents	Ongoing	Ministry of Planning and National Development (MoPND)	Project Manager
Establishment of a national student learning assessment system	Assessment Reports, Data Analysis	Annually	Ministry of Education	Project Manager
Strengthening monitoring and evaluation	Evaluation Reports, Performance Indicators	Semi-annually	Ministry of Education, Ministry of Planning and National Development (MoPND)	Project Manager
Component 2				
Incentivizing non-state providers to enroll children free of cost	Incentive Programs, Partnership Agreements	Annually	Ministry of Employment, Social Affairs and Family (MESAF)	Project Coordinator
Building new schools and support packages for disadvantaged children	Construction Plans, Budget Allocation	As needed	Ministry of Public Works, Land and Housing (MoPWLH)	Project Coordinator
Component 3 – if included for Somaliland				
2-year Teachers Professional Development Program (TPDP)	Training Curriculum, Course Materials	Quarterly	Ministry of Education, Somalilander Teachers	Project Coordinator
Component 4 – if included for Somaliland				
Project management and staffing	Staffing Plans, Project Updates	Ongoing	Ministry of Finance Development (MoFD)	Project Director
Project implementation progress	Project Reports, Performance Indicators	Monthly	Ministry of Finance Development (MoFD)	Project Coordinator

Information to be Disclosed	Method of Disclosure	Timing/ Frequency	Target Stakeholders	Responsible Stakeholder
Procurement and financial management	Procurement Plans, Financial Statements	Quarterly	Ministry of Finance Development (MoFD)	Fiduciary and Safeguards Staff
Project coordination and supervision	Project Updates, Site Visits	Regularly	Ministry of Planning and National Development (MoPND)	Project Coordinator
Project communication and outreach	Communication Plans, Awareness Campaigns	As needed	Ministry of Information and Communication Technology (MICT)	Project Director
Environmental and climate considerations	Environmental Impact Assessments, Mitigation Plans	Annually	Ministry of Environment and Climate Change (MoECC)	Project Coordinator
Water resource management	Water Resource Plans, Usage Reports	Quarterly	Ministry of Water Resource Development (MoWD)	Project Coordinator
Youth engagement and participation	Youth Empowerment Programs, Feedback Mechanisms	Ongoing	Somalilander Youths	Project Director
Parental involvement and awareness	Parent Workshops, Information Campaigns	Biannually	Somalilander Parents	Project Coordinator
Community engagement and consultation	Community Meetings, Consultation Sessions	As needed	Somalilander CECs	Project Coordinator

5.3. Timeline for Provision of Feedback

36. The Ministry of Education and Science (MoES) and the PIU will provide appropriate background and relevant technical information to stakeholders whose feedback is sought on various project issues with sufficient advance notice (7-10 business days) so that the stakeholders have enough time to prepare to provide meaningful feedback.

6. Inclusion Plan

6.1. Introduction

37. The project will give special consideration to disadvantaged groups. These include:
- i. Minority casts and groups⁸.
 - ii. Internally Displaced Persons (IDPs).
 - iii. Those who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities.
 - iv. Nomadic pastoralist communities.
 - v. Adults and children living with mental and/or physical disabilities.
 - vi. Widows.
 - vii. Single heads of households.
 - viii. Orphans.

38. There are social, economic and physical barriers that prevent disadvantaged individuals and groups from participating in projects, which include lack of financial resources, inaccessibility of meeting venues, social stigma, lack of awareness and/or poor consultation. For instance, people living with disabilities are often not effectively engaged in consultations due to lack of access and social stigma and cultural beliefs that they are not able to participate or benefit from school or have limited productive roles in society. In this regard, the project will deploy viable strategies to engage target communities and other stakeholders and overcome social stigma and encourage inclusion. These strategies will include ensuring that these groups are targeted in public consultations, the formation of Social Accountability Committees (SACs), which will promote inclusion and ensure the representation of the disadvantaged groups. Teachers and communities will be trained on inclusion of disadvantaged groups including people with mental and physical disabilities, etc. In addition, the monitoring tools will also have questions on inclusion and be used to strengthen strategies.

