

GOVERNMENT OF SOMALILAND



MINISTRY OF EDUCATION AND SCIENC

**Empowering Women Through Education and Skills
Project – “Raja Kaaba” (P176898)**

STAKEHOLDER ENGAGEMENT PLAN(SEP)

DRAFT 1.0

FEBRUARY 28, 2025

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ACRONYMS AND ABBREVIATIONS

CECs	community education committees
CSOs	Civil Society Organizations
DG	Director General
ESCP	Environmental and Social Commitment Plan
ESIRT	Environmental and Social Incident Reporting
ESMF	Environment and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
ESSP	Education Sector Strategic Plan
GBV	Gender-based Violence
GoSL	Government of Somaliland
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDPs	Internally Displaced Persons
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MIS	Management Information System
MoECC	Ministry of Environment and Climate Change
MoES	Ministry of Education, and Science
MoFD	Ministry of Finance Development
MESAF	Ministry of Employment, Social Affairs, and Family
MoPLH	Ministry of Public Works, Land and Housing
NDP	National Development Plan
NFE	Non-Formal Education
NGOs	Non-governmental Organizations
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PAD	Project Appraisal Document
PAPs	Project Affected Persons
PDO	Project Development Objective
PIU	Project Implementation Unit
PMC	Project Management Committee
PSC	Project Steering Committee
PWDs	Persons Living with Disabilities
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
STEM	Science, Technology, Engineering and Math
TVET	Technical and Vocational Education and Training
WBG	World Bank Group

1. INTRODUCTION

1.1. PROJECT BACKGROUND

1. Somaliland's potential progress is confronted with the substantial challenges of widespread poverty, low economic growth, and low fiscal capacity. 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. The 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 (GoSL) at an even worse and perilous position.

2. With high fertility and improved survival rates means that education, skills, and employment needs will remain high for decades to come. Adolescents and youth aged 10-24 years represent 34 percent of the population, slightly higher than the Sub-Saharan African average share at 32 percent and much higher than the global share at 24 percent.¹ These demographic changes will require expansion of fiscal space for education to keep up with demand and provide the skills required for economic transformation.

3. With the right investments in its people – particularly in educating girls and women – Somaliland has the opportunity to capture a demographic dividend. Despite currently low levels of literacy and access to education, Somalia's youthful population indicates a high return on investing not only in the school-age population but also in girls and women who have been left behind by the formal education system and could benefit from a second chance. Timely and effective investments in human capital for girls and women hold the promise of reducing the intergenerational transmission of poverty.

4. The World Bank proposes to engage and support the (GoSL) 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.

5. 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:

- i. to promote within society, the acquisition and application of relevant knowledge, skills and attitudes necessary to fulfil its potential for development in a continuously changing world.
- ii. concern for proper management and utilization of the physical environment.
- iii. a sense of responsibility for peace and improved relations at the individual, family, community, national and international levels.

¹ According to the UN WPP (2019), the median age of the Somali population was only 16.7 years. It is among the lowest in the world behind Niger (15.2), Mali (16.3), and Chad (16.6).

- iv. 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.
- v. values of loyalty, self-reliance, tolerance, co-operation, diligence, openness, inquiry, critical thought, honesty, justice, fairness and peace.
- vi. awareness of the need for and the active promotion of social justice, in the context of Islam.

2. PROJECT DESCRIPTION

2.1. PROJECT DESCRIPTION AND COMPONENTS

6. The Project aims to support the government's efforts to enhance the conditions for women by providing the fundamental skills, qualifications, competencies, and mindset needed 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 and will include policy development and system management across project components. This will be designed through a multitrack approach that leverages Somaliland's advanced internet penetration and telecommunication coverage through the provision of second-chance education for girls and women who did not complete formal schooling, and investments in higher education to build leadership capacity and create aspirational pathways for young women, and to ensure these interventions achieve their desired outputs, access to education, quality and improved coherence. This project has three components.

- **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 fund with a Grant Committee that includes 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.
- *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 a flexible approach which will include contracting Non-governmental Organizations (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.
- **Component 2: Higher Education for Women's Leadership** 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. Through this component, the GoSL will take the first steps in creating an autonomous or semi-autonomous Somaliland Women's University (SWU) that will serve as the institutional hub for a

system-wide expansion of women’s leadership development through participation in higher education. The principal aim of the SWU would be to provide Somaliland girls and women from all walks of life with strong academic potential with access to a dedicated, safe, and well-resourced higher education opportunity through which they can 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. This university will serve two key strategic goals identified by the GoSL 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.

- Initial implementation activities will consist of utilizing existing facilities and academic programs at selected institution(s) to implement women-centered short courses and foundational courses for upskilling and preparing girls/women for university. Independent campuses in at least two regions in Somaliland (initially will cover Maroodi Jeeh, Togdheer and /or Sanaag regions) would be established by the close of the project, with possibilities for expansion beyond the life of the project. SWU would be independent of any umbrella university, likely adjacent to or within one of the existing public universities. Component 2 will also help government build the strategy and policy framework to support, sustain, and grow pathways for Somali women to engage in and benefit from higher education and leadership support.
- **Component 3: Systems Strengthening, Technical Assistance and Project Management** will provide resources to support the project implementation by strengthening the management capacity of Ministry of Education and Science staff as well as regional and district level education administrators. Financing to be provided under this component will support staffing of key project staff at regional levels, capacity building and training activities, operating costs for project management, monitoring, and training programs, office equipment and furniture for project staff.
- The component will finance 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. The component will also finance cross-cutting technical assistance, including: a comprehensive approach to GBV prevention, risk mitigation and response, building on the GBV prevention and mitigation activities under the SEHCD Project; development of a national strategy on gender in higher education for Somalia; and pilot studies, qualitative evaluations, and impact evaluations on the innovative activities developed under both Components 1 and 2

2.2. PROJECT DEVELOPMENT OBJECTIVE

7. The Project Development Objective (PDO) is to enhance the conditions for women's empowerment through improved literacy and numeracy skills, and skills for leadership. 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).

