

THE GOVERNMENT OF SOMALILAND



MINISTRY OF EDUCATION AND SCIENCE

Empowering Women through Education and Skills – “Raja Kaaba” Project in
Somaliland (P176898)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

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TABLE OF CONTENT

TABLE OF CONTENT	ii
LIST OF TABLES	iii
LIST OF FIGURES	iv
LIST OF ACRONYMS AND ABBREVIATIONS	iv
1. EXECUTIVE SUMMARY	vii
2. INTRODUCTION AND PROJECT CONTEXT	1
2.1. Project Context	1
2.2. Somalia Empowering Women Through Education and Skills Project	4
3. PROJECT DESCRIPTION	6
3.1. Project Development Objective and Components	6
3.2. Project Beneficiaries	10
4. SCOPE AND METHODOLOGY OF THE ESMF	12
4.1. Purpose and Scope of the ESMF	12
4.2. ESMF Justification	12
4.3. ESMF Principle	13
4.4. Methods	13
5. POLICY, LEGISLATIVE AND INSTITUTIONAL FRAMEWORK	14
5.1. Overview	14
5.2. Somaliland National Laws, Policies and Legislations	14
5.3. Institutional Capacity for Environmental Management	17
5.4. International Conventions and Agreements Signed or Ratified by Somalia	18
5.5. World Bank Environmental and Social framework	19
5.6. Gap Analysis	28
6. PROJECT BIOPHYSICAL AND SOCIO-ECONOMIC SETTING	38
6.1. Introduction	38
6.2. Climate	38
6.3. Ecosystems	39
6.4. Socio-Economic Environment	39
7. CONSULTATIONS AND PUBLIC DISCLOSURE	49
7.1. Introduction	49
7.2. Stakeholder Analysis of the Project	49
7.3. Stakeholder Engagement Activities of the Project	53
7.4. Planned Stakeholder Engagement Activities	55
7.5. The Stakeholder Engagement Plan (SEP) of the Project	56
7.6. Grievance Mechanism (GM)	57
Table 13: Project Information Disclosure	62
8. IMPACT & RISK CLASSIFICATION AND ESMF PROCEDURES	64
8.1. Introduction	64
8.2. Environmental, Social and SEA/SH Risk Classification and Rating	64
8.3. Environmental and social assessment Procedure	66
9. ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES	68
9.1. Environmental and Social Risks and Impacts (ESS1)	68

ESMF for Raja Kaaba Project in Somaliland (P176898)

9.2.	Measures proposed for mitigating Environment and Social Risks and Impacts	70
9.3.	Gender Mainstreaming and SEAH Prevention and Response Action Plan	74
9.4.	Security Management Plan	75
9.5.	Environmental and Social Monitoring by Contractors	76
9.6.	Environmental and Social Liabilities of Contractors	77
10.	IMPLEMENTATION ARRANGEMENTS AND ROLES AND RESPONSIBILITIES	78
10.1.	Introduction of Project Implementation Arrangement	78
10.2.	Environmental and Social Management	78
10.3.	Responsibility for the ESMF	79
10.4.	Roles and Responsibilities of the MOES	80
10.5.	World Bank Roles and Responsibilities	80
10.6.	Updating the ESMF	81
10.7.	Disclosure of Safeguards Instruments	81
11.	MONITORING PLAN	82
11.1.	Regular Monitoring and Inspection for Compliance	82
11.2.	Incident and Accident Reporting	83
11.3.	SEP Activities Requiring Monitoring	84
12.	ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN AND BUDGET	84
12.1.	Introduction	84
12.2.	Environmental and Social Safeguards Training	85
13.	Budget for ESMP Implementation	116
14.	ANNEXES	117
	ANNEX 1: WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS	117
	Annex 2: Stakeholder consultation and participation list	119
	ANNEX 3: INDICATIVE ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST	125
	ANNEX 4: DRAFT TERMS OF REFERENCE FOR AN ESIA FOR SITE-SPECIFIC SUB-PROJECT	128
	ANNEX 5: DRAFT TERMS OF REFERENCE OUTLINE FOR AN ESMP FOR A SUB-PROJECT	132
	ANNEX 6: PROTECTION OF CULTURAL PROPERTY	134
	ANNEX 7: GRIEVANCE INFORMATION FORM	135
	ANNEX 8: COMPLAINT CATEGORIZING	136
	ANNEX 9: SAMPLE GRIEVANCE REGISTRATION FORM	137
	ANNEX 10: MEETING RECORD FORMAT	138
	ANNEX 11: WORLD BANK INCIDENT CLASSIFICATION GUIDE	139

LIST OF TABLES

Table 1: Key Project ESF Instruments	xii
Table 2: Project Components and Costs	6
Table 3: Overall Geographical Coverage of Component 1 (indicative list in SL)	10
Table 5: Relevant ESSs of the WB to the Project	19
Table 6 : Summary of applicable World Bank E&S Standards (ESSs) and Guidelines	21

ESMF for Raja Kaaba Project in Somaliland (P176898)

Table 7: GAP analysis for Environmental and Social Standards	29
Table 9: Project-Affected Parties	50
Table 10: Other Interested Parties	51
Table 11: Consultation Meeting on 11th October 2021	54
Table 12: Stakeholder Engagement Matrix for Somaliland Empowering Women through Education and Skills Project – “Raja Kaaba”	56
Table 13: Project Information Disclosure	62
Table 14: Collective Environmental and social Aspects of the Project & Proposed Mitigation Measures	70
Table 15: Detailed ESMP Monitoring and Budget – Somalia Empowering Women through Education and Skills Project (Raja Kaaba)	86
Table 16 : ESMF/ESMP Implementation Budget of Somaliland Women Empowering Project	116

LIST OF FIGURES

Figure 1: Map of Somaliland	1
Figure 2: The process to be adopted by the project in managing grievances.	61
Figure 3: Incident reporting process	84

LIST OF ACRONYMS AND ABBREVIATIONS

Acronym or abbreviation in full
ABE	Alternative to Basic Education
BOQ	Bill of Quantities
BRA	Benadir Regional Administration
CBO	Community-based organization
CEC	Community Education Committee
C-ESMP	Contractor Environmental and Social Management Plan
CoC	Code of Conduct
CPF	Country Partnership Framework
CSO	Civil society organization
DG	Director General
EA	Environmental Audit
ECCE	Early Childhood Care and Education
EHS	Environment, Health and Safety
EHSGs	Environmental Health and Safety Guidelines
EiE	Education in Emergency
ERP	Emergency Response Plan
ESC	Education Sectoral Committee
ESCP	Environment and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment

ESMF for Raja Kaaba Project in Somaliland (P176898)

Acronym or abbreviation in full
ESIRT	Environmental and Social Incident Reporting
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRC	Environmental and Social Risk Classification
ESS	Environment and Social Standards
FCV	Fragility, Conflict & Violence
FGM/C	Female genital mutilation/circumcision
GAP	Gender Action Plan
GBV	Gender-based Violence
GCF	Green Climate Fund
GDP	Gross Domestic Product
GEF	Global Environment Facility
GHG	Greenhouse Gas
GIS	Geographic Information System
GNI	Gross National Income
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Services
HADMA	Humanitarian Affairs and Disaster Management Agency
HEIs	Higher Education Institutes
IA	Implementing Agency
ICR	Implementation Completion Report
IDA	International Development Association
IP	Implementing Partner
IPF	Investment Project Financing
IPV	Intimate partner violence
IVAs	Independent Verification Agents
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MIS	Management Information System
MOECC	Ministry of Environment and Climate Change
MoES	Ministry of Education, and Science
MoEM	Ministry of Energy and Minerals
MoPND	Ministry of Planning and National Development
NFE	Non-Formal Education
NGO	Non-governmental Organization
OHS	Occupation health and safety
OP	Operational Policy
PDO	Project Development Objective
PIU	Project Implementation Unit
PMC	Project Management Committee
PMT	Project Management Team
PMU	Project Management Unit
POM	Project Operational Manual
PPE	Personal Protective Equipment

ESMF for Raja Kaaba Project in Somaliland (P176898)

Acronym or abbreviation in full
PSC	Project Steering Committee
PWDs	People with disabilities
RAP	Resettlement Action Plan
RPF	Resettlement Planning Framework
RVA	Rift Valley Institute
SCD	Systematic Country Diagnostic
SDF	Skills Development Fund
SDG	Sustainable Development Goal
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SMF	Security Management Framework
SMPs	Security Management Plans
SOPs	Standard Operating Procedures
SPVA	Somali Poverty and Vulnerability Assessment
SRAs	Security Risk Assessments
STEM	Science, Technology, Engineering and Math
SWEDD	Sahel Women's Empowerment and Demographic Dividends
SWU	Somalia Women's University
TA	Technical Assistance
ToR	Terms of Reference
TTL	Task Team Leader
TVET	Technical and Vocational Education and Training
UNDP	United Nations Development Program
UNHCR	United Nations High Commissioner for Refugees
VMGs	Vulnerable and Marginalized Groups
WBG	World Bank Group

1. EXECUTIVE SUMMARY

Introduction

1. Wider Somalia has a population of approximately 16.5 million,¹ almost half of whom are women and youth forming a significant portion of the population with under half (45.6%) of the population being less than 15 years and three-quarters (75%) of the population being less than 30 years old.² Somalia's gross domestic product (GDP) per capita has consistently been ranked among the five lowest in the world throughout the last decade and in 2020 it was the second lowest in the world (only Burundi had a lower GDP per capita in 2020). The World Bank estimated GDP per capita for 2021 was 446 US dollars, marking a good rebound from COVID and post COVID shocks further decline from previous years (314.543 and 320.038 US dollars in 2018 and 2019, respectively).³ This translates into well below the international poverty line of 1.90 US dollar a day⁴ and the target for SDG1: Eradicate extreme poverty. The arrival of the Corona Virus Disease 2019 (COVID-19) in March 2020 put further pressure on the already modest economic recovery and health systems.

2. The majority of Somalis, including Somalilanders, suffer from multidimensional poverty. According to the World Bank's Somali Poverty and Vulnerability Assessment (SPVA), nearly 90 percent of Somali households are deprived of at least one fundamental dimension: access to income; electricity; education; or water and sanitation.⁵ Somalia's basic social services have been decimated due to civil unrest and years of underinvestment. The Somali civil war and the associated violence and collapse of state institutions has in particular resulted in two generations of Somali children largely missing school. In general, according to the World Bank, just 55 percent of Somalis can read and write, while only 16 percent of Somalis have completed primary school (compared to 34 percent in low-income Sub-Saharan African countries). Only 7 percent have finished secondary school (compared to 19 percent in Somalia's regional peers).⁶

3. More than two decades of conflict have nearly destroyed Somalia's educational system, which is characterized by poor quality, insufficient numbers of qualified teachers, and inadequate resources. The educational deficit in Somalia is one of the most acute in the world. Of the total 4.7 million school-aged population, about a million children (or one out of every five Somali student-aged child) are displaced. To address the structural and systemic challenges in the education sector, the Government of Somaliland through its Ministry of Education, and Science (MoES) will implement part of the Somalia Empowering Women through Education and Skills – "Raja Kaaba" Project (P176898) (hereinafter known as "the Project") in Somaliland. The International Development Association (IDA, hereinafter "the Association") has agreed to provide financing for the Project.

4. The overall objective of the Project is to improve literacy and numeracy skills of women in selected areas and to prepare women for leadership roles. The project supports the Government of Somalia's efforts to educate and empower girls and women with skills to promote their economic empowerment and capacity to lead. Boosting women's economic empowerment is essential to achieve economic growth, shared prosperity, and social stability in Somalia and in Somaliland and to meet current Government objectives set out in the Somaliland Education Sector Strategic Plan 2022-2026. Under the 2018-2022 Country Partnership Framework, the World Bank is intensifying its efforts to advance gender equity and address factors of exclusion and

¹ <https://data.worldbank.org/indicator/SP.POP.TOTL?locations=SO>.

² [Population-Estimation-Survey-of-Somalia-PESS-2013-2014.pdf \(unfpa.org\)](#)

³ [GDP per capita \(current US\\$\) | Data \(worldbank.org\)](#)

⁴ IMF Country Report No. 21/69, April 2021, page 4.

⁵ See <http://documents.worldbank.org/curated/en/464241565765065128/Findings-from-Wave-2-of-the-Somali-High-Frequency-Survey>

⁶ World Bank, 2020. Project Concept Note – Somalia Education for Human Capital Development Project.

marginalization. Addressing gender disparities is also critical to the consolidation of peace and security in the fragile context of ongoing conflict and instability in Somalia. This project reflects the Government's vision of a comprehensive approach to education and skills that will target the most disadvantaged women and girls with support to acquire basic literacy, numeracy, socio-emotional and livelihoods skills, as well as foster female leadership at the highest levels of society.

5. The Project design recognizes the self-reinforcing dynamics of women's success across various levels of education. Female leadership at the top of society requires a pipeline of girls and women progressing through primary to secondary education and beyond. Acquisition of numeracy and literacy skills enhance women's basic ability to engage in the world and facilitate access to skilled occupations and entrepreneurship. The Project's comprehensive approach, focused on basic literacy and numeracy, skills training, and higher education, recognizes the potential for a virtuous cycle of women's success up and down the educational system.

6. **The Project Components:** The project in Somaliland comprises the following three components as described below:

7. Component 1: Skills for Life and Labor Market Success will seek to enhance basic literacy and numeracy skills, skills for income generation, and cross-cutting life skills for adolescent girls and women. Under this component, the project seeks to address both demand-side constraints as well as supply-side constraints in service delivery. The component will also support the establishment of a Skills Development Fund (SDF) and finance service delivery.

8. Component 2: Higher Skills Development for Women's Leadership: will expand opportunities for women through the establishment of women's development centers (WDCs) and take the first steps in creating a consortium of autonomous women's colleges to support a system-wide expansion of women's higher-level skills and leadership development. The component is designed to help girls and women develop the knowledge, qualifications, and abilities to serve effectively in high-skilled employment and in leadership roles in politics, government, and the world of business. The component will initially utilize existing institutions to implement short courses and other programming to support women's leadership through WDCs, as well as support a feasibility study and implementation plan for a new consortium of women's colleges.

9. Component 3: Systems Strengthening, Technical Assistance and Project Management will include: (i) developing data systems for the Non-Formal Education (NFE), TVET, and higher education sectors; (ii) building capacity to manage NFE more effectively, including through the development of a Skills Development Fund; (iii) developing contextually appropriate ways to leverage technology to deliver skills and leadership training and monitor and evaluate the system and impact of individual interventions; (iv) project management; and, (v) Somaliland government capacity building of which that the project resources will be used to pay project management costs, including salary support to key staff, as well as resources for training activities and operating costs for project management, including monitoring, and training programs. The component will also finance the acquisition of office equipment and furniture.

10. **Environment and Social Management Framework (ESMF).** The objective of this ESMF is to develop a framework to be used for the environmental and social screening and assessment of the potential impacts from the project investments. This ESMF ensures that the project activities scheduled for implementation are compliant with the relevant requirements of national policies, regulations, and legislations (construction and operation standards) as well as the World Bank's Environmental and Social Framework (ESF), including the Environment and Social Standards (ESSs).

11. This ESMF sets out the principles, rules, guidelines, and procedures to assess the environmental and social impacts of interventions to be funded by the project. Therefore, it directly applies to those activities that will be financed by the project or which are associated or

ESMF for Raja Kaaba Project in Somaliland (P176898)

implemented as a result of project interventions. This ESMF also highlights the appropriate World Bank's ESS and relevant existing Somalia environmental and social relations laws which sub-projects and activities financed or related to this project have to conform to.

12. The ESMF also contains an overview of the baseline environmental conditions in the states identified for support under the Somalia Empowering Women through Education and Skills Project (known by its Somali moniker of "Raja Kaaba"). This ESMF will identify potential environmental and social risks and impacts that might arise out of the implementation of the project components and proposes mitigation and enhancement measures. The ESMF also excludes certain types of activities as ineligible under the project. These include activities that may cause long-term, permanent, and/or irreversible impacts (e.g. loss of major natural habitats), have a high probability of causing serious adverse effects to human health and/or the environment, may have significant adverse social impacts and/or may give rise to significant social conflicts. Others include activities anticipated to result in permanent or temporary physical or economic displacement, that may involve physical resettlement or extensive economic resettlement, that may impact known cultural heritage sites including those important to local communities, as well as activities that involve use of pesticides.

13. In particular, Component 2 of the project would support using existing university campuses and infrastructures, which may include minor rehabilitation/renovation work. This ESMF will, therefore, be the basis for the preparation of the site-specific Environmental and Social Impact Assessment studies (ESIAs) and Environment and Social Management Plans (ESMPs) during rehabilitation and operation of the selected university campuses.

14. Environmental Policy, Legal and Institutional Frameworks. This ESMF outlines relevant legal and regulatory framework documents including relevant Somaliland national laws, policies and legislation. The ESMF also includes gap analysis, showing variance between national-level laws and policies and the relevant World Bank ESF policy requirements.

15. The key legal instrument for managing the environmental affairs in Somaliland is the Constitution, specifically Article 12 ("Public Assets, Natural Resources and Indigenous Production"), Article 15 ("Education, Youth and Sports"), Article 18 ("The Environment and the Relief of Disaster"), Article 34 ("Duties of the Citizen")

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

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

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

Environmental Risks and Risks Rating

19. The environmental risk rating is "**Substantial to moderate.**" The Project will not include major construction works, although renovation work if taking place, is likely to result in the occurrence of environmental impacts, including noise pollution, soil erosion, waste and wastewater management, loss of vegetation, e-waste, as well as possible occupational health and fire safety risks. The project is likely to be implemented by under-strength and inexperienced construction companies who have unknown capacities for E&S implementation, and lack of regulations for ESIAs and OHS requirements, and with little knowledge of Good International

ESMF for Raja Kaaba Project in Somaliland (P176898)

Industry Practice (GIIP). In addition, the capacity for environmental risk management at the Ministry of Education ('MoECHE') is weak at the moment.

20. During implementation of the very limited renovation work: The major environmental risks and impacts of the project (rehabilitation/new construction of WDCs and Women consortium of colleges) may include air emissions, noise pollution, soil erosion, change of land use, generation and disposal of solid wastes, wastewater effluents from worksites and work camps, generation and disposal of hazardous waste and e-waste, loss of vegetation, use of material sources by primary suppliers (such as quarries and borrow pits), and possible Occupational Health and Safety (OHS) issues, as well as risk of fire and life safety.

21. During Operation: this would include air pollution, potable water supply, waste water generation and disposal, solid waste generation and disposal, resource utilization (water and energy, in particular), emergency events (both natural and man-made), as well as range of community health and safety issues, including infrastructure and equipment design and safety, safety of services, traffic and road safety, and Occupational Health and Safety of workers/ trainers/ trainees during operating educational and training institutes.

Social Risks and Risks Rating

22. Social risk rating for the project is "**High**". Overall, it is expected that the project will contribute considerably to the strengthening of women empowerment, not just among the immediate beneficiaries but also indirectly to the society at large. This will consequently lead to positive social outcomes including institution and capacity building, empowerment of the vulnerable persons and groups. However, social risks may increase, both towards project beneficiaries and project implementors. Social norms around early marriage, expectations that girls support households and rearing of younger siblings and greater 'social value' in boys accessing education over girls play a role in lowering enrolment and completion rates of girls in addition to a predominantly male teaching force and long distances to centers will need to be addressed as part of implementation.

23. Thus, the project has to address an imbalanced power structure which may trigger intentional and unintentional backlash, including varying forms of GBV, by extreme-conservative political groups, in an already very challenging FCV situation with considerable security risks. The above relates mainly to second chance education activities as well as the operation of the women's college. The project must also address risks of exclusion via an inclusion assessment and management instrument, which equally will address the risk resulting from data collection activities. This extends to data collection. The project also entails more standard ES risks on eventual small-scale land acquisition and involuntary resettlement, inward migration, labour influx and possible use of child labour, elite capture of project benefits, human trafficking, exclusion and access to beneficiaries for effective consultations and grievance redress. Respective risk management instruments are being developed accordingly.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

24. The risks of GBV/SEA and sexual harassment are currently as "**High**" based on the existing high rates of GBV in Somaliland. Gender restrictive norms and lack of decision-making power are often cited as barriers to women and girls accessing education opportunities and increasing exposure to harm. The risk of violence or assault may also increase while travelling long distances to reach to the locations of the Women University and other service provider institutions supporting women and girls. Other factors such as unequal gender and power relations can exacerbate the risks of GBV in the two universities especially where unethical university

administrators or lecturers take advantage of their positions and sexually exploit students as well as the potential of sexual harassment of female lecturers and instructors. Also, disruption of power dynamics might surface in a community and within households due to the arrival of the workforce in an area. It can be during construction, as women in the community come into contact with mobile workmen in various ways, including direct employment on the project during the two universities construction or operation or indirectly via associated services such as catering. These measures will include a) conducting PIU sensitization and capacity building to improve understanding, management, and monitoring of Sexual Exploitation Abuse and Harassment (SEAH) risks throughout the life of the project; b) Reinforcing women-led CSOs that address GBV/SEAH in the two universities in order to cultivate an environment free from GBV and SEAH; c) ensuring regular community consultations to raise awareness of the risk of SEA /GBV and measures for reporting and response; d) ensuring that grievance redress measures include mechanisms for safe and confidential reporting of cases of SEAH; e) Mapping GBV service providers and Identifying a dedicated referral process for the university related violations, relevant organizations for referrals, development of procedures and processes for referrals, development of accountability framework for handling allegations ; and f) Conducting regular safety mapping with the women benefiting from the university, professors, students, community and parents to identify areas within and outside the university where they feel unsafe and develop remedial actions where necessary. SEAH Prevention and Response Plan will be prepared risk mitigation requirements will be integrated into all relevant safeguard instruments.

25. **Applicable Environmental and Social Standards (ESSs).** Due to limited applicable environmental and social laws and regulations in Somaliland, the project will apply the World Bank Environment and Social Framework (ESF)⁷. The following ESSs are considered relevant to the activities implemented under the project:

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

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

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

⁷ For better understanding of the World Bank’s ESF, please visit <https://projects.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

ESMF for Raja Kaaba Project in Somaliland (P176898)

- Improvements in access to education for both gender in the tertiary levels of education and schooling and supports the education investments by families for both males and females;
- Lower literacy levels in addition to restrictive social- cultural norms, the risks and fear of gender-based violence such as sexual harassment and rape are some factors that keep women within the household and prevent them from searching for employment/ opportunities
- Minimize gender-specific barriers as women suffer from the precarious labour market situation in general and access to employment, including favouritism resulting from clannism over qualification.
- Overall, the project may contribute towards the development of social cohesion and national stability in the longer-term.

28. **Mitigation Measures and Monitoring.** In order to address the aforementioned potential adverse environmental and social risks and impacts, an environmental and social screening process has been proposed under this ESMF. This will be applied in such a way as to ensure that potential negative risks and impacts of the project are prevented or mitigated appropriately, while enhancing positive impacts. Ministry of Education and Science and relevant stakeholders will have responsible role in ensuring that the proposed mitigation measures are implemented.

29. To facilitate the mitigation of risks several key ESF instruments including this ESMF will be prepared and activated in the life of the project, as summarized in Table 1:

Table 1: Key Project ESF Instruments

#	Document	Purpose
1.	Stakeholder Engagement Plan (SEP)	Sets out effective and transparent management of consultation and information disclosure processes: the SEP will include a Grievance Mechanism (GM) and procedures for disclosure of project information
2.	Labour Management Procedures (LMP)	Guides how project related labour will be sourced and managed in a manner that reduces harm on the human environment.
3.	GBV Prevention and Response Plan	Articulates the key risks and key mitigation measures, as well as the identification of GBV Service Providers and reporting and referral protocols in the event cases emerge, and communication and training requirements for communities and all project related staff, including project workers, lecturers, and University administrators. An Accountability and Response Framework will elaborate the adoption of mitigation measures, tapping of local workforce, use of code of conduct (CoC), collaboration with local communities and GBV-related service providers
4.	Security Management Framework (SMF)	Outlines measures to minimize security risks in the project including the protection of students, workers, and communities and to ensure that security personnel employed as part of the project do not use undue force or impact negatively on

ESMF for Raja Kaaba Project in Somaliland (P176898)

#	Document	Purpose
		communities. Ahead of the preparation of the SMF, the project will need to prepare Security Risk Assessment (SRA) reports
5.	Environmental and Social Commitment Plan (ESCP)	The Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, to be carried out or caused to be carried out by the Ministry of Education, Somalia, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and other obligations relevant for the smooth implementation of the project.
6.	Resettlement Framework (RF)	Outlines how land acquisition and/or restriction on land use, which might result in involuntary physical and/or economic displacement will be managed and guidance on the preparation of Resettlement Plans (RPs), as needed. It will also provide the protocols for voluntary land donations and agreements.
7.	SEAH Prevention and Response Action Plan	The SEAH Prevention and Response Action Plan will include, among other things, clarify a response and accountability framework to outline key response measures should incidence occur, and identification of GBV Service Providers to enable appropriate and immediate care should cases arise.

30. **Stakeholder engagement plan (SEP):** Engagement and consultations on the project design and the planned activities and implementation arrangements have been held with key institutional stakeholders including the relevant Government agencies, and other cooperating agencies and community representatives. The SEP will be updated and refined during project implementation on need basis. The SEP includes the Grievance Redress Mechanism (GRM).

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

32. The GM is envisaged to be implemented at multiple levels and will address project related complaints, including logging, tracking, and resolving grievances promptly before, during and after the implementation of the project. The MoES will appoint a dedicated person or team to be responsible for setting up and maintaining the GM that allows the general public in the project areas and affected communities or individuals to file complaints and receive responses in a timely manner. The system will also record and consolidate complaints and their follow-up. In addition, the system will be designed for handling complaints perceived to be generated by the project or its personnel. It may also include disagreements about compensation and other related matters. More details of the GRM can be found in the SEP.

Project Implementation Arrangements

33. **The implementation of the project will be led by The Ministry of Education and Science of the Republic of Somaliland.** the (MoES) will be responsible for coordination of all project

ESMF for Raja Kaaba Project in Somaliland (P176898)

activities and overall reporting on project progress and performance. Overall project leadership will be provided by the Project Steering Committee (PSC), details of which can be found in the table below. This inclusive body will be crucial for promoting dialogue, consensus-building and joint decision making on key aspects of the education system. A Program Management Committee (PMC) headed by the Director General (DG) of the (MoES) will provide technical leadership for project implementation. Key responsibilities of the PMC include (a) establishing a platform for collaboration, management, troubleshooting and technical support for implementation of the project.

34. **A Project Implementation Unit (PIU)** will be established at (MoES) to support the implementation of the project. The PIU will work in close collaboration with the relevant directorates and departments of the ministry that include Non-Formal Education (NFE), Technical Vocational Education and Training (TVET) and the Higher Education department. The PIU staff will be headed by the PIU Coordinator and include experts to manage key functions including financial management specialist, Social Specialist and other experts will be hired to help in smooth implementation of the project. In addition to responsibility for implementation of the project Components, the PIU will also be responsible for coordinating project activities with the implementing NGOs under component 1 and universities participating in the scholarship sub component under component 2. The PIU with guidance of the DG will arrange quarterly reviews of project implementation, consolidate reports and report overall project progress and performance. Functions related to FM at the SOMALILAND level will be implemented jointly under the common approach using arrangements established under PFM and other Bank projects.

35. Given the large number of entities involved in implementation of the project, the project governance structure will consist of a Project Steering Committee (PSC) and a Project Management Committee (PMC), as well as Project Implementation Unit (PIU) to facilitate collaborative decision making and oversight of project activities. These forums will serve as mechanisms for ensuring coherent implementation of activities across the country and to enable knowledge sharing around implementation experience and innovations from the different administrative levels to benefit overall implementation of the project. The structure, roles and responsibilities of the forums are described in the tables below.

2. INTRODUCTION AND PROJECT CONTEXT

2.1. PROJECT CONTEXT

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

37. Somaliland, a self-declared independent region located in the northern part of Somalia (Fig. 1), faces significant challenges in the context of quality of life and poverty, sharing similar socioeconomic conditions to Somalia due to geographic proximity and its history. The Government of Somaliland, which is separate from Somalia, is faced with two critical challenges: (i) establishing sustainable internal peace; and (ii) paving the way for shared economic growth and prosperity.



Figure 1: Map of Somaliland

38. There has not been an official census conducted in Somaliland since the Somalia census in 1975, while the results from a 1986 census were never released into public domain. A population estimate was conducted by United Nations Population Fund (UNFPA) in 2014 primarily for the purpose of distributing United Nations funding among the regions and to offer a reliable population estimate in lieu of a census. This population estimate puts the combined population of the regions of Somaliland at 3.5 million. However, the Somaliland government estimated that there are 6,200,000 residents as of 2024, an increase from a 2021 government estimate of 5,700,000.⁸

⁸ ["Somaliland population reaches 6.2 million, government reports". www.hiiraan.com.](https://www.hiiraan.com)

ESMF for Raja Kaaba Project in Somaliland (P176898)

39. Somaliland has the fourth-lowest GDP per capita in the world, and there are huge socio-economic challenges for Somaliland, with an unemployment rate between 60 and 70% among youth, if not higher.

40. With a Gross Domestic Product (GDP) of about USD 7.2 billion as of 2022, the poverty rate in Somaliland is a pressing issue, further exacerbating the numerous social and environmental challenges, inclusive of inadequate infrastructure, environmental degradation and limited access to basic services including but not limited to education and health. Quality of life in Somaliland is considerably low, mirroring the vast challenges faced by its population. Data obtainable from the Global Data Lab denotes that the Human Development Index (HDI) of Somalia is the lowest in the world at 0.361 (2019), which by extension, places the Government of Somaliland at an even worse and perilous position.

41. Further, the prevailing nomadic culture in Somaliland poses additional obstacles to development efforts, with the nomadic lifestyle of the population hindering access to formal education, social services, and healthcare. Here, families' abilities to engage in alternative economic activities is hindered by the prioritization of traditional livelihoods such as pastoralism and livestock herding. Additionally, pockets of insecurity and sporadic conflicts hinder implementation of development projects in Somaliland, further exacerbating social and environmental challenges.

42. Although unrecognized internationally, the political dynamics and administrative framework in Somaliland shall be accounted for in this ESMF to bolster coordination and effective implementation, especially in cognizance of the untapped potential for sustainable development that exists in the region, owing to its natural resources (minerals and fisheries), strategic location and crucially, an entrepreneurial and resilient population.