39. In addition, due to likely clannism and elite capture and potential exclusion of the disadvantaged groups during the life span of the project, there shall be a social accountability committee, which will report directly to the social specialists at the regional level. They will promote accountability and transparency in the running and management of the project at the district or school level and receive complaints or concerns from the community, which will be raised directly with the CEC and the school management or reported to the Project's social specialist. They will also be a link with the community for virtual reporting e.g. photographic monitoring or for phone call back mechanisms. The committee members, shall reflect the diversity of the community including disadvantaged groups and will have its own code of conduct (CoC).

40. District selection under component 2: The Project will ensure that targeting criteria for identifying the districts to benefit from the activities specified are based on districts with availability of data of primary gross enrollment rate (typically below 10 percent). This criterion will also meet necessary requirements that include technical correctness, equity and fairness, as well as project financing feasibility. Two additional criteria will be applied to select the districts from those that have enrollment below 10 percent. First, an important consideration in selection of the districts is their

⁸ This shall include all groups falling outside identified clans and not genealogically associated with them in a specific district or geographical area including the ethnic, occupational groups.

accessibility from a security perspective for civil works execution and supervision of schools. Second, the districts that have existing cash transfer or nutrition interventions to meet demand-side needs of children attending school were prioritized. Initially, two regions, Oodwayne and Xuddun, have been selected in Somaliland so far.

41. School site selection: In the selected regions, surveys will be undertaken to identify school sites to benefit from the project. The following criteria will be applied for selection of new school sites:

- i. Site selection will be needs based. The process will consider areas with the highest population of primary aged children (% of school-aged population = Population of school aged children (5 - 13)/total population). Within these areas, those with the largest number of out of school children (OOSC) children will be prioritized. In addition, school site selection will ensure equity and inclusivity considerations, particularly for minority groups and casts and IDPs, so all the investments are not all in mainstream majority clan areas.
- ii. District authorities must predefine location of the school.
- iii. The served community should have a school feeding or another nutrition/cash transfer program.
- iv. The site location must not be contested land or have multiple claims. Residents and users of the land as well as other stakeholders must agree in writing on its use for the school.
- v. Climate zones of the school site must be defined.
- vi. Key environmental and social factors of the school site will need to be considered.
- vii. School sites should be located in secure and accessible areas.
- viii. District authorities will need to develop a plan for the schools that demonstrate the ability to enroll children from disadvantaged backgrounds and lack basic resources, including teaching resources and trained teachers (e.g. IDPs, rural children, disabled children etc.).
- ix. A CEC for the prospective school will need to be formed and commits to maintaining at least 50% girls' enrolment in schools.
- x. Site selection should take into account local administration that can demonstrate the ability to support funded activities even after the completion of the site construction. Priority should be given to the local administrations that can produce those documents (this process is further detailed in the Resettlement Planning Framework (RPF)).
- xi. The district authorities should demonstrate operational sustainability plan of the school site.
- xii. School sites selected for construction must be registered with the MoES and all relevant ministries and authorities.
- xiii. District authorities should produce supporting documentations that shows the registered schools under their authority are implementing the National Curriculum.
- xiv. District authorities should involve and consult with the school communities in all interventions.

6.2. Engaging disadvantaged and marginalized groups

42. The project will take special measures to ensure that members of disadvantaged and marginalized groups have equal opportunity to project benefits. This will include ensuring that they are involved in consultations on project siting and design, ensuring the schools are accessible to people with physical disabilities (e.g. having ramps and rails where appropriate) and teachers and CECs are trained on their responsibilities to provide services without discrimination. In addition, efforts will be made to

promote diversity in staffing (see labor management procedures (LMP) and environment and social management framework (ESMF)) and social accountability committees will have diverse representation including disadvantaged groups.