2.3. PROJECT CONTEXT AND TARGET POPULATION

8. The project will be implemented in targeted districts across Somaliland screened to ensure that they meet a threshold of need, defined by female literacy levels and/or the presence of vulnerable populations. Direct project beneficiaries are women and girls primarily and may, in some target districts, also include disadvantaged boys and men all from primarily marginalized and disadvantaged populations, however, numbers to be determined based on available budget. The selection criteria will include (i) two target districts and one alternate district (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 1 on selected districts

Table 1: Proposed districts in Somaliland

Regions within Somaliland		Proposed Districts		Alternative District
Soma liland	Maroodi-Jeex and Togdheer	1	Hargaisa	Erigavo (Saanag Region)
		2	Burao	

2.4. KEY ENVIRONMENTAL AND SOCIAL RISKS OF THE PROJECT

9. While Somaliland has seen considerable improvement in security and governance, it remains vulnerable and fragile. The fragility includes high poverty and unemployment levels, the oligopolistic nature of key sectors of the economy, rapid urbanization, pressure on key natural resources (especially water and rangeland), and the biggest threat remains the conflict in the eastern part.

10. The environmental risk rating is “Substantial to moderate” at this time. This is due to the environmental risks that may arise from proposed minor renovation activities under Component 2 in the project, if decided for the existing educational campuses. Such minor renovations are 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. Occupational health and safety (OHS) risks and impacts are anticipated with little in-country knowledge of Good International and Industry Practice (GIIP) in relation to the implementation of both Components 1 and 2.

11. It is expected that the project will contribute considerably to the strengthening of women’s empowerment, not just among the immediate beneficiaries, but also indirectly to the society at large, and have positive social outcomes on peace processes and institutional building. Whereas project activities are expected to have significant positive impacts, the likelihood of project activities leading to adverse risks and impacts is rated “High.” Key social risks include: (i) security risks and extremist-instigated violence on project-affected communities resulting in discontinuity of the project; (ii)

institutional and systems capacity weakness to identify, understand, monitor and prevent adverse social impacts on the project as this is only developing; (iii) impacts on the health, safety and well-being of project workers; (iv) use of child labor in hazardous work that jeopardizes the health and safety of children; (v) exclusion of vulnerable, marginalized and minority members from the project benefits due to project investments being rolled out in a context of limited resources against widespread need; (vi) challenges in access to beneficiaries for meaningful stakeholder engagements as well as grievance redress and monitoring; (vii) sexual exploitation and abuse, sexual harassment (SEA/SH) and other forms for gender-based violence (GBV) extending from registration of women attending skills development centers and interaction at the college; (viii) intentional and unintentional repercussions against women and girl beneficiaries, including varying forms of GBV, due to the unequal gender and power relations; and (ix) risks related to data collection activities.

3. STAKEHOLDER ENGAGEMENT PLAN (SEP)

3.1. PURPOSE OF THE SEP

12. The SEP seeks to define a structured, purposeful, genuine, and culturally appropriate approach to consultation and information disclosure. This SEP is being prepared in accordance with ESS10 of the World Bank's Environmental and Social Framework. The Government of Somaliland (GoSL) 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. This differential necessitates systematic efforts and requires the preparation, adoption, disclosure and implementation of this Stakeholder Engagement Plan (SEP). It is with this in mind that this SEP has been developed.

13. This plan will help the GoSL to identify elaborately different stakeholders and develop an approach for reaching each of the identified groups. The SEP 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. Overall, this SEP serves the following purposes:

- i. Identify and analyze different stakeholders at different levels.
- ii. Plan engagement modalities by use of effective communication tools for consultations and disclosure.
- iii. Define the role and responsibilities of different actors in implementing the SEP.
- iv. Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings.
- v. Establish a grievance redress mechanism (GRM) for the project.
- vi. Outline platforms for stakeholders to influence decisions regarding the project.
- vii. Outline project information dissemination modalities including differentiated considerations for inclusion of poor and vulnerable populations.
- viii. Document stakeholder consultations on proposed project design, environmental and social risks and impacts, mitigation measures, the proposed SEP, and draft environmental and social risk management instruments.

3.2. STAKEHOLDER IDENTIFICATION, ANALYSIS AND ENGAGEMENT

14. 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.

15. The project will engage a large and diverse array of stakeholders during planning and implementation. The GoSL will be responsible for project implementation and management, together

with contracted implementation partners, who will implement project TVET interventions throughout the selected regions, 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. The process of stakeholder engagement will involve the following, as set out in further detail in this SEP:

- stakeholder identification and analysis,
- planning how the engagement with stakeholders will take place,
- disclosure of information related to the project, and which can be released without negative security outcomes,
- consultation with identified sectoral stakeholders,
- addressing and responding to grievances, and
- reporting to stakeholders.

16. The GoSL will engage with stakeholders throughout the project lifecycle, and in a meaningful, timely, and relevant manner. Ensuring the information is understandable and accessible to all and free of manipulation, interference, coercion, discrimination, and intimidation. The nature, scope and frequency of stakeholder engagement will be all-inclusive reflecting the nature and scale of the project, including the need for meaningful consultations with women, youth, and marginalized groups.

17. As part of project preparation, the GoSL will carry out a Stakeholder Engagement Analysis which will aim at identifying (a) who will be directly or indirectly affected by the project, (b) how the project will reach out to stakeholders, and (c) how the project would share information and get stakeholders involved in decision-making and implementation of the project.

18. Special consideration will be taken to ensure that women, youth, minority groups, and persons living with disabilities will be represented amongst the stakeholder groups. Various other stakeholders such as religious leaders, clan elders and opinion leaders - who may influence the perception and uptake of education services and involvement of women in the project, will also be engaged.

3.3. STAKEHOLDER MAPPING AND ANALYSIS

19. For the purpose of this ESS10, “stakeholders” are categorized into two major groups as below, details of which are provided in the tables.

- **“Project Affected Parties”**: 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. See Table 2 below.