43. Among the most critical sectors for the emerging state is the education sector. However, after enduring several decades of civil strife, the education system in the Government of Somaliland is in a dire state. Years of internal conflict virtually wrecked the education system, resulting in a sector "characterized by poor-quality education, insufficient numbers of qualified teachers and inadequate resources," according to the United States Agency for International Development (USAID, 2020). According to International Labor Organization (ILO), illiteracy exists up to 70% in several areas of Somaliland, especially among females and the elder population.⁹¹⁰ Country-wide, more than three million children, aged between 6 and 13 years, are reportedly out of school. The absence of a conducive environment, including appropriate educational facilities, restricts access to schooling in the Government of Somaliland, resulting in a primary school enrolment rate of around 30 percent on average, further declining to 18 percent in the more remote and less secure southern regions.

44. Reference to the "National Strategy and Plan of Action for Female Participation in Education – a revised draft in September 2019"¹¹, the level of girls and women's participation in the educational system in Somaliland is governed by a number of socioeconomic and cultural factors. The Gross Enrolment Rate (GER) stands at 38% and reports show that only 11.7% of teachers at primary level are female and 15% of teachers at the secondary level are female. Of the women who manage to enrol in universities and tertiary institutions, only a small number are admitted for a professional courses like law, engineering and accountancy. Participation of women in the management and administration of

⁹ "New World Bank GDP and Poverty Estimates for Somaliland". World Bank.

¹⁰ "Responses to Information Requests – Immigration and Refugee Board of Canada". Immigration and Refugee Board of Canada. Archived from the original on 8 September 2021. Retrieved 2 October 2021.

¹¹ Somaliland Ministry of Education and Science.

<https://moe.govsomaliland.org/site/downloadfile/file/MjAyMi8wMMS8yMDIyLTAxLTEzLTA4LTl4LTMTxLTy5OTktMTY0MjA2MjUxMS5wZGY%3D/view/1>

the education system is even lower. At the community level, the participation of women in the Community Education Committees (CECs) is low, only one third of CEC members are female yet most communities cannot raise the required number of women representations in CECs. The entry of females into productive employment has remained a challenge. While there is no obvious discrimination against women at the point of recruitment, work environment, social values, working conditions and remuneration are major constraints for women to engage in the productive employment.

45. As much as Somaliland evaded a prolonged conflict the government still faces enormous social-economic challenges especially the fragile security challenges in the eastern side of the country. The national resource base is poor and significant proportion of the budget is funded by the foreign donors. The education sector budget is a minimal 6% and this cannot cater to the enormous challenges facing the sector. On another hand, poorer families tend to rely on the earning capacity of women. In light of such economic challenges, the direct and hidden cost (in terms of books, pens, and clothing, as well as the loss of vital household help) of sending daughters to school are perceived by parents to be prohibitive. This is seen where the majority of women are engaged in small scale businesses like selling tea, vegetables, khat, etc. to support the household. Economic challenges have also resulted in many girl children staying at home to take care of the younger siblings and attending to domestic chores, thus minimizing overall female participation in education.

46. The unfavourable learning environment is just another challenge. Most educational institutions in Somaliland are not adequately equipped to meet the needs of female students. There are limited recreational facilities for girls in most schools and female students are mostly not allowed to participate in co-curricular activities. While most schools have separate latrines for girls, discussions held with girls and boys at schools revealed that most girls do not use latrines at school for several cultural barriers against using latrines in public places, in presence of boys and men, including discouragement by teachers.

47. The Somaliland National Education Policy (SLNEP 2015-30) provides for the philosophical and ideological basis for constructing the education system, this document confirms the Government's commitment to education and training as a means of generating human capital (skills, knowledge, competencies) among learners, thus making them successful and productive citizens. The Plan goes beyond a mere statement of objectives and activities of the education subsectors, calling for prominence to be given to the themes of education financing, curriculum development, out of school children, governance, internal and external efficiency, gender and equity, as well as the role of these in sustaining the main subsectors and their contribution to provision of quality education and training services. The proposed project's interventions will have implications for each of these themes.

48. The World Bank proposes to engage and support the government of Somaliland, and make targeted investments in the education sector with an emphasis on girls and women. The project aims to enhance the conditions for women's empowerment through improved literacy and numeracy skills, skills for income generation, and skills for leadership which is well-expressed in the project's development objective.

49. The project is consistent with Somaliland's Vision 20308 whose five key pillars are: economic development; infra-structure development; governance and rule of law; social development; and environmental protection, Somaliland National Education Policy (SLNEP 2015-30), which outlines the national goals of education and national education objectives, which guide the implementation of education programs and give prominence to the following objectives:

- A. to promote within society, the acquisition and application of relevant knowledge, skills and

ESMF for Raja Kaaba Project in Somaliland (P176898)

- attitudes necessary to fulfil its potential for development in a continuously changing world.
- B. concern for proper management and utilization of the physical environment.
 - C. a sense of responsibility for peace and improved relations at the individual, family, community, national and international levels.
 - D. the growth of civic consciousness in an informed and socialized citizenry committed to mutual understanding, a culture of peace, and collaboration an acceptance of diversity, and toward resolving differences without violence.
 - E. values of loyalty, self-reliance, tolerance, co-operation, diligence, openness, inquiry, critical thought, honesty, justice, fairness and peace. awareness of the need for and the active promotion of social justice, in the context of Islam.

2.2. SOMALIA EMPOWERING WOMEN THROUGH EDUCATION AND SKILLS PROJECT

50. The Empowering Women through Education and Skills Project (Raja Kaaba), will be entirely financed by the World Bank with a budget of US\$5 million, with the purpose to improving literacy and numeracy skills of women in selected areas and to preparing women for leadership roles.

51. In Somaliland the Project intends to support the government's efforts to enhance the conditions for women's empowerment by providing the fundamental skills, qualifications, competencies, and mindset needed for women to improve their labor force participation, enhance their informal and formal sector job success and self-employment, and expand their leadership roles across all sectors of the society. The Project is designed to reinforce Somaliland's efforts to build a coherent education system at all levels, strengthen the stewardship role of the I and enhancing capacity in the MoES in Somaliland. These efforts are also meant to complement and build on the system-building activities supported by the Somalia Education for Human Capital Development Project, in which Somaliland is taking part.

52. **The implementation of the project will be led by The Ministry of Education and Science of the Republic of Somaliland.** the (MoES) will be responsible for coordination of all project activities and overall reporting on project progress and performance. Overall project leadership will be provided by the Project Steering Committee (PSC), details of which can be found in the table below. This inclusive body will be crucial for promoting dialogue, consensus-building and joint decision making on key aspects of the education system. A Program Management Committee (PMC) headed by the Director General (DG) of the (MoES) will provide technical leadership for project implementation. Key responsibilities of the PMC include (a) establishing a platform for collaboration, management, troubleshooting and technical support for implementation of the project.

53. The project will draw on the analytical and operational expertise being developed under the World Bank Group's Somalia Gender Equity Platform. The platform was designed to help the Bank engage in dialogue with Somali government and civil society partners to strengthen knowledge and evidence and develop interventions to address, and potentially overcome, challenges related to women's exclusion, limits on adolescent girls' and women's empowerment and economic engagement, barriers to women's entrepreneurship, and gender-based violence. These links will ensure that the project is grounded in the Somali context, while also drawing on global knowledge products including Gender at Work, the companion to the World Development Report on Jobs (2014); and the 2019 World Development Report the Changing Nature of Work.

ESMF for Raja Kaaba Project in Somaliland (P176898)

54. The Project is aligned with the World Bank's broader women's empowerment agenda in Sub-Saharan Africa. The project is highly relevant to the "4Es" approach (empowering women, employing women, enhancing access to reproductive health services, and educating girls). It is also consistent with the principles of the Sahel Women's Empowerment and Demographic Dividends (SWEDD) model, the project will follow a holistic approach to remove different barriers to girls' and women's access to education.

55. This Project is well aligned with the Bank's Human Development portfolio, which addresses the various determinants of high fertility and women's empowerment. Complementary projects include the Somalia Education for Human Capital Development Project (P172434), which aims to improve girls' access to basic education and learning outcomes; the Shock Responsive Safety Net for Human Capital Project, "Baxnaano" (P171346), which provides cash transfers to targeted poor and vulnerable households in selected districts while building a national safety net system; and the Improving Healthcare Services in Somalia Project, "Damal Caafimaad" (P172031), which addresses reproductive and maternal and child health and aims to ensure access to basic health services with a strong focus on family planning.

3. PROJECT DESCRIPTION

3.1. PROJECT DEVELOPMENT OBJECTIVE AND COMPONENTS

56. **Project Development Objective.** The Project Development Objective (PDO) of the Empowering Women Through Education and Skills Project is to improve literacy and numeracy skills of women in selected areas and to prepare women for leadership roles.

The PDO will be measured via the following indicators:

- I. Change in basic proficiency rates in literacy and numeracy in the targeted population of second chance programs (percentage, disaggregated by gender).
- II. Beneficiaries obtaining a skills qualification related to labor market needs or livelihood (number, disaggregated by gender).
- III. Female graduates of Women’s University programs in leadership roles (cumulative, disaggregated by disability status).

57. **The Project Components:** The project comprises the following three components as described below in Table 2:

Table 2: Project Components and Costs

Project Component	Cost US\$ million
1. Skills for Life and Labor Market Success	1.9
2. Higher Skills Development for Women’s Leadership	1.8
3. Technical Assistance and Project Management	1.3

58. **Component 1: Skills for Life and Labor Market Success:** seeks to address gaps in access to essential skills – including basic literacy and numeracy skills, skills for income generation, and cross-cutting life skills – for girls and women. Specific sectors for support will be guided by demand and labour dynamics and in consultation with regional authorities, existing institutions, civil society and employers. Component 1 will support the creation of a competitive Skills Development Fund (SDF) and finance service delivery through it. A skills fund is a centrally managed process to award contracts to organizations and institutions to deliver skills training in line with the objectives and guidelines of the Fund. The SDF will be a national level fund with a Grant Committee that includes regional representatives, stakeholders from civil society, and representatives of the private sector. The Grant Committee will report to the project Steering Committee, oversee the Fund's operations, and make the final decisions on which grant applications to support. The Project will also establish and finance the SDF secretariat, which will manage the grantmaking process centrally.

59. The SDF will finance large-scale delivery of second-chance education and skills training in districts combining non-formal second-chance programs focused on functional literacy and numeracy and some sector-specific skills training initially (potentially in sectors of agriculture, childcare, hair and beauty and renewable energy). The delivery mechanisms will respond to present limitations and adopt

ESMF for Raja Kaaba Project in Somaliland (P176898)

a flexible approach which will include contracting NGOs that can provide a range of services using schools and public or private TVET centers where they exist, or by deploying alternative service delivery models. This subcomponent will also finance essential demand-side interventions by facilitating uptake through different interventions such as: (i) provision of stipends to reduce costs for the most vulnerable students, especially girls; (ii) provision of childcare services to enhance attendance; (iii) awareness campaigns and active engagement with the community and religious leaders; and (iv) completion bonuses for girls and women who complete courses and pass a test of competency.

60. **Component 2: Higher Skills Development for Women's Leadership:** Through this component, the Ministry of Education and Science will expand opportunities for women through the establishment of Women Development Centers (WDCs) and take the first steps in utilizing existing educational campus to support a systemwide expansion of women's higher-level skills and leadership development. This component will finance interventions that will help more women acquire the competencies, qualifications, confidence, and networks to advance into postsecondary education and more capably step into leadership roles including in government, politics, public service, business, education, and civil society. The component is designed to help Somali girls and women develop the knowledge, qualifications, and abilities to serve effectively in high-skilled employment and in leadership roles in politics, government, and the world of business. It is envisaged that Component 2 will support at least 1,500 individual women directly, including in Somaliland (reaching 7,500 family members indirectly).

61. Digital skills and competencies, as well as piloting remote delivery options, will feature strongly in the curriculum and operations across the consortium of women's colleges and WDCs. While campus-based learning is particularly important for providing an environment conducive and committed to the safe and deliberate education of women, digital skills and remote operational elements will also be core functions of the women's colleges. When possible, digital skills and competencies will be built into the curriculum in all fields of study. Having learned important lessons from other countries' capacity to continue delivering higher education programs during the COVID-19 pandemic, the women's colleges will be developed with remote delivery considerations built into the planning (including curriculum and

62. infrastructure) from the early stages to support resilience in delivery in case of future disruptions.

63. Component 2 will also aim to reduce the cost of education and training through the provision of financial support and other incentives to vulnerable women. Scholarships will be accompanied with messages to empower girls and women to be active in their communities, including encouraging them to initiate activities to mitigate climate change. On the adaptation side, one standard to target beneficiaries will be whether they live in areas affected by climate change-related events.

64. Any rehabilitation related to Component 2 (i.e., WDCs & consortium of autonomous women's colleges) will consider the following interventions:

- Facilities encouraged to use eco-friendly materials, including non-toxic building/learning materials.
- The component will support institutions to procure and use institutional green cookstoves to deliver meals to beneficiaries and employees.

ESMF for Raja Kaaba Project in Somaliland (P176898)

- Guidance will be provided on incorporating climate-resilient measures such as rainwater harvesting for flood control and water conservation; stormwater management (flood risk reduction), utilization of stored water for schools, and groundwater discharge will be managed.
- Separating, reducing, reusing, recycling and composting waste will manage waste with the least adverse effects on the environment. Recycling and using organic waste for composting options will be carefully reviewed, and the best choice will be developed including:
 - a) Students will be motivated to plant trees and use the compost made from the organic waste in local gardens, reducing the use of fertilizer and other chemicals.
 - b) Recycling programs that educate staff and students will be developed.
 - c) All university facilities will be fitted with sanitary disposal bins.

Specifically, component 2 has the following two sub-components:

65. **Sub-component 2.1: Establishing Women’s Development Centers (WDCs): The objective of this sub-component is to establish WDCs to support women’s leadership and higher education through a range of accessible programming.** This sub-component will finance the renovation of existing Somaliland University campuses. Support will be based on the utilization of existing facilities and academic programs at selected institution(s) of higher learning. Exact locations will be determined in consultation with higher education committees taking into account security, climatic and environmental considerations. The autonomous (or semi-autonomous) SWU will serve as the institutional hub for a system-wide expansion of women’s leadership development through enhanced women’s participation in higher education. Through a fee-free physical and virtual safe spaces, the university will offer courses designed to enhance women’s skills and competencies to serve effectively in high-skilled employment and in leadership roles in politics, government, and the world of business. Beneficiaries will include women with some level of post-secondary education and girls and women needing additional preparation to be ready for admission to and progression through higher education. The university campuses are expected to admit its first cohort of 500 young women who will benefit from the planned courses on management and leadership. These campuses will be financed initially with project funds but, in subsequent phases, may be expanded with support from additional partners, including other donors and the private sector. While existing possible structures for the initial campuses will be utilized, minor renovation activities are still envisaged under this component.

66. Furthermore, the subcomponent will support the establishment of a competitive grants program to fund 10–15 WDCs at universities or other government authorized HEIs across the country. The allocation will take place through competitive calls for proposals administered by the PMU, with engagement of the MoES. An Evaluation Committee of recognized international and national experts on women’s education, including the National Commission for Higher Education, representatives from civil society, Criteria are likely to include (a) the quality of the proposals overall; (b) the capacity of the institutions to have the strongest impact on girls/women in their academic community; and (c) the sustainability planning embedded in the proposals.

67. **Sub-component 2.2: Developing a consortium of autonomous women’s colleges.** This subcomponent will aim to support MoES to develop the model for the women’s college consortium. It is intended to support the Government of Somaliland to develop a consortium of autonomous women’s colleges, chartered to provide a unique learning environment for women in Somaliland, to develop the high-level skills needed to participate fully in the Somali labor market and to serve as

future leaders in politics, public service, business, education, and civil society. These colleges will serve two key strategic goals identified by Somaliland as of national importance: (i) increasing the number of women with the high-level skills needed to serve at the highest levels of leadership in Somaliland, including in the Parliament, where there is a national target already set to reach and maintain 30 percent female representation by the next parliamentary election cycle; and (ii) expanding opportunities for women to hone the academic learning and research skills needed to proceed through increasingly advanced levels of post-secondary education, including through Master's and Doctoral level studies, particularly in science, technology, engineering and math (STEM) fields.

68. The main activities of this subcomponent will include: (a) drafting of an inception report, outlining the benefits of a variety of options for the consortium model, to inform the design and implementation plan for the consortium of women's colleges; (b) development of design plans for the consortium model, including charter design plans for at least two initial pilot institutions (including options for infrastructure and facilities rehabilitation, curriculum tailored to specific local conditions and broader national strategic needs, staffing, budgeting, scholarship plans, and enrollment plans); (c) legal establishment of each institution and a national Women's College Board, which would be responsible for governance oversight for the entire consortium; (d) implementation of the charter plans to create the legal conditions that establish the women's colleges and the Women's College Board for sustainable operations; and (e) opening of some institutions to begin enrolling students. The inception report will include a template that other districts could use to develop a strategic plan for developing future women's colleges, including identifying existing infrastructure to be converted into the campus for the women's college, establishing the relevant academic curriculum to serve their local/regional needs, and defining a roadmap for implementation that would be achievable during and beyond the project implementation timeline.

69. The rehabilitation of women's colleges, when required will take place in an existing structures, and no new structures will be built. Buildings will be designed to ensure optimized natural lighting to minimize the use of electric lighting and natural ventilation in buildings by using appropriate-size window apertures, energy efficiency measures and environment-friendly features, including use of automatic controls for efficient lighting systems with controlled luminance and using LED bulbs. The use of diesel generators will be avoided to reduce the emission of CO₂ during service life. If and where required, water boreholes would be dug at safe distances from toilets to prevent the contamination of groundwater. In addition, any physical facilities upgraded or constructed could be built to serve as evacuation centers in the case of climate-related emergencies (or other emergencies); accordingly emergency response plans will be developed and communicated to professors and students and displayed within the facilities.

70. The designs for women's colleges will include setting aside agro-forestry parkland with native vegetation to create a micro-climate effect (plot ratio: 30%+). Also, advice will be provided on how to retrofit facilities to be more energy-efficient than the prevailing standards in the project location, which will help institutions to identify opportunities to: (a) Undertake energy audits; (b) Specify the use of energy-efficient appliances and equipment; and (c) Undertake energy-efficient improvements in buildings.

71. **Component 3: Systems Strengthening, Technical Assistance and Project Management:** will provide resources to support the project implementation by strengthening the management capacity of MOES staff as well regional and district level education administrators. Financing to be provided under this component will support staffing of key project staff at the national level, including: (i)

ESMF for Raja Kaaba Project in Somaliland (P176898)

developing data systems for the NFE, TVET, and higher education sectors that will support the development of a robust system for collection and utilization of data on NFE, TVET, and higher education, with an emphasis on tracking gender gaps and informing the subsequent development of strategic policies and plans; (ii) building capacity to manage NFE more effectively, including through the development of a Skills Development Fund that will bring cohesion and improve the quality and efficiency of NFE in Somaliland. A skills fund is an efficient and effective mechanism to award contracts to organizations and institutions to deliver skills training through a centrally managed process and can be an effective mechanism to coordinate finance and implementation of activities across various providers and funders, while allowing for contextualization to the diverse regions of Somalia (iii) developing contextually appropriate ways to leverage technology to deliver skills and leadership training and monitor and evaluate the system and impact of individual interventions; this will support monitoring and evaluation and use of remote technology to support system strengthening; build resilience in the face of potential future disruptions to face-to-face learning; support tracer studies to collect data on labor-market outcomes and other outcomes of beneficiaries in both Components 1 and 2 and an impact evaluation of the basic second chance program under Component 1. The component will also support Somaliland to experiment with technological solutions to improve monitoring and evaluation in a fragile context, leveraging Somalia's relatively high rate of mobile coverage to seek beneficiary feedback and monitor service delivery and impact. These systems will help build capacity to reach girls and women in remote or unstable areas where face-to-face delivery is not possible (iv) project management; and, (v) Somaliland government capacity building. Because current capacity at all administrative levels is weak, continuing support will be needed to ensure project financing is used in a credible manner and managed efficiently. This component will therefore further strengthen management capacity, and the project coordinator will work closely with the various implementing entities, monitoring and evaluation (M&E), fiduciary and environmental and social risks management staff, including to support the establishment of the consortium of women's colleges.

3.2. PROJECT BENEFICIARIES

72. The Project is expected to benefit and empower women and girls. During the implementation period, under Component 1, the project is expected to benefit at least 50,000 young women, including marginalized and vulnerable populations, IDP communities, in the targeted districts across Somaliland. Component 1 will directly benefit these beneficiaries through non-formal second-chance programs focused on functional literacy and numeracy, livelihoods, and sector-specific skills and labor market qualifications. Under Component 2, at least 3,000 women will directly benefit from WDCs with short-courses, mentorship and leadership development opportunities and the consortium of women's colleges will be established to offer certificate and degree programs. Across components, it is expected that at least 10 percent of beneficiaries will be persons with disabilities.

73. The selection criteria will include (i) two target districts in Somaliland, (ii) demand from regional and district officials, (iii) accessibility for government supervision, (iv) capacity to implement the programs, (v) availability of complementary demand-side interventions such as cash transfer programs, and (vi) avoiding duplication with similar programs, such as the FCDO-financed AGES program Table 3 on selected districts.

Table 3: Overall Geographical Coverage of Component 1 (indicative list in SL)

Regions within Somaliland	Proposed Districts	Alternative District
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ESMF for Raja Kaaba Project in Somaliland (P176898)

Somaliland	Maroodi-Jeex andTogdheer	1	Hargaisa	Erigavo (Saanag Region)
		2	Burao	

4. SCOPE AND METHODOLOGY OF THE ESMF

4.1. PURPOSE AND SCOPE OF THE ESMF

74. This ESMF has been developed in compliance to the components of Empowering Women through Education and Skills Project (Raja Kaaba) which includes the construction of Somalia Women University in Hargeisa. The purpose of the ESMF is to set out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts. Where adverse risks and impacts cannot be avoided, the impacts are adequately identified, assessed and necessary mitigation measures designed and implemented following relevant, existing Somaliland's environmental and social legislation (where available) and the World Bank's ESSs.

4.2. ESMF JUSTIFICATION

75. The ESMF clarifies appropriate ESS, processes, and mitigation principles, organizational arrangements, and design criteria to be applied to all components in the Empowering Women through Education and Skills Project (Raja Kaaba). These standards, principles, instruments and other documents are to be prepared during project implementation by the project implementation unit (PIU) at the MoES in Somaliland, in coordination with other state administrations in the project-supported localities in Somaliland and private construction companies for the construction of the Somali Women University in Hargeisa), and other activities under component 1 and 2. The specific objectives of this ESMF are to:

- Ensure that the implementation of the components of Raja Kaaba project, for which the exact locations of the sub-project sites are not definitively identified at this stage, will be carried out in an environmentally and socially sustainable manner;
- Provide adequate E&S baseline information on the areas in which subprojects are expected to be sited;
- Provide information about scope of adverse environmental and social risks and impacts expected from designing, construction, and operation of the university campuses in Mogadishu Hargeisa,
- Support to describe the methods to mitigate and monitor ESMPs and actions to be taken and cost implications;
- Clarify the roles and responsibilities of the MoES of Somaliland, in connection with the PIUs, women-led CSOs, private sector companies and operators, and other stakeholders with regard to environmental and social due diligence, management of risks and impacts, and monitoring; and
- Provide the project implementers with an E&S screening process and risk management procedures that will enable them to identify, assess and mitigate potential environmental and social impacts of specific project sites, including through the preparation of site-specific ESMPs for both construction and operation, where applicable.

4.3. ESMF PRINCIPLE

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

4.4. METHODS

77. There have been a series of discussions and engagements among the teams of the MoES and WB, including initial consultations on. There was a joint project identification mission conducted between the World Bank and the Somaliland representatives virtually 13th – 15th December 2021 and subsequent meetings in January and February 2022. A follow-on stakeholders' consultation workshop was conducted virtually on February 7, 2022. The session was attended by national and international organisations with activities, projects, and programs in the education sector in Somalia, women groups, representing of vulnerable groups, and minority groups representatives. This second consultative workshop focused primarily on highlighting the key environmental and social risks as well as the various project instruments.

78. The Project in Somaliland has also conducted a one-day workshop on the 10th of February 2025 at the ASSOD Hotel, Hargeisa. Key stakeholders from the Ministries of Education, Finance, Employment and Social Affairs, Higher Education Commission, Universities, and Civil Society Organizations participated in the event. In total 31 participated in the workshop, of which 10 females and 21 males. See Annex 2 for minutes of meeting and participants list.

79. MoES-based project preparation team in Hargeisa, with close coordination with the World Bank undertook a review of relevant national legislation, policies, and guidelines, including the World Bank ESS related to this Project. Baseline information was also collected in close coordination with implementation units, and through research in literature and review of other relevant projects undertaken by the WB and other development agencies, which have taken place in the country.

80. The ESMF will be validated and finalized through public consultations to be conducted in districts expected to accommodate the Project's activities and interventions, together with other ESF instruments including the Resettlement Policy Framework (RPF), as the project is expected to have in place several Resettlement Action Plans (RAPs) for subprojects, Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP) and the SEAH Prevention and Response Action Plan, as well as Security Management Framework (SMF). Final consultation schedules will be updated into SEP and POM after locations of sub-project sites have been identified. Feedback of site-specific consultations will be included in their pertinent site-specific ESMPs prior to approval.

5. POLICY, LEGISLATIVE AND INSTITUTIONAL FRAMEWORK

5.1. OVERVIEW

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

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

5.2. SOMALILAND NATIONAL LAWS, POLICIES AND LEGISLATIONS

Constitution of the Government of Somaliland

83. The key legal instrument for the management of environmental affairs in Somaliland is the Constitution (adopted by the Houses of the Parliament of Somaliland on 30 April 2000), especially Article 12 (“Public Assets, Natural Resources and Indigenous Production”), Article 15 (“Education, Youth and Sports”), Article 18 (“The Environment and the Relief of Disaster”), Article 34 (“Duties of the Citizen”). Article 12 of the Constitution states that “the care and safeguarding of property, endowments and public assets is the responsibility of the State and all its citizens and shall be determined by law”. Article 15 of the Constitution states that “Education is in the public interest and is rooted in the experience and the special environment of the Somaliland society”. Article 18 of the Constitution states that “the state shall give a special priority to the protection and safeguarding of the environment, which is essential to the wellbeing of the society, and to the care of the natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law” The article proceeds to declare that “[the state shall undertake relief in disasters such as famine, storms, epidemics, earthquakes, and war.” Article 33 (“Protection of the Environment”) states that “Every person has the right to a clean and healthy environment. The State shall take the necessary measures to protect the environment from destruction, pollution, and ecological degradation” whereas Article 34 stipulates that “every person shall have the duty to care for, protect and save the environment”.

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

85. Article 21 of the Constitution addresses issues of application of fundamental rights. Further, the Constitution has made commitments on women’s empowerment and gender mainstreaming. Article 36 (1,2,3,4) together with Article 20(2) of the Constitution provides for the protection of women¹² against all forms of violence and provides for protection from sexual abuse, segregation and

¹² 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

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

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

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

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

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

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

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

The Somaliland Penal Code

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

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

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

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

The Somaliland Family & Personal Law

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

Somaliland National Gender Policy

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

Somaliland Environmental Management Act

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

Somaliland National Education Policy (SLNEP 2015-2030)

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

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

Somaliland National Construction Standards

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

5.3. INSTITUTIONAL CAPACITY FOR ENVIRONMENTAL MANAGEMENT

99. ***The Government of Somaliland.*** The Government of Somaliland has a Ministry of Environment and Climate Change (MOECC), which bears the lead responsibility for developing the Climate Change sector, protecting, conserving, and managing the environment through sustainable development aimed at eradicating poverty, improving living standards, and ensuring that a protected and conserved environment is available. Further, the MOECC is responsible for carrying out environmental impact assessments (EIAs) or overseeing the EIA process, playing a crucial role in ensuring that development projects and activities comply with environmental regulations and guidelines to minimize negative impacts on the environment. Further, the Environment Management Act (LR 79/2018) of Somaliland provides that the MOECC shall prepare and adopt guidelines for Environmental and Social Impact Assessment (ESIA) on proposed actions which may affect the country’s natural and social environment, as provided for under the ESIA Operational Guidelines¹³ which serve as the basic administrative directive.

¹³ These ESIA Operational Guidelines are available [here](#).

ESMF for Raja Kaaba Project in Somaliland (P176898)

100. The MOECC has a number of priorities, including institutional capacity development; climate change adaptation; biodiversity management, national rangeland rehabilitation, ecological improvement and management; reduction of charcoal production and increasing of alternative energy.

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

102. The Ministry of Education and Science of Somaliland is a national executive authority responsible for the state policy development and normative and legal regulation in the sphere of education, research, scientific, technological and innovation activities, nanotechnology, intellectual property, as well as in the sphere of nurturing, social support and social protection of students and pupils of educational institutions. The work of the Ministry of Education and Science of Somaliland is governed by the Constitution of the Republic of Somaliland, National Education Act, National Constitutional Laws, and Decrees by the President of the Republic of Somaliland. The MoES of the Republic of Somaliland worked in cooperation with other national executive bodies, executive bodies of the subjects of the Republic of Somaliland, local authorities, public associations and other institutions.¹⁴

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

5.4. INTERNATIONAL CONVENTIONS AND AGREEMENTS SIGNED OR RATIFIED BY SOMALIA

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

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

¹⁴ [https://en.wikipedia.org/wiki/Ministry_of_Education_and_Science_\(Somaliland\)](https://en.wikipedia.org/wiki/Ministry_of_Education_and_Science_(Somaliland))

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

- i. Forced Labour Convention, 1930 (No. 29)
- ii. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- iii. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- iv. Abolition of Forced Labour Convention, 1957 (No. 105)
- v. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- vi. Worst Forms of Child Labour Convention, 1999 (No. 182)
- vii. Medical Examination of Young Persons (Sea) Convention, 1921 (No. 16)
- viii. Workmen's Compensation (Accidents) Convention, 1925 (No. 17)
- ix. Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)
- x. Seamen's Articles of Agreement Convention, 1926 (No. 22)
- xi. Repatriation of Seamen Convention, 1926 (No. 23)
- xii. Underground Work (Women) Convention, 1935 (No. 45)
- xiii. Right of Association (Non-Metropolitan Territories) Convention, 1947 (No. 84)
- xiv. Labour Inspectorates (Non-Metropolitan Territories) Convention, 1947 (No. 85)
- xv. Labour Clauses (Public Contracts) Convention, 1949 (No. 94)
- xvi. Protection of Wages Convention, 1949 (No. 95)
- xvii. Recruiting of Indigenous Workers Convention, 1936 (No. 50)¹⁵
- xviii. Contracts of Employment (Indigenous Workers) Convention, 1939 (No. 64)¹⁶
- xix. Penal Sanctions (Indigenous Workers) Convention, 1939 (No. 65)¹⁷

5.5. WORLD BANK ENVIRONMENTAL AND SOCIAL FRAMEWORK

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

107. All ESSs of the World Bank are relevant to the activities in the Empowering Women through Education and Skills Project (Raja Kaaba) as listed in the table 5 below, except for ESS7 and ESS9:

Table 4: Relevant ESSs of the WB to the Project

E and S Standards of the World Bank	Relevance
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Relevant
ESS2: Labor and Working Conditions	Relevant
ESS3: Resource Efficiency and Pollution Prevention and Management	Relevant

¹⁵ Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

¹⁶ Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

¹⁷ Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

ESMF for Raja Kaaba Project in Somaliland (P176898)

E and S Standards of the World Bank	Relevance
ESS4: Community Health and Safety	Relevant
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Relevant
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Relevant
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Relevant
ESS8: Cultural Heritage	Relevant
ESS9: Financial Intermediaries	Not Relevant
ESS10: Stakeholder Engagement and Information Disclosure	Relevant

ESMF for Raja Kaaba Project in Somaliland (P176898)

108. Summary of applicable World Bank E&S Standards (ESSs)¹⁸ to the Somaliland Empowering Women through Education and Skills Project (Raja Kaaba).