43. Community and teacher training will emphasize non-discrimination and access to education for all including minority groups and people living with disabilities. The approach will involve the use of community engagement modalities, including the use of the CECs to identify the most vulnerable households, vulnerable girls and persons with disabilities to benefit from the project.

44. Stakeholder and community engagement will be key in the sensitization of community level structures and means by which complaints and grievances related to the project will be received, handled and addressed. The understanding is that communities know their own vulnerabilities than external actors and the engagement of local structures is most effective in such projects where administrative capacity is limited.

45. The participation of disadvantaged and marginalized groups in the selection, design and implementation of project activities will largely determine the extent to which the Inclusion Plan will be achieved. Where adverse impacts are likely, the PIU will undertake prior and informed consultations with the likely affected communities and those who work with and/or are knowledgeable of the local development issues and concerns. The primary objectives will be to:

- Understand the operational structures in the respective communities;
- Seek their input/feedback to avoid or minimize the potential adverse impacts associated with the planned interventions;
- Identify culturally appropriate impact mitigation measures; and
- Assess and adopt economic opportunities, which the MoES could promote to complement the measures required to mitigate the adverse impacts.

46. Consultations will be carried out broadly in two stages. First, prior to commencement of any project activities the PIU will arrange for consultations with community leaders, the CECs and representatives of disadvantaged and marginalized groups about the need for, and the probable positive and negative impacts associated with the project activities. Secondly, after initial roll-out of the project activities, a rapid assessment will be conducted to ascertain how the disadvantaged groups in general perceive the interventions and gather any inputs/feedback they might offer for better outcomes, which would inform the project delivery. The PIU will:

- a) Facilitate broad participation of disadvantaged and marginalized individuals and groups with adequate gender and generational representation; community elders/leaders; and CSOs;
- b) Provide the disadvantaged and marginalized individuals and groups with all relevant information about project activities including on potential adverse impacts;
- c) Organize and conduct the consultations in forms that ensure free expression of their views and preferences; and
- d) Document details of all consultation meetings, with disadvantaged and marginalized groups on their perceptions of project activities and the associated impacts, especially the adverse ones;
- e) Share any input/feedback offered by the target populations; and
- f) Provide an account of the conditions agreed with the people consulted.

47. Once the disadvantaged and marginalized individuals and groups are identified in the project area, the provisions in this Inclusion Plan will ensure mitigation measures of any adverse impacts of the

project are implemented in a timely manner. The project should ensure benefits to the disadvantaged and marginalized by ensuring that they are consulted, have accessible and trusted complaints mechanism and benefit from project activities.

48. The following issues will be addressed during the implementation stage of the project:
 - i. Provision of an effective mechanism for monitoring implementation of the Inclusion Plan;
 - ii. Development of accountability mechanisms to ensure the planned benefits of the project are received by disadvantaged individuals and groups;
 - iii. Involve suitably experienced CSOs/NGOs to address the disadvantaged individuals through developing and implementing action plans;
 - iv. Ensuring appropriate budgetary allocation of resources for the Inclusion Plan;
 - v. Provision of technical assistance for sustaining the activities addressing the needs of the disadvantaged and marginalized; and
 - vi. Ensure that disadvantaged and marginalized groups' traditional social organizations, cultural heritage, traditional political and community organizations are protected.

7. RESOURCES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION AND MONITORING

7.1. Management

49. The overall coordination role in the implementation of the SEP will be carried out by the MOES. The MOES has experience with the implementation of projects financed by international development organizations, including the World Bank.

50. A PIU will be established for the management of the implementation of this Project. This PIU has a good track record of project implementation and ensures compliance with the applicable World Bank procedures. The Project Management Committee (PMC) will provide a platform for the collaborative management and joint decision making of the program. The MoES Director General will chair the PMC and include relevant GoSL Director Generals, heads of relevant MOES departments and Program Director.