Table 2: Project-Affected Parties

No	Stakeholders	Description	Area of interest
1	General Public especially women and girls in youth age period.	<p>The public who reside in the project locations 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 VMGs²) 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.
2	Communities that will benefit from the project	There is a possible role for communities, especially through established community education committees (CECs), who may be involved in providing space for project activities and follow-up of households to ensure women, and young mothers attend to the program.	<ul style="list-style-type: none"> - Meaningful community engagement in the project decisions. - Lack of interference in the function of the CECs at the community level. - CECs are trained and facilitate to perform their multiple roles. - CECs conform to a code of conduct that is clear on the GBV/SEA in accessing project benefits.
3	Ministry Officials at the	The respective department under the MoES will	- MoES identifies and

² Vulnerable and Marginalized Groups

No	Stakeholders	Description	Area of interest
	Ministry of Education and Science	have implementation responsibility through a dedicated PIU. The MoES will overall have responsibility of managing all the components of the project. It will work closely with the regions receiving project support.	<p>meaningfully engages with partners in all aspects of the project.</p> <ul style="list-style-type: none"> - The coordination between the districts - Principles of engagement are observed in all aspects of consultation at the different levels. - Selection of the proposed college of women site and schools to be used/ constructed 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 construction services and provision of supplies and equipment for proposed university
4	Ministry Officials at the District levels	The Ministry of Education (MoES) at this level will be responsible for the implementation of the project activities and policies.	<ul style="list-style-type: none"> - 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	Schools/TVET institutions and universities	The schools and TVET institutions will partly host the NFE trainings and the life skills training; the university will host the women's university.	<ul style="list-style-type: none"> - Meaningful engagement with the school/TVET administrators and the CECs on the utilization. - Transparency in the process of school/TVET selection through the Skills Development Fund.
6	Civil society organization and Nongovernmental organization both local	These are organizations that have an interest in the women education at all levels and have activities to promote girls/ women education across the country	<ul style="list-style-type: none"> - Meaningful engagement on the target groups - Means of improving

No	Stakeholders	Description	Area of interest
	and international	and entrepreneurship among young women.	demand side of the project - Retention of NFE students - The best skills development activities and monitoring methods.

- Other Interested Parties (OIP):** These include individuals/groups/entities whose interests may be affected by the project and who have the potential to influence project outcomes. OIP 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 Organizations (CSOs) and NGOs who may become project partners. 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.

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 supporting the education sector, business companies employing women and entities that may be involved in the provision of services. See Table 3 for more detail.

Table 3: Other Interested Parties

Stakeholders	Description	Area of Interest
CSOs and NGOs operating in the identified project districts.	Most development activities in rural and remote parts 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.	- They complement government services in different areas, including education. - There is transparency and accountability in all aspects of the engagement. - Principles of engagement are observed in all aspects of the consultation.
Other Ministries: Ministry of Finance Development (MoFD) Ministry of Employment, Social Affairs, and Family (MESAF) Ministry of Public Works, Land and Housing (MoPLH)	The other Ministries will be involved in as far as the implementation of specific activities and linkages with ongoing interventions: Employment and Social Affairs and family providing policy direction and guidance on all labor administration, particularly areas of protection and development of the labor force. Ensure security of project workers and investments. The Ministry of Environment and Climate Change is standard-bearer institutional for environmental risk	<ul style="list-style-type: none"> Implementation of specific activities and linkages with ongoing interventions. Relevant policies and frameworks are followed.

Stakeholders	Description	Area of Interest
Ministry of Environment and Climate Change(MoECC)	management for the project environment.	
Development Partners (UNICEF, etc.)	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

- 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.

The vulnerable groups identified for this project include pastoralists, and women with disabilities, IDPs, minority groups, etc.

20. The GoSL 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.

4. INSTITUTIONAL AND LEGAL FRAMEWORK FOR THE SEP

4.1. INTRODUCTION

21. The key legislation for this project can be subdivided into two groups:
- i. legislation, policies, and other legal frameworks on the education sector in Somalia.
 - ii. legislation on access to information.

4.2. LAWS, POLICIES AND OTHER LEGISLATION ON THE EDUCATION SECTOR IN SOMALIA

22. **The Constitution:** The constitution provides the legal framework for the need of education and 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”. Also the constitution is against any form of discrimination and 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’

23. **Somaliland National Education Policy (SLNEP 2015-2030):** The GoSL 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 GoSL 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.

4.3. ACCESS TO INFORMATION AND STAKEHOLDER ENGAGEMENT IN SOMALIA

24. Somaliland has enacted citizen and stakeholder engagement legislation that relates both the right to access information and participation in policy development and decision-making. However, this is still very much nascent, and the project will be guided by the necessary World Bank Environment and Social Standards on stakeholder engagement.

25. Somaliland currently does not have clear national legislative provisions on citizen and stakeholder engagement in the more specific investment programs and projects. In those cases, it relies on the relevant provisions of the donor organizations. The project will include a local framework for stakeholder engagement as part of the Technical Assistance and capacity building products.

4.4. WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARD ON STAKEHOLDER ENGAGEMENT

26. The main World Bank Environmental and Social Standards (ESS) for Stakeholder Engagement is ESS10: Stakeholder Engagement and Information Disclosure, which 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.

27. The World Bank's Environmental and Social Standard 10 (ESS10) defines the requirements for stakeholder engagement as follows:

- i. Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them.
- ii. Assess stakeholder interests and support for the project and enable stakeholders' views to be taken into account in project design.
- iii. Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle.
- iv. Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner.

28. The objectives of ESS10 are as follows, as relevant to the project:

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

5. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. CONSULTATIONS PRIOR TO THIS SEP

29. The analytical underpinnings of the project are based largely on Somaliland's needs assessments for education. The project has been conceived in light of Somalia's Ninth National Development Plan, which has a special chapter dedicated to the need for investments in the country's social sectors, including the education sector. The design and priorities of the project have been discussed and refined through a series of engagements between the World Bank and FGS and GoSL representatives, including a joint project identification mission conducted between the World Bank and the Ministry representatives virtually and physically on diverse dates from 15th May 2024- February 2025

30. In addition, consultation meetings were held with project stakeholders, especially institutions present in the education space in Somaliland. The main consultations were held on February 10, 2025, in Hargeisa.

31. Under this SEP and its preparation, the GoSL conducted one project-specific essential stakeholder consultations. The main stakeholder consultations began on February 10, 2025, when a consultative workshop was organized in Hargeisa. **Consultation Meeting on 10th February 2025:** 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.