Table 5 : Summary of applicable World Bank E&S Standards (ESSs) and Guidelines

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS	RELEVANT	1.1	<p>Application</p> <p>This Standard sets out the MOES’s responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of Somaliland education project in order to achieve environmental and social outcomes consistent with the ESSs.</p> <p>As a result, this ESMF has been prepared, in conjunction with other, appropriate safeguards documentation, including:</p> <ul style="list-style-type: none"> • Resettlement Policy Framework (RPF) • Labour Management Procedures (LMP) • Resettlement Plans • Stakeholder Engagement Framework (SEF), which includes a Grievance Mechanism (GM) • SEAH Response and Action Plan • Security Management Framework <p>The project will be expected to conduct Environmental and Social Impact Assessments (ESIAs) and develop ESMPs, especially for the initial two WDCs construction sites, including for one site in Hargeisa, covering both construction and operation phases.</p>
ESS 2: LABOR AND WORKING CONDITIONS	RELEVANT	2.1	<p>While the exact labour use (including the number of project workers, their characteristics and timing of workforce mobilization) in Somaliland is unknown to the date of preparing instrument, the project workers engaged or employed will include:</p> <ul style="list-style-type: none"> • Direct workers (such as consultants hired in the PIU, MoES, and supervision consultants if required). • Contracted workers (such as skilled permanent staff of the primary contractor (construction company), contracted trainers for life skill courses (component
		2.2	
		2.3	

¹⁸ More details at <http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources>

			<p>1), and Technical Assistance programme of Component 3, skilled workers engaged by sub-contractors (such as heavy machine operators), and unskilled workers engaged by the contractor including IDPs female workers, as well as staff of third-party monitors working with the project.</p> <ul style="list-style-type: none"> • Primary supply workers (such as workers to produce essential college construction materials such as aggregates and building blocks on an ongoing basis for the project). • Government civil servants such as district education officers in the parallel departments and line ministries, as well as district police officers. The civil servants will remain subject to the terms and conditions of their existing public sector employment, but will comply with OHS requirements including security and GBV/SEAH prevention and response <p>Potential labour risks and mitigation measures</p> <ul style="list-style-type: none"> • OHS risks and impacts during construction (such as moving equipment and heavy machines, noise, vibration, welding, chemical hazard, working environment temperature, working at height and safety and hygiene in worker camps) • OHS risks and impacts during operation (such as those related to life-skill trainings, agricultural, hair & beauty, and renewable energy, in particular). Risks in this regard would include, but are not limited to, integrity of workspace structures, safety of working environments, exposure to hazardous material and equipment, exposure to electricity and fire, as well as insufficient awareness and use of suitable Personal Protective Equipment (PPE). • Child labour • Forced labour • Labour influx • Security risks to labor • Labour disputes over terms and conditions of employment • Discrimination and exclusion of disadvantaged groups (including in payment terms) Security risks (workers' exposure to attacks and women's security while at school)
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ESMF for Raja Kaaba Project in Somaliland (P176898)

			<ul style="list-style-type: none"> • GBV/SEAH <p>The Labour Management Procedures (LMP) developed for the project, will contain relevant mitigation measures to be incorporated into procurement documents. LMP will also detail the establishment and utilization of a Worker’s GRM, to provide appropriate avenue for workers to address their all workplace-related concerns. In addition, security to labor will be addressed in area-specific Security Risk Assessments, as well as in Security Management Plans.</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT	RELEVANT	3.1	<ul style="list-style-type: none"> • Because of the nature and relatively minor to moderate scale of the civil works, as well as training and life skill activities, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction. • The risks related to ESS3 include the normal impacts of civil works (i.e. dust, noise, erosion, surface water sedimentation, pollution from construction wastes and water use), as well as waste from worker campsites, unfilled quarries and borrow pits. • During operation phase, risks and impacts related to efficient use of resources will still be expected. This includes increased use of water by students and administrations at WDCs and women campuses (especially when training on agricultural practices – component 1), as well as increased use of energy at the WDCs when applying tools for renewable energy practical trainings. These facilities will also be expected to release a range of harmful effluents to the surrounding environment, as a result of insufficient solid waste and wastewater management practices. <p>To address these short-term impacts, this ESMF includes an Environmental and Social Management Plan (ESMP) for both construction and operation phases, as well as measures for monitoring compliance. ESMP measures will mostly be including those proposed in General WB Environmental, Health and Safety Guidelines (EHSGs).</p>
ESS 4: COMMUNITY HEALTH AND SAFETY	RELEVANT	4.1	<ul style="list-style-type: none"> • Community health and safety impacts will be minor, temporary, and confined to the area immediately surrounding the college construction. • Anticipated risks and impacts include community health and safety risks associated with construction work, such as Infrastructure and Equipment Design and

ESMF for Raja Kaaba Project in Somaliland (P176898)

			<p>Safety, safety of services, traffic safety, security risks to the community, community exposure to diseases (including COVID-19), hazardous materials and emergency preparedness and responses.</p> <ul style="list-style-type: none"> • Open quarries due to sourcing of materials for construction • To address these short-term impacts, the ESMF includes Standard Operating Procedures (SOPs) and good construction management practices, including those proposed in WB EHSs. • To address potential risks associated with the security personnel to be hired by contractors, the project will develop and implement a Security Management Framework, area-specific Security Risk Assessments, as well as in Security Management Plans. • Assessment of project related GBV/SEAH/SEA will be conducted during project preparation. • Given the assessment of GBV/SEAH risks for Somalia generally, and for Somaliland specifically, and considering context of pervasive insecurity, the project will adopt a robust approach to address potential GBV/SEAH/SEA risks. • Relevant mitigation measures to address these risks include integrating Codes of Conduct (CoCs) with GBV/SEAH-related protections, community consultations and mapping activities to identify potential service providers, and establishment of GRM with procedures and channels to enable safe, confidential, and ethical reporting of GBV/SEAH incidents) are articulated in this ESMF. • Additional considerations include the development of a GBV/SEAH Prevention and Response Action Plan and elaboration of provisions for Third Party Monitoring. • The project will also look to include provisions of capacity building and training of relevant stakeholders including contractors, primary suppliers, third party monitors and project workers, in addition to capacity building for the MoES. <ul style="list-style-type: none"> • GBV/SEAH/SEA risks will be monitored throughout project implementation through regular re-assessment with risk screening tools. • Contractors and primary suppliers will be debarred for 2 years if they fail to comply with GBV/SEAH and CoC obligations.
<p>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND</p>	<p>RELEVANT</p>	<p>5.1</p>	<ul style="list-style-type: none"> • The resettlement impacts of the construction component are likely to be moderate due to the limited size and nature of the individual physical works. It

ESMF for Raja Kaaba Project in Somaliland (P176898)

INVOLUNTARY RESETTLEMENT			<p>is notable that the two initial university colleges will be constructed in public land or within the existing university land, which is the case also for the pilot university, women WDCs, and the women college consortium planned in Somaliland.</p> <ul style="list-style-type: none"> • The physical displacement will be minimized and duly compensated. • The economic displacement will largely relate to encroachment on private or community lands or temporary impact during the construction, which will be also minimized. More details are presented in the RPF and site-specific RAPs.
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES	RELEVANT	6.1	<ul style="list-style-type: none"> • The pre-construction screening process in the ESMF will exclude such sensitive areas. • The ESMF includes specific measures to avoid or minimize negative impacts on critical or protected areas if the pre- construction screening process does not otherwise exclude these areas.
ESS 8: CULTURAL HERITAGE	RELEVANT	8.1	<ul style="list-style-type: none"> • There is the potential for chance find of cultural or archaeological significance during construction and associated infrastructures, and the existence of some historic buildings in neighborhood that could potentially be impacted from the construction. The ESMF has been updated to comply with ESS8, and the project specific ESMPs will address these issues through the inclusion of chance find procedures. <p>• More details are available in Annex 5 of this ESMF.</p>
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE	RELEVANT	10.1 10.2	<p>Key stakeholders include beneficiaries, students, guardians, and other project-affected communities, host communities, and municipal authorities responsible for education, religious and local leaders, civil society organizations (CSOs), and other development partners.</p> <ul style="list-style-type: none"> • As discussed in ESS1, the potential vulnerable and disadvantaged groups to be considered for stakeholder engagement include: <ul style="list-style-type: none"> o IDPs, refugees and returnees; o Poor households (such as female headed, widows, older persons, orphans, persons living with severe illness); o Persons with disabilities;

ESMF for Raja Kaaba Project in Somaliland (P176898)

		<ul style="list-style-type: none"> o Illiterate community members; o Nomadic pastoralists; and o Minority groups • The project will take differentiated measures to include these groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, discrimination of written materials or graphics or provision of free municipal transport. <ul style="list-style-type: none"> • ESS10 sets many provisions for establishing an accessible, culturally appropriate, and inclusive GM during the life cycle of the Project. Although the right for Somali citizens to express concerns and complain about their grievances has been guaranteed by the Constitution, the Project will apply the much more details provided by WB ESS10 to setup this GM, in a way proportionate to the E&S risks and impacts brought about by Project’s interventions. • More details on the consultation, information disclosure, inclusion plan and the GM are presented in the SEP.
<p>WBG General Environment, Health and Safety Guidelines (WBG EHSs)</p>	<p>RELEVANT</p>	<ul style="list-style-type: none"> • The Project will involve civil works that could range from minor renovation activities to moderate new construction of two university campuses and development centers. A variety of risks and impacts on workers, the surrounding communities, the immediate environment are expected during construction phase. The WBG EHSs provides a comprehensive analysis and proposed actions (designed according to international standards and best practices) that can be applied to the mitigate adverse impacts on receptors, including physical/biological environment and possible locations of borrow pits. • The Project can also apply other measures suggested by the Guidelines that are necessary to mitigate risks and impacts during operating phases of the campuses and training centers, specifically those related to Occupational Health and Safety as well as waste management, effluents, and reduction of energy consumption (components 1, 2 & 3). • The “Section 3.3 Life Fire and Safety” of these Guidelines refers to international standards adopted for new buildings accessible to the public, which aims to ensure preparedness to emergency fire and life-threatening risks. It also includes a set of useful tips to address risk of fire during operating new buildings, which can be

ESMF for Raja Kaaba Project in Somaliland (P176898)

			applied to this Project.
ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works Projects	RELEVANT	Ver. 1 April 7, 2020	The Project will involve increased levels of personal contact either during construction by workforce and community or during operation by end users of the new/rehabilitated WDCs and women colleges. Therefore, the Project will apply this interim note to ensure precautionary measures of Covid-19 transmissions are in place during construction and operation phases. The extent to which this Note is applicable will depend on updates of the status of the Pandemic declared by international agencies (e.g. from WHO), as well as updates/instructions issued by local health authorities.
Good Practice Note for Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works.	RELEVANT		The project will include activities related to Health, Nutrition, Population, Education, Social Protection, and Jobs (referred to in the GPN as HD Operations) either in construction or operation. It introduces tools and approaches to addressing SEA/SH risk in HD Operations that reflect emerging good practice consistent with the key ESF principles of proportionality and appropriateness. Although the Project will embark on addressing SEA/SH as a necessary precondition, through preparing a SEAH Prevention and Response Action Plan, this GPN will not be a substitute for full and equal participation of women and girls in the design, implementation, and benefits of the project.

109. The MoES will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs) of the World Bank.

5.6. GAP ANALYSIS

110. The proposed project of Somaliland will be implemented by the MoES. According to the Constitution of the Government of Somaliland 2000, the Somaliland Government is mandated to implement education programs and policies.. Administrative structures of the Somaliland Ministry of Education and Science are still under development, and as a result, capacity within the Ministry remains generally low in relation to staffing, skills and training of personnel. Gender disparities and representation of disadvantaged, vulnerable and marginalised groups including minority groups are especially prevalent among education ministry personnel. Capacity for management of environmental and social risks is weak, although the ministry is commencing with implementing the Somaliland component of the Education for Human Capital Development Project (P172434) which allows learning during implementation. Further, there is limited infrastructure in place to support the organizational capacity of the ministry (offices, vehicles, computers, and logistics).

111. A lean Project Implementation Unit (PIU) housed in the MoES will be responsible for overall project management, coordination, implementation, monitoring and day-to-day responsibility of this project.

112. There is limited capacity among contractors which could undermine the implementation of the mitigation E&S measures. Due to inherent system and staffing weaknesses, the MoES relies on additional support in the form of technical advisors who typically come from the Somali diaspora community with the aim of supporting state building and recovery processes inside the country. Past projects showed a positive impact of noted approach.

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

114. Table 7 summarizes a comparison focusing on the World Bank policies relevant to the project and gaps identified in existing Somaliland laws and regulations.

Table 6: GAP analysis for Environmental and Social Standards

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
<i>ESS1 (“Assessment and Management of Environmental and Social Risks and Impacts”)</i>				
EIA instruments	Range of instruments to satisfy the Bank include EIAs, regional or sectoral EAs, EMPs, etc.	Instruments for environmental assessment have been delineated adequately at SL level.	EIAs incorporated into National laws, and are captured in Somaliland.	National law to guide and ESMF to supplement where needed the borrower to perform other detailed actions, such as preparing ESIA/ ESMPs for identified locations, in addition to preparing RPF/ RAPs where land is required, or economic displacement is expected.
Environmental impact screening	Screening procedures developed for projects involving sub-projects, as is likely to be the case in the Somaliland Empowering Women through Education and Skills Project – “ Raja Kaaba”	There are no detailed procedures for screening under the statutes of Somaliland.	Screening procedures are present in Somaliland.	National law to guide and where needed the ESMF to supplement screening procedure according to provisions of WB ESS1, which will be used to either confirm or exclude sub-projects, in consultation with PAPs. Those screened-in will have site-specific ESMPs prior to implementation.
Social impact screening	Screening procedures developed for projects involving sub-projects, as is likely to be the case in the Somaliland Empowering Women through Education and Skills Project – “ Raja Kaaba”	There are procedures for screening under the statutes of Somaliland.	Screening procedures are present in Somaliland.	The national law will guide and the ESMF will supplement a generic screening procedure according to provisions of WB ESS1, which will be used to either confirm or exclude sub-projects, in consultation with PAPs. Those screened-in will have

ESMF for Raja Kaaba Project in Somaliland (P176898)

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
				site-specific ESMPs prior to implementation. The borrower will also prepare other required WB instruments, including SEP (incl. Inclusion Plan), LMP, and GBV/SEAH Prevention and Response Action Plan, where necessary.
Public consultations	The Bank requires the Borrower to initiate consultations with project-affected persons and other interested parties including CSOs.	Procedures for public consultations not explicitly stated.	Procedures for public consultations not explicitly stated.	The project is to prepare SEP to guide the borrower to best consultation and communication procedures. SEPs will be tailored to different site contexts and needs.
Monitoring of environmental and social data	Bank requires regular monitoring of environmental and social safeguards data to evaluate the success of mitigation and to foster corrective measures at the earliest possible juncture.	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental and social data.	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental and social data.	ESMF provides a proposed monitoring plan for the Project as a whole, in accordance with WB Guides and sound international standards. Monitoring plans will be revisited and updated to fulfil the needs of site-specific ESMPs
Institutional arrangements	Requirement by the Bank for specific description of institutional arrangement and implementation schedule for monitoring and mitigation measures.	<ul style="list-style-type: none"> • MoES as the project implementing partner. • (<ul style="list-style-type: none"> • MoES has limited capacity for technical implementation of project interventions but will require Safeguards support. • Ministry of Environment and climate change may be responsible for 	The PIU to work with the respective ministries and agencies responsible for management of environmental and social matters for development projects, including those accountable for environment protection and social affairs, as the

ESMF for Raja Kaaba Project in Somaliland (P176898)

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
			coordinating institutional responses under this ESMF, but the institutional information is not available, and its remit is unknown, as is the technical capacities.	focal points for administration of this ESMF..
ESS2 (“Labour and Working Conditions”)				
Management of different types of project workers	The Bank puts emphasis on the identification and characterization of different types of workers (project workers, direct workers, contracted workers, primary supply workers) to manage different types of labour risks.	The Somaliland Labour (Amendments & Additions) Law (No. 31/2020) is the specific labour law governing all aspects of labour and working conditions, which covers the contract of employment, terms and condition, remuneration, and OHS, trade unions and labour authorities. The provisions of the Somaliland Labour (Amendments & Additions) Law (No. 31/2020) apply to all employers and employees in all project municipalities. The Somaliland Labour (Amendments & Additions) Law (No. 31/2020) is applicable to all project workers of the Somaliland Women Empowering project.	The Somaliland Labour (Amendments & Additions) Law (No. 31/2020) is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.	ESMF and the Labour Management Procedures (LMP) are to be prepared to fill this gap. Site-specific ESMPs will also provide site-specific measures on workforce and workplace issues, during construction and operation.
Labour standards	Several provisions made under ESS2 to safeguard the workers, promote safety at work and ensure that they have a viable means of communicating grievances and receiving redress.	<ul style="list-style-type: none"> Article 36 (1,2,3,4) together with Article 20(2) of the Constitution provides for the protection of women against all forms of violence and provides for protection from sexual abuse, segregation and discrimination. On human rights, Article 24(4) of the Constitution states that crimes against human rights such as torture, extra-judicial killings, mutilation, and other similar acts shall have no limitation 	The implementation of the existing articles in practice may not be very strong.	<p>The Project will not allow any forced and child labour. It will hold all contractors liable to the implementation of the LMP. Site-specific ESMPs will include monitoring measures to ensure enough management measures</p> <p>The PIU will have overall responsibility to monitor</p>

ESMF for Raja Kaaba Project in Somaliland (P176898)

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<p>periods. Article 20(2) stipulates that the conditions of work of the young and women, night working and working establishments shall be regulated by the Labour Law.</p> <ul style="list-style-type: none"> • Every labour law shall comply with gender equality. • The Somaliland Labour (Amendments & Additions) Law (No. 31/2020) encapsulates a number of issues - disciplinary acts are covered under Article 51, dismissal and resignation under Articles 36 and 37, duties of employees and employers, including appraisals, under Articles 33 – 35, employees’ grievances and cases under Article 39, fundamental employment rights – inclusive of equality and non-discrimination on grounds of gender, colour, religion, political opinion, clan origin and/ or HIV/AIDS under Article 7, Health and Safety under Articles 41-45, Hours of Work under Articles 8 – 10, non-employment of minors under Article 38, Regulations under Article 56, Salary and emoluments under Articles 20 – 23, and matters recruitment, including that of foreign employees, under Articles 31 and 32. • 		<p>the implementation of the LMP.</p> <p>Other important instruments are to be prepared, including SEP (incl. Inclusion Plan) and GBV/SEAH Prevention and Response Action Plan</p> <p>Worker GM will be put in place in LMP</p> <p>The Project will fully comply with WB ESS 2.</p>
ESS3 (“Resource Efficiency and Pollution Prevention and Management”)				
Pollution prevention and management	This ESS requires the Borrower to undertake a health and safety risk assessment of any existing	<ul style="list-style-type: none"> • he National Urban Planning Standards & Norms (2022), by the Ministry of Public work, Land and Housing. Entails minimum national constructions 	There are no supporting legislative frameworks for pollution prevention and management	ESMF to guide the borrower on pollution prevention and management.

ESMF for Raja Kaaba Project in Somaliland (P176898)

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
	<p>pollution which may affect communities, workers and the environment, especially in the school environment which will be the main arena for project implementation.</p>	<p>standards for schools.</p> <ul style="list-style-type: none"> No known national statutes in support of periodic environmental audits. No national pollution standards known at the time of developing this ESMF. 		
<p>Management of hazardous wastes and resource efficiency</p>	<p>The Bank requires the Borrower to undertake specific measures to manage both hazardous and non-hazardous wastes. And ensure resources are efficiently utilized. Specific emphasis is given in this ESS with respect to transportation and disposal, obtain chain of custody documentation to the final destination, and advocate for use and reuse of recyclable materials. Approved disposal sites are required for this ESS.</p>	<ul style="list-style-type: none"> No known national legislation or policies on management of hazardous wastes. The Constitution of the Government of Somaliland - Article 33 states that "Every person has the right to a clean and healthy environment. The State shall take the necessary measures to protect the environment from destruction, pollution, and ecological degradation". Article 34 of the Constitution stipulates that "every person shall have the duty to care for, protect and save the environment. Article 18 of the Constitution ("The Environment and the Relief of Disaster") states that "the state shall give a special priority to the protection and safeguarding of the environment, which is essential to the wellbeing of the society, and to the care of the natural resources. Therefore, the care of and (the combating of) the damage to the environment shall be determined by law". The article proceeds to declare that "the state shall undertake relief in disasters such as famine, storms, 	<p>There are no approved hazardous waste disposal sites, neither are there legislations on the efficient use of resources in Somaliland.</p>	<p>ESMF to guide the borrower on the management of both hazardous and non-hazardous wastes, and efficient use of resources.</p>

ESMF for Raja Kaaba Project in Somaliland (P176898)

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
		<ul style="list-style-type: none"> epidemics, earthquakes, and war". 		
ESS4 (“Community Health and Safety”)				
Health and safety of community members	The ESS anticipates that the project will put measures in place to anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances. Further, it provides for the avoidance or minimization of community exposure to project-related traffic and road safety risks, diseases and hazardous materials.	<ul style="list-style-type: none"> The Somaliland Penal Code is divided into three “books”, pertaining to (i) Offences in General – covering general principles such as non-retroactive application of law, jurisdiction, offences committed abroad and extradition. (ii) Crimes – encapsulating crimes against personality of the state, against public administration, against the course of justice, against public order, against public safety, against national economy, industry and commerce, against property, and against the person and safety of individuals, to mention but a few, and (iii) Contraventions. 	<p>The Somaliland Penal Code fails to protect survivors and prosecute perpetrators for GBV/SEAH crimes.</p> <p>The crimes under Book II and provisions under Book III (Contraventions) are too narrowly defined to satisfy not only international law standards of protection from sexual and GBV/SEAH, but also, the World Bank’s ESS4 requirements pertaining to safety of structures and services, traffic and road safety, exposure to health issues, management and safety of hazardous materials and emergency preparedness.</p>	The ESMF, LMP, SEP and the GBV/SEAH Response and Action Plan developed for this project will guide the reduction of harm to communities affected by the project.
Security personnel	<p>This ESS postulates that when the Borrower retains security personnel to safeguard workers and property, it will assess the risks posed by these security arrangements to those within and outside the project sites.</p> <p>The Borrower will not sanction any use of force by direct or contracted workers</p>	<p>District police will likely provide security services in the implementation of the Somaliland Women Empowering project. The civil servants in Somaliland are governed by the Constitution, Civil Service Law, the Civil Service Commission Law, the Code of Conduct for Civil Servants, Financial Regulations, and the Labor Code and Employment Act..</p> <p>However, there are no security protocols guiding their deployment, and there is possibility of violence meted out on civilians</p>	While the security protocols guiding the deployment and use of force are broadly unknown, the project will coordinate with the law enforcement authorities in each municipality to manage associated risks.	<p>The project to be guided by the ESMF and relevant provisions of ESS4 on the deployment of security personnel to construction sites where security risks are deemed substantial.</p> <p>The project will also develop and implement a Security Management Framework.</p>

ESMF for Raja Kaaba Project in Somaliland (P176898)

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
	in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.	or workers or even the possibility of rent-seeking.		
ESS5 (“Land Acquisition, Restrictions on Land Use and Involuntary Resettlement”)				
Physical and economic displacement	This ESS covers the involuntary taking of land, resulting in loss of shelter or loss of assets: a hierarchy has been provided that seeks to minimize losses to affected persons. It forbids forced evictions.	<ul style="list-style-type: none"> • Constitution of the Government of Somaliland, Article 26 states that every person has the right to own, use, enjoy, sell and transfer property • The Constitution defines land as public property. The government has created means to transfer some land into private ownership by granting ownership for urban and agricultural land.¹⁹ Formal legal frameworks now exist alongside customary land management. • The State may compulsorily acquire property only if doing so is in the public interest. Any person whose property has been acquired in the name of the public interest has the right to just compensation from the State as agreed by the parties or decided by a court. • Compensation is provided only for occupants of temporary structures. Affected persons are to be settled in suitable land and their eviction and settlement costs be paid for by the local government. • 	<p>There is a lack of detailed legislation governing land use and ownership. Evictions are reported to be commonplace in Somaliland.</p> <p>There are no functional national policies guiding involuntary resettlement of persons that may be affected by the project. More details are provided in the RPF.</p>	Both RPF and site-specific RAP are to be prepared to guide the borrower.
ESS6 (“Biodiversity Conservation and Sustainable Management of Living Natural Resources”)				
Risk of using	Exclude activities or civil	<ul style="list-style-type: none"> • Somaliland has not developed a 	There are no functional	Include management

¹⁹ IGAD, Somalia. Land Governance Country Profile, Assessment of Land Governance Framework, Training & Research Land Governance Institutions, accessed at: <https://land.igad.int/index.php/countries/39-countries/somalia/40-somalia-profile?showall=1>

ESMF for Raja Kaaba Project in Somaliland (P176898)

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
lands of biological environment sensitivity	works that would be established on or next to environmentally sensitive areas	<p>National Biodiversity Strategy and Action Plan (NBSAP), which ought to call for action to be taken to manage biodiversity hotspots.</p> <ul style="list-style-type: none"> • Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources. • There are no clear procedures for screening under the statutes of Somaliland. 	national policies guiding biodiversity conservation and sustainable development of natural resources, and screening mechanism for screening out harmful projects is not available.	measures and screening tools in this ESMF, and ensure environmental concerns in construction/ activity sites are mitigated and monitored through site-specific ESMPs. Works of potential harm to the environment will be screened out.
ESS8 (“Cultural Heritage”)				
Management of risks on tangible and intangible cultural heritage, including legal protection to cultural heritage sites	<p>There is the potential for chance find of cultural or archaeological significance during construction and associated infrastructure, and the existence of some historic buildings in neighborhood that could potentially be impacted from the construction.</p> <p>This ESS requires the Borrower to manage risks on tangible and intangible cultural heritage, including identification of the presence of all listed legally protected cultural heritage areas affected by the project.</p>	No information is available at hand on how the government of Somaliland intends to manage cultural heritage.	There are no explicit laws or regulations known to be delineating sites as places of cultural importance.	ESMF to guide the Borrower in this regard. The project will clarify chance find procedures in site-specific ESMPs.
ESS10 (“Stakeholder engagement and information disclosure”)				

ESMF for Raja Kaaba Project in Somaliland (P176898)

Scope	Bank Standard	Government of Somaliland policies, regulations	Gaps identified	Gap-filling measures
<p>Meaningful engagement of stakeholders and grievance mechanism in the project activities from planning to implementation levels</p>	<p>The World Bank anticipates that the project will establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. Further, the project will promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them. The project affected persons should be provided with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances.</p>	<p>The Constitution of the Government of Somaliland: Article 32 stipulated that every person has the right of access to information held by the State. The Parliament shall enact a law to ensure the right of access to information.</p>	<p>The law on the right of access to information currently only exists as a draft. Additionally, the redress mechanism is not entrenched in the country’s laws and the existing traditional instructions are largely men dominated and not victim centric.</p>	<p>The Project will implement stakeholder consultations and GM throughout the lifetime of the project, as per the SEP.</p> <p>The PIU will ensure that a grievance mechanism for the project is in place, in accordance with ESS10 as early as possible in project development to address concerns from project affected persons.</p>

6. PROJECT BIOPHYSICAL AND SOCIO-ECONOMIC SETTING

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

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

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

6.1. INTRODUCTION

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

118. Many of the species aforementioned are categorized as Critically Endangered (CR), Endangered (EN) or Vulnerable (VU) in international conventions and agreements, such as the World Conservation Union's Red List of Threatened Animals.²⁰ Some of the endangered flora and fauna species, according to the IUCN Red List, include *Aloe eminens*, *Aloe hildebrandtii*, *Aloe grisea*, *Mirafra ashi*, *Mirafra sharpie*, *Aloe ambigens*, *Aloe albovestita*, *Dirachma somalensis*, *Aloe scobinifolia*, *Aloe cremnophila*, *Aloe gracilicaulis*, *Aloe gillettii*, *Aloe bella*, *Cleopatra rugosa*, *Aloe peckii*, *Ceratonia oreothauma subsp. somalensis*, *Hildegardia gillettii*, *Elapsoidea chelazzii*, *Linaria johannis*, and *Vigna monantha*. Somalia has ratified the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES), but few if any practical measures are being taken to ensure its implementation. Like for the fisheries, the wildlife is also subject to illegal, unreported and unregulated trapping and trafficking.

119. As a precaution, it will be critically important for the PIUs to engage with communities, contractors, civil society and other government's Ministries, Departments and Agencies (MDAs) to ensure that the project does not affect existing biodiversity.

6.2. CLIMATE

120. All the proposed project states share similar characteristics, climate-wise. There is generally warm and arid climate across most parts of Somaliland, although precipitation and the wind can be highly variable in places at certain times of the year (on account of proximity to the equator). Typically, the Somaliland climate is hot and semi-arid to arid, with two annual rainy seasons *Gu'* (which spans from April to June), and *Deyr* (which takes place from October to November). There are variations in spatial distribution of rainfall, with about 500 mm recorded annually in the northern highlands and between 300 and 500 mm in the southern regions. The coastal plains register only between 50 and 150 mm.