51. The PMC provides collaborative management of program activities, decision-making around co-design and co-management of activities including the annual work plan and budget, co-monitors program activities, conducts quarterly progress reviews, makes joint decisions on issues pertaining to implementation and ensures open communication and maximum accountability.

52. The PIU will be based in the MOES and is responsible for technical oversight and support, partner coordination, financial and administrative management, the communication management, the environmental, social and GBV/SEAH risks and impact management, as well as the program activity monitoring and reporting to the World Bank. The PMC organogram is captured in figure 1 below. The PMC team consists of program director, program coordinator, technical component leads, communication specialist, procurement specialist, finance manager, environmental, social, GBV/SEAH specialists, and M&E specialist.

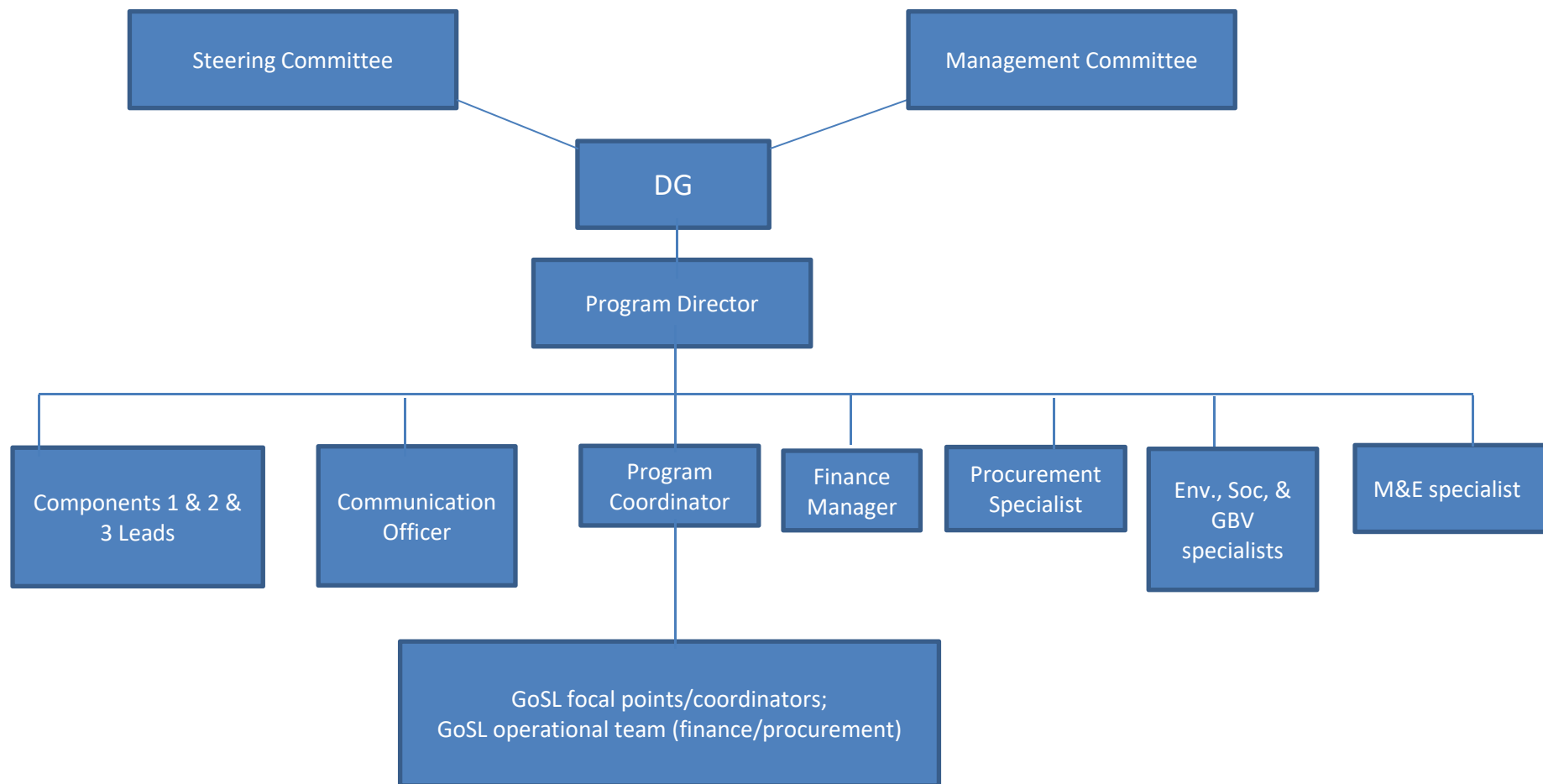


Figure 1: Proposed PIU Structure

53. The PIU would 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 Project Management component and may be increased should there be a need.

54. **Disadvantaged/ Vulnerable Individuals or Groups.** The project will be targeting two districts across Somaliland on the basis of the following targeting criteria: (i) districts with the lowest enrollment rates (GER below 11 percent); and (ii) districts that are accessible for civil works construction and supervision. Along criteria, project will give especial consideration to most disadvantage or vulnerable groups whose voices are not being considered into the decision-making processes. There are certain limitations preventing disadvantaged groups from participation of projects, not limited but includes, lack of financial resources, accessibilities to some event, lack of awareness or poor consultation. People with disabilities are often not engaged well. In this regard, the project will deploy viable strategy to engage target communities and other stakeholder. Stakeholders will be informed about impact and risks of the project through consultation process or participatory approach IDPs, marginalized groups, people with special needs, pastoralists and nomadic communities will be consulted during the project design. Communication awareness strategy will be developed. Inclusive meetings that will accommodate people's needs regardless of their socioeconomic background, physical abilities, or gender. Everyone should be included.

7.2. Resources