32. Additionally, the meetings discussed the project components, benefits and possible risks associated with the it. The participants expressed their support to the project and were looking forward to seeing how transformational the project would be. Key among the issues raised is the geographical scope of the project and how limited it is, additionally, the participants also expressed the need to have everyone gets equal opportunities when it comes to employment and opportunities offered by the project. The project coordinator also indicated the need for the project to adhere to the environmental and social framework of the World bank and the relevant environmental and social Standards applicable to the project. The coordinator presented all the ESS relevant and took the participants through including the importance of the grievance redress mechanism (GRM). Appendix 1 provided Minutes of Meeting and Participants list.

6. STAKEHOLDER ENGAGEMENT

6.1. PRINCIPLES OF STAKEHOLDER ENGAGEMENT

33. To meet best practice approaches, the project will apply the following stakeholder engagement Principles.

Openness and life-cycle approach: transparent public consultations for the project will continue during the whole project lifecycle from preparation through implementation. Stakeholder engagement will be free of manipulation, interface, coercion, and intimidation.

Informed participation and feedback: information will be provided and widely distributed among all stakeholders in an appropriate format. Consultations will be conducted based on timely, relevant, understandable, and accessible information related to the project; opportunities provided to raise concerns and assure that stakeholder feedback is taken into consideration during decision making.

Inclusiveness and sensitivity: stakeholder identification will be undertaken to support better communications and building effective relationships. The participation process for the projects is inclusive. All stakeholders are always encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, particularly women-headed households, youth, elderly and the cultural sensitivities of diverse ethnic groups, with targeted processes put in place to avoid exclusion.

6.2. PLANNED STAKEHOLDER ENGAGEMENT ACTIVITIES

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

35. 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 4 below presents the stakeholder engagement activities envisaged under the project.

Table 4: Stakeholder Engagement Matrix for Empowering Women through Education and Skills Project – “Raja Kaaba” in Somalia

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 - Virtual 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 Consultants 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
Social Assessment (SA)	PMC (social safeguards specialist) Consultants GBV/SEA specialist	Adversely affected individuals, households, and groups	<ul style="list-style-type: none"> - Structured survey - Questionnaires covering quantitative and qualitative information 	Inputs for disadvantaged and vulnerable groups and identification of issues that could be incorporated into the design and implementation of the project
Implementation	PMC (social safeguards Consultant Locally based NGOs/CSOs GBV/SEA	<ul style="list-style-type: none"> - Disadvantaged and vulnerable groups - Community leaders/elders/ women leaders and other stakeholders 	<ul style="list-style-type: none"> - Committees (formal or informal) 	Implementation of the Inclusion Plan and the SEP.

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Beneficiaries including disadvantaged and vulnerable individuals and groups		
	specialist			
Monitoring and Evaluation	PMC (social safeguards specialist) Consultants NGOs & CSOs	- 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.

6.3. INFORMATION DISCLOSURE

36. Information that is needed to be disclosed to relevant stakeholders and affected communities:

- Project activities, timing, progress, and employment opportunities.
- Dissemination of Grievance Redress Mechanism to project-affected parties.
- Environmental and Social Management Framework.
- Environmental and Social Commitment Plan.
- Site-specific environmental and social management plan.
- Resettlement Action Plan.
- Labor management plan including labor influx.
- Stakeholder Engagement Plan
- SEAH Prevention and Response Action Plan
- ToRs for various studies including feasibility and technical designs.

6.4. INFORMATION DISCLOSURE PROCEDURES

37. The table 5 below outlines what information should be disclosed on the project and how this shall be done.

Table 5: Project Information Disclosure

Information to be Disclosed	Method of Disclosure	Target Group	Responsibility
Before Appraisal			
Disclosure of PAD, SEP	Website MoES and WBG, with summary of SEP.	All key stakeholders	PMC
After Appraisal			
Disclosure of the project documents ESMF,	- Websites - MoES and WBG.	- MoES and all partners involved in the project	- MoES PMC - WBG Team

Information to be Disclosed	Method of Disclosure	Target Group	Responsibility
Updated SEP, LMP, SEAH prevention and response Action Plan, among others	- Brief summaries of the main features of the project SEP, LMP, ESMP, ESCP and SEAH prevention and Response Action Plan in Somali	- Open access to all interested parties - All beneficiaries.	- Implementing Partners
During Implementation			
ESMP, GRM, SEAH Prevention and Response Action plan and ToRs.	- Website - Local administration offices - PIU and at the respective project sites	- Beneficiaries - Contractors - The community at large	- PIU - Social Safeguards Specialist -
Monitoring and Reporting			
Quarterly Annual report on progress and lessons learnt, complaints resolution and feedback	- The official website of the Ministry of Education - Stakeholder consultation meetings - Print, audio and visual media outlets	Key stakeholders and project beneficiaries at FGS and FMS level including vulnerable groups or their representatives	- PIU - PMC - PSC

6.5. INCLUSION PLAN

Imperative for the Inclusion Plan

38. There are social, economic, and physical barriers that prevent vulnerable and marginalized individuals and groups from participating in projects, which include lack of financial resources, inaccessibility of meeting venues, social stigma, lack of awareness and/or poor consultation. For instance, people living with disabilities are often not effectively engaged in consultations due to lack of access and social stigma and cultural beliefs that they are not able to participate or benefit from school or have limited productive roles in society. There are also biases and elitism which may contribute to the poor and minorities being included in project deliberations. In this regard, the project will deploy strategies to engage target communities and other stakeholders and overcome social stigma and encourage inclusion.

39. The project will take special measures to ensure that members of disadvantaged and marginalized groups have an equal opportunity to contribute positive outputs. This will include ensuring that they are involved in consultations on project siting and design, ensuring the project activities are accessible to people with physical disabilities, and project implementors at the local levels are guided on their responsibilities to provide services without discrimination. In addition, the staffing part will be made to reflect and promote diversity (see Labor Management Procedures [LMP] and Environment and Social Management Framework [ESMF]).