²⁰ See <http://www.animalinfo.org/country/somalia.htm>

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

6.3. ECOSYSTEMS

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

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

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

6.4. SOCIO-ECONOMIC ENVIRONMENT

124. The Government of Somaliland, with a landmass of about 176,6119 km² (53,100 square miles) has a population estimated to be 4.9 million people (2018), with a population growth rate of 3.14%/year, a GDP of USD 2.573 billion (2017), GDP/ capita of USD 499.8 according to the World Bank, just ahead of Burundi, Democratic Republic of the Congo and Niger, life expectancy of 50.40 years (2014), and literacy rate of 48%. The population density is estimated at 28.27 persons per km², one of the lowest in East Africa. The median age in Somaliland is estimated to be 16.7 years. The population's livelihoods are connected to either livestock husbandry, smallholder dryland agriculture, itinerant commerce or remittances from diaspora.

Poverty in the Government of Somaliland

125. The United Nations classifies the Government of Somaliland as a least developed country. The socio-economic situation of the country is described as "very poor"²¹, with a World Bank study showing that for every four people living in urban areas in Somaliland, one is living in poverty. Poverty cuts across sectors, location, group and gender, and its forms and causes vary, with 37 percent of rural and 30 percent of the urban population being classified as poor according to the Somaliland Household Survey (2013). An understanding of Somaliland's geography, recent trends in its economy and consequences of civil strife is important to determining the nature and extent of its poverty. According to a World Bank study²², access to health services in urban areas compares well to other regional countries, but in rural areas, most births are at home without a skilled attendant. Mothers are more likely to die giving birth, and babies more likely to die before their first birthday, as compared to neighbouring Ethiopia or Djibouti.

²¹ See <http://extwprlegs1.fao.org/docs/pdf/som169866.pdf> for a copy of the Plan

²² This World Bank study is available [here](#).

126. Somaliland's economy is largely consumption-based and dominated by agriculture, while it is also supported by remittances from the diaspora and large aid flows. Remittances and aid flows are estimated at USD 1.4 billion in 2018²³, about 50% of Somaliland's GDP. Livestock production plays a key role by constituting 60 – 65 percent of GDP, and 85 percent of foreign export earnings²⁴. Other notable products exported, apart from live animals, include scrap metal, gemstones, animal skins, gold, fishing products and frankincense. Approximately over half of Somaliland's population depends on pastoralist and agro-pastoralist activities²⁵, employing over 70% of the population, meaning that people remain highly vulnerable to natural disasters.

Human Development

127. The Government of Somaliland scores very low on UNDP's HDI. Although it has not been ranked for a few years, different indicators reveal low scores. For example, life expectancy at birth lies at 50.40 years with a global average of 56 years²⁶ in low human development countries;²⁷ and the mortality rate under the age of 5 is at 132 per 1000 live births²⁸, while the global average is 39.²⁹

Education

128. The school enrolment rates in Somaliland are among the lowest in the world. In the education sector, the primary net enrolment rate in Somaliland has been reported to be around 63-65 percent for boys and 59-61 percent for girls, and while transition from primary to secondary school remains a great challenge, the net enrolment rate for secondary education is lower with estimates ranging from 16-20 percent for boys, and 10-14 percent for girls. Further, as per a World Bank study³⁰ only about half of 6- to 13-year-olds go to primary school in Somaliland, further pointing to a bleak future for comparative literacy rates with other countries in the region in the future.

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

130. Obstacles to education for girls and women include poverty, distance from home to school, preferential treatment of males, and other social norms that include pressure to marry at young age and household chores and care responsibilities for younger siblings. As data shows, there significant gender gap at all formal education levels from pre-primary through primary level, including in technical vocational education training (TVET) centers. Non-formal education (NFE) and alternative basic education (ABE) channels of education are trying to bridge the gap through second chance education, which is the prevalent model of education delivery in the Raja Kaaba project.

131. In Somaliland, despite efforts made by the Somaliland government, CSOs and the international community to address various challenges to promote inclusive and safe education for all, child recruitment, compulsory military training, segregation of boys' and girls' classes and concerns over attacks on education institutions remain key challenges in the provision of education for all children.

²³ The Danish Institute for International Studies published an article highlighting the remittances for Somaliland [here](#).

²⁴ The 2021 Somaliland GDP report is available [here](#).

²⁵ The Somaliland Ministry of Investment and Industrial Development provides a breakdown of the livestock statistics for Somaliland [here](#).

²⁶ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

²⁷ UNDP, Human Development Report 2019, p.38.

²⁸ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

²⁹ WHO, Children. Reducing Mortality, factsheet, accessed at: <https://www.who.int/news-room/fact-sheets/detail/children-reducing-mortality>

³⁰ This World Bank study is available [here](#)

Furthermore, there are inadequate water and sanitation facilities, limited classrooms, and supplies, as well as a shortage of teachers in overcrowded schools. Additional enrolments of IDP children makes the situation even more dire. Absence of school feeding programs in famine and drought prone zones disrupts school attendance as well and drops the nutrition status of children.³¹ Access to education is particularly difficult for nomadic/pastoralist populations, with only 16 percent of nomadic population age 6 and above being enrolled in school.³²

Water and Sanitation Hygiene

132. Access to basic water supply is estimated at 83 percent in urban areas and 28 percent in rural areas. About 88% of the population lacks access to universal sanitation facilities in urban areas and 20 percent in rural areas. According to an African Development Bank³³ (AfDB) report, these key problems are exacerbated by (i) continued conflict, (ii) low rainfall and a very complex hydrogeology of the country, (iii) centrality of pastoralist livelihoods to the economy, and (iv) weak or absent local government institutions. There is further a lack of a harmonized legal and policy framework and policies in place and inconsistency with implementation.³⁴

133. Frequent droughts have had negative impacts on the water sector, while conflicts have weakened the water supply and sanitation services. WASH facilities have been destroyed as a result of conflict, and there is a lack of sufficient WASH facilities for the large number of IDPs. Furthermore, the population pressure causes over pumping of ground water, and the wearing out of equipment.³⁵ Even though various aid programs have supported the development of latrines, UNICEF reports that there is little impact on increased use of latrines or improved sanitation and hygiene more so in the rural areas. There is further a lack of sustainability of latrines and little indication of behavioural change among the population. Widespread displacement and recurrent emergencies contribute to this dire picture. Diseases like cholera are therefore widespread in Somaliland, with a total of 164,000 cases reported between 2006 and 2015.³⁶

Agriculture, Livestock and Livelihoods

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

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

³¹ Ditto, p. 25-26

³² Ditto, p. 30

³³ This African Development Bank report is available [here](#).

³⁴ UNICEF Somalia Country Office, Water, Sanitation & Hygiene (WASH) Profile, February 2020, p.2, accessed at: <https://www.unicef.org/somalia/media/1251/file/Somalia-wash-profile-February-2020.pdf>

³⁵ Ditto, p. 2

³⁶ Ditto, p. 3.

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

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

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

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

Labour and Employment

140. According to an assessment by Somaliland's Ministry of Employment, Social Affairs and Family, In the labour sector, 75 percent of the population in Somaliland is unemployed, 30% of the unemployed being females and 20% being young males. Moreover, only 26% of 15- to 55-year-olds in rural Somaliland and 33% in urban Somaliland are employed (wage or self-employment). As per the World Bank³⁷, Somaliland's GDP (2012) was estimated to have been USD 1.4 billion, with 30% being derived from the livestock industry, 20% from wholesale and retail trade (including the informal sector), 8% from crops and 6% from real estate activities. Somaliland's trade deficit in 2012 was approximately USD 496 million, financed through a combination of remittances and external aid, with the country ranked 180th in the world for gross fixed capital formation as a percentage of GDP. Also, Somaliland has very low employment to population ratios, with 17% for females and 28% for males. In addition, as the ILO points out, the legal and judicial systems governing employment are still weak; and there are few private or public insurance institutions; in addition, there are no labour inspection systems. This indicates that workers can be exposed to hazardous work without adequate protection, and child labour is a common practice in Somaliland.³⁸

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

³⁷ The World Bank's assessment can be found [here](#).

³⁸ ILO, Decent Work Programme, Somalia 2011-2015, p. 12.

Land Issues

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

Cultural Heritage

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

Security and Conflict Environment

144. Somaliland's security and conflict environment is accentuated by a variety of factors, inclusive of relative stability compared to other regions and corresponding challenges. Somaliland has managed to maintain a relatively peaceful and stable environment within its self-declared borders, with its own security forces and institutions that have successfully maintained law and order and prevented large-scale violence. Somaliland declared its independence from Somalia in 1991 following the collapse of the central Somali government, but while it operates as a de facto state with its own political institutions, legal system, and security forces, it has not achieved international recognition as an independent country. The country is affected by conflicts and tensions in neighbouring regions, with clashes between clans and occasional border disputes with neighbouring Puntland – a semi-autonomous region in Somalia – creating localized tensions. Notably, the recent security developments have created a complex situation in Nugaal area and the ensuing battle between the inhabitants of the area and the Hargeisa government has now created a new regional state Khaatumo which will have great implication in terms of security between the newly created entity and the government in Hargeisa.

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

146. The social impacts and potential aggravation of resource-related conflicts is well documented in a range of pastoralist and agro-pastoralist assessments carried out in the Somaliland region.³⁹ Access to water and pasture is a fundamental source of both conflict and co-operation between clans and civil authorities throughout the Somali region. In terms of conflict, extensive trans-boundary movements of livestock and limited access to the combination of water and pasture is one of the primary drivers of conflict across the Horn of Africa and within Somaliland. Following decades of low investment in

³⁹ Lewis 1961; Lewis 1998; DfID 2005; Gomes 2006 Access to water for pastoral resources management

Somaliland, water points with adequate surrounding pasture are especially scarce, claimed by clans, fiercely guarded and intrinsically linked to resource conflict.

147. Somaliland has largely been spared from the activities of extremist groups like the Islamist group Al-Shabaab, which primarily operates in and still controls areas in Southern and Central Somalia, providing harsh treatment, forced recruitment vis-à-vis the local populations. It infiltrates other areas and conducts deadly attacks on citizens. Most importantly, Al-Shabaab has introduced a harsh tax system in its areas of control and beyond. It has also started to expand on other administrative functions, such as the provision of justice.⁴⁰ Al-Shabaab remains a key source of violence, attacking government facilities, personnel, security forces, and members of international organizations. However, there is potential risk of Al-Shabaab's influence spreading to Somaliland, calling for vigilance and cooperation with regional and international partners to counter this threat.

148. It is notable that different armed groups maintain checkpoints along key entry points of the country to extract fees from travellers. People are thereby associated with their clans and have difficulties moving and working in areas in which their clans are not prominent. Even government checkpoints can be little efficient, as they are subject to corruption.⁴¹ There's presence of entry and exit checkpoints⁴² at each district within Somaliland, in addition to checkpoints on all roads leading in and out of Hargeisa City. However, these do not adversely hamper accessibility or mobility of residents.

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

Vulnerability and Social Exclusion

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

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

⁴⁰Security Council, S/2019/858, p.3

⁴¹ J. Sanya and I. Mwenda, Mogadishu. When Checkpoints don't work, Horn International Institute for Strategic Studies, accessed at: <https://horninstitute.org/mogadishu-when-checkpoints-dont-work/>

⁴² More details on the accessibility of Somaliland is available in the Somalia Key Socio-Economic Indicators: Country of Origin Information Report available [here](#).

152. IDPs commonly settle in informal urban settlements, where access to services and conditions is poor, and where they often become victims of forced eviction, sexual harassment, exploitation and forced labour. Conditions of displacement often compound existing conditions of vulnerability and poverty. They are therefore part of the poorest strata in Somaliland and are often in dire need of access to food, water, sanitation, health services, shelter and education.⁴³ Generally, the socio-economic and human development indicators for IDPs are worse than those of non-IDPs. While 1 in 4 Somalilanders are poor, over three in four IDPs live under 1.90 \$ per day.⁴⁴

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

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

Gender and GBV

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

156. Women make up the lion's share of the workforce in agriculture and pastoralism (both of which constitute nearly 85 percent of the local economy). Gender disparity is higher in upper grades due to economic constraints and early marriage. A Gender Gap Assessment⁴⁵ carried out by OXFAM (2019) revealed that the gender gap index in Somaliland is 0.45, indicating that women are severely disadvantaged through having fewer economic opportunities, de facto non-representation in political decision-making processes and lower educational attainments.

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

⁴³Internal Displacement Monitoring Center 2020, p. 30.

⁴⁴The World Bank, Somali Poverty and Vulnerability Assessment, Findings from the Wave 2 of the Somali High Frequency Survey, April 2019, p.73

⁴⁵ The OXFAM gender gap assessment for Somaliland is available [here](#).

maintenance of the home, often at the expense of the girls' education and skills development.⁴⁶ Further, as much as Somaliland's economy offers limited opportunities for formal employment, the OXFAM Gender Gap Assessment⁴⁷ (2019) found that women are twice as likely as men to be unemployed but actively looking for a job, at 30.1% of the female labour force compared to 16.4% among men.

158. While there is lack of statistical data on the situation of women in Somaliland, the available evidence shows that Somaliland women are still far from enjoying equal rights and treatment. While the Social Institutions & Gender Index for 2014 places Somalia on the 6th lowest position in the world, with 'very high' discriminatory family codes, 'very high' levels of restricted physical integrity, and a 'very high' level of restricted resources and assets, the situation in Somaliland is relatively more dire.⁴⁸ The continuation of practices, such as polygyny, early and forced marriages, FGM, and wife inheritance, continues to undermine development towards increased gender equality. Lack of access to services, such as education and health, or lack of access to agricultural production or other livelihoods and employment opportunities has kept most of the female population of Somaliland disempowered.

159. Insecurity for women is still the number one issue that prevents gender equality and women's empowerment from being a feasible objective. Somaliland has ranked prominently as one of 'the worst countries to be a woman'⁴⁹ and one of the 'worst countries to be a mother'⁵⁰. Women continue to suffer disproportionately from clan-fights and extremist interventions, with gender-specific barriers impeding their access to the job market while pervasive clannism/ favouritism over qualification posing a major barrier to employment. Formal security forces have proven to be weak in their willingness to protect women, and the justice system has failed survivors of conflict related GBV⁵¹, as well as the many survivors of domestic violence and FGM. Protracted conflict and fragility have increased fundamentalist religious interpretations, including the acceptance of pharaonic-type FGM/C by the younger generation.⁵²

160. The ongoing fragility, conflict and natural disaster like floods are responsible for an increasing number of IDPs within Somaliland, including a high proportion of women. They are often subject to poor security arrangements, which leave women and girls particularly vulnerable. In this context, as well as outside IDP camps, GBV/SEAH (particularly rape) is widespread, including as a tool between social units in conflict.⁵³ The UN has consistently reported that between 75-85% of GBV incidents collected through the Gender-Based Violence Information Management System (GBVIMS) are perpetrated against IDPs.⁵⁴

⁴⁶ Interagency Working Group on Disaster Preparedness for East and Central Africa.

⁴⁷ The OXFAM gender gap assessment for Somaliland is available [here](#).

⁴⁸ OECD Development Center, Social Institutions and Gender Index, 2014, accessed at: http://genderindex.org/ranking?order=field_sigi_value14_value&sort=asc

⁴⁹ See: <http://www.theguardian.com/world/interactive/2011/jun/15/gender-afghanistan>

⁵⁰ Save the Children, 'The Urban Disadvantage. State of the World's Mothers 2015', Fairfield 2015, p.9.

⁵¹ Implementation of the Beijing Platform for Action. Beijing +20 Review. Somalia Country Report 2014, p. 14

⁵² See, for example, NAFIS Network/MOLSA, Assessment of the Prevalence, Perception and Attitude of Female Genital Mutilation in Somaliland, 2014.

⁵³ See, for example, UNICEF 'Sexual Violence as a Weapon of War, accessed at: <http://www.unicef.org/sowc96pk/sexviol.htm>

⁵⁴ Somalia Humanitarian Country Team, 2019, Humanitarian Needs Overview, accessed at: https://reliefweb.int/sites/reliefweb.int/files/resources/Somalia_2019_HNO.PDF; UNFPA, September 2016, Somalia Gender Based Violence Sub-Cluster Bulletin, accessible at <https://somalia.unfpa.org/en/publications/somalia-gender-based-violence-sub-cluster-bulletin>; UNFPA, December 2016, Somalia: Gender Based Violence Sub-cluster Bulletin, accessed at https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec_GBV%20Bulletin%20%283%29.pdf; UNFPA, August 2015, Somalia: Gender Based Violence Sub-cluster Bulletin, accessible at <https://reliefweb.int/report/somalia/somalia-gbv-sub-cluster-bulletin-1-january-august-2015>

161. Available information indicates that SGBV/SEAH in the country is very high. In particular, sexual violence against women has been used as a tool of war, including leheyste-galmo, a form of sexual hostage-taking as well as child marriage, FGM/C (98% of female population in Somaliland), rape and intimate domestic violence (IPV) which already existed but were normalized after conflict.⁵⁵

162. Rape is increasing in prevalence, becoming more violent and taking on a more normalized form. There are reports of an increase of gang rape and “date rape” as a youth phenomenon driven by frustrations associated with lack of opportunity and access to marriage.⁵⁶ Rape case reports indicate that it primarily affects younger women between the ages of 11–25 years as well as children, both girls and boys. In Somaliland and IDP areas, perpetrators are often ‘uniformed’.⁵⁷

163. An initial assessment conducted by UNFPA and its implementing partners in flood-prone regions identified damages and access challenges to the health facilities and GBV/SEAH one-stop centers which support vulnerable women and girls including pregnant women and survivors of GBV/SEAH. Hence, the need for SRH and GBV services to the affected populations. At least 20,340 women and girls are estimated to be at risk of GBV/SEAH as the displacement weakens traditional family and community protection mechanisms. Recurrent floods, drought, protracted conflict and armed attacks in Somaliland have resulted in insecurity, major protection challenges, food insecurity and also extremely weakened basic socio-economic services.⁵⁸

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

165. Most domestic and sexual violence cases are dealt with through the customary and Sharia legal systems. Anecdotal evidence indicates that some customary practices result in double victimization of women and girls, denial of justice for many survivors, and impunity for perpetrators. The customary justice system is focused on clans. Justice is delivered for the clan rather than for the survivor of the sexual violence. Traditional approaches to dealing with rape seek resolution or compensation through negotiation between clan members. Restitution is paid to the clan and not to the survivor. Once restitution is paid, the perpetrator of the sexual violence is free from further punishment and the case is considered finalized. In some cases, the woman or girl is forced to marry the perpetrator of the violence as a form of “restitution” ordered by customary courts. The customary system is widespread, and many families and clans choose it over other justice systems.⁵⁹

166. In view of inheritance and access to resources, women are exposed to housing, land and property violations, especially land-grabbing and denials of inheritance. The fact that, after marriage, 11 women will likely enter a different family limits women’s inheritance. Investing in women is perceived as a misuse of scarce resources in times of poverty and conflict. Therefore, women rarely inherit valuable assets such as land and income-producing animals. Also, women are not considered principals; they are

⁵⁵ Expanding Access to Justice Program, Gender Assessment, 2019.

⁵⁶ Ditto.

⁵⁷ For example, security and law enforcement officials, AMISOM, gang-members and/or freelance militia

⁵⁸ UNFPA Flood Response Situation Report, November 2019.

⁵⁹ UNDP 2018

not diya-paying members and thus do not usually share in diya receipts, even if they relate to a violation against them. This creates important vulnerabilities for women, while a woman must be protected by her clan members by convention, as a non-diya paying member and one who cannot contribute to clan security in times of conflict, women will always be less valuable and more dispensable.⁶⁰

167. On the other side of gender, since the war in 1991, the majority of men lack the resources to fulfil their gender specific expectations and responsibilities. Men have become vulnerable and are at risk of revenge killing a war-related phenomenon that affects male mobility and work opportunities which puts pressure on women to act as breadwinners. Men have been forced to leave outside of their clan territory, which makes them leave in constant fear without the protection of the clan.⁶¹ Interventions for women and children should consider the well-being of the family as a whole. A positive engagement with the issues confronting Somali men should be part of any attempt to address the needs of women and children.

⁶⁰Expanding Access to Justice in Somalia Program 2019.

⁶¹J. Garder and J. El-Bushra, The impact of war on Somali men and its effects on the family, women and children.

7. CONSULTATIONS AND PUBLIC DISCLOSURE

7.1. INTRODUCTION

168. The World Bank ESS10 “Stakeholder Engagement and Information Disclosure” recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

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

170. The project will engage a large and diverse array of stakeholders during planning and implementation. The Government of Somaliland will be responsible for project implementation and management, together with contracted implementation partners, who will implement project TVET interventions throughout the selected regions and districts, in partnership with local organizations where possible. Non-state stakeholders—such as community leaders, citizens who benefit from the services provided, education workers, disadvantaged and vulnerable groups and their representatives and advocates, etc.—will be involved regularly throughout the life of the project. Additional diverse groups—such as private education providers, including universities in Somaliland, international NGOs working in the education sector, and civil society groups—will also be engaged as appropriate. Relationships with existing non-government actors—including UN agencies, NGOs, and private sector organizations—will also be established and/or enhanced to ensure the project leverages the activities of the agencies within the education sector in Somaliland.

7.2. STAKEHOLDER ANALYSIS OF THE PROJECT

171. In accordance with the ESS10, the stakeholders of the Somaliland Empowering Women through Education and Skills Project (Raja Kaaba) are categorized into two:

1. Project Affected Parties (PAPs)
2. Other Interested Parties (OIP)

Project Affected Parties:

172. These are persons, groups and other entities within the Project Area of Influence (PAI) that are impacted or likely to be impacted directly or indirectly, positively or adversely, by the project. Such stakeholders are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. This category of stakeholders includes young girls, women and mothers, instructors in NFE schools both public and private, administrators, communities that will directly benefit from education support, the MoES staff and other government institutions; and staff that will be involved in service provision.

Table 7: Project-Affected Parties

No	Stakeholders	Description	Area of interest
1	Somaliland citizens, especially women and girls.	<p>Somaliland citizens are the primary beneficiaries of services offered by the project. Their views about the potential environmental and social risks are essential in identifying and mitigating those risks. Their feedback about the project implementation is crucial to the overall success of the project and elicits views from disadvantaged groups and particularly from women themselves who are the main beneficiaries of the project.</p> <p>Provision of quality education services for all members of the society (especially women and youths and Vulnerable and Marginalized Groups (VMGs)⁶²) will lead to a population with higher literacy levels.</p> <p>The women and the girls across Somaliland who may not have been able to finish their studies for various reasons are important parties for the project. Also, young women who might want to enroll into higher learning institution to be part of the political, and administrative leadership of the country. These include the vulnerable groups like the minority groups, disabled persons, IDPs, orphans, widows, etc.</p>	<ul style="list-style-type: none"> - Equitable access to these institutions. - Clear and transparent process to select those who will participate or those to be enrolled. - Clear and transparent process on how to hire the instructors to offer the services.
3	Ministry Officials at the Ministry of Education and Science at all administrative levels	The respective department under the MoES will have implementation responsibility through a dedicated PIU. The MoES will hold overall responsibility of managing all the components of the project.	<ul style="list-style-type: none"> - MoES identifies and meaningfully engages with partners in all aspects of the project. - The coordination at all regional and district levels are done in a transparent and accountable manner. - Principles of engagement are observed in all aspects of consultation at the different levels. - Selection of the proposed college of

⁶² Vulnerable and Marginalized Groups

No	Stakeholders	Description	Area of interest
			women site and schools to be used/ for purposes of the second chance and life skills training. - Clear and transparent process related to Skills Development Fund establishment and award of funds. - Clear and transparent process on procurement of renovation services and provision of supplies and equipment for proposed university campuses
4	Ministry Officials at the Regional and District levels	The Ministry officials (Education Officers) at this level will be responsible for the day-to-day implementation of the project activities and policies.	- The selection of districts to be supported is based on a transparent criterion. - The coordination between the State and districts is done in a transparent and accountable manner. - Principles of engagement are observed in all aspects of consultation at the different levels.
5	TVET institutions and universities	The TVET institutions will partly host the NFE trainings and the life skills training; the university will host the women’s university.	- Meaningful engagement with the TVET administrators and the CECs on the utilization. - Transparency in the process of TVET selection through the Skills Development Fund.

Other Interested Parties (OIPs):

173. These include individuals/groups/entities whose interests may be affected by the project and who have the potential to influence project outcomes. OIPs may not experience direct impacts from the Project, but they may consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Such stakeholders include Civil society organization at both the local and international level, and other CSOs and NGOs who may become project partners. This group also includes national or local regulatory authorities that are entrusted with the protection of cultural heritage and nongovernmental organizations and cultural heritage experts, including national and international cultural heritage organizations. Others include business owners and providers of services, goods and materials within the project area who may be considered for the role of project’s suppliers; mass media and associated interest groups, including local, regional and national print and broadcasting media, digital/web-based entities, and their associations, among others.

174. The partners whose interests may be affected include CSOs, NGOs, and partners engaged in the education sector in the country, NFE providers, Universities, development partners (or IPs) supporting the education sector, business companies employing women and entities that may be involved in the provision of services.

Table 8: Other Interested Parties

Stakeholders	Description	Area of Interest
CSOs and NGOs	Most development activities in rural and remote parts	- They complement government

ESMF for Raja Kaaba Project in Somaliland (P176898)

Stakeholders	Description	Area of Interest
operating in the identified project districts.	of the country are led by NGOs and CSOs funded directly by donors and religious bodies, and they also represent the vulnerable groups. They have social capital that the project can tap into.	<p>services in different areas, including education.</p> <ul style="list-style-type: none"> - There is transparency and accountability in all aspects of the engagement. - Principles of engagement are observed in all aspects of the consultation.
<p>Other Ministries:</p> <p>Ministry of Finance Development (MoFD), Ministry of Employment, Social Affairs and Family (MESAF), Ministry of Public Works, Land and Housing (MoPWLH), Ministry of Interior, Ministry of Information and Communication Technology (MICT), Ministry of Environment and Climate Change (MoECC)</p>	<p>The other line Ministries will be involved in as far as the implementation of specific activities and linkages with ongoing interventions are required, some of the key roles include:</p> <p>Employment and Social Affairs providing policy direction and guidance on all labor administration, particularly areas of protection and development of the labor force.</p> <p>Interior Affairs ensure security of project workers and investments.</p> <p>Social Affairs and Family ensure women representation and safeguard the human and family rights.</p> <p>The MoECC provides necessary advice on the area of regulation, forest protection, minimization of air pollution, preservation of bio-diversity and ensures environmental risk by the project is properly managed.</p>	<ul style="list-style-type: none"> • Implementation of specific activities and linkages with ongoing interventions. • Relevant policies and frameworks are followed.
Program Implementation Partners (UNICEF, etc.) (shortly referred to as Implementing Partners (IPs) or Development Partners)	Most of the education activities are supported by donors who tend to fund the activities separately.	<ul style="list-style-type: none"> • Principles of engagement are observed in all aspects of the consultation process. • Information is shared in a timely manner.
Contractors and Consultants	These are part of service providers who have interest in the project.	<ul style="list-style-type: none"> • Transparency in project implementation and design. • Transparency in project hiring and procurement. • Continuous engagement and information sharing.
Media and online platforms of communication	The role of the media is key in keeping people informed about the project. Media can also be used to share grievances and complaints on project activities.	<ul style="list-style-type: none"> • Information shared by the media will be accurate • Complaints and grievances shared on social media platforms will be picked and addressed as necessary
Third-party Independent Verification Agency (IVA)	IVAs will be deployed to monitor overall project implementation, including the implementation of environmental and social risk mitigation measures. The IVAs will report non-compliance to the PMU and	<ul style="list-style-type: none"> • Project interventions are implemented as planned and monitoring results achieved throughout the project life cycle.

Stakeholders	Description	Area of Interest
	directly to the World Bank.	

175. Marginalized and Vulnerable Groups: persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerability and that may require special efforts to ensure their equal representation in the project consultation and decision-making processes.

176. The vulnerable groups identified for this project include pastoralists, and women with disabilities, IDPs, minority groups, etc. The SEP contains an Inclusion Plan to ensure that disadvantaged and vulnerable groups in Somaliland are properly identified, consulted upon, engaged with, and are included in project benefits and activities.

177. The government of Somaliland will maintain and disclose as part of the environmental and social assessment, 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 taken into account, or the reasons why it was not. In this context, the Project in Somaliland has conducted a one-day workshop on the 10th of February 2025 at the ASSOD Hotel, Hargeisa. Key stakeholders from the Ministries of Education, Finance, Employment and Social Affairs, Higher Education Commission, Universities, and Civil Society Organizations participated in the event. In total 31 participated in the workshop, of which 10 females and 21 males. See Annex 2 for minutes of meeting and participants list.

7.3. STAKEHOLDER ENGAGEMENT ACTIVITIES OF THE PROJECT

178. The design and priorities of the project have been discussed and refined through a series of engagements between the World Bank and Somaliland representatives, including a joint project identification mission conducted between the World Bank and the Somaliland representatives virtually 13th – 15th December 2021 and subsequent meetings in January and February 2022 which involved important stakeholders including line ministries, , and development partners such as UN agencies.

179. In addition, consultation meetings were held with project stakeholders, especially institutions present in the education space in Somaliland. The initial consultations were held on October 11, 2021, in Mogadishu, while a follow-on workshop was held on February 7, 2022.

180. The Somalia and Somaliland governments conducted two project-specific essential stakeholder consultations. Initial stakeholder consultations began on October 11, 2021, when a consultative workshop was organized in Mogadishu for leading women in the educational sector as well as leading women activists and promoters of women’s education. The one-day workshop included lively discussions revolving around a set of previously prepared questions that aimed to establish a foundation for the project by listening to the first-hand accounts of women on the frontline. The workshop was held in two sessions: the first session focused on the prospects of second chance education initiatives for young women and girls, and the second session focused on the provision of skills for employment and livelihoods.

181. **A follow-on stakeholders’ consultation workshop was conducted virtually on February 7, 2022.** The session was attended by MoECHE officials, Education officials, private education sector groups, national and international organisations with activities, projects and programs in the education

sector in Somalia, women groups, representing of vulnerable groups, minority groups and persons with disability. This second consultative workshop focused primarily on highlighting the key expected Environmental and Social risks and impacts, proposed mitigation measures as contributed by the participants, as well as the various project instruments that are required for E&S safeguarding.