55. The project has set aside funds to ensure that the planned stakeholder engagement activities are implemented and monitored effectively. The summary budget is presented in Table 8 below.

Table 9: Summary budget for implementing the SEP

Stakeholder Engagement Activities	# Qty (Yrs)	Unit Cost, USD	Total cost (USD)
GRM, MIS case management process, database (including running of hotline, record keeping, etc.)	3	40,000	120,000
Travel expenses of staff on stakeholder engagement missions	3	10,000	30,000
Activities related to the Inclusion Plan including social accountability committees	3	10,000	30,000
Communication materials (leaflets, posters)	bulk	10,000	10,000
Project press conferences or FM radio broadcasts (twice per year)	6	5,000	30,000
Training (social issues, outreach, GRM, etc.) for PIU, Region, District and community levels	3	10,000	30,000
Project hotline to receive complaints and grievances related to the project (TA and Airtime)	bulk		10,000
Subtotal			260,000
Contingency (5%)			13,000
Total			273,000

8. MONITORING AND REPORTING

56. The SEP will be periodically revised and updated as necessary in order to ensure that the information and the methods of engagement remain appropriate and effective in relation to the project context and spread of COVID-19. Any major changes to the project related activities and to its schedule will be duly reflected in the updated SEP. Monthly/quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventive actions will be collated by responsible staff and referred to the senior management of the project.

57. The monthly/quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the project during the year may be conveyed to the stakeholders in two possible ways:

- i. Publication of a standalone annual report on project's interaction with the stakeholders; and
- ii. A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis and reported on.

58. The project team will conduct surveys on World Bank supported components at mid-point and three-quarter point. The results from these surveys will be used to inform the World Bank on the necessary steps to take towards meeting the project goals.

9. GRIEVANCE REDRESS MECHANISM (GRM)

9.1. Introduction

59. Transparency and accountability will be core elements of the Somaliland's Human capital development in education. For this purpose, the project will include a Feedback and Compliant Response Mechanism (FCRM) that is already used in a different project funded by the World Bank. The goal of the FCRM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. The FCRM is a mechanism that allows for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the FCRM 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 project impact.