40. E&S assessment and management plans developed under the project after effectiveness will identify and address barriers to disadvantaged and vulnerable groups participating in and benefiting

from project services. Measures will be included in the contractors' ES documents and contractors as well as via training of service providers and education staff on the need to promote inclusion and diversity in staffing. Physical measures, such as ramps and rails in facilities to be developed under this project, including the College of Leadership, will be considered as well as means of ensuring that information is presented in accessible formats including sign language and braille. The project will ensure access to separate and culturally appropriate facilities for males and females in the TVET and higher education facilities supported by the project.

41. There are social, economic and physical barriers that prevent disadvantaged and vulnerable individuals and groups from participating in projects, which include lack of financial resources, inaccessibility of meeting venues, social stigma, lack of awareness and/or poor consultation. For instance, PWDs are often not effectively engaged in consultations due to lack of access, social stigma and cultural beliefs that ensure they are not prioritized in education service delivery due to their limited productivity in society. Women with disabilities, for instance, have continued to have less access to education services due to stigma. In this regard, the project will deploy viable strategies to engage targeted communities and other stakeholders to overcome social stigma and promote inclusion.

42. In view of the risk of clannism, nepotism and elite capture and potential exclusion of disadvantaged and vulnerable groups, the social safeguards team at the MoES will ensure that the project teams put measures in place to reach areas where disadvantaged and vulnerable groups live. They will also promote inclusion in project consultations and access to education services. There will be a need to be deliberate in ensuring that men are involved in consultations and all the other aspects related to access to project benefits.

Engaging disadvantaged, minorities and vulnerable groups

43. The project will promote inclusion of disadvantaged and vulnerable groups by ensuring their involvement in consultations in the sub-project design and the development of the ESMPs. This will include ensuring that education facilities are accessible to people with physical disabilities (e.g., having ramps and rails where appropriate) and training Somaliland government staff and community education committees on their role of providing services without discrimination. In addition, efforts will be made to promote diversity in staffing (see project's LMP). In addition, community education committees will have diverse representation including disadvantaged and vulnerable individuals and groups.

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

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

- a. Understand the operational structures in the respective communities.
- b. Seek input and feedback to avoid or minimize the potential adverse impacts associated with the planned project interventions.
- c. Identify culturally appropriate impact mitigation measures.

46. Consultations will be carried out broadly in two stages. First, prior to the commencement of any project activity, the MoES will arrange for consultations with community leaders, community education committees and representatives of disadvantaged and vulnerable groups about the need for, and the probable positive and negative impacts associated with, the project activities as part of the development of the project environmental and social risk management instruments. Second, there will be continuous stakeholder engagement that will ensure the active involvement of disadvantaged and vulnerable groups as part of overall project monitoring. The Ministry of Education and Science will:

- Facilitate broad participation of disadvantaged and vulnerable individuals and groups with adequate gender and generational representation, community elders/leaders, religious leaders, and CBOs.
- Provide the disadvantaged and vulnerable individuals and groups with all relevant information about the project including on potential adverse impacts.
- Ensure communication methods are appropriate given the low level of literacy, local dialects and communication challenges for PWDs.
- Organize and conduct the consultations in forms that ensure free expression of their views and preferences.
- Document details of all consultation meetings with disadvantaged and vulnerable individuals and groups on their perceptions of project activities and the associated impacts, especially the adverse ones.
- Share any input/feedback offered by the target populations.
- Provide an account of the conditions agreed with the people consulted.

47. Once the disadvantaged and vulnerable individuals and groups are identified in the project area, the provisions in this Inclusion Plan will ensure mitigation measures of any adverse impacts of the project are implemented in a timely manner. The project should ensure benefits to the disadvantaged and vulnerable by ascertaining that they are consulted, have an accessible and trusted GM to channel the complaints they might have on the project.

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

- Provision of an effective mechanism for monitoring implementation of the Inclusion Plan throughout the project life by the PIU and social safeguards team and with the help of contracted third parties, if any.
- Ensure that the project beneficiaries must reflect all groups including the minority groups, persons with disability and the IDPs. The actual number per project will depend on the degree of the availability of the group in the district.
- Ensuring appropriate budgetary allocation of resources for this Inclusion Plan as part of the project ESF instruments, including the ESMPs.
- Provision of technical assistance for sustaining the activities addressing the needs of the

disadvantaged and vulnerable individuals and groups.

Snapshots of Disadvantaged Groups in Somalia

49. Disadvantaged groups in the country include the following:
- i. Internally Displaced Peoples (IDPs),
 - ii. People who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities,
 - iii. Urban poor,
 - iv. Nomadic pastoralist communities,
 - v. Persons living with disabilities (PWDs),
 - vi. Female-headed households,
 - vii. Orphans and unaccompanied minors, and
 - viii. Elderly persons.
50. The project will, therefore, give special consideration to disadvantaged groups and learning from the best practices.

7. IMPLEMENTATION ARRANGEMENTS

7.1. IMPLEMENTATION ARRANGEMENTS FOR THE PROJECT

51. The project will be jointly implemented by the Ministry of Education and Science. The Ministry will be responsible in consultation with partner FMSs for policy development, standard-setting and monitoring and all participating states (incl. GoSL) are mandated to implement education programs and policies.
52. The Ministry will be responsible for the oversight and coordination of all project activities and overall reporting on project progress and performance. Regional, District Education and Community Education Committees (CECs) will also play an important role in the delivery of the project activities at the regional, district and facility level.
53. The project implementation arrangements would build on the institutional and implementation arrangements including the Project Steering Committee (PSC) and Project Management Committees (PMC) used for the recently approved Somalia Education for Human Capital Development Project (P172434) and propose new ones where applicable. The PSC will be chaired by the GoSL Minister of MoES and will provide overall project leadership. The PMC headed by the Director General (DG) and including DGs from participating regions/districts will provide technical leadership for project implementation.