182. The Project continued efforts to engage stakeholders in the preparation of key E&S instruments necessary for kick off. As mentioned above, the Project in Somaliland has conducted a one-day workshop on the 10th of February 2025 at the ASSOD Hotel, Hargeisa. Key stakeholders from the Ministries of Education, Finance, Employment and Social Affairs, Higher Education Commission, Universities, and Civil Society Organizations participated in the event. In total, 31 participated in the workshop, of which 10 females and 21 males. The Project management introduced the participants to the Project objectives and key components to be implemented in Somaliland, including group discussions on the expected E&S risks and impacts, and how this project will contribute to the overall development of the education sector in the country, in addition to challenges, and opportunities for cooperation and expansion. See Annex 2 for minutes of meeting and participants list. Table 11 is the Summary of stakeholder consultations undertaken under Somalia Empowering Women through Education and Skills Project in Somaliland.

Table 9: Consultation Meeting on 11th October 2021

No	Issues raised	Responses
1	Basic skills as a priority need for women’s well-being and success.	The participants agreed that it was a key priority for women to have the basic skills of Somali language reading and writing as well as basic calculation skills.
2	Factors that have interfered with girls’ ability to complete their primary education besides the lack of access to affordable schools nearby.	a) Cultural beliefs also act as hindering factors. b) Early marriage and the environment at home. c) Abuse and harassment in the school placed) d) Insecurity
4	Activities to be incorporated into second chance programs to help ensure girl’s retention and completion once enrolled.	a) Ensuring there are more qualified female teachers/instructors to create an overall supportive environment. b) Teaching them on their basic rights, how to defend themselves against abuse and harassment and what the channels of support are, is also an important factor. c) Providing guidance and counselling for family members to raise their awareness and allow them to become more supportive of the girls and young women seeking second chance education. d) Provision of safe transportation solutions to mitigate the harassment and security risks related to travelling to school, e) Provision of safe places and good infrastructure such as clean private toilet facilities, and cool air-conditioned environments, private prayer facilities, financial incentives, employable skills, funding for starting businesses, and free child-care services on site.

		<p>f) Providing on-going motivation throughout the program through organizing motivational speeches or debates and creating school-papers.</p> <p>g) Focusing on business skills along with basic skills such as digital marketing, product design, inventory, communications, human resource management, financial management and accounting which are key skills for the successful implementation of employable skills. Some of the other key skills recommended besides basic skills of reading and writing, and calculation are daycare as a profession; teaching; hospitality; nutrition; and handcrafts such as jewelry.</p> <p>h) Creating strict supervision and quality assurance mechanisms for any new second-chance education programs to ensure a long-lasting positive impact.</p> <p>i) Creating a public relations department within these programs dedicated to following up with girls who drop out of the program, understand the reasons for leaving the program and offering them support in the form of at-home education options for those who are willing to continue learning.</p>
5	Initiatives that could help families and husbands encourage young women to attend second chance education programs.	<p>Second-chance education programs that:</p> <p>a) conducted at an appropriate time.</p> <p>b) there is some form of financial incentives.</p> <p>c) there is the prospect of employment/self-employment</p> <p>d) the education is provided for free, at safe environments</p> <p>e) there is no extra burden placed on the families such as extra childcare responsibilities.</p>
8	Efforts to help women work outside the home.	Participants indicated that while it is overall highly recommended for young women and girls to seek some form of financial independence either by self-employment or seeking a job outside the home.

7.4. PLANNED STAKEHOLDER ENGAGEMENT ACTIVITIES

183. The project interventions are countrywide. Therefore, the project stakeholder engagement activities need to be streamed horizontally and vertically.

184. The horizontal stream implies an engagement with stakeholders on a national level. Activities on the horizontal level are assumed to improve awareness and coordination of efforts in the implementation of planned construction activities, enrolment of students and general management of the project activities. On the other hand, vertical stream implies the application of cascading mode which will allow the project to establish communication with project-affected parties. Table 12 below presents the stakeholder engagement activities envisaged under the project.

Table 10: Stakeholder Engagement Matrix for Somaliland Empowering Women through Education and Skills Project – “Raja Kaaba”

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Beneficiaries including disadvantaged and vulnerable individuals and groups		
Project design, verification of existing and location/sites for projects	PMC Project Social Safeguards Consultants	<ul style="list-style-type: none"> - CSOs - NGOs - CECs - Communities 	<ul style="list-style-type: none"> - Public announcements - Face-to-face meetings. 	First-hand assessment of the local people’s perceptions of potential project benefits and risks
Screening of the proposed projects	PMC, Ministry Officials, Social Safeguards and other stakeholders	<ul style="list-style-type: none"> - CSOs, - Affected groups (IDPs, pastoralist / nomadic communities) - Community leaders/elders/ women leaders - Key informants 	<ul style="list-style-type: none"> - Public announcements - Face-to-face meetings - Virtual meetings 	Identification of concerns on project impacts, and feedback from would-be affected persons
In-depth study of risks and benefits taking into consideration, inter alia, the conditions that led to community consensus	PMC, Project Consultants (Social Safeguards Specialist), NGOs, CSOs, Other knowledgeable persons GBV/SEA specialist	<ul style="list-style-type: none"> - Would-be affected individuals and groups - Locally based CSOs/NGOs - Community leaders/elders/ women leaders - Key informants 	<ul style="list-style-type: none"> - Formal/informal interviews - Focus group discussions - Discussion on specific impacts, alternatives, and mitigation; etc. 	More concrete views of project impacts and feedback on possible alternative mitigation and development measures
Implementation	PMC (social safeguards specialist Locally based NGOs/CSOs GBV/SEA specialist	<ul style="list-style-type: none"> - Disadvantaged and vulnerable groups - Community leaders/elders/ women leaders and other stakeholders 	Committees (formal or informal)	Implementation of the SEP (incl. Inclusion Plan).
Monitoring and Evaluation	PMC (social safeguards specialist) NGOs & CSOs	<ul style="list-style-type: none"> - Individuals and groups of the disadvantaged and vulnerable 	Formal participation in review and monitoring	Identification and resolution of implementation issues, effectiveness of the Inclusion Plan.

7.5. THE STAKEHOLDER ENGAGEMENT PLAN (SEP) OF THE PROJECT

185. A detailed Stakeholder Engagement Plan (SEP) was prepared for the Somaliland Empowering Women through Education and Skills Project (Raja Kaaba) which provides details about the affected and interested stakeholders. The SEP seeks to define a structured, purposeful, genuine, and culturally appropriate approach to consultation and information disclosure. The Somaliland recognizes that the

project's stakeholder profile is diverse and heterogeneous and that their expectations and orientation, as well as the capacity to interface with the project, are different.

186. The SEP will assist the Government to identify different stakeholders and develop an approach for reaching each of the identified groups. It provides an appropriate approach for consultations and disclosure. These in turn are expected to create an atmosphere of understanding that actively involves project-affected persons (PAPs) and other interested parties, reaching out to them in a timely manner and that each group is provided opportunities to voice their opinions and concerns.

7.6. GRIEVANCE MECHANISM (GM)

187. In compliance with the World Bank's ESS10 requirement, a project-specific grievance mechanism will be set up for this project at the MoES. Accurate communication materials for the GM will be developed to help residents to familiarize themselves with the grievance redress channels and procedures. The PIU within the Ministry of Education and Science will implement a grievance mechanism to ensure that it is responsive to any concerns and complaints, particularly from project-affected parties and communities.

188. The Project GM would help to respond to concerns and grievances of project-affected parties related to the performance of the project activities and interventions. The GM would make sure that grievances, adverse effects and perceived injustices are responded to and mitigated.

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

190. Transparency and accountability will be core elements of the Project. The GM 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.

191. As per World Bank standards, the GM will be operated in addition to GBV/SEAH Prevention and Response Action Plan, which includes reporting and referral guidelines (there will be a stand-alone GBV/SEAH Prevention and Response Action Plan developed for this project). The GM will also operate in addition to specific workers' GMs, which are laid out in the LMP and will include channels for safe and confidential reporting of cases of GBV/SEAH.

192. **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 public regarding any aspect of program implementation. Potential complaints include:

- i. Fairness of contracting;
- ii. Fraud or corruption issues;
- iii. Inclusion issues;
- iv. Social and environmental impacts;
- v. Payment related complaints;

- vi. Quality of service issues;
- vii. Inefficient use of funds;
- viii. Workers' rights;
- ix. Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and sexual harassment;
- x. Forced labor, including human trafficking and use of prison labor;
- xi. Child labor; and
- xii. Threats to personal or communal safety.

193. The MoES will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with the Government of Somaliland's laws and regulations, and World Bank's 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 Safeguards Specialists at the state, regional and district levels who will receive grievances by phone, text or email to publicized toll-free mobile phone lines and email addresses at state, regional and district levels. The social safeguards 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 PIU Social Specialist will carry out training of all Project Implementation Unit staff and MoES's staff involved with the project, and contractors, on receiving complaints and referral and complaints handling and reporting and will oversee awareness-raising on the GM at the national level.

194. **A Grievance Redress Committee (GRC)** will be established at the national level chaired by the project manager, and the relevant staff will be included as necessary depending on the complaint (procurement, finance, monitoring and evaluation (M&E), GBV Specialist and communication). The Social Safeguards 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, and the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the GM system and the project. Immediate meetings will be held in case of significant complaints to be addressed at the MOES/PIU level. Significant complaints will be outlined in the GM manual. For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, the PIUU(through a social specialist) in the field should immediately inform the GBV/social specialist or head of the PIU, who will coordinate the message with the PMU , to inform the World Bank within 48 hours as per the Environmental and Social Incident Reporting (ESIRT) requirements.

195. Considering the limited capacity in the Government system, the Ministry may engage the support of CSOs working in the project areas to support the GM activities or NGOs/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 GM 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).

196. **Receive and Register Complaints:** The beneficiaries will have multiple ways of channeling complaints on any aspect of the project. This will be through, mobile phones, community meetings, email and websites. There will also be opportunities for in-person reports at the community level

through community leaders. Once the complaints have been received, the GM focal point will log them into the Complaints Register.

197. **Acknowledge, Assess and Assign:** An acknowledgment of receipt will be sent to the complainant within 7 days of receipt of the complaint. The GM focal point will assess the complaint and assign it to the relevant team, PIU or other level of implementation (e.g., Education Administrations at the regional/district levels). For instance, if the complaint is about the contractors, primary suppliers or the lack of community engagement, the issue will be forwarded to the relevant group/agency to address. All cases will be treated with utmost confidentiality.

198. **Incident Reporting:** Incidents that are considered severe, which cause significant adverse effects on the environment, the affected communities, the public or workers, e.g., fatality, GBV, forced or child labor, will be reported by the PIU to the PMU and the WBG within 24 hours (details on this process are described in the Labor Management Procedures).

199. **Where grievances are of sexual nature and can be categorized as GBV/SEAH risks,** the will handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the SEAH Prevention and Response Action Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GM operators and relevant project staff.

200. **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. 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 GM. 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.

201. **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 only for non-GBV related complaints, will include the name of the person reporting, district, State, cooperating partner where applicable, project activity, and the nature of the complaint or grievance.

202. **Propose a Response:** The GM 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 PIU 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/SEAH Prevention and Response Action Plan.

203. **Where a negotiated grievance solution is required,** the PIU 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.

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

205. **Implement the Response:** The GM 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 GM focal point will guide the individual or group to seek alternative grievance resolution mechanisms including mediation, arbitration, and judicial processes.

206. **Review of the Grievances:** The GM 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 GM focal point will record the actions recommended by the GM team and file a monthly report to the PIU. Most importantly, all cases filed will need to be logged and monitored by the PIU, contractors and primary suppliers. The Figure 2 below is about the process to be adopted by the project in managing grievances of this Raja Kaaba Project in Somaliland.

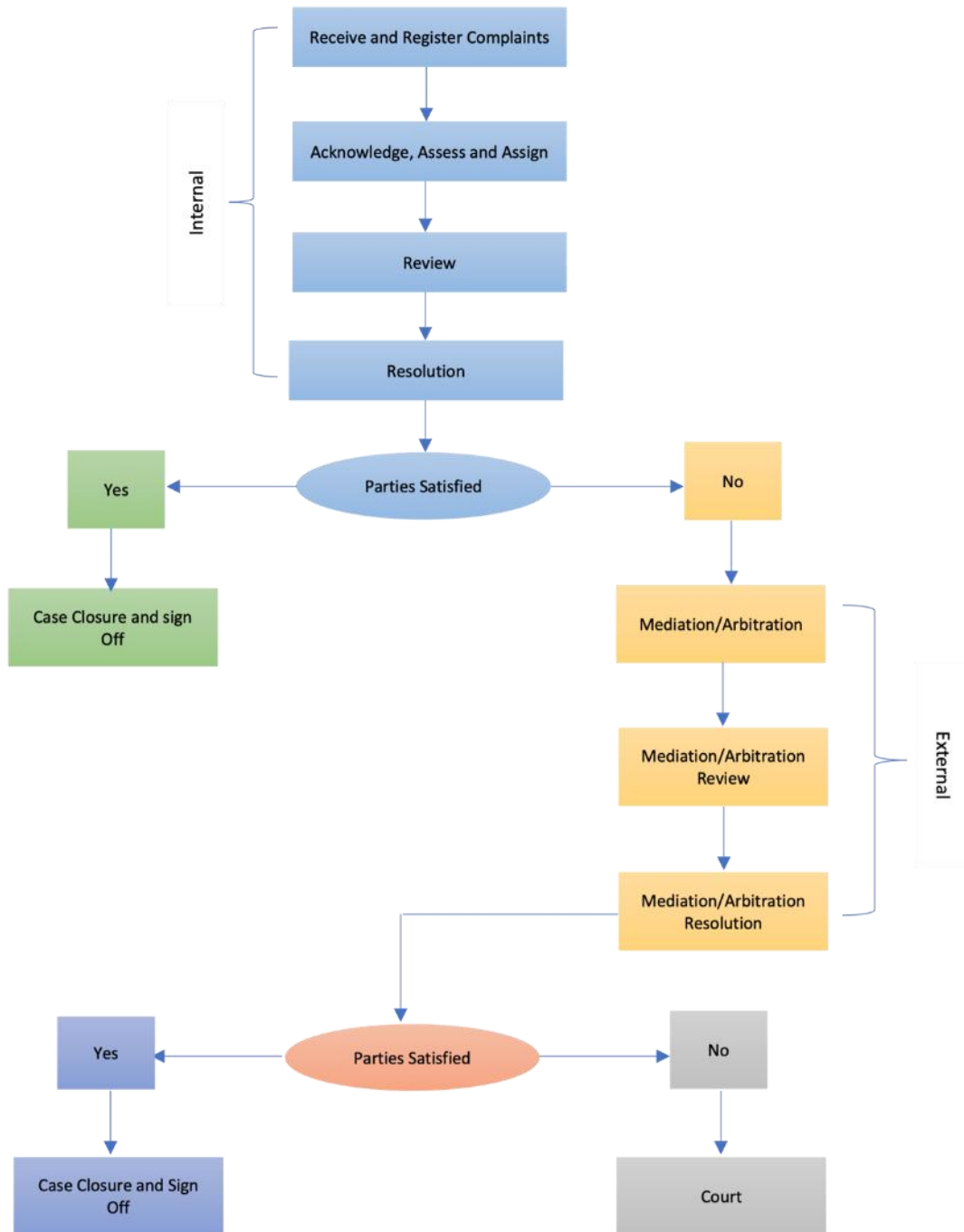


Figure 2: The process to be adopted by the project in managing grievances.

Monitoring and Reporting of the GM

207. The PIU at the MoES, specifically the Social Safeguards Specialist, will be responsible for monitoring the access to and implementation of the GM by the PIU itself.. The Specialist will include the GM in his/her supervision and monitoring missions to the field and conduct spot checks on its implementation, or, where access is difficult delegate to a focal person to do so.

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

209. 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. They will further maintain a documented record of stakeholder engagements, including a description of the stakeholders consulted, a summary of the feedback/grievances received during community consultations. The PMU will extract lessons from the GM and conduct an analysis on the overall grievances and share the results with the PIU.

World Bank’s Grievance Redress Services (GRS)

210. 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.

211. 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 (<http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>).

212. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org. A complaint may be submitted in English or Somali, although additional processing time will be needed for complaints that are not in English. A complaint can be submitted to the Bank GRS through the following channels:

- By email: grievances@worldbank.org
- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA.

Information Disclosure Procedures

213. The table 13 below outlines what information should be disclosed on the project and how this shall be done.

TABLE 11: PROJECT INFORMATION DISCLOSURE

Information to be Disclosed	Method of Disclosure	Target Group	Responsibility
Before Appraisal			
Disclosure of PAD, SEP and ESCP	Website MoES and WBG, with summary of SEP and ESCP in Somali	All key stakeholders	PMU/PIU
After Appraisal			
Disclosure of the project documents ESMF, Updated SEP, LMP, RPF, and GBV/SEAH prevention and	- Websites - MoES and WBG. - Brief summaries of the main features of the	- MoES and all partners involved in the project - Open access to all interested parties	- MoES PIU -

ESMF for Raja Kaaba Project in Somaliland (P176898)

Information to be Disclosed	Method of Disclosure	Target Group	Responsibility
response Action Plan.	project SEP, LMP, RPF/RAPs, ESMP, ESCP and GBV/SEAH prevention and Response Action Plan in Somali	- All beneficiaries.	
During Implementation			
ESMP & ESIA for WDCs, ESCP, GM, GBV/SEAH Prevention and Response Action plan and ToR, as well as RAPs	<ul style="list-style-type: none"> - Website - Local administration offices - PIU and at the respective project sites 	<ul style="list-style-type: none"> - Beneficiaries - Contractors - The community at large 	<ul style="list-style-type: none"> - PIU - Social Safeguards Specialist - GBV specialist
Monitoring and Reporting			
Quarterly Annual report on progress and lessons learnt, complaints resolution and feedback	<ul style="list-style-type: none"> - The official website of the Ministry of Education and Science - Stakeholder consultation meetings - Print, audio and visual media outlets 	Key stakeholders and project beneficiaries at State and regional levels including vulnerable groups or their representatives	<ul style="list-style-type: none"> - PIU - PMU - Project Steering Committee (PSC)

8. IMPACT & RISK CLASSIFICATION AND ESMF PROCEDURES

8.1. INTRODUCTION

214. The implementation of components under the Somaliland Women Empowering project will have a number of social and environmental benefits. The social benefits include:

- The key physical footprint of this project will be the construction of a Somali Women University in Hargeisa and offering of second chance for youth which will contribute to the skills and qualifications of women in Somaliland;
- Improve gender equality in the tertiary levels of education and schooling and supports the education investments by families for both males and females;
- Lower literacy levels in addition to restrictive social- cultural norms, the risks and fear of gender-based violence such as sexual harassment and rape are some factors that keep women within the household and prevent them from searching for employment/ opportunities;
- Minimize gender-specific barriers as women suffer from the precarious labour market situation in general and access to employment, including favourism resulting from clanism over qualification;
- Contribute to disrupt negative social norms around early marriage, expectations that girls support households and rearing of younger siblings and greater 'social value' in boys accessing education over girls also play a role in lower enrolment rates of girls
- improving women participation in learning by introducing incentives for increasing and maintaining their enrolment to improve the gender situation in Somaliland;
- overall, the project will contribute towards the development of social cohesion and national stability in the longer-term.

215. These anticipated benefits would also be enhanced by increasing community engagement in the Project phases, showcasing achievements to key stakeholders (such as increased percentage of female education and enrollment in higher education, as well as increased rate of participation in labor market) and ensuring design of activities are in compliance with cultural and traditional context of each individual area.

8.2. ENVIRONMENTAL, SOCIAL AND SEA/SH RISK CLASSIFICATION AND RATING

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

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

ESMF for Raja Kaaba Project in Somaliland (P176898)

217. The physical components of the project are civil works related to the renovation and operation of existing WDCs and women colleges. The impact of the civil works is expected to be medium scale, localized and reversible. There are, therefore, no significant or irreversible adverse environmental issues anticipated from the activities to be financed under the project. The extent of civil works will range between minor to moderate, which would impose different levels of significant impacts on E&S aspects. A closer look at the level of significance will be included in the site-specific ESIA/ESMP, once locations have been determined.

218. The engineering capacity of the client is nascent and growing with regards to construction of small-scale civil works. However, the client's ability to apply the World Bank ESF is limited due to lack of appropriate technical capacity for safeguards at the MoES. In addition, the country risks are extensive due to political and security considerations. The ability for the World Bank to supervise environmental and social risk management is limited. Limited renovation work specifications will conform to the government policy prototypes, align with agreed standards (safe, inclusive, resilient, and climate-smart), and incorporate a modular approach as appropriate to suit local needs so as to ensure optimal coverage. The project will also adhere to the national construction standards by the Ministry of Public Works, Land and Housing which establishes standards for construction or renovation projects funded by, or on behalf of, the government of Somaliland. The ministry's building standards put emphasis on ensuring that such buildings are accessible to persons with disabilities (PWDs), i.e., PWD-friendly, through "universal design," which ensures usability by all people, to the greatest extent possible, without the need for adaptation or specialized designs. The overall environmental and social risk rating is "substantial to moderate" under World Bank's Environmental and Social Risk Classification system (ESRC). The limited renovation works of Somaliland existing educational campuses presents the single largest environmental challenge. However, it will be implemented in compliance to the national construction standards as regulated by the Ministry of Public Works, Land and Housing which establishes standards for construction or renovation projects funded by, or on behalf of, the government of Somaliland, and the World Bank.

219. A detailed Environmental and Social Impact Assessment (ESIA) will be carried out at the specific site of the construction, and Environmental and Social Management Plans (ESMPs) will be in place during the construction phase of each of the WDCs and women colleges, as well as during operation.

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

- This ESMF;
- The Resettlement Policy Framework (RPF);
- The Stakeholder Engagement Plan (SEP);
- The Labour Management Procedures (LMP);
- GBV/SEAH Prevention and Response Action Plan; and
- Security Management Framework

221. The ESCP also requires compliance with ESIA, ESMPs, Resettlement Action Plans (RAPs), SEP and LMP, which will be prepared for the project.

8.3. ENVIRONMENTAL AND SOCIAL ASSESSMENT PROCEDURE

222. **Step 1:** Screening is the first step in the ESMP preparation process. The proposed construction sites of WDCs and women colleges will be subjected to the screening process to determine and assign it an environmental and social risk rating and further identify potential sensitive environmental and social receptors likely to be negatively impacted. This also goes for other activities and interventions of the Project, such as providing life skills training programme, in particular, those involve practical training and use of resources. The process will also identify critical issues that might be triggered by the components and would need further detailed investigations during environmental and social assessments. This process will also help in advising which safeguards tools (ESIAs, ESMPs, RAPs, etc.) will be required. See Annex 3 for indicative screening checklist, including proposed exclusion criteria.

223. **Step 2:** Screening of designs for each sub-project site and training programme: The design for sub-projects/ training programmes will be a key measure in terms of minimizing/managing potential Environment, Health and Safety (EHS) impacts and risks including those on resource efficiency, pollution prevention, OHS, community health and safety. Designs of the sub-projects/ training programmes will be screened to ensure proper consideration of EHS requirements against relevant provisions of the WBG EHSGs, especially when targeting skills of agriculture and renewable energy. These draft designs once screened in, will be further reviewed, and approved by project engineers in close consultation with international development partners (UNOPS as one option).

224. Design considerations investigated would include, but not limited to: optimized natural lighting to minimize the use of electric lighting and natural ventilation in buildings by using appropriate-size window apertures; energy efficiency measures; and environment-friendly features, including use of automatic controls for efficient lighting systems with controlled luminance and using LED bulbs and solar panels to replace or reduce their current power source. The use of diesel generators will be avoided to reduce the emission of CO₂ during service life. If and where required, water boreholes would be dug at safe distances from toilets to prevent the contamination of groundwater.

225. **Step 3:** Development of E&S instruments. Based on the findings of the environmental and social screening, the team will proceed to the next step of development of environmental and social instruments in the event that significant environmental and social impacts are anticipated. Environmental Impact Assessment instruments will analyze alternative sites of WDCs in terms of their expected E&S risks and impacts, as well as alternative training techniques that would cause less harm to the environment, participants/ trainers, and communities. The team will therefore prepare the following environmental and social documents:

- a. Site-specific Resettlement Plans (RPs); and
- b. Site-specific Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) covering both construction and operation phases.

226. **Step 4:** Review and approval. The draft environmental and social instruments prepared will be submitted to the Project Implementation Unit, who will review and disclose on official sites, and in turn forward these draft documents to the World Bank ESF team supporting this project, for finalization prior to submitting to the WB for final clearance. The World Bank will internally review the submitted instruments carefully and will likely have suggestions for quality improvement, including enhancing the proposed environmental and social mitigation measures. After clearance by the World Bank, the project team can go ahead and implement the sub-projects, including allowing contractors to move on and commence civil works/ training programmes. It is important to note that all project work bids and contracts will include the necessary EHS terms and conditions, including those from the standard WB

procurement documents for works and require the construction contractor to prepare a Contractor Environmental and Social Management Plan (C-ESMP).

227. **Step 5:** Implementation, monitoring and reporting. In this instance, the project teams in the targeted districts will ensure that specific requirements on contractor management, including incorporating EHS requirements, are incorporated into bidding document and contracts. Contractors are duty bound to ensure that they report as accurately as possible on incidents and accident in the course of the construction and operation of the pilot university campus, colleges and WDCs, as well as during delivery of life skill training programmes and other Technical Assistance (TA) activities, supported by the project in Somaliland. The environmental and social screening would involve:

- reconnaissance of the university campus, women colleges, and WDCs' construction, settings and their surrounding areas;
- identification of the major activities and interventions to be implemented;
- preliminary assessment of the impacts of these activities on the ecological, physiochemical and environment of the construction surrounding areas; and
- potential impacts on the individuals, households and communities living in the project area.

228. Key environmental and social risks identified as crosscutting for the project include labour and OHS. The project investments will be considered in the environmental and social assessments. Specific environmental and social risks for each project component are mainly linked to processes and capacities of key stakeholders for environmental and social risk management.

9. ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

9.1. ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS (ESS1)

229. This section discusses the guideline to predict the potential risks and mostly typical impacts on the key environmental and social parameters of the project. The overall risks and impacts of the project are High as its more likely that the adverse risks and impacts could be minimized or eliminated by adopting standard mitigation measures; there is also a scope to enhance some of the beneficial impacts to be generated from the project.

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

- For each site of WDCs and women colleges once determined, ESIA or ESMP will be prepared;
- The LMP will guide how project related labour will be sourced and managed in a manner that reduces harm on all categories of workers;
- The SEP will set out effective and transparent management of consultation and information disclosure processes. The SEP will include a Grievance Redress Mechanism (GRM) and Inclusion Plan as key components;
- A GBV/SEAH Prevention and Response Action Plan, which will articulate the key risks and mitigation measures to address GBV/SEAH risks, identification of GBV Service Providers and reporting and referral protocol in the event cases emerge, and communication and effected stakeholders of the project;
- Security Management Framework, sub-project SRAs, and Security Management Plans (SMPs), which will be highlighting measures to minimize security risks such as protection of project construction workers, if any; and
- A Resettlement Policy Framework (RPF), which will contain a key guide in terms of the processes and procedures for land acquisition and resettlement, should this be necessary. In addition to RAPs upon final identification of sub-project locations and where relevant.

Environmental Risks and Impacts Envisaged

231. Environmental risks and impacts envisaged during the utilization of existing university campuses are rated “substantial to moderate” due to the possibility of limited renovation work that may take place. These Environmental risks and impacts include noise pollution, soil erosion, waste and wastewater management, loss of vegetation and change of land use, generation and disposal of solid wastes, wastewater effluents from working sites and work camps (if deemed necessary), generation and disposal of hazardous waste and e-waste, use of material sources by primary suppliers (such as quarries and borrow pits), as well as possible Occupational Health and Safety (OHS) and fire safety risks. Congregating large numbers of persons during the COVID-19 pandemic is likely to result in exposure to the virus. While the final determination of the scope of the Women’s College is yet to be determined, in the event it becomes a STEM facility with laboratories the PIU will ensure that there is adequate

ventilation and fire safety measures, as well as safe and secure storage of flammable or toxic substances. Further reconnaissance of this proposed subproject area is needed as at this point the project has not identified the selected locations where the subproject will be implemented and its particular social and environmental baselines.

232. During Operation, Environmental risks and impacts (pertinent to Component 2) would include air pollution, potable water supply, waste water generation and disposal, solid waste generation and disposal, resource utilization (water and energy, in particular), emergency events (both natural and man-made), as well as a range of community health and safety issues, including infrastructure and equipment design and safety, safety of services, exposure to health issues, traffic and road safety, and Occupational Health and Safety of workers/ trainers/ trainees during operating educational and training institutes, as well as possible loss of flora and fauna and change of land use at a very limited scale.

233. The project is likely to be implemented by inexperienced contractors who may possess less capacities for handling E&S risks and impacts, which would result in weaker compliance to the requirements of ESIA, ESMPs and OHS, as well as to the application of Good International Industry Practices (GIIP). The capacity for environmental governance at the MoES is also perceived as weak. Components 1 and 3 will provide Life skills and Technical Assistance in the form of contracts to deliver skills training sessions through leveraging available technologies. In this context, adverse environmental impacts may include risk of excessive use of water and energy resources during training sessions, as well as increased effluents. The Project will ensure (through TORs) that TA activities shall be subject to adequate assessment of E&S implications, and that advice provided through TA for addressing such implications is consistent with ESF's requirements.

Social Risks and Impacts Envisaged

234. The risks of GBV/SEAH, are assessed as “**High**” based on the existing high rates of GBV in the country. Gender restrictive norms and lack of decision-making power are often cited as barriers to women and girls accessing education opportunities and thus increasing exposure to harm. The risk of violence or assault may also increase on the way to and from the University and other service provider institutions supporting women and girls. Other factors such as unequal gender and power relations can exacerbate the risks of GBV in the university, especially where university administrators or lecturers can take advantage of their positions to sexually exploit students, in addition to the increased potential of sexual harassment on female lecturers/instructors and students. Furthermore, disruption of power dynamics (during renovation) might surface in the community and within households due to the labor influx. Women working at existing facilities may come in contact with site workers in different ways, including through direct employment of male workers, during implementation/operation, or indirectly through external vendors, such as provision of catering services. Measures in this context include a) conducting sensitization and capacity building sessions by PIU's E&S specialists, to improve understanding, management, and monitoring of SEAH risks throughout the lifecycle of the project; b) reinforcing women-led CSOs that address GBV/SEAH in the university in order to cultivate a GBV/SEAH-free environment; c) ensuring regular community consultations to raise awareness of the risk of GBV/SEAH, and possible measures for reporting and response; d) ensuring that grievance redress measures include mechanisms for safe and confidential reporting of cases of GBV/SEAH; e) mapping GBV service providers and identifying a dedicated referral process for the university related violations, relevant organizations for referrals, development of procedures and processes for referrals, development of accountability frameworks for handling allegations ; and f) conducting regular safety mapping with the women benefiting from the university, professors, students, community and parents to identify areas within and outside the university where they feel unsafe and develop remedial actions

where necessary. GBV/SEAH risk mitigation requirements will be integrated into all relevant safeguard instruments.