60. The Project Management Unit will make sure that the mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

61. Definition: For the purposes of this SEP, a Grievance Redress Mechanism can be defined as the process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project.

62. SCOPE: SEHCD's Feedback and Complaint Response Mechanism will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

63. Users: Project beneficiaries, project workers, project affected people (i.e., those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry can use the FCRM for the above purposes.

64. FCRM's management: The FCRM for Somaliland Education for Human Capital Development Project is managed by the SEHCD's Project Management Unit, under the direct responsibility of Director General of the ministry. And, submission of complaints can be done at any time throughout the Project implementation period.

65. 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.⁹ 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 to and manage such grievances'.¹⁰ 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.

66. 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:

1. Fairness of contracting;

⁹Under 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 mechanisms, which will be defined in a separate GBV/SEA and GBV Action Plan.

¹⁰ World Bank, Environmental and Social Framework, 2018, p. 131.

2. Fraud or corruption issues;
3. Inclusion;
4. Social and environmental impacts;
5. Payment related complaints;
6. Quality of service issues;
7. Poor use of funds;
8. Workers' rights;
9. Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and sexual Harassment (SH);
10. Forced labor, including human trafficking and use of prison labor;
11. Child labor; and
12. Threats to personal or communal safety.

67. 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 GBV Action Plan developed for this project, as part of the ESMF). The GRM will also operate in addition to specific workers' GRMs, which are laid out in the LMP.

68. 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 channeling 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.

69. 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 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.

70. The MoES will have the responsibility for overseeing the resolution of all issues related to the project activities in accordance with the laws of Somaliland 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 regional level who will receive grievances by phone, text or email to publicized toll free mobile phone lines and email addresses at the regional 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 Project's social specialist will carry out training of all field staff and MoES staff involved with the project, including contractors, on receiving, referral, handling and reporting on complaints, and will oversee awareness raising on the GRM at national level.

71. A Grievance Redress Committee (GRC) will be established at the MoES level, which will be chaired by the project manager, and others for procurement, finance, monitoring and evaluation (M&E), GBV advisor and communication, where deemed necessary. The social specialists 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.

72. 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 field team should immediately inform the Project's social specialist or head of the PIU, who will inform the World Bank within 48 hours as per the Environmental and Social Incident Response Toolkit (ESIRT) requirements.

73. Due to limited capacity in the Government system, the Project may enlist the support of CSOs working in the project areas to support the GRM activities, which will in turn, establish an independent call center 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).

74. At community level social accountability committees with strong representation of disadvantaged groups will receive complaints directly from the community, contractors or schools and forward to the Project's social specialist to support resolution and follow up.

9.2. Proposed GRM Procedure

75. Receiving and Registering Complaints: The beneficiaries will have multiple ways of channeling 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, or community leaders. All complaints will be channeled to the relevant social specialist, who will log them into the Complaints Register (see a template in Annex 2).

76. Acknowledging, assessing and assigning: 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). 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) who 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.

77. Incident reporting: Severe incidents 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 PIU and the WB within 24 hours (details on this process are described in the Labor Management Procedures).

78. 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. A 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.

79. For all other grievances, the 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.

80. At all times, the PIU 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.

81. 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 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.

82. Proposing and Responding: 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.

83. Agreement of a response between the Complainant and the GRM Team: 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.