7.2. STAKEHOLDER COMMUNICATION ENGAGEMENT METHODS

54. Suitable ways of communicating will be developed using the Somali language where appropriate to improve project perception, design, implementation and contribute greatly to the achievement of project objectives. Often, effective communication with the project stakeholders gives a greater understanding of the project by the stakeholders and enable them to review and adapt how to support and deliver the project. To sufficiently meet the needs of all stakeholders.
55. The following is a summary of some of the methods of engagement, and the responsible entity, proposed to be applied with the project stakeholders.
- i. **Community Meetings:** The PIU, with environmental and social specialists, organizes project-related meetings to allow the stakeholders to interact with the Project by contributing towards its planning and to be developed in an effective and culturally appropriate manner. These meetings will be organized in a quarterly manner and as needed.
 - ii. **Digital Communication:** The PIU, with environmental and social specialists, can also organize project engagements using digital tools such as email distributions and call for comments, WhatsApp, SMS, phone, WebEx, and Zoom.
 - iii. **Local Radio Broadcasting/Mass Media:** The PIU, accompanied by the social and environmental specialists, will organize TV and radio announcements to update the stakeholder at the local level through mass media includes email, website, social media, leaflets, ads, posters, brochures, hand-outs the content of which will be in the local language.

- iv. **Training and Workshops:** With the observance of COVID-19 social distancing regulations, on-location trainings to be provided to the MoES staff, PIU, district MoES staff on a variety of project related issues such as project targeting, GBV, SEA, disability and inclusion.
- v. **Grievance Redress Mechanism:** In compliance with the World Bank’s ESS10 requirement, a specific grievance mechanism will be set up for the project. Accurate communication materials for the GRM will be developed to help residents to familiarize themselves with the grievance redress channels and procedures. The PIU within the MoES will implement a grievance mechanism to ensure that it is responsive to any concerns and complaints, particularly from project-affected parties and communities.

7.3. BUDGET

56. The Ministry of Education and Science will set aside a dedicated budget for the implementation of this Stakeholder Engagement Plan. The budget shall be utilized to put together a communication strategy for the project, cost of face-to-face and virtual stakeholder consultations throughout the project cycle. The budget will also be used to defray the costs of setting up and maintaining of GRM throughout the project implementation phase and disclosure activities such as translation and disclosure of ToRs, study outputs, environmental and social instruments in a manner that is easily accessible and culturally appropriate. The budget will also pay for the services of a Stakeholder Engagement Specialist as appropriate. An indicative budget is included below (see Table 6) and will be clarified during further project preparation work.

Table 6: Budget for implementing the Stakeholder Engagement Plan for the Somalia Empowering Women through Education and Skills Project

ITEM	INDICATIVE COST (\$)
FM radio press conferences and call ins (one per year at FGS and FMS levels), FM radio	\$30,000
Communication Materials for the Project Preparation Phase	\$15,000
Stakeholder consultation and feedback meeting	\$10,000
Trainings of all staff and contractors on GRM	\$15,000
Setting up and Maintaining Project GRM	\$20,000
Operational Costs for Stakeholder Engagements (Travel, Logistic Support, Security, Transportation & Accommodation)	\$10,000
Sub-total	\$100,000
Contingency (5%)	\$5,000
Total Budget	\$105,000

8. GRIEVANCE REDRESS MECHANISM (GRM)

8.1. INTRODUCTION

57. Under the World Bank ESS10, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.³ One of the key objectives of ESS10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances’.⁴ This GRM should help the Project to respond to concerns and grievances of project-affected parties related to the performance of the project activities. The Project will provide mechanisms to receive and facilitate resolutions to such concerns.

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

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

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

- i. Fairness of contracting;
- ii. Fraud or corruption issues;
- iii. Inclusion issues;
- iv. Social and environmental impacts;
- v. Payment related complaints;
- vi. Quality of service issues;
- vii. Inefficient use of funds;

³Under ESS2 (Labor and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labor Management Plans (LMPs). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanism, which will be defined in a separate GBV/SEAH Prevention and Response Action Plan.

⁴ World Bank, Environmental and Social Framework, 2018, p. 131.

- 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.

61. The MoES will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with national laws and World Bank Environmental and Social Standards through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all grievances will be with the Social Safeguards Specialists will receive grievances by phone, text or email to publicized toll-free mobile phone lines and email addresses at both 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 Social Specialist will carry out training of all PM staff and Ministry of Education and Science staff involved with the project, and contractors, on receiving complaints and referral and complaints handling and reporting and will oversee awareness-raising on the GRM at the national level.

62. A Grievance Redress Committee (GRC) will be established at national levels chaired by the project manager, and the relevant staff will be included as necessary depending on the complaint (procurement, finance, monitoring and evaluation (M&E), GBV Specialist and communication). The Social Safeguards Officers 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 GRM 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 social specialist should immediately inform the head of the PMC, who will inform the World Bank within 48 hours as per the Environmental and Social Incident Reporting (ESIRT) requirements.

63. Considering the limited capacity in the Government system, the States may engage the support of CSOs working in the project areas to support the GRM 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 GRM and have a focal person to receive complaints regarding the construction and their workers and put in place complaints structures specific to the workers (as detailed in the LMP).

64. **Receive and Register Complaints:** The beneficiaries will have multiple ways of channeling complaints on any aspect of the project. This will be through radio, mobile phones, community meetings, email and websites. There will also be opportunities for in-person reports at the community level through the CECs or community leaders. Once the complaints have been received, the GRM focal point will log them into the Complaints Register.

65. **Acknowledge, Assess and Assign:** An acknowledgment of receipt will be sent to the complainant within 7 days of receipt of the complaint. The GRM focal point will assess the complaint and assign it to the relevant team, project implementing unit PIU. 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.

66. **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 PMC and the WBG within 24 hours (details on this process are described in the Labor Management Procedures).

67. Where grievances are of sexual nature and can be categorized as GBV/SEAH risks, the IP 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 GRM operators and relevant project staff.

68. For all other grievances, the respective IP 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 IPs will provide feedback promptly to the aggrieved party, for example through the phone or through the community structures established for addressing GRM. Feedback will also be communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback will be given to the concerned persons bilaterally.