235. The project will be implemented in areas of fragility due to endemic poverty, acute drought, floods and protracted conflict and insecurity which may challenge direct access to beneficiaries and amplify risks due to lack of effective stakeholder engagement, community participation, grievance redress and application of other risk mitigation protocols. Other cumulative risks include systemic capacity weaknesses at the MoES in the area of preventing adverse social impacts of the project, and mitigating and offsetting impacts of social harm, wherever they occur.

9.2. MEASURES PROPOSED FOR MITIGATING ENVIRONMENT AND SOCIAL RISKS AND IMPACTS

236. Table 14 below presents the overarching measures proposed for mitigating adverse environmental and social aspects anticipated for the Somaliland’s component of Empowering Women through Education and Skills project. In Chapter 11 a more detailed Environmental and Social Management Plan has been proposed against specific activities and interventions, including detailed monitoring measures and indicative costs for management. The rehabilitation sites of the WDCs, once determined will go into detailed site-specific E&S risks and impact analyses and will entail the preparation of specific management measures (i.e., via a site-specific ESIA/ESMP).

Table 12: Collective Environmental and social Aspects of the Project & Proposed Mitigation Measures

Potential adverse environmental and social risks and impacts	Proposed mitigation measures
Possible loss of vegetation due to rehabilitation/renovation work, although limited	<ul style="list-style-type: none"> • Contractors and PIUs to seek advice and clearance from appropriate government agencies on the location of any sensitive environments • Minimize removal of existing vegetation within the project site, or restore/rehabilitate areas temporarily cleared of its vegetation • Use of appropriate indigenous species (tree/shrub/grass/cover crop) for rehabilitating temporarily disturbed/cleared/denuded areas • Reduce areas that need to be cleared for the different subprojects • Carefully select sites as to avoid sensitive and/or breeding areas • Include vegetative regeneration as one condition in the contracts for civil works
Air quality impacts, including: (a) increased levels of air pollution caused by the operation of construction vehicles and heavy equipment (b) increased greenhouse gas emissions due to the operation of construction vehicle and equipment	<ul style="list-style-type: none"> • Ensure that project and contractor vehicles and other equipment undergo scheduled preventive maintenance for proper exhaust emission • Establish speed limits for Construction vehicles on site, and monitor compliance • Avoid burning of biomass to the extent possible, and use fire where necessary, with minimal damage to the environment
Noise, dust and vibration from operating construction vehicles and applying maintenance to	<ul style="list-style-type: none"> • Use of modern, well-maintained equipment fitted with noise enclosures

Potential adverse environmental and social risks and impacts	Proposed mitigation measures
equipment	<ul style="list-style-type: none"> • Strict controls of timing of activities (e.g., prohibition on night-time working) • Observance of seasonal sensitivity (breeding and animal migration seasons)
Inefficient solid waste management during implementation, operation and maintenance phases, leading to waste generation hence polluting soils, surface and shallow groundwater, especially during the rainy season	<ul style="list-style-type: none"> • Preparation of waste management plan for each waste stream and implementation of the waste hierarchy • Prepare and implement a waste management plan • Contractors to provide garbage receptacles in strategic places within the construction area, and regularly collect and properly deposit of these wastes in the designated disposal areas • As much as practicable, reuse construction spoils that meets construction material specifications • When practicable, compost organic and degradable waste in suitable containers, and engage farmers for agricultural use options
Poor management of occupational health and safety could lead to accidents, injuries and diseases, especially among less skilled community workers (see also OHS measures proposed in the LMP)	<ul style="list-style-type: none"> • Conform to International standards and regulations governing civil works and other developments of infrastructures • Rest and recreational facilities and time should be provided for workers • Apply construction standards and codes regulated by the MoPWLH • Adherence to comprehensive health, safety and risk management plans and reporting system • Availability of First Aid kits at the working sites and camps (including temporary camps) • Training of construction workers on First Aid procedures • Strictly follow the incidents log • Arrange with nearby suitable hospitals or health clinics to treat project staff and workers that who are sick or have been victims of onsite accidents • Contractors to develop an OHS plan as well as an Emergency Response Plan (ERP) for the University campus supported by the project • Orient ambulance drivers and emergency response teams on alternative routes, and instruct traffic aides to assist the medical and emergency response teams when necessary • Set a CoC to be followed by all construction supervisors and workers that will include disciplinary actions in case of violating the guidelines
Resettlement issues (including physical and economic displacement)	<ul style="list-style-type: none"> • Screening of potential sub-projects sites to minimize land acquisition and involuntary resettlement. • Comply with the RAP, including the following: • Prepare the RAPs subject to WB approval, for the utilization of existing university campuses, in case

Potential adverse environmental and social risks and impacts	Proposed mitigation measures
	<p>resettlement is inevitable</p> <ul style="list-style-type: none"> • Ensure all resettlement issues are resolved prior to the start of renovation works of the selected university campuses • Require contractors to give preferential hiring to qualified members of project affected households/area
<p>Possible social tensions and conflicts as a result of project activities and interventions, such as displacement, marginalization of community groups (see also the LMP on management of labour-related risks)</p>	<ul style="list-style-type: none"> • Comply with the RAP • Ensure all resettlement issues are resolved prior to the start of construction • Ensure continual community consultation, and ensure that vulnerable and marginalized groups are represented • All public consultation meetings are to be well-documented • Ensure establishment of a functioning GM to promptly address community and worker grievances (see Annex 6 on sample GM) • Proper selection of renovation workers, with priority given to hiring of qualified members of project affected households, local residents and IDPs • Provide orientation to all renovation workers on local customs and traditions • Ensure that communities are sensitized on health and safety related issues
<p>Community health and safety</p>	<ul style="list-style-type: none"> • Establish and maintain continuous liaison with the host communities including sensitization on safety and health issues at renovation sites • Install and maintain appropriate safety and warning signage on selected sites • Use local language and images for signage • Ensure proper and adequate provision of sanitation and waste management facilities at all working sites • Maintain a system of receiving and responding to any safety concerns by the communities, basically utilizing the GM set for the project • Maintain adequate social distance and apply masking and temperature checking measures at working sites and during operation of the project, to minimize COVID cases and other transmissible diseases • To mitigate impact by deploying security personnel, inquiries should be conducted to verify that security personnel were not engaged in past abuses, ensure enough training on use of force, and require them to act within the applicable laws and requirements as set out in the Project’s ESCP (ref: Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel).
<p>Negative social implications attributable to labour influx</p>	<ul style="list-style-type: none"> • Contractor to prepare and enforce a No Sexual Harassment Policy in accordance to the national law,

Potential adverse environmental and social risks and impacts	Proposed mitigation measures
	<p>where applicable</p> <ul style="list-style-type: none"> • All workers and nearby communities and stakeholders will be educated on preventing and responding to sexual harassment and GBV ahead of any project related works • The community within the vicinity where the renovation work will take place will also be educated on GBV and sexual offenses such as sexual harassment, rape and defilement in the context of labour influx, including possible prevention and response measures • Strategies such as male involvement will be employed in preventing and responding to GBV/SEAH • Partnerships will be established with relevant government agencies and NGOs to ensure survivors of GBV and sexual offenses access survivor centred services such as medical care, psychosocial support, legal redress, safety, etc. as and when necessary • Provision of gender disaggregated data, separate bathing, changing, sanitation facilities for men and women • Impose zero tolerance on sexual harassment, all forms of GBV and discrimination at all phases of the project • Grievance mechanisms including non-retaliation should be set up for all workers
<p><i>Discrimination of vulnerable groups</i> Several vulnerable groups</p>	<ul style="list-style-type: none"> • Implement the SEP and the Inclusion Plan prepared for the project • Generate a comprehensive list of disadvantaged and vulnerable people and groups in the respective areas, and ensure this list is regularly updated • Ensure a continued update of vulnerable groups • Monitor the implementation of the GM and SEP
<p><i>GBV/SEAH</i> There are already high levels of GBV that might increase during project implementation since the project seeks to increase the number of female teachers/instructors and increase female students to about 70% of the university population There is a risk of GBV/SEAH during the construction phase</p>	<ul style="list-style-type: none"> • Comply with the provisions of the GBV/SEAH Prevention and Response Action Plan • Sensitize the beneficiaries, communities, management and administrative staff on GBV/SEAH issues • Provide training to all Project workers – direct, contract, supplies and community on GBV/SEAH topics • Include GBV/SEAH provisions in the CoCs to be read, understood and signed by each project worker • Include CoCs in Contractors’ agreements to be signed • Sensitize the communities living around the university on GBV/SEAH topics • Monitor and refine GBV/SEAH activities throughout the project implementation period • Establish a survivor-centered GM to handle GBV/SEAH complaints and informing workers,

Potential adverse environmental and social risks and impacts	Proposed mitigation measures
	beneficiaries and communities of this GM.
<i>Lack of or inadequate public participation</i> This will mainly arise due to the country's fragility and high levels of insecurity	<ul style="list-style-type: none"> • Ensure that adequate measures are put in place to identify and reach out to the vulnerable groups and rural populations for informing about the project in a timely manner. • Use communication channels that are accessible including the use of community radios • Translate and disseminate information in the local language. • Hold meetings with the beneficiary to update on the project and respond to any communal concerns • Identify and equip local leaders with information on the project more generally and the GM for further dissemination in their communities
<i>Security threats</i> The project will be implemented in urban areas that may be prone to security threats from known and unknown militia	<ul style="list-style-type: none"> • Refer to the Security Management Framework • Coordinate with the Ministry of Interior, which is responsible for security • Monitor the security of project workers and take actions based on the threats • Prepare and implement site-specific SRAs and SMPs.
<i>Use of resources</i> The project will include the delivery of technical assistance/training during operation, which may result in excessive use of water and energy, as well as release of pollutants to the surrounding environment	<ul style="list-style-type: none"> • Ensure conservation measures are within training syllabus • Ensure provision and usage of energy and water saving apparatus and tools • Supervise maintenance work and ensure adherence to manufacturer instructions • Raise awareness about best management practices • Monitor amounts and consumption

9.3. GENDER MAINSTREAMING AND SEAH PREVENTION AND RESPONSE ACTION PLAN

Gender Mainstreaming

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

238. To address such risks, the project will take a number of differentiated measures to include female members in stakeholder engagement processes (including consultation events and grievance redress committees); provision of job opportunities in subprojects' civil works; and fair working conditions (including provision of maternity leave and nursing breaks where relevant, and sufficient and suitable toilet and washing facilities, separate from men and women workers). These measures are also included in the LMP and SEP. Gender mainstreaming can be incorporated into the project with lessons from the Africa Region Gender Action Plan (GAP).⁶³ This plan lays out the World Bank Africa Region's

⁶³ See <http://siteresources.worldbank.org/INTAFRICA/Resources/AFR-Gender-Action-Plan-FY13-17.pdf> for more details

strategy for addressing gender inequality. The plan's objective is to advance development for both men and women through operations grounded in robust evidence and informed country dialogue.

Management of GBV/SEAH Risks

239. Given that GBV/SEAH in Somaliland is a significant contextual challenge, the project will adopt a robust approach to address potential GBV/SEAH related risks. Relevant mitigation measures to address these risks will be included in the ESMP as follows:

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

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

9.4. SECURITY MANAGEMENT PLAN

241. A SMP will be developed to describe the procedures and protocols related to the security for the project and ensure that the security arrangements of the project are in line with the World Bank's ESF. The framework will also describe the pre-requisite security arrangements (policies, resources and equipment), which should be in place before the implementation of the project, including those of the contractors and primary suppliers before they are awarded service-delivery contracts. In addition, the Plan will further outline the roles and responsibilities of every project partner including roles and responsibilities of other participating Ministries in the Project.

242. Prior to the development of the SMP, wide consultations will be conducted under the supervision of the MoES and close coordination with security teams and World Bank experts, while ensuring enough experience in developing local and activity SMPs.

9.5. ENVIRONMENTAL AND SOCIAL MONITORING BY CONTRACTORS

243. The PIU of Somaliland MoES's officers will ensure contractors monitor, keep record and report on the following environmental and social issues for the specific components of Raja Kaaba project including the limited rehabilitation/renovation works (if required) at selected University campuses across the country:

- Routine Environmental Performance reporting: including material usage, water usage, solid and liquid waste generation and disposal, hazardous waste generation, etc.
- Occupational Health and Safety reporting: hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, etc.).
- Environmental Health and Safety reporting as required in the ESCP: including environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
- Major works: those undertaken and completed, progress against project schedule, and key work fronts (work areas).
- Environmental and social requirements: noncompliance incidents with permits and national law (legal noncompliance), project commitments, or other Environmental and Social requirements including the ESMPs, C-ESMPs and EHS contractual requirements.
- Environmental and social inspections and audits: by contractors, engineers, or others, including authorities - to include date, inspector or auditor's name, sites visited, and records reviewed, major findings, and actions taken.
- Workers: number of workers, indication of origin (expatriate, local, non-local nationals, IDPs), gender, age with evidence that no child labour or forced labour is involved, and skill level (unskilled, skilled, supervisory, professional, and managerial).
- Training conducted on Environmental and Social issues: including dates, number of trainees, and topics.
- Footprint management: details of any work outside boundaries or major off-site impacts caused by ongoing civil works—to include date, location, impacts, and actions taken.
- External stakeholder engagement: highlights, including formal and informal meetings, and information disclosure and dissemination—to include a breakdown of women and men consulted and themes coming from various stakeholder groups, including vulnerable groups (e.g., disabled, older people, children, etc.).
- Details of any security risks: details of risks the contractor/supplier may be exposed to while performing the work - threats may come from third parties external to the project.
- Worker grievances: details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed

should include those received since the preceding report and those that were unresolved at the time of that report and time taken to resolve grievances.

- External stakeholder grievances: grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender-disaggregated.
- Major changes to contractor’s Environmental and Social practices.
- Deficiency and performance management: actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or plans for actions to be taken
- Incidences of GBV/SEAH reported and handled through the referral systems, number of perpetrators prosecuted.

9.6. ENVIRONMENTAL AND SOCIAL LIABILITIES OF CONTRACTORS

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

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

10. IMPLEMENTATION ARRANGEMENTS AND ROLES AND RESPONSIBILITIES

10.1. INTRODUCTION OF PROJECT IMPLEMENTATION ARRANGEMENT

245. Somalia Empowering Women through Education and Skills Project (Raja Kaaba) will be implemented by the Government of Somaliland represented by the Ministry of Education and Science (MoES). The MoES will be responsible for oversight and coordination of all project activities and interventions, and reporting on project progress and performance to the MoES, including responsibility for monitoring service delivery in participating jurisdictions. Regional, District Education and Community Education Committees (CECs) will also play an important role in the delivery of project activities and interventions in their areas.

246. The project will set up a single Project Steering Committee (PSC). The PSC, headed by the MoES with one representatives from from the Education Sectoral Committee (ESC) coordination body and one donor representative. The PSC will provide strategic direction and guidance on high-level risk management and monitoring. It will also facilitate effective relationships across the project. The PSC will meet annually. The MOES will have the latitude to make changes in the membership of the PSC and/or its terms of reference (TOR).

10.2. ENVIRONMENTAL AND SOCIAL MANAGEMENT

247. The PIU in Somaliland will be responsible for overall project management, coordination, implementation, monitoring and day-to-day responsibility of the project. Key responsibilities of the PIU will include: (i) ensuring Project activities are implemented as agreed and in compliance with the World Bank technical and fiduciary guidelines; (ii) leading technical, operational, and fiduciary functions, especially contracting and contract management; and (iii) coordinating and overseeing Project implementation/management with PMU at the Federal level, as well as with other participants at the FMS level, including monitoring and evaluation of Project activities and interventions, capacity building, and ensuring compliance with environmental and social framework (ESF) requirements. These responsibilities are expected be fulfilled through appointing a fulltime Environmental Specialist, a fulltime GBV/SEA specialist, a fulltime Social Specialist, and a fulltime Security Specialist. The PIU will also prepare the annual work plan and budget and conduct quarterly progress reviews. In addition, the PIU will coordinate project activities and interventions with the PMU and other education implementing partners and education sector coordination committees internally at the regional and Local levels..

248. To ensure smooth implementation of Project activities and interventions, a Project Operational Manual (POM) for the Somaliland t will be prepared by the PIU for the World Bank's review and approval typically before commencement of the Project's activities and interventions. This will clarify project activities, including fiduciary/disbursement and environmental and social implementation arrangements, roles and responsibilities of the parties involved, and coordination mechanisms. A third-party independent verification agency (IVA) will be contracted by the MoES to verify M&E procedures and results and monitor overall progress under Component 1.

249. Overall project implementation and coordination will be led by the MoES . The MoES will collaborate with all participating regional MoES,, to implement the different components of the project.

250. The PMC will provide collaborative management of project activities, decision-making around co-design and co-management of activities including the annual work plan and budget, co-monitor

project activities, conduct quarterly progress reviews, make joint decisions on issues pertaining to implementation and ensure open communication and maximum accountability.

10.3. RESPONSIBILITY FOR THE ESMF

251. The PIU will provide overall responsibility for safeguards' due diligence, and compliance monitoring, including a Third-party IVA. During the meetings with World Bank Safeguards Specialists, MoECHE-based PMU staff members were encouraged to appoint persons from within their ranks, who are qualified and up to the task, as E&S Safeguards Specialists for the project. With regards to Safeguards, the PIU will:

- Utilize existing full-time E&S safeguards specialists appointed to the SEHCDP;
- Contract with Implementation Partners/Development Partners, wherever relevant;
- Ensure compliance with World Bank's ESF and other relevant country laws and regulations as contained in this ESMF;
- Support the smooth and efficient implementation of the project; and
- Undertake effective preparation, review, approval and implementation of sub-project ESIAs/ESMPs, and RAPs (if envisaged), among others, based on the provisions in this ESMF.

E&S Safeguards Specialists

252. The E&S Safeguards specialists at the PIU will specifically:

- Screen all subprojects for E&S risks and impacts;
- Review all design documents, ESIAs, ESMPs, reports and documents prepared by environmental and social consultants to ensure compliance with the World Bank's ESF and the Project's E&S documents including ESMF, LMP, etc.;
- Ensure that the project design, specifications and budget adequately reflect the requirements in the ESSs and recommendations of the ESIAs/ESMPs;
- Co-ordinate application, follow up processing and obtain requisite clearances and approvals from the World Bank for the Contractor's ESMPs (C-ESMPs) submitted by the individual subprojects;
- Prepare regular monthly/quarterly/semi-annual and annual progress reports with statutory requirements and those of the Project with WB (eg ESCP) and associated with E&S incidents per the ESCP.
- Develop, organize and deliver appropriate E&S safeguards related training courses for the PIU staff, contractors, local government/community representatives and others involved in the project implementation;
- Review and approve the C-ESMPs and the WDC operators' ESMP using this ESMF as a guide;
- Liaise with the Contractors, Operators and the PMU/other PIUs/MDAs on implementation of the ESMPs;
- Liaise with various Government agencies on environmental, resettlement and other regulatory matters;

- Frequently interact with relevant NGOs/CBOs and community groups;
- Establish dialogue with the affected communities and ensure that the environmental and social concerns and suggestions are incorporated and implemented in the project;
- Ensure the implementation of all plans developed for the project including the LMP, SEP (that contains the GRM), ESMPs, GBV/SEAH Prevention and Response Plan, and SMP;
- Review the performance of the project in terms of the progress in E&S safeguards, through an assessment of the periodic internal monthly and quarterly environmental and social monitoring reports; provide summaries of the same and initiate necessary follow-up actions; and
- Provide support and assistance to the Government MDAs and the World Bank during Project Review Missions.

10.4. ROLES AND RESPONSIBILITIES OF THE MOES

253. The MoES is the lead implementing agency of the project in Somaliland. This Project compliments and is well aligned with the World Bank's Somaliland Education for Human Capital Development Project which will also be managed by the MoES at the regional level. The MoES will be responsible for oversight and coordination of all project activities and interventions and reporting on project progress and performance. Specific E&S roles of the MoES include:

- Take the lead in screening, scoping, review of all instruments listed in the ESCP of the Somalia Empowering Women Project submitted on February 28, 2022 to the MoECHE, pertinent to the Somaliland case;
- Convene a technical decision-making panel (if required), ensuring conformity with applicable standards, conduct environmental and social liability investigations, and conduct monitoring and evaluation;
- Provide overall leadership during public consultations related to the Project;
- Ensure that the Project implementers comply with all relevant environmental laws, regulations and policies;

10.5. WORLD BANK ROLES AND RESPONSIBILITIES

The World Bank will:

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

10.6. UPDATING THE ESMF

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

255. This ESMF and the agreed ESCP of the project may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted by the MoES, the MoECHE and the World Bank. The MoES, and the World Bank will identify and agree on any changes to the project and E&S instruments through the official means of communication.

256. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, labor influx, gender-based violence (GBV) or sexual exploitation and abuse (SEA).

10.7. DISCLOSURE OF SAFEGUARDS INSTRUMENTS

257. This ESMF has been prepared in light of a stakeholder consultation that took place at the MoES on 10th of February 2025. Copies of this ESMF and other safeguard instruments developed later (including LMP, SEP, GBV/SEAH Prevention and Response Action Plan, RPF, ESIAs and ESMPs), prepared for the subprojects to be financed under the project, should be disclosed in compliance with relevant country regulations and the World Bank's ESF. The ESMF will be disseminated within Somaliland at all project sites. The executive summary will be translated into Somali language to facilitate information communication.

11. MONITORING PLAN

11.1. REGULAR MONITORING AND INSPECTION FOR COMPLIANCE

258. Overall responsibility for project monitoring and evaluation will lie with the PIU in Somaliland, in coordination with the PMU and, including pertinent Higher Education Commissions, for oversight of the consortium of women's colleges. An M&E officer will be a core part of the PIU team to coordinate across these entities and to manage all project monitoring, reporting and evaluation activities. Specific responsibilities include compiling results data across project components, supervising project implementation sites, conducting process and/or impact evaluations of project activities, implementing citizens' engagement surveys to gather beneficiary and community feedback, and reporting on the engagement surveys to key decision makers to improve project performance. Component 3 of the project will finance technical assistance for the PIU on monitoring and evaluation, including an independent verification agent to validate results reported by service providers and ensure the integrity of the skills fund payment requirements. A separate reporting structure will be established for Somaliland.

259. Component 1 will support the creation of a competitive Skills Development Fund (SDF) and finance service delivery through it. A skills fund is a centrally managed process to award contracts to organizations and institutions to deliver skills training in line with the objectives and guidelines of the Fund. In Somaliland, the SDF will be a State-level fund with a Grant Committee that includes stakeholders from civil society, and representatives of the private sector. The Grant Committee will report to the project Steering Committee, oversee the Fund's operations, and make the final decisions on which grant applications to support. The Project will also establish and finance the SDF secretariat, which will manage the grant making process at.

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

261. The main monitoring responsibilities and inspection activities will be with the PIU in Somaliland, which will administer the overall project-related environmental and social monitoring and implementation as laid out in this ESMF (see Table 15), as well as the SEP, LMP, RPF, GBV/SEAH Prevention and Response Action Plan and SMP. The Project Coordinator of the PIU will bear the overall responsibility for the implementation of the environmental and social mitigation measures, as well as for monitoring and inspections for compliance. The Environmental and the Social Specialists in the PIU will address the day-to-day tasks in regard to the implementation of the ESMF and associated instruments. In addition, Contractors, suppliers and Operators are expected to monitor their own implementation of environmental and social risk mitigation measures as per this ESMF. Independent Verification Agents (IVA) will also include environmental and social risk mitigations in their project monitoring activities.

262. The ESMF is the overall document that guides the development of site specific ESMPs and ESIA's. All implementers will be responsible for their own site/activity specific screening, impact assessments, development of site/activity-specific ESMPs, monitoring of impacts, and administration of mitigation measures in regard to their respective sub-component activities. They further commit to integrate stakeholder inputs into their regular monitoring and reporting activities. All implementers are

committed to report all screening results, results of ESIA, site/activity-specific ESMPs, to the PIU in Somaliland.

263. The PIU’s Environmental and Social Specialists will assess, as per the Table 15, the compliance of all implementers’ activities against the ESMF and their subsequent ESMPs, and will report possible non-compliance to the Project Coordinator of the PIU. Similarly, the security specialist will assess compliance with the Project’s Security Management Framework (SMF), Security Management Plans (SMPs) and Security Risk Assessments (SRAs). Indicators are identified in both documents, and used as a baseline for assessing progress on implementation. The PIU will also independently conduct its own monitoring, verification and inspection of the activities of all implementers to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts. Performance will be integrated into quarterly reports to the World Bank through PMU.

264. The World Bank will also supervise and assess the environmental and social performance through review of the biannual monitoring reports and through regular site visits.⁶⁴ A summary of the key E&S aspects to be covered during project reporting is provided in Annex 3.

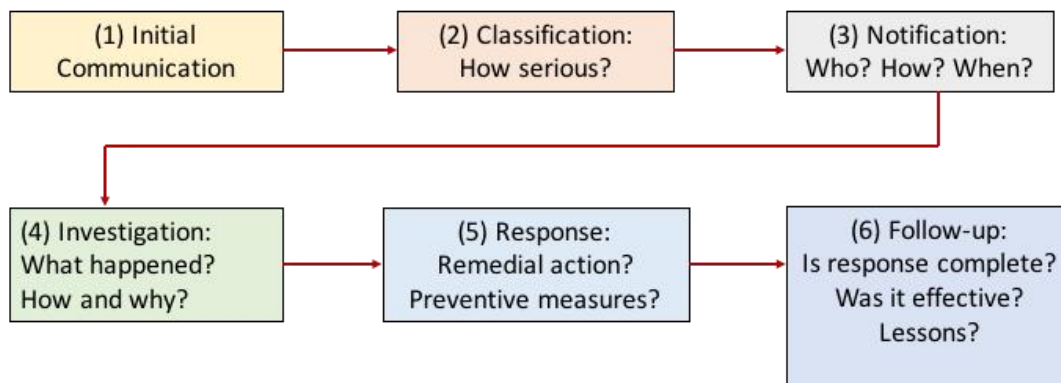
265. The GM will further help track complaints and effectiveness of interventions, including those with environmental and social impacts. Furthermore, Independent Verification Agents (IVAs) will be deployed to monitor overall project implementation, including the implementation of environmental and social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

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

267. Implementation (work plan) progress shall be reported by the IPs to the PIU in Somaliland, and verified through periodic project site visits. The PIU in turn will keep the PMC and the World Bank properly updated on implementation progress. It is also expected that the IPs will maintain a supervision consultant to supervise activities in the implementation of E&S instruments.

11.2. INCIDENT AND ACCIDENT REPORTING

268. Incident reporting will follow the process indicated in Figure 3.



⁶⁴ Frequency will be determined by the need but expected to be more frequent at early stages of project implementation

Figure 3: Incident reporting process

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

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

271. Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the implementer has to handle the case appropriately, and refer the case to the GBV referral system, defined in the GBV/SEAH Prevention and Response Action Plan.

11.3. SEP ACTIVITIES REQUIRING MONITORING

272. The required outcomes of the stakeholder engagement process are being achieved and provide the opportunity to amend the process where necessary.

- 1) Implementation of SEP that includes the update of stakeholder database and issues, as well as documentation of stakeholder engagement activities.
- 2) Consultation and disclosure activities conducted with all stakeholders.
- 3) Dissemination of information about Grievance Mechanism .
- 4) Grievance logging and tracking.
- 5) Effectiveness of grievance management, and the number/percentage of grievances cases solved.

12. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN AND BUDGET

12.1. INTRODUCTION

273. This section describes the specific E&S due diligence provisions necessary to avoid, minimize, or mitigate project activities with potential risks, and monitor their outcomes. This process also includes identification of institutional responsibilities (implementation, supervision, monitoring and evaluation, and reporting) along the lifetime of the interventions, timing of actions, how these provisions will be monitored and reported on, and identification of budget requirements. The rehabilitation/construction sites of WDCs when determined will go through a detailed site-specific E&S risks and impact analyses and the preparation of specific management measures (i.e., via a site-specific ESIA/ESMP). The objectives of the ESMP are:

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

12.2. ENVIRONMENTAL AND SOCIAL SAFEGUARDS TRAINING

274. Environmental and social safeguards training will help ensure that the requirements of the E&S and subsequent social safeguard are clearly understood and followed by the PIU staff, and all project personnel throughout the project period. The PIU will ensure, in collaboration with the PMC that these trainings are provided to all Project personnel. The E&S training will be provided to the pilot sites representatives in Hargeisa, site contractors, and other staff engaged in the Project. Training will cover all staff levels, ranging from the management and supervisory to the skilled and unskilled categories. The scope of the training will cover general environmental and social awareness and the requirements of the World Bank's ESF and relevant ESSs, with special emphasis on sensitizing the project staff to the social and gender aspects of the area. This includes (as specified in ESCP): relevant aspects of E&S assessment including scoping and screening procedures; emergency preparedness and response planning; EHS guidelines; GBV; OHS; establishment and monitoring of GRM; and incorporating E&S risk mitigation measures into procurement (pre- and post-bidding) and contract management. Different training programs will be initiated which can be realigned based on the needs.

Table 13: Detailed ESMP Monitoring and Budget – Somalia Empowering Women through Education and Skills Project (Raja Kaaba)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
Planning and Design Phase							
Project Design and planning	Exclusion of the VMGs including women, youth, and minorities from project design and planning	<ul style="list-style-type: none"> • Inclusion of the VMG groups in discussions over the design and planning of the project • Ensuring the discussions are done in a culturally acceptable setting and in the language that is understood by all • The meeting area should be accessible 	No. of the participating VMG, No. of the meeting attended by the VMG Issues raised by the group.	Meeting reports Site visit	Continuous	Social safeguards	Included in communication plan
Project beneficiaries – Somali women and girls	Discrimination and exclusion of vulnerable groups in beneficiary selection process	<ul style="list-style-type: none"> • The project will implement the inclusion plan contained in the SEP • The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the 	Procedures of project targeting Numbers of vulnerable people included	Field visits, Document review	Quarterly	Social Specialist	Included in beneficiary selection plan

⁶⁵ The project implementation team will work closely together with the World Bank team to provide indicative costs for these mitigation measures and thereafter ensure that these measures, and the costs thereof, are included in the project implementation budget, and especially factored during the project’s procurement processes.