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

85. Implementing the response: 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.

86. Reviewing the Grievances: 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.

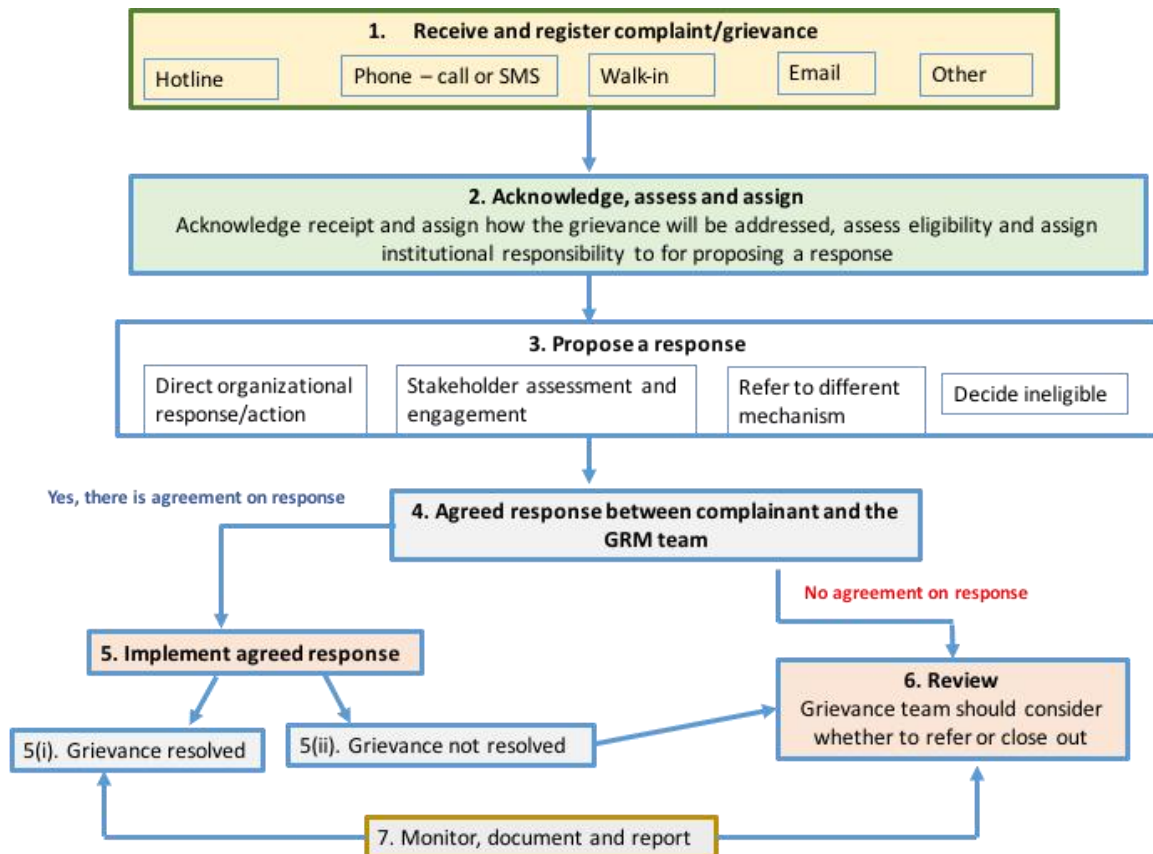


Figure 2: Grievance process for the project

9.3. Monitoring and Reporting of GRM

87. The PIU, specifically the Social Specialist, will be responsible for monitoring the access to and implementation of the GRM by all project teams at the Federal Government and 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.

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

89. The PIU 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 PIU 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.

9.4. GBV and SEA

90. Cases of GBV/SEAH can be reported through the general Project GRM. However, additional channels for reporting GBV/SEAH 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 PIU 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/SEAH 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.

91. The GRM proposes the following key features on preventing GBV/SEAH: (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.

92. Beneficiaries and communities will generally be encouraged to report all GBV/SEAH cases through the dedicated GBV/SEAH 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/SEAH 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/SEAH will be articulated within the GBV/SEAH and GBV Action Plan.

93. If a GBV/SEAH case is reported through the Project GRM, the GRM Operator will report the case within 24 hours to the PIU, and the PIU is obliged to report this case to the WB within 24 hours. Furthermore, cases of Sexual Harassment 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 PIU 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/SEAH 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.

9.5. GRM Appeals and Escalation Mechanisms

94. 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.

9.6. WBG's Grievance Redress Service (GRS)

95. 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 Somalis office at: somaliaalert@worldbank.org.