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

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

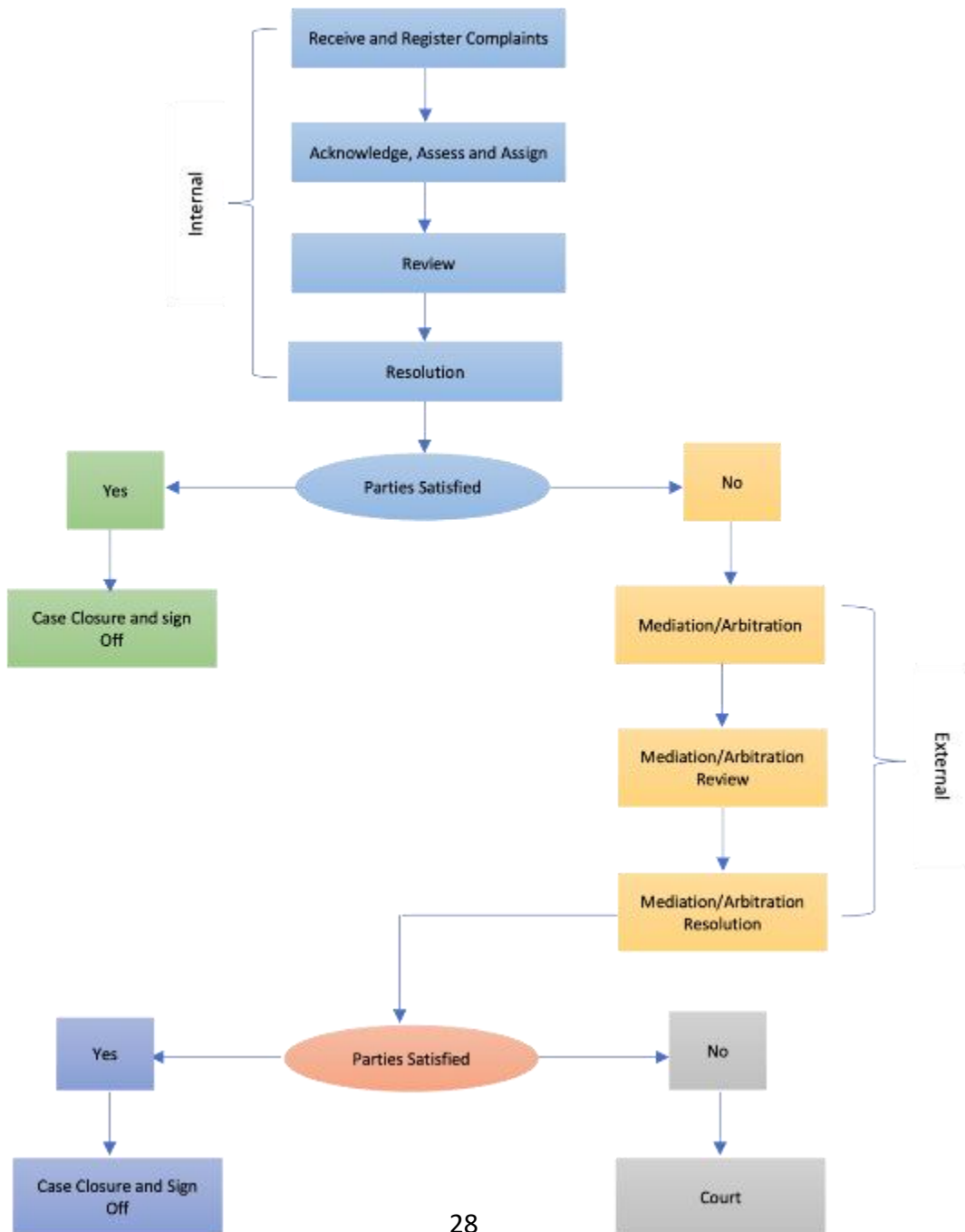
71. Where a negotiated grievance solution is required, the IP will invite the aggrieved party (or a representative) and decide on a solution, which is acceptable to both parties and allows for the case to be closed – based on the agreement of both parties.

72. After deciding a case, the IP will provide an appeals mechanism to the aggrieved party, which is constituted through the PMC. This is important in cases in which the aggrieved party is dissatisfied with the solution provided by the IP. 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 PMC GRM Team and will be decided on jointly with the 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.

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

74. **Review of the Grievances:** The GRM team will conduct a review of the cases reported on a monthly basis and agree on the next steps on cases that have not been closed out. The GRM focal point will record the actions recommended by the GRM team and file a monthly report to the PIU. Most importantly, all cases filed will need to be logged and monitored by the PIU, contractors and primary suppliers. See Figure 1 below for the illustration of GRM process.

Figure 1: The process to be adopted by the project in managing grievances.



8.2. MONITORING AND REPORTING OF THE GRM

- i. The PMC, specifically the Social Safeguards Specialist, will be responsible for monitoring the access to and implementation of the GRM by the PIU. The Specialist will include the GRM in his/her supervision and monitoring missions to the field and conduct spot checks on its implementation, or, where access is difficult recruit local teams to do so.
- ii. The PIU, contractors and primary suppliers will provide analytical synthesis reports on a quarterly basis to the PMC, which will include the number, nature and status of grievances. These reports will form the basis of all regular reports from the PMC to the World Bank.
- iii. 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 PMC will extract lessons from the GRM and conduct an analysis on the overall grievances and share the results with the PIU.

8.3. WORLD BANK'S GRIEVANCE SERVICES (GRS)

75. 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.

76. 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. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

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

9. MONITORING, DOCUMENTATION AND REPORTING

9.1. INTRODUCTION

78. Monitoring of the stakeholder engagement process allows the Project to monitor and identify key performance indicators that reflect the objectives of the SEP and the specific actions and time frames. Monitoring the stakeholder engagement activities is important to ensure that consultation and disclosure is fruitful and that stakeholders have been meaningfully consulted throughout the process. Monitoring also allows the Project to improve its strategies through following feedback information acquired from the monitoring and evaluation activities. To monitor and evaluate the stakeholder engagement activities of the Project, the environmental and social management system will be used as the base of that monitoring and evaluation activities.

9.2. SEP ACTIVITIES REQUIRING MONITORING

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

- i. Implementation of SEP that includes the update of stakeholder database and issues, as well as documentation of stakeholder engagement activities.
- ii. Consultation and disclosure activities conducted with all stakeholders.
- iii. Dissemination of information about Grievance Mechanism .
- iv. Grievance logging and tracking.
- v. Effectiveness of grievance management, and the number/ percentage of grievances cases solved.