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		employment relationship <ul style="list-style-type: none"> • Hold sensitization meetings on resources planning and conflict resolution mechanisms • Institutionalization of inclusion of all categories in processes and decision making • There will also be enough and suitable toilet and washing facilities, separate from men and women workers, boy youths and girl youths as the community cultures demand • The contracts with third parties will include non-exclusion requirements which will also be part of the monitoring system 					
Selection of project beneficiaries	Lack of or inadequate public participation and consultation	<ul style="list-style-type: none"> • Ensure that measures are put in place to identify and reach 	-Records of Public participation -Meetings minutes	-Field visits -Document review	Quarterly	Social Specialist	Included in communication and

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		out to the vulnerable and rural populations with project information; <ul style="list-style-type: none"> • Use communication channels that are accessible to marginal populations including use of community radios, translating information in local languages; and • Identify and equip local leaders with information on the project more generally and the GM for further dissemination in their communities. 	No. of complains recorded				beneficiary selection plans
Implementation Phase							
Component 1 skills training /Skills Development Fund (SDF)	Compromised selection process	<ul style="list-style-type: none"> • Ensure the development of a criteria for selection of teachers to benefit from the training • Disclose, at the county level, information on those selected for training 	-Selection criteria -No. of teachers trained	Training procedures	Quarterly	E&S Specialists,	Included in communication and beneficiary selection plans
	GBV/SEA/SH	<ul style="list-style-type: none"> • Monitor and report on the behaviour of project workers at all 	No. of reported cases No. of cases handled	Field Visit Document review	Quarterly	Social Specialist	-included in GBV/SEA/SH action plan

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		levels; <ul style="list-style-type: none"> • Ensure the people engaged in project activities understand the GBV referral pathway; • Ensure all learners and community members have access to the GRM contacts; and • All workers should sign the CoC (see the LMP). 	related to conclusion Existence of SEA/SH Plan				implementation
Project implementation	Inadequate capacities: - Environment - Social - GBV - Communication - M&E	<ul style="list-style-type: none"> • Undertake a training needs assessment for the MoES and implementing partners • Identify suitable and tailor-made courses for the technical teams • Facilitate capacity building efforts for the team • Monitor the performance and provide continuous technical support to the PIU and PMTs 	-Training needs assessment report -Training protocols -List of staff trained	-Field visits -Review of project reports	Monthly	PIU team/ third-party monitor	Included in salaries and contract prices
Project Implementation	Inadequate and/or inefficient management	<ul style="list-style-type: none"> • Standardization of inventory 	Clear procedure for opening bid,	Field Visit Document	Quarterly	Project Coordinator	Operational costs

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
on	of logistics	management tools and mechanisms <ul style="list-style-type: none"> • Checking needs for support in all centers, more so those in remote and marginalized areas • Empowering implementing partners to take over the supply of inputs for the activities for which they are responsible • Independent responsibility of each partner for its activities (logistical support: accommodation, means of communication and IT, transport, etc.) • Strengthening the package of shared logistics services for efficient response 	Adherence to the Implementation manual	review		Social Specialist	
Component 2 – Utilization of existing university campuses	Inadequate consultations with local communities and other stakeholders	<ul style="list-style-type: none"> • Identify a list of minority, marginalized and disadvantage communities in each of the participating districts 	# of marginalized, minority and disadvantaged groups per districts No. of meetings held No. of participants structured along	Meeting reports -Site visits	Continuous	Social Safeguards Specialist	Included in communication plan

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<ul style="list-style-type: none"> Establish and maintain continuous liaison with the host communities including sensitization on the project objectives and design Use innovative communication means to reach out to the communities with information on the project Establish GRM structures in the communities that would sensitize the communities on the project GRM Maintain a system of receiving and responding to any project concerns by the communities 	vulnerability				
Component 2 - Utilization of existing university campuses	Land and resettlement issues	<p>Comply with the RAP, including the following:</p> <ul style="list-style-type: none"> Preparation and implementation of RAPs (if needed) subject to WB approval, for each of the sub-projects 	<p>- RAPs for each subproject and resettlement</p> <p>No. of land related complaints captured through the GRM</p>	<p>-Site visits</p> <p>-Project documents</p>	Monthly	<p>Social safeguards Specialist</p> <p>In coordination with project steering committees</p>	<p>Included in RAP plan</p> <p>Operational cost by authorities</p>

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		with significant resettlement requirements <ul style="list-style-type: none"> • Ensure all resettlement issues are resolved prior to the start of subproject implementation • Require contractors to give preferential hiring to qualified members of project affected households 					
Component 2 - Utilization of existing university campuses	Localized noise and vibration	<ul style="list-style-type: none"> • Selecting equipment with lower sound power levels e.g., the use of hand drilling machines • Installing suitable mufflers on engine exhausts and compressor components in cases where the service provider uses generators • Post safety signage including “men/women at work” signs, prominently displayed • Provide fit to work 	Noise & vibration monitoring if sites are close to sensitive receptors Recorded cases of complaints by the project workers and community members	- Noise & vibration monitoring devices -Site visits -Document review	Monthly	EHS Specialist	10,000 for monitoring noise & vibration at selected sites Specialist salary

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<p>PPE (ear plug/earmuffs) for all workers involved in the areas with elevated noise levels</p> <ul style="list-style-type: none"> • Coordinate with the office users/staff as to determining timing and more importantly what specific noise controls and mitigations may be needed at the site • Installing acoustic enclosures (sound nets) for equipment casing radiating noise i.e. generator • The contractor should use equipment that is/are in good working condition and are periodically serviced • 					
Component 2 - Utilization of existing university campuses	Fire hazards	<ul style="list-style-type: none"> • Provide fire hazard training to workers • Install fire hydrants • Provide fire extinguishers • Designate areas as “assembly points” • Establish, where 	<p>No. of fire extinguishers installed No. of fire hydrants installed No. of assembly points designated</p>	<p>- Site visits - PIU reports - Third-party monitor reports</p>	Quarterly	EHS Specialist	Cost of equipment included in the contract price Specialist salary

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		possible, live fire breaks in form of appropriate vegetation					
Component 2 -Utilization of existing university campuses	Dust Emission	<ul style="list-style-type: none"> • Suppress dust by water spraying and dampening where necessary • Dampening the soil where possible to reduce dust vortices and soil erosion • Practice good general housekeeping at the work site; sweep off the drilled-out materials • Post safety signage including “men/women at work” (or “work in progress”) signs • Provide fit to work PPE for all workers involved in the renovation and installation activities 	International thresholds for dust concentration (PM10 & PM2.5) No. of complaints on dust emissions	- PM10/2.5 monitoring devices -Site visits -Document review -Photography	Monthly	EHS Specialist	10,000 for dust monitoring at all selected sites Cost of PPE included in the contract price
Component 2 -Utilization of existing university campuses	Open pits at worksites can result in injuries, especially for girls and women The pits can also become breeding grounds for mosquitoes	<ul style="list-style-type: none"> • Ensure that all quarries are registered • Contractors should commit to backfilling the open pits before 	- OHS plans by suppliers implemented - Environmental protection/remedy plans by suppliers implemented	-Site visits -incident reports -Document review -Photography	Monthly	EHS Specialist	OHS/EHS costs included in the contract price and supplier fees

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
	and other vermin	handing over the sites	-Agreements with contractors No. of complaints on open pits				
Component 2 -Utilization of existing university campuses	Outbreak of pests and vermin	<ul style="list-style-type: none"> • Spacing out University-going women and girls • Periodic fumigation of university infrastructure 	No. of fumigation events conducted	- pesticide usage monitoring/reporting - type of pesticide used, amount used, location, and date - Site visits - Inspection reports - Third-party monitor reports	Twice a year	MoES/ Municipalities	Operational cost of MoES and Municipalities
Component 2 - Utilization of existing university campuses	Mismanagement of solid waste generated on site	<ul style="list-style-type: none"> • The contractor shall ensure provision of suitable waste bins at the site to handle waste generated • Efficient use of materials to as much as possible avoid and minimize waste production • Ensure waste are recycled/reused before opting to dispose of 	No. of waste bins at the site No. of complaints related to solid waste mismanagement	- waste monitoring/reporting (incl. type, amount, level of reuse/recycle) Site Visit Project progress reports review	Monthly	EHS Specialist	-included in Specialist salary

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<ul style="list-style-type: none"> • Use of durable, long-lasting materials that shall not need to be replaced often • Ensure waste is collected and disposed of in accordance with Somaliland Government Regulations 					
Component 2 - Utilization of existing university campuses	Occupational health and safety: slip/fall, elevated noise, dust and electrocution	<ul style="list-style-type: none"> • The contractor shall provide the workers with the required PPE and enforce on use at all times while at the work sites • The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality • Carry out Job Risk Assessment (analysis of hazards likely to occur and precautions need to be undertaken) before executing the work • Use of safety signage “MEN/WOMEN AT WORK” to warn 	<ul style="list-style-type: none"> - type and frequency of training - amount of PPE provided and applied - results from OHS inspections -Accident logs -First Aid Kits -Fire extinguishers 	<ul style="list-style-type: none"> -Site visit -Document reviews -Photography 	Monthly	Environment & Social Specialist	10,000 for PPE 10,000 for training Monitoring cost included in Specialist salary

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		contractor workers and visitors to worksites <ul style="list-style-type: none"> • Provision of adequate signage and communication of risk to workers and communities • Training and use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards • Electrical works should be performed by trained and qualified Specialists • Ensure that electrical equipment is properly connected before switching on sockets • In case on any spillage at working areas, this should be cleaned off immediately, anti-slip hazard warning when mopping floors should be provided to reduce chances on slips and falls 					
	Spread of infectious	<ul style="list-style-type: none"> • Train all staff on the 	No. of reported	Site Visits	Monthly	Social	Specialist

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
	diseases - in particular COVID-19	<p>signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms</p> <ul style="list-style-type: none"> ● Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing ● All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs ● Mandatory provision and use of appropriate PPE such as masks shall be required for all 	cases at site availability of IPC strategies for hand and water hygiene, use of PPE -Training reports	Document review Grievance/incident log		Specialist, Health authorities	salary Operational cost by authorities

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<p>project personnel including workers and visitors</p> <ul style="list-style-type: none"> • Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks • Avoid congregation of more than 15 workers at one location. Where more than one person is gathered, maintain social distancing of at least 2 meters • Restriction of the number of people accessing the work areas • Fumigation of offices and work areas • Train all workers in respiratory hygiene, cough etiquette and hand hygiene • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste 					

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		generated from the project related facilities					
	Spread of infectious diseases - in particular HIV/AIDS	<ul style="list-style-type: none"> • Sensitize workers and communities on HIV/AIDS prevention and management • Place signage at the work sites/schools on HIV/AIDS prevention • For site camps: provide signage for workers on HIV/AIDS at all the camps • Provide HIV testing facilities at worksites, those with many workers not sure about the threshold) 	<p>No. of sites with communication posters/ information on HIV/AIDS</p> <p>No. of communities reached out with information on HIV/AIDS</p> <p>No. of people who know about where to get HIV/AIDS services</p>	<p>-Site Visits</p> <p>-Document review</p>	Monthly	Environment & Social Specialist in collaboration with Health authorities	<p>Awareness campaign costs included in contract price</p> <p>Operational cost and Specialist salary</p>
	Labour disputes	<ul style="list-style-type: none"> • Fair terms and conditions shall be applied for workers (guided by relevant laws and WB ESS2) • The project shall facilitate the development and operationalization of GRMs for project workers (direct workers and contracted workers) to promptly address their workplace 	No. of reported cases of disputes by workers	<p>-Site visits</p> <p>-Workers' GRM</p> <p>-Document review</p>	Monthly Reports	Social Specialist	<p>Workers' GRM operational cost</p> <p>Specialist salary</p>

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		grievance (as provided for in the LMP) <ul style="list-style-type: none"> The project shall respect the workers' rights of labour unions and freedom of association 					
	Insecurity – working sites	<ul style="list-style-type: none"> Preparation and implementation of SRAs and SMPs All work sites and camps shall be protected by security personnel All visitors to worksites (as appropriate) will be required to fill a visitors' form providing all personal details and purpose of the visit A data file with information regarding the visitor will be recorded and kept by the MoES Security induction must be done to all project workers The SMP, developed for this project, will be implemented by 	No. of reported insecurity incidents, No. of training offered to project workers No. of workers trained	Site visits SMP reports Project documents	Quarterly	E&S Specialist PIU's security specialist, Security personnel involved in the project activities	Cost of security contract/ operations Cost of training included in contract price Specialist salary

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		all parties involved in the project implementation					
	Risks by deploying security personnel	<ul style="list-style-type: none"> Inquiries should be conducted to verify that security personnel were not engaged in past abuses, ensure enough training on use of force, and require them to act within the applicable laws and requirements set out in ESCP (ref: Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel). 	<p>No. of cases caused by security personnel</p> <p>Site visits GRM reports</p>	<p>Incident reports</p> <p>Field reports</p> <p>GRM reports and analysis</p>	<p>Quarterly for analysis</p> <p>Weekly for field visits</p>	<p>PIU's security specialists</p> <p>Agency responsible for security personnel</p>	Cost of monitoring included in project operational cost, and contract price/ agreement
	Traffic Hazards	<ul style="list-style-type: none"> Use of competent drivers with defensive driving techniques MoESs' at the district level shall regularly inspect vehicle safety and maintenance All fleet handling deliveries shall observe speed limits to a maximum of 	<p>-amount and type of vehicle traffic entering the worksite</p> <p>-site visit/ inspection to assess potential traffic risks</p> <p>No. of accidents recorded,</p> <p>No. of Vehicle inspection reports</p> <p>-Trip Management</p>	<p>-incident/ accident reports</p> <p>-Field visits</p> <p>-Document review</p>	Quarterly	<p>-E&S Specialists</p> <p>-SMPC</p> <p>-Contractors</p> <p>-Drivers</p> <p>In coordination with Traffic authorities</p>	Monitoring cost included in contract price and operations of traffic authorities

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		80km/h out of major towns but 30kms in towns <ul style="list-style-type: none"> • All drivers and loaders should sign the CoC • Drivers (especially going to high insecurity areas) should follow guidance on safe emergency driving 	Plans				
Operation and Maintenance Phase							
Components 1&3 -Use of the Somalia Women University campus after rehabilitation/ renovation	Security threats	<ul style="list-style-type: none"> • All students and workers shall be oriented on security matters • Preparation and implementation of SRAs and SMPs • The SMP shall be shared with the key project teams (university managers and MoES officers) on a need-to-know basis • All visitors to the campus, colleges and WDCs will be required to fill a visitor form providing all personal details and purpose of the visit 	No. of reported cases at site, -Types of work site and camp protocols Trainings offered to staff	-Field visits -Document review -photography	Quarterly	E&S Specialist PIU's security specialist, Security Personnel/ Village elders	Included in security contract price Operational cost

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<ul style="list-style-type: none"> • Security induction must be done to all project staff • A search of personal luggage shall be performed by the guards at the access control point to ensure no access of prohibited items into the project site 					
Components 1&3 - Project beneficiaries – Somali women and girls	Sexual Exploitation and Abuse (SEA)	<ul style="list-style-type: none"> • Sensitization of project workers and the MoES staff and benefiting communities; • Instituting a Grievance Committee to handle among others sexual abuses, • Involving local authorities and police where appropriate in handling sexual abuses; and • All project staff should be trained against SEA awareness programs for workers and the beneficiary community. 	No. of reported cases No. of cases handled to conclusion Existence of SEA Plan	Field Visits Document review	Quarterly	Social Specialist	Cost of GBV/SEA/SH action plan implementation Operational cost of workers GRM
	Spread of HIV/AIDS and STIs.	<ul style="list-style-type: none"> • Carry out periodic 	No. HIV/ AIDS campaign done	Field Visit Document	Quarterly	Social Specialist,	1000.00 10,000 for

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		HIV/AIDS awareness for workers and staff, <ul style="list-style-type: none"> • Carry out voluntary HIV/AIDS testing for workers; and • Workers should sign the CoC and abide by its provisions for HIV/AIDS awareness and prevention. 	Training records available	review		CBO In coordination with Health authorities	awareness campaigns Operational cost by authorities
	Spread of Infectious Disease – COVID-19	<ul style="list-style-type: none"> • Train all women staff going to the university on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms; • Ensure that the university infrastructure (including chairs and desks) are well spaced apart, and are frequently sanitised • Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and 	No. of reported cases at site, Availability of IPC strategies for hand and water hygiene, use of PPE	Field Visit Document review, and photography	Quarterly	Environment and Social Specialist, Health authorities	Variable

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		severe coughing with fever, and do not voluntarily submit to testing; <ul style="list-style-type: none"> ● Mandatory provision and use of appropriate Personal Protective Equipment (PPE) such as masks shall be required for all project personnel including suppliers, workers and visitors; ● Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the schools and during breaks; ● Avoid concentration of more than 15 persons at one place ● Fumigation of offices, work areas, store and project vehicles delivering food to the university; ● Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and ● Train cleaning staff in 					

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the Ministry offices /educational facilities.					
Components 1&2 - Operation & Management of the university and other training ICT Equipment	Generation of hazardous and non-hazardous solid wastes, as well as E-Waste with associated toxic chemicals leading to Air Pollution, pollution of ground water	<ul style="list-style-type: none"> • Procure electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste; • Recycle all E-waste through the licensed e-waste recycling companies; • Return Obsolete devices to the supplier depending on warranty period/agreement; • Establish an E-Waste Temporal Collection Centre at MoES; including collection bins/receptacles; • Contract the services of NEMA Licensed E- 	<ul style="list-style-type: none"> -waste inventory (types, amounts, storage, and final disposal) -Clearly labelled E-waste bins / receptacles -Warrant for the ICT Equipment -Temporary E-waste collecting facility at MoES and other offices -Training records for E-Waste handling, -E-Waste disposal Certificates -Waste License for contracted Firm 	Field Visit Document review, Photography	<ul style="list-style-type: none"> -monthly for waste inventory -quarterly for training -Annually for E-waste collection 	<p>Project Coordinator</p> <p>EHS Specialist at PIU</p> <p>In coordination with Ministries of Environment and Municipalities</p>	Collection and disposal cost included in the contract price 10,000 for training per each site Operational cost by authorities

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<p>Waste Firm to collect E-wastes from MoES and dispose of in an environmentally sound manner</p> <ul style="list-style-type: none"> • Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management; and • The contractor for the installation of the ICT equipment shall adhere to the provisions in the E-Waste Management Plan. 					
<p>Components 1&2 - Delivery of educational and training programmes – Ambient air quality</p>	<p>Poor air quality due to the release of contaminants into the workplace can result in possible respiratory irritation, discomfort, or illness to workers/trainers/trainees</p>	<ul style="list-style-type: none"> • Maintaining levels of contaminant dusts, vapors and gases in the work environment at concentrations below those recommended concentrations to which most workers can be exposed repeatedly (8 hours/day, 40 hrs/week, week-after week), without 	<ul style="list-style-type: none"> - Air pollutants under permissible thresholds - No health incidents related to air quality - No complaints raised about air quality - Ventilation devices working properly 	<ul style="list-style-type: none"> - Site supervision - Incident reports - Site management plans - Maintenance plans - Worker GRM 	<p>Monthly</p>	<ul style="list-style-type: none"> -WDCs and women colleges' administration Maintenance staff 	<p>Included in operational and maintenance costs</p>

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<p>sustaining adverse health effects.</p> <ul style="list-style-type: none"> • Apply work practices to minimize releases, such as: • Direct piping of liquid and gaseous materials • Minimized handling of dry powdered materials • Enclosed operations • Local exhaust ventilation at emission / release points • Vacuum transfer of dry material rather than mechanical or pneumatic conveyance • Indoor secure storage, and sealed containers rather than loose storage 					
<p>Components 1, 2 &3- Delivery of educational and training programmes – Occupational Health and</p>	<p>Exposure to hazardous materials and equipment, including possible injuries during practical training</p>	<ul style="list-style-type: none"> • Select legitimate and reliable trainers through screening OHS records • Address OHS risks with non-compliance remedies in procurement 	<p>Availability of a incident logs</p> <p>No. of first Aid Kits</p> <p>No. of fire extinguishers</p> <p>% of</p>	<p>-Site supervision</p> <p>-Quality assurance/ quality control procedures</p> <p>-External monitoring Incidents</p>	<p>Monthly</p>	<p>-Training cadre</p> <p>-WDCs and women colleges’ administration</p>	<p>Included in operational cost</p>

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
Safety		<p>documents.</p> <ul style="list-style-type: none"> • The Training staff shall always provide the trainees with the required PPE and enforce their use while at the work sites. • The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality. • Carry out Job Risk Assessments (analysis of hazards likely to occur and precautions need to be undertaken) before executing the construction. • Provision of adequate signage and communication of risk to workers and communities. • Training and use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards, where possible. 	<p>workers/trainer/trainees using PPE</p> <p>No. of trainings conducted</p>	reports			

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<ul style="list-style-type: none"> ● Renewable energy trainings should be performed by trained and qualified experts. ● Ensure that electrical equipment is properly connected before switching on sockets. ● In case on any spillage at working areas, this should be cleaned off immediately, anti-slip hazard warning when mopping floors should be provided to reduce on chances on slip and falls. ● Safety induction for workers/trainers during induction process ● OHS Officer should be on site to implement OHS requirements Proper PPE provided for workers/trainers/trainees ● Provision of sanitary facilities for workers/trainers/trainees 					

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<ul style="list-style-type: none"> • Separate toilets and change rooms for male and female employees • Maintain onsite appropriate first aid and other equipment associated with the level of worker/trainer/trainee OHS risk, and establish procedure to transport of injured worker/trainer/trainee to nearby hospital • Ongoing monitoring and reporting of OHS performance • Proper investigation of all worker accidents or project-related health issues, including documentation of investigation results and as needed implementation of corrective measures • Establish emergency plan/procedure in case of emergencies such as chemical spills, fires, 					

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		explosions, flooding.					
Components 1&2 - Operation and maintenance – Life and fire safety	<ul style="list-style-type: none"> • Fire and life risks when accessing and using educational facilities 	<ul style="list-style-type: none"> • Ensure enough provision of emergency egress, including clear, unimpeded escape routes, accessibility to impaired/handicapped, marking and signing, and emergency lighting • Enough provision of alarm systems and fire distinguishers (incl. automatic sprinkler systems and fire hose reels) • Preparation and application of emergency response plans 	<ul style="list-style-type: none"> - Evacuation drills Conducted successfully - All alarms and escape facilities are working properly - No incidents reported 	<ul style="list-style-type: none"> - Emergency response plans - Site inspection 	Monthly	-WDCs and women colleges' administration In coordination with firefighting authorities	Included in operational cost
Components 1&2 - Operation and maintenance – Traffic safety	<ul style="list-style-type: none"> • Risks of traffic injuries are expected when accessing and servicing educational/development centers and campuses by workers/trainers/trainees/students 	<ul style="list-style-type: none"> • Good and effective Traffic Management Plan, including at macro and micro level and consideration of pedestrians • Use of competent drivers with defensive driving techniques. • Regular inspection of 	<ul style="list-style-type: none"> - No. incident/accident reports - Full compliance with safety measures by drivers - Speed is within limits - No. complaints by the community 	<ul style="list-style-type: none"> - Maintenance logs - Incident/accident reports - Project GRM 	Quarterly	-WDCs and women colleges' administration In coordination with traffic authorities	Included in operational cost

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		<p>vehicle safety and maintenance.</p> <ul style="list-style-type: none"> ● All fleet handling deliveries shall observe speed limits to a maximum of 80km/h out of major towns but 30kms in the built-up areas in project areas. ● All drivers and loaders should sign the CoC. ● Take appropriate safety measures, which are technically and financially feasible, to avoid the occurrence of incidents and injuries to members of the public associated with the operation. ● Safe driving awareness for drivers. ● In case of project related traffic or pedestrian accident, implement adequate accident investigation procedure (reporting, cause assessment, corrective measures 					

ESMF for Raja Kaaba Project in Somaliland (P176898)

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD) ⁶⁵
		as appropriate, etc.).					
Components 1, 2 & 3 - Operation & Management of the university and other training ICT Equipment (life skills training, beauty, agriculture, renewable energy, etc.)	<ul style="list-style-type: none"> • Extensive use of water and energy resources during vocational/ practical training • Extensive use of water and energy resources during maintenance work • Insufficient measures as to use energy saving tools and lighting equipment as per design recommendations • Insufficient measures to use water retrofitting devices 	<ul style="list-style-type: none"> • Ensure conservation measures are within training syllabus • Ensure provision and usage of energy and water saving apparatus and tools • Supervise maintenance work and ensure adherence to manufacturer instructions • Raise awareness about best management practices • Monitor amounts and consumption 	Pre-set limits for energy and water consumption No. of maintenance operations Complaints/ incident reports	- Water and energy bills - Training materials - Training evaluation	Monthly	WDCs and women colleges' administration	Included in operational cost

13. Budget for ESMP Implementation

275. A budget for implementation of the proposed ESMP through this ESMF, will be developed properly later once the POM and detailed breakdown of project activities and costs are prepared. This budget does not include the cost of involuntary displacement, if any.

276. In the current situation, the estimates reflect the level of cost, but the actual costs will be determined during the implementation phase, when the specific number of people required for training will be identified and the level of technical assistance required. In Somaliland, there is a gap of establishing environmental and social safeguarding tools and manuals, therefore, it requires to allocate a lot of resources for capacity building. The initial estimated ESMF/ESMP budget is presented in the Table 16 below:

Table 14 : ESMF/ESMP Implementation Budget of Somaliland Women Empowering Project

No	Item	Cost estimate (USD)
1	1. Preparations of the environmental and social screening activities and other E&S instruments, such as GBV/SEA/SH Response and Prevention Action Plan and SEP + inclusion plan.	5,000
2	Preparation of detailed ESIA/ESMPs at specific site levels (estimated at throughout the life cycle of the project), consulting firm for resettlement planning, preparation and implementation	10,000
3	Capacity building including the development of missing regulatory and policy gaps of MoES of Somaliland and training	10,000
4	Public consultation, communication, awareness raising and grievance handling cost	10,000
5	External monitoring, technical support, annual review, auditing and supervision of the implementation of the ESMF/ESMP	20,000
	Total	55,000

14. ANNEXES

ANNEX 1: WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS

ESS1: Assessment and Management of Environmental and Social Risks and Impacts*⁶⁶

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

ESS2: Labour and Working Conditions*

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

ESS3: Resource Efficiency and Pollution Prevention and Management*

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

ESS4: Community Health and Safety*

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

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

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

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

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

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

This Standard ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ESS7 is also meant to avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such

⁶⁶ The asterisk sign (*) denotes that this Standard is applicable in the Somalia education project

impacts.