96. 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. 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.

Annexes

Annex 1 – List of participants in the stakeholder consultation meeting on SEP

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	Ayub 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

Annex 2 - Stakeholder Meetings on Project's E&S instruments 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	Ayub 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

No.	Name	Title & Institution
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 12th 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	<ul style="list-style-type: none"> - Regular meetings with the Minister of Education and the Minister of Finance to discuss progress on the 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. 	Quarterly
2	Ministry of Education	To implement the Education for Human Capital Plan and achieve its objectives			
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	<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> - 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	Medium	<ul style="list-style-type: none"> - Regular meetings with civil society organizations to discuss 	Quarterly

Stakeholder Analysis				Stakeholder Engagement Strategy	
No.	Stakeholder Group	Interests and Concerns	Influence	Engagement Activities	Frequency
		education		the Education for Human Capital Plan and how they can contribute to its implementation. - Joint advocacy initiatives 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	- Roundtables and business forums to discuss the private sector's role in education and human capital development. - Public-private partnerships to support the implementation of the Education for Human Capital Plan.	Annually
9	Development partners	To support the government in implementing the Education for Human Capital Plan	Medium	- Joint planning and monitoring missions to ensure that the Education for Human Capital Plan is aligned with other development initiatives in the country. - Regular meetings to discuss progress on the plan and any challenges that are being faced.	Twice a year

Annex 3 – Complaints Log

Date and complaint from	Complaint e.g. non- issuance of ID	Officer/ department complained against	Nature of complaint/ service issue, e.g. delay	Type of cause – physical (e.g. system failure), human (e.g. inefficient officers, slow, unresponsive) or organization (e.g. policies, procedures, regulations)	Remedy granted	Corrective/ preventive action to be taken	Feedback given to complainant

Annex 4 – Stakeholder Engagement Framework

Please read this in conjunction with the Stakeholder Engagement Plan Template

In certain instances where the specifics for creating a detailed Stakeholder Engagement Plan are not available, a stakeholder engagement framework (SEF) may be adopted. The SEF will guide the development of an SEP, as soon as the specific locations, stakeholder groups, and schedule of activities are known. The scope and level of detail of the framework SEP should be commensurate with the nature and scale, potential risks, and impacts of the project and the level of concern in the project area. However, since adequate information is not yet available on which people can comment, more detail is needed on the range of issues under consideration than in a specific SEP, which is often attached to or accompanied by a nontechnical summary of the project.

It is important to remember that people make their minds up about a project, whether positive or negative, at an early stage. If only limited information is provided to people from the project, they will form opinions based on their own informal discussions, and perhaps on the basis of less credible information. While it is important to manage expectations, it is typically a mistake to delay providing information to stakeholders, as opinions can be quite firmly established, even when more information is later provided.

When the details of the project location, technology, or other key factors are not known and will be decided at a future date, the Stakeholder Engagement Plan should be presented as the approach to stakeholder engagement that is envisaged, following the information note above, but with the following changes:

- The stakeholder identification may expand to a wider area than the project will affect, if a location has not yet been identified. Be careful to provide information on the range of options under consideration and how these options will be narrowed down.
- Provide information on the process that will be followed in developing a specific stakeholder engagement plan and the objectives of the consultation.
- Provide details on the early stages of consultation, when more information will be gathered to draft the Stakeholder Engagement Plan, and welcome input on the best methods of notification, information disclosure, and consultation.
- The framework needs to be specific about the way people will be informed when more information is known, including specific names of media and websites. It should outline the general process that will be followed, and the number of days/weeks/months that people will have to comment on information when it is available.
- When locations and dates of meetings are not known, provide a general range of the number of meetings planned and the approach to consultation.
- The contact information for the project needs to be provided in full in the framework for people who have more questions or concerns.

The grievance mechanism needs to be provided in full in the framework. Stakeholders can have problems even during the project planning stage.