9.3. PERFORMANCE REVIEW

80. The SEP is expected to be well implemented and performance will be measured against the following measures:

- i. Materials disseminated: type, frequency, and location;
- ii. Number, place, and time of formal engagement events and level of participation by specific stakeholder categories and groups;
- iii. Number of comments by issue/ topic and type of stakeholders, and details of feedback provided;
- iv. Numbers and type of grievances and the nature and timing of their resolution;
- v. Recording and tracking commitments made to stakeholders; and
- vi. Community attitudes and perceptions towards the Project-based on and stakeholder feedback.

9.4. REPORTING




81. During SEP implementation, the Environmental and Social Specialist will prepare a quarterly progress report to the PSC. The stakeholder engagement activities and significant changes or updates in the process and upgrade, stakeholder's concerns, environmental and social issues will be regularly reported and transparently disclosed to public websites. Data reported on will include the above-mentioned information.

Appendix 1: STAKEHOLDER CONSULTATION AND PARTICIPATION LIST

I. Minutes of Meeting – 10 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>	<ul style="list-style-type: none"> - During the remarks of the officials, the Director General of the Ministry of

Activity	Key Note Speeches
<p>Director General, Ministry of Education and Science.</p>	<p>Education and Science (MoES) express gratitude to all the participants and the MoES Project Implementation Unit (PIU) team for organizing and 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</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>

Activity	Key Note Speeches
<p>Honorable Minister Minister of Education & Science, Somaliland.</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 criteria as Faheema has already said. All will have the opportunity to contribute to the project. - 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: <i>to improve literacy and numeracy skills of women in selected areas and to prepare women for leadership roles.</i> - 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>


Activity	Key Findings
	<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> <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: 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: 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,

Activity	Key Findings
	ECW and EU funds programs). - Promote inclusiveness
Group 3: Presentation Finding presented by: Mustafe,	Mr. Mustafe from Group three presented the findings from group discussion, highlighted the following points: <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 - The scope of the project's coverage is limited to only a few regions of Somaliland.
3.2.3. Next Steps Presentation: PIU Coordinator	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. <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 SAYAISKA

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	Abdifatah Mohamed Abdi	UOH	cfataxmc@gmail.com		89
2	Mustafa Hassan Dalin	EAV	mbdalin.02@gmail.com		90
3	Raqiya Ahmed Badi	EAV	raqiya22@gmail.com		91
4	Abdigan Ismail	CHE	abdigan.493@gmail.com		92
5	Isra Ahmed Mohamed	SNDF	isra.ahmed@sndf.scn.org		93
6	Sagal Mohamed Hawadle	Nagaad Network	Sagalhawadle@gmail.com		94
7	Nafisa Yusuf Mohamed	Nagaad	nagaad.org@yahoo.com		95
8	AHMED MOHAMED ATETE	MOES	atete01@gmail.com		96
9	Ismail Dualeh	MOES	Minister.MoE@sl.gov.org		97
10	Abdikadir Yusuf HAKDI	MOLSER	hakadi115@gmail.com		98
11	Aden Jama Duale	NCHE	Dg-nche@sl.gov.org		99
12	Abraham Hussein H. H. H.	MOE	DG.MOES@sl.gov.org		100
13	Abmal Ismael Abdi	MOE	amad.xidambrooksl@gmail.com		101
14	Abdirahman Jama Abille	MOPND	Nurgass7@gmail.com		102
15					

S/N	Name	Organization	Email	Telephone	Signature
16	Mahdi Ali Hussein	Street Child	mahdi.ali@street-child.org		1
17	Nimra Ahmad Eel	CMRight	Nimraahmed19@gmail.com		2
18	Abdigaadir Isse Hussein	MOES	abdigaadir.isse@gmail.com		3
19	Siyaad Mohamed Abdi	MOES	siyaad.mohabdi@fornet.com		4
20	Muissa Ismael Ahmed	MOE	muissa.ismael123@gmail.com		5
21	Mohamed Omar Hussein	SERP Coordinator	mohamed.omer@serp.org		6
22	Abdifatah Amir Dirir	FMS-MOES	abdifatah.dirir@gmail.com		7
23	Tawdus Saad Dirir	WB Consultant	tawdusdirir@gmail.com		8
24	Muhammad Saad Abd.	MOTS	medsriid@gmail.com		9
25	Abdul Mohamed Shire	UOH	abdulmohamedshir@uoh.edu.so		10
26	Ismail Mubaid Abdi	MDFBED	ismailmubaid@gmail.com		11
27	Fadia Ismael Abd	MCESTH	fyad.issah@uoh.edu.so		12
28	Seemal Mohamed	ABUCO	seemalmk@gmail.com		13
29	Abdirahman Ismael Abd	MOES	abdirahman.ismael@gmail.com		14
30	Jahema Haji - Corahim	MOES-PIU	jahema.haji@hotmail.com		15
31	YUSUF HUSSEIN MOHAMED	MOES	Yhusein44@gmail.com		16
32					
33					

Appendix 2: 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:

.....
.....
.....
.....
.....
.....
.....

(Attach letter or a petition / document as submitted)

Source of Complaint:

Attachments: 1) _____ 2) _____ 3) _____

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

Appendix 3: 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"/>

Appendix 4: Meeting Record Format (GRC)

Project/Subproject:

Location:

Date of the Meeting:

Complaint Register No:

Venue of meeting:

Details of Participants

Project/Government	Project/Government

Summary of the Grievance:

.....

Notes on Discussion:

.....

GRC Meeting Decisions /Recommendations:

.....

Issue Solved Unsolved

Name of Meeting Chairperson:

Signature: Date:(DD/MM/YYYY)

Appendix 5: Participants at Stakeholder Consultation Workshops

Screenshot of participants at the meeting and in addition, their names below.

Date: Feb 11, 2025

No	Name (Original Name)	Institution	Email
1			
2			
3			
4			
5			
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7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			

Date: February 7, 2022