ESS8: Cultural Heritage*

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

ESS9: Financial Intermediaries (FIs)

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

ESS10: Stakeholder Engagement and Information Disclosure*

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




More information on these Standards is available at

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

ANNEX 2: STAKEHOLDER CONSULTATION AND PARTICIPATION LIST**I. Minutes of Meeting – 11 February 2025**

Activity	Key Note Speeches
<p>3.1.1. Welcoming Remarks and Key Objectives of Stakeholder Engagement Session</p> <p>Faheema, Ministry of Education and Science- PIU Coordinator.</p>	<p>At the opening of the Stakeholder Engagement Session for the Raja-Kaaba Project under the World Bank in Somaliland, Mr. Yusuf warmly welcomed MoES Leadership officials, guests, and other participants who attended this stakeholder engagement meeting for the Raja-Kaaba Project. Then, he invited the Project Implementation Unit (PIU) Coordinator to the stage to explain the main agenda points of this stakeholder’s engagement session.</p> <p>The MoES, PIU Coordinator, Ms. Faheema, expressed her gratitude to the Minister of Education, the Deputy Minister of the Ministry of Finance and Development, the Deputy Minister of the Ministry of Employment Social Affairs and Family, Director Generals of the Ministry of Education and Higher Education Commission, representatives from the Universities, Civil Society organizations representatives and Ministry of Education Department Directors. She outlined the following agenda for the stakeholder engagement session:</p> <ul style="list-style-type: none"> - Provide an overview of the project beneficiaries, structure, components, workflow and key stakeholders. - Establish a common understanding environment and social safeguarding principles in regard to the project. - Discuss key questions as stakeholders for the development and sustainability of the project. - Understand key next steps. <p>After presenting the objectives of the stakeholder’s engagement session, the stage was open for welcome remarks by few key leaders from different institutions as project stakeholders.</p>
<p>3.1.2. Nafiisa,</p> <p>Nagaad Umbrella Executive Director:</p>	<p>Nafiisa from the Nagaad Umbrella thanked the leadership of the Ministry of Education and Science for organizing and inviting to this important session on the Raja-Kaaba Project. She stated that the mandate of the Nagaad Umbrella includes the empowerment of girls' education. Nafiisa also, highlighted that the Raja-Kaaba Project aligns with the Ministry of Education's goals to enhance access to education. As we are aware this Raja-Kaaba Project will focus how on girls’ access to education and the provision of life skills and as a Nagaad Umbrella we are committed to working with the Ministry of Education for girls' education.</p>
<p>3.1.3. Adan Jama</p> <p>Director of Higher Education Commission.</p>	<p>On behalf of the Higher Education Commission, he stated the following key points during his speech;</p> <ul style="list-style-type: none"> - The Director General acknowledged the Ministry of Education and Science leadership for their invitation, and as the Higher Education Commission we are ready to collaborate with the leadership of the MoES. - The Director General underlined the importance of the girls’ education and other marginalized groups and hopefully the target regions will benefit in a proper manner.
<p>3.1.4. Mr. Abdirahman,</p> <p>Director General, Ministry of Education and Science.</p>	<ul style="list-style-type: none"> - During the remarks of the officials, the Director General of the Ministry of Education and Science (MoES) express gratitude to all the participants and the MoES Project Implementation Unit (PIU) team for organizing and

Activity	Key Note Speeches
	<p>facilitating this stakeholder’s engagement session for the Raja-Kaaba Project.</p> <ul style="list-style-type: none"> - The Director General, underlined the project targeted certain districts and the Ministry of Education is committed to the implementation of the Raja-Kaaba Project which considers the project objectives and indicators. He recommended during this session; the participants will actively contribute to the discussions and working groups of the project as a stakeholder.
<p>3.1.5. Mohamed H. Muse Deputy Minister, Ministry of Employment Social Affairs and Family</p>	<ul style="list-style-type: none"> - During the meeting, after acknowledging the Ministry of Education leadership for inviting this crucial stakeholder engagement meeting the Deputy Minister described the key role of the Ministry of Employment, Social Affairs, and Family includes the girl’s empowerment including the girl's access to education and underlined the Somaliland constitution stated clearly every person has right to education. - The Deputy Minister, underlined the importance of prioritizing the enhancement of girl’s education, representation and employment. He also mentioned the significance of using the Somali language in any documents for understanding issues, best practice and to promote indigenous knowledge.
<p>3.1.6. Mr. Ismail, Deputy Minister, Ministry of Finance and Development</p>	<p>During the meeting, the Deputy Minister acknowledged the Ministry of Education and Science for organizing this stakeholder engagement meeting. As a representative of the Ministry of Finance and Development, he deeply addressed and highlighted the following key areas;</p> <ul style="list-style-type: none"> - The Deputy Minister of Finance, underlined that World Bank-funded Projects utilize the country’s finance system and the Ministry of Finance plays a crucial role in facilitating the release of the funds for these projects. The minister stated the importance of ensuring that financial processes are transparent and efficient to support the smooth implementation of education initiatives, including this Raja-Kaaba Project - Additionally, the Deputy Minister reiterated the Ministry of Finance’s commitment to working closely with the Ministry of Education and Science, particularly on matters related to financial management. - The Deputy Minister, highlighted the importance of strengthening the collaboration between the sector Ministries of Finance and Education, ensuring the financial procedure and successful implementation of the project. - Finally, the Deputy Minister acknowledged the Ministry of Education and Science for organizing this crucial stakeholder engagement meeting.
<p>3.1.7. Official Opening of the Stakeholder Engagement Session. Prof. Ismail Duale Yusuf Honorable Minister Minister of Education & Science, Somaliland.</p>	<p>Eventually, this was officially the Stakeholder Engagement Session of the Raja-Kaaba Project, by the Hon. Minister of Education & Science, Somaliland he provided a summary of the program and highlighted the Education policy of the new government led by the President of Somaliland H.E. Dr. Abdirahman Mohamed Abdillahi (Cirro);</p> <ul style="list-style-type: none"> - This is a World Bank Project focused on girls’ education in three regions of Somaliland (M/Jeh, Togdheer, and Sanag). - In this stakeholder engagement session, together will discuss many issues of the project components, and the participants and the key ESS

Activity	Key Note Speeches
	<p>criteria as Faheema has already said. All will have the opportunity to contribute to the project.</p> <ul style="list-style-type: none"> - The Minister mentioned this Raja-Kaaba Project will support girls' education by targeting those who do not have access to education in target regions of Somaliland. - Underlined the importance of transparency, accountability, and wise utilization of the project budget to ensure its effectiveness and impact on the target beneficiaries under the regions of M/Jeh, Togdheer, and Sanag. - During the session, the Minister, highlights that education and other basic services are a key and top priority for this new government administration, particularly improving equitable access to education by enhancing girls' education and constructing new learning spaces in remote areas under the project target regions. - Finally, the Minister stated, "one of the new government's top priorities is to maintain peace and stability to improve proper service delivery including education to all our citizens".
<p>3.1.8. Presentation on Raja-Kaaba Project Overview</p>	<p>At the end of the opening remarks, the Project Coordinator Ms. Faheema. presented the overview of the Raja-Kaaba Project in which she shared the following main points;</p>
<p>Faheema, PIU Coordinator, MoES-</p>	<ul style="list-style-type: none"> - Project Information: the Raja-Kaaba Project approved June 20th, 2022 and the closing date is: June 20th, 2026. - Project Development Objectives: to improve literacy and numeracy skills of women in selected areas and to prepare women for leadership roles. - Beneficiary: Girls and women; ages 15-35 years; national coverage; with the following groups: <ul style="list-style-type: none">  Group 1: Girls/women without functional skills in literacy and numeracy  Group 2: Girls/women with basic literacy and numeracy skills  Group 3: Secondary school graduates ready for higher education <p>Following the presentation, participants openly discussed the programme components, mainly the selection process of target locations, implementation modalities. some of the programme activities and the key importance of ESS practices as well as the role of the stakeholders.</p>

Activity	Key Findings
<p>3.2.2. Groupwork Discussions:</p>	<p>Following the presentations made by Faheema PIU Coordinator, the participants had three separate group work discussions held during the stakeholder's engagement session in which the facilitator divided participants into 3 groups to discuss and answer the questions;</p> <p>Therefore, after group work discussions, each group presented their findings reflecting the following key questions;</p> <ul style="list-style-type: none"> ● <i>Thinking about the Environmental and Social Framework (ESF), as set out by the World Bank:</i>


Activity	Key Findings
	<ol style="list-style-type: none"> 1. What are your thoughts on Raja Kaaba project in Somaliland's context? 2. What do you think of key objectives and components? 3. What would you consider the main contributions or strengths in this project? 4. If any, what potential weaknesses are there within this project? Handout given and understood. People aware with a lot of the guidance in discussion. 5. Are there any potential gaps in this project? 6. What other opportunities need to be explored or incorporated within this project? 7. Do you have any additional thoughts or reflections regarding this project ?
<p>Group 1: Presentation Finding presented by:</p> <p>Hillow</p>	<p>Mr. Hillow from group one presented the findings from group discussion, highlighted the following points:</p> <ul style="list-style-type: none"> - NFE/TVET system strengthening - Teacher recruitment and training and scholarship/skills training, labour market. - Capacity building: Economic empowerment - Access to education specifically girls/women for TVET/NFE system strengthening - Quality: higher skills development and provision of scholarships - Strengthening the capacity of MoES at levels - To work with all the relevant stakeholders in achieving the projects and success - Sustainability of exist strategy
<p>Group 2: Presentation Finding presented by:</p> <p>Safia,</p>	<p>Ms. Safia from Group two presented the findings from group discussion, highlighted the following points:</p> <ul style="list-style-type: none"> - Improvement - Applicable - Promoting literacy and numeracy of the girls/women in Somaliland - Contribute social economic situation of the women/girls in Somaliland - Improve women leadership empowerment - The geographic coverage is limited - The project timeframe is too short, in the context of education, a minimum of a 3 years program. - The project should in line with other existing multi-year programs (GPE, ECW and EU funds programs). - Promote inclusiveness
<p>Group 3: Presentation Finding presented by:</p> <p>Mustafe,</p>	<p>Mr. Mustafe from Group three presented the findings from group discussion, highlighted the following points:</p> <ul style="list-style-type: none"> - Positive and relevant to access and promotion - Promotion of girl's education and creating economic opportunities - Relevant (system strengthening) - PIV (Equity, coverage stakeholders) - The project is limited timeframe and insufficient project funding

ESMF for Raja Kaaba Project in Somaliland (P176898)

Activity	Key Findings
	<ul style="list-style-type: none"> - The scope of the project's coverage is limited to only a few regions of Somaliland.
<p>3.2.3. Next Steps Presentation:</p> <p>PIU Coordinator</p>	<p>The PIU Coordinator, Ms. Faheema, after the group work discussion, she presented the following the next steps; she outlined the key actions to be taken moving forward and importance of continued collaboration among all the stakeholders.</p> <ul style="list-style-type: none"> - We will carry your discussion points forward & assign a point person to action them. - Create a plan and share with our PSC & PMC. - Create reports consistent with our discussions for all stakeholders. - Hold more ESCP stakeholder meetings to inform our work processes

II. Participation List

10/02/25



REPUBLIC OF SOMALILAND
MINISTRY OF EDUCATION
AND SCIENCE

JAMHUURIYADA SOOMAALILAND
WASAARADA WAXBARASHADA
IYO SAYNISKA

ESCP Stakeholder Engagement Meeting for Raja Kaaba

Participants Attendance Sheet Assod Hotel, Hargeisa Date: 10/02/2025

S/N	Name	Organization	Email	Telephone	Signature
1	Abdifatahi Mohamed Abdi	UOH	cfataaxmc@gmail.com		89-Af
2	Mustafe Hassan Dalin	EAU	mhdahir-02@gmail.com		Xaf
3	Ragija Ahmed Sidi	EAU	ragija23@gmail.com		Bali
4	Abdiganani Ismail	CHE	abdiganani493@gmail.com		Dan
5	Isra Ahmed Mohamed	SNDF	isra.ahmed@sndf.som.org		Isra
6	Sagal Mohamed Hawadle	Nagaad Network	Sagalhawadle@gmail.com		Hawadle
7	Nafisa Yusuf Mohamed	Nagaad	nagaad.org@yahoo.com		Nafisa
8	AHMED MOHAMED ATYE	MOES	atye01@gmail.com		Atye
9	Ismail Dualeh	MOES	Minjater.Moe@sl.gov.org		Isma
10	Muhammad Ali Hassan	MOLSAF	alalaidi1984@gmail.com		38
11	Aden Jama Duale	NCHE	Dg.nche@sl.gov.org		Aden
12	Abraham Hussein Ali	MOE	DG.MOE@sl.gov.org		Abraham
13	Ahmed Ismail Abdi	MOE	ahmed.xidambacsket1@gmail.com		Ahmed
14	Abdirahman Jama Adille	MOPND	Nurgass7@gmail.com		Adille
15					

ESMF for Raja Kaaba Project in Somaliland (P176898)

No	Name	Organization	Email	Telephone	Signature
16	Mahdi Ali Hussein	Street-Child	mahdi.ali@street-child.org		Mahdi
17	Nimcaran Ahmed Eiel	CMRight	NimcaranEiel@gmail.com		Nimcaran
18	Abdiragadir Issa Hussein	MOES	abdiragadir.issa@gmail.com		Abdiragadir
19	Sadiq Mohamed Aden	MOES	Sadiq.moh.72@gmail.com		Sadiq
20	Muhammad Farooq Ahmed	MOE	muhammadfarooq123@gmail.com		Muhammad
21	Mohamad Omar Hussein	SERP coordinator	mohamad.omer@serp.org		Mohamad
22	Abdulfatih Amal Dirir	FMS-MOSS	abulfatih.fch@gmail.com		Abdulfatih
23	Fardus Saeed Dirir	WB consultant	fardusdirir@gmail.com		Fardus
24	Muhammad Sa. Abd.	MOTS	medsaeid@gmail.com		Muhammad
25	Ahmed Mohamed Shirena	UOTI	ahmed.shirena@uot.edu.so		Ahmed
26	Ismael Mustafid Abdi	MOFED	ismaelmustafid@gmail.com		Ismael
27	Baka Jibul	MOEST	bakajibul@gmail.com		Baka
28	Seemal Mohamed	ABUCO	seemalmk@gmail.com		Seemal
29	XXXXXXXXXXXX	MOES	XXXXXXXXXXXX		XXXXXXXXXXXX
30	Jaheema Haji-Corahim	MOES - PIU	jaheema.haj@hmail.com		Jaheema
31	YUSUF HUSSEIN MOHAMED	MOES	Yhmohamed44@gmail.com		Yusuf
32					
33					

ANNEX 3: INDICATIVE ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

No	ITEM	DETAILS				
INTRODUCTION						
1	Project Name	Somaliland Women Empowering Project				
2	Project Location					
3	Project Description (brief)					
4	Does the Project require any:	<i>Yes</i>	<i>No</i>	<i>If yes, extent in ha.</i>		
5	Reclamation of land, wetlands					
6	Clearing of grazing lands					
7	Felling of trees					
8	Minimum land area required for the proposed development (ha)					
9	Available total land area within the identified location (ha)					
10	Expected construction period					
11	Responsible contact person, contact information					
12	Present land ownership	<i>State:</i>	<i>Private:</i>	<i>Other:</i>		
13	Source of funding					
14	Total Cost of the Project					
15	Anticipated Date of Completion					
ENVIRONMENTAL & SOCIAL IMPACTs AND MITIGATION/ENHANCEMENT DURING CONSTRUCTION PERIOD						
	Impacts	H ⁶⁷	M ⁶⁸	L ⁶⁹	N/A	Mitigation/Enhancement
16	Soil erosion					
17	Water pollution					
18	Noise pollution					
19	Solid waste generation					
20	Loss of vegetation cover					
21	Habitat loss or fragmentation					
22	General disturbance to animal behaviour					
23	Interference with normal movement of animals					
24	Irreversible/irreparable environmental change					
25	Compromised selection process					
26	GBV/SEAH					
27	Inadequate public/stakeholder consultation					
28	Lack of management capacity					
29	Land and resettlement issues					
30	CHS – fire hazards and life threats					
31	CHS – transmission of diseases					
32	CHS – security personnel					

⁶⁷ High⁶⁸ Medium⁶⁹ Low

ESMF for Raja Kaaba Project in Somaliland (P176898)

33	CHS – Exposure to hazardous materials and equipment					
ENVIRONMENTAL & SOCIAL IMPACTS AND MITIGATION/ENHANCEMENT DURING OPERATION PERIOD						
	Impacts	H	M	L	N/A	Mitigation/Enhancement
34	Use of water resources					
35	Use of energy resources					
36	Effluents downstream					
37	Air and noise pollution					
38	Water pollution					
39	Working terms and conditions					
40	OHS					
41	GBV/ discrimination at workplace					
42	CHS – fire hazards and life threats					
43	CHS – transmission of diseases					
44	CHS – security personnel					
45	CHS – Exposure to hazardous materials and equipment					
COMMUNITY ENGAGEMENT						
46	Number and nature of public consultation meetings conducted so far	Type of Meeting	Number of Meetings	Nature of Participants	Participants	
					Male	Female
CONTACT DETAILS OF OFFICIALS AND RECOMMENDATIONS						
47	Name of the person completing form					
48	Designation and contact information					
49	List of team members					
50	Signature and date					
51	Name of officer who checked this form					
52	Designation and contact information					
53	Remarks					
54	Signature and Date					

Screening procedure will consider the following exclusion criteria, as a minimum:

- a. Activities that may cause long-term, permanent, and/or irreversible impacts (e.g. loss of major natural habitats);
- b. have a high probability of causing serious adverse effects to human health and/or the environment;
- c. may have significant adverse social impacts and/or may give rise to significant social conflicts;
- d. activities anticipated to result in permanent or temporary physical or economic displacement;
- e. that may involve physical resettlement or extensive economic resettlement;
- f. that may impact known cultural heritage sites including those important to local communities; and

- g. activities that involve use of pesticides.

ANNEX 4: DRAFT TERMS OF REFERENCE FOR AN ESIA FOR SITE-SPECIFIC SUB-PROJECT

1.0 INTRODUCTION

1.1 Purpose of the ESIA

There is need to carry out an Environmental and Social Impact Assessment (ESIA), which will have to comply with the environmental procedures ofand with the environmental requirements guidelines of the financing institutions, World Bank (<https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>).

1.2 Objectives of the ESIA

The objectives of the ESIA are to:

- Thoroughly document baseline conditions of the study area and the socio-economic conditions of the affected communities;
- Place the ecological baseline conditions of the concession area in the context of the surrounding region;
- Inform, obtain and address contributions from stakeholders including relevant authorities and the public;
- Assess in detail, the environmental and social impact that would result from the project;
- Identify mitigation measures that would reduce the significance of predicted negative impacts or enhanced predicted benefits of the proposed project;
- Develop an appropriate environmental and social management plan (ESMP) for the proposed project; and
- Meet the requirements of the national environmental regulatory agencies in as well as international best practice for project of this nature.

The ESIA will identify the potential environmental and social impacts associated with the project and then provide the measures that will be required to manage those impacts, which will be incorporated into an ESMP. A multi-disciplinary team of experts will conduct the ESIA with the stages identified as follows:

2.0 PHASE DESCRIPTION

Screening/Scoping- Identification of key issues and concern that are to be addressed by the specialist studies

Stakeholders Engagement – Initial engagement of key stakeholders during scoping

Baseline Study - Characterize current broadly-defined environmental and social conditions on and near the site to serve as a basis against which impacts can be measured and monitored

Assessment and Mitigation - Identification of positive and negative impacts; the potential spatial extent, severity, duration and probability of impacts are described along with mitigation actions

Reporting - Collation of specialist studies and assessments and the compilation of the ESIA Report

Review - The ESIA Report is reviewed by theMinistry, sector agencies and stakeholders. All stakeholders in the process should have an opportunity to comment on the ESIA Report, in such a manner that any concerns are able to be taken into account.

The ESIA process will be guided by the [insert name of] Guidelines for EIA process as stipulated in Annex 6 and international best practice guidelines for projects of this nature such as the World Bank.

3.0 TASKS

The EMP, based on the Environmental and Social assessment, should identify those E&S issues that require a more detailed management plan in order to manage potential impacts and mitigation. In the conduct of the ESIA the consultant team will undertake the following tasks:

- Provide a detailed description of the project;
- Describe alternatives examined in developing the project;
- Identify the relevant laws, guidelines, regulations and standards that define the operating framework of the project;
- Assemble relevant baseline information on the project area including: geology, soils, hydrology, surface water quality, noise, air quality, climate, terrestrial and aquatic flora and fauna;
- Collect Information on the socio-economic background of the project area;
- Identify and assess the physical, biological, socio-economic impacts of the project;
- Identify and assess cumulative impacts;
- Identify and discuss mitigation measures for identified impacts and clearly identify residual impact;

- Conduct and document stakeholder engagement;
- Prepare an environmental and social management plan that recommends measures to address those adverse impacts that can be avoided, or reduced to acceptable levels; and
- Design a monitoring and auditing plan for the duration of the project.

4.0 SPECIFIC ISSUES TO BE ADDRESSED BY THE ESIA

The consultant team will address the full range of issues triggered by the proposed project.

Specific issues include:

- Legal and institutional framework
- Land acquisition
- Security situation
- A detailed description of the project area including maps showing the boundaries of the project area, layout of current land uses of the surrounding areas and network of drainage systems;
- Current water quality data from surrounding streams, rivers and groundwater and the establishment of fixed stations for continuous monitoring;
- Dust and noise management in particular from haul roads;
- Impacts to aquatic and terrestrial flora and fauna;
- Water use and effluent management;
- Waste management;
- Land use;
- Cultural and archaeological resources;
- Occupational health and safety;
- Social and economic impacts to the local communities including direct benefits such as jobs;
- Cumulative and residual impacts of the project;
- An ESMP
- A Monitoring and Auditing Plan
- An Emergency Response Plan (to consider identification of emergencies, response mechanisms, personnel responsibilities and equipment and training requirements).

5.0 SITE VISIT AND SCOPING

The ESIA consultant will cover the cost of site visits associated with the conduct of the ESIA, public notices and other costs associated with the ESIA.

6.0 TECHNICAL TEAM

Team Members should satisfy these minimum requirements:

General Professional Experience:

Mandatory (must have)

- Science degree in relevant subject areas
- At least six years of professional working experience, (ten for team leader) of which three years must be related to ESIA in the sector, in the region
- Good communication skills, verbally and written
- Ability to work in a team (or lead a team, in the case of the team leader)
- Working knowledge of English (writing and speaking)

Desirable (nice to have)

- Knowledge of the country
- Knowledge of relevant local language (s)

Specific Professional Experience:

Mandatory

- Prior experience with <insert donor> policies and procedures
- Prior experience of EIA or ESIA, at least three previous assignments
- Prior experience of leading teams (for team leader) at least five previous assignments
- Prior experience of the specific sector, at least three previous assignments

Desirable (nice to have)

- Prior experience of ESIA in the sector in the country

7.0 ESIA REPORT

Outline for an Environmental and Social Impact Assessment Report:

An Environmental and Social Impact Assessment process should not exclusively be perceived as a matter of preparing a report and obtaining approval only, instead the use of the ESIA should help ensure that the environmental and social concerns of local communities and other stakeholders are taken into account throughout the life of the project. The ESIA should be tailored to the specific sub-project and to the legal requirements, environmental and social conditions where it is situated. The coverage of the ESIA report itself will depend on local circumstances. The identification and participation of relevant stakeholders is a critical part of the process. The following outline for a typical ESIA report is offered on the basis that identified issues will not necessarily have the same degree of relevance for all sub-projects:

Executive Summary or Non-Technical Summary – To be written in non-technical language, be translated into the major indigenous language (s), and be accessible and understandable to the relevant stakeholders and/or affected communities

Methods and Key Issues – This provides the opportunity to clarify some basic information about the ESIA including what difficulties have been encountered and the limitation of the assessment.

Legislative Framework – The legislative framework should include the relevant legislation and requirements of the country and region where the project is situated. It is also important to include a statement that commits the project to compliance.

Consultation Process – Should contain the step-by-step approach and views expressed. If clear recommendations resulting from the consultation process were not followed, the reasons for those decisions should be provided.

Description of the Environmental and Social Baseline – Should describe information collected in order to provide a picture of existing trends resulting from natural events or human activities, the current state of the environment, the current socio-economic conditions in the project area, and any potential future changes which may occur as a result of planned developments.

Consideration of Alternatives – Should present the results of a well-thought-out process that has ensured that reasonable alternatives of different types have been considered.

Description of the Proposed Development – Should cover the purpose and scope of the sub-project, an overview of the sub-project and its location, a detailed description and layout, the site preparation and construction, and the nature of the process, as well as resources and technologies to be used.

Prediction and Evaluation of Significant Environmental and Social Impacts – Should emphasize the most important impacts, who or what these will affect, and how significant the effect will be.

Mitigation/Offset Measures – Should provide an assessment of the hierarchy of impacts and whether mitigation measures proposed to alleviate the impacts and residual and/or cumulative effects. Proposed methodology to reduce negative impacts should also be included.

Environmental and Social Management Plan – Should provide a framework for managing and monitoring impacts (implementation costs inclusive) for the duration of the sub-project, and ensuring corrective measures. It should be designed to ensure that the commitments made in the ESIA, and in any subsequent assessment reports, together with any license approval or similar conditions are implemented.

Monitoring and Auditing Plan – The monitoring plan is primarily to ensure a project is implemented (pre-construction, construction and commissioning) with commitments made in the ESIA. The auditing plan is primarily to ensure a project is operated (after commissioning) in accordance with commitments made in the ESIA.

Institutional Framework – should explain in detail the project management hierarchy, along with providing detailed roles and responsibilities. This should also include reporting pathways and frequency, as well as capacity building requirements

Bibliography – A list of all references cited should be included in the report.

8.0 THE TECHNICAL TEAM

One-page CVs of each technical team members should be appended to the ESIA Report.

9.0 MANAGEMENT OF THE ESIA PROCESS

The consultant will manage the overall ESIA process and will be responsible for the compilation and presentation of the ESIA Report. The consultant will plan, coordinate and execute all activities of the ESIA process as well as in the planning and execution of the public scoping meeting and public hearing if required. The consultant will provide

updates to all relevant agencies on the ESIA process.

10. DURATION

The duration for the preparation of ESIA will be adequate to describe the base line accurately, taking into account any potential seasonal changes.

11. ESIA SUBMISSION

This will be discussed with the commissioning authority.

ANNEX 5: DRAFT TERMS OF REFERENCE OUTLINE FOR AN ESMP FOR A SUB-PROJECT

Introduction and Project Description:

Give a short description of the project

Purpose

Indicate the objectives and the project activities, the activities that may cause environmental and social negative impacts and needing adequate mitigation measures.

Tasks

The ESMP should cover:

- Potential environmental and social impacts resulting from project activities;
- Proposed mitigation measures;
- Institutional responsibilities for implementation;
- Monitoring indicators
- Institutional responsibilities for monitoring and implementation of mitigation measures;
- Costs of activities; and
- Calendar of implementation

The ESMP results and the proposed mitigation measures should be discussed with relevant stakeholders, NGOs, local administration and other organizations mainly involved in the project activities. Recommendations from these public consultations should be included in the final ESMP. This ESMP should also be aligned with other Project instruments, including SEP, LMP, GBV/SEAH Prevention and Response Action Plan, ESMF, and ESCP.

Site Visit and Scoping

The ESIA consultant will cover the cost of site visits associated with the conduct of the ESIA, public notices and other costs associated with the ESIA.

Technical Team

Team Members should satisfy these minimum requirements:

General Professional Experience:

Mandatory (must have)

- Science degree in relevant subject areas
- At least six years of professional working experience, (ten for team leader) of which three years must be related to ESIA in the sector, in the region
- Good communication skills, verbally and written
- Ability to work in a team (or lead a team, in the case of the team leader)
- Working knowledge of English (writing and speaking)

Desirable (nice to have)

- Knowledge of the country
- Knowledge of relevant local language (s)

Specific Professional Experience:

Mandatory

- Prior experience with <insert donor> policies and procedures
- Prior experience of EIA or ESIA, at least three previous assignments
- Prior experience of leading teams (for team leader) at least five previous assignments
- Prior experience of the specific sector, at least three previous assignments

Desirable (nice to have)

- Prior experience of ESIA in the sector in the country

Format

- Cover page
- Table of Contents
- List of Abbreviations, Acronyms and Units
- Executive Summary
- Introduction
- Purpose of the ESMP/Objectives
- Project Site Description: Bio-physical environment, administration and governance, educational services,

ESMF for Raja Kaaba Project in Somaliland (P176898)

population profile

- Project components, activities and processes: Describe details of sub-project, including designs, project characteristics
- Applicable standards: including World Banks Operational Performance Standards. Country Standards, Other funding partner standards, other international standards, if appropriate (ISO, WMO, WHO and so on) and other elements of good international practice. If there are specific international standards or practices that need to be met, these should be listed
- Description of environmental and social impacts and mitigation measures for project activities: general positive impacts of the project, specific positive impacts of the sub-project, and possible negative E&S impacts cascaded by ESSs, and table with mitigation measures, monitoring indicators and responsibilities, and estimated budget.
- Institutional framework, roles and responsibilities, action parties
- ESMP Training requirements, if any
- References
- Annexes: such as consultation feedback and screening information

Timescale

The consultant will produce the final ESMP one week after receiving consolidated comments from the World Bank, relevant Country institutions

Deliverables

Draft and Final ESMP (soft copy only)

ANNEX 6: PROTECTION OF CULTURAL PROPERTY

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

The initial phase of the proposed Somaliland Women Empowering project interventions pose limited risks of damaging cultural property. Nevertheless, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents.

Chance Find Procedures

Chance find procedures will be used as follows:

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

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

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

Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Ministry in charge of Department of Archaeology and Museums. Construction work could resume only after permission is given from the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums concerning safeguard of the heritage

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

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

ANNEX 7: GRIEVANCE INFORMATION FORM

Project Details:

Project/Subproject: Location:

Date: (yyyy/mm/dd)

Place of Registration:

Registration No:

Contact Details of the Complainant:

Name: Age:

Gender: Address:

Phone No:

Email Address:

Location Related to the Complaint / Issue:

Village/Town:

Category of Complainant:

Affected Person

Mediator for the Affected Person

Civil Organization / Service Organization

Other (specify)

.....

Summary of Grievance:

.....
.....
.....
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(Attach letter or a petition / document as submitted)

Source of Complaint:

Attachments: 1) _____ 2) _____ 3)

Prepared by: _____ Date:(dd/mm/yyyy)

ANNEX 8: COMPLAINT CATEGORIZING

S/N	Category	Tick	S/N	Category	Tick
1	General Complaints	<input type="checkbox"/>	14	Safety Issue	<input type="checkbox"/>
2	Exclusion	<input type="checkbox"/>	15	Gender Based Violence (GBV)	<input type="checkbox"/>
3	Lack of Consultations	<input type="checkbox"/>	16	Sexual Abuse and Exploitation and Sexual Harassment (SEA/SH)	<input type="checkbox"/>
4	Insufficient Access	<input type="checkbox"/>	17	Forced labor, including human trafficking and use of prison labor	<input type="checkbox"/>
5	Concerns on strategies and priorities including land acquisition strategy and risks	<input type="checkbox"/>	18	Child labor	<input type="checkbox"/>
6	Property Damage	<input type="checkbox"/>	19	Fairness of contracting	<input type="checkbox"/>
7	Land Acquisition	<input type="checkbox"/>	20	Accident During Material Transport	<input type="checkbox"/>
8	Crop Loss	<input type="checkbox"/>	21	Noise	<input type="checkbox"/>
9	Access Road Blockage	<input type="checkbox"/>	22	Vibration	<input type="checkbox"/>
10	Water Quality and Quantity Loss	<input type="checkbox"/>	23	Air pollution and Dust	<input type="checkbox"/>
11	Soil Erosion and Degradation	<input type="checkbox"/>	24	Smell	<input type="checkbox"/>
12	Forest Loss	<input type="checkbox"/>	25	Flooding	<input type="checkbox"/>
13	Other (specify)	<input type="checkbox"/>	26	Other (specify)	<input type="checkbox"/>

ANNEX 9: SAMPLE GRIEVANCE REGISTRATION FORM⁷⁰

COMPLAINANT DETAILS			
Complainant's name (or name of a representative for complainant/s)			
Complainant's address			
Complainant's telephone number and e-mail address (if available)			
Preferred language of communication			
Complainant confidentiality	I wish to raise my grievance anonymously		
	I request that my identity is not disclosed to anyone internally except the grievance coordinator handling my case		
I would prefer if the person contacting me is:	Male	female	gender does not matter
GRIEVANCE DETAILS			
Date			
Description of incident			
Severity	One-time incident/grievance (date)		
	Recurring (how many times)		
	Ongoing (currently experiencing problem)		
Complainant's request/proposal to resolve grievance (Please explain what should be done to solve this problem)			
Grievance type (environment, human rights, livelihood, health, legal, property, corruption)			
Level of damage?	Low	Medium	High
Additional documentation related to grievance			
Verbal Complaint	If complaint is verbal and in the case that the complainant cannot read or write, the grievance coordinator will help to write it down.		

⁷⁰ More details on registering grievances are elaborately indicated in the SEP for the Somaliland Empowering Women through Education and Skills Project (Raja Kaaba)

ANNEX 10: MEETING RECORD FORMAT

Project/Subproject:

Location:

Date of the Meeting:

Complaint Register No:

Venue of meeting:

Details of Participants

Project/Government

Project/Government

Summary of the Grievance:

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Notes on Discussion:

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GRC Meeting Decisions /Recommendations:

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Issue Solved Unsolved

Name of Meeting Chairperson:

Signature: Date:(DD/MM/YYYY)

ANNEX 11: WORLD BANK INCIDENT CLASSIFICATION GUIDE

Indicative

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

Serious

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

Severe

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