REPUBLIC OF SOMALILAND

ENHANCING PUBLIC RESOURCES MANAGEMENT PROJECT (SERP)

STAKEHOLDER ENGAGEMENT PLAN (SEP)

JUNE 2023

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ABBREVIATIONS AND ACRONYMS

CBO	Community-based organization
CBoSL	Central Bank of Somaliland
CIP	Capacity Injection project
CoC	Code of Conduct
CPF	Country Partnership Framework
CSC	Civil Service Commission
CSO	Civil society organization
CSSP	Civil Service Support Project
DRM	Domestic Revenue Mobilization
EAFS	External Assistance Fiduciary Section
ESF	Environment and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environment and Social Standards
ESSP	Education Sector Strategic Plan
EU	European Union
FCDO	Foreign, Commonwealth and Development Office
FCV	Fragility, Conflict & Violence
GBV	Gender-based Violence
GM	Grievance Mechanism
GoSL	Government of Somaliland
GoSL	Government of Somaliland
GRC	Grievance Redress Committee
GRS	Grievance Redress System
HR	Human Resource
ITAS	Integrated Tax Administration System
LMP	Labour Management Procedures
LTO	Large Taxpayer Office
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MoFD	Ministry of Finance Development
NGO	Non-governmental Organization
OAG	Office of Auditor Generals
OHS	Occupation health and safety
OIP	Other Interested Parties
P&G	Pay and Grade
PAI	Project Area of Influence
PBC	Performance Based Conditions
PCU	Project Coordination Unit
PDO	Project Development Objective
PFM	Public Finance Management
PIM	Public Investment Management
PIU	Project Implementation Unit

PSM	Public Service Management
PWDs	Persons with disabilities
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SERP	Enhancing Public Resource Management
SLFMIS	Somaliland Financial Management Information Systems
SMP	Staff Monitored Programs
TA	Technical Assistance
ToR	Terms of Reference
WBG	World Bank Group

1.   INTRODUCTION

1.1. Background information

1.   Somaliland's development history has evolved from 30 years of grassroots peacebuilding and state building. Over time, a resilient institutional structure has taken shape, in which modern and traditional institutions, religious authorities, the private sector, and civil society have worked together to ensure peace, stability and the delivery of basic services. Somaliland has enjoyed relative peace and institutional building. Since 2001, Somaliland has successfully held seven nationwide elections, including three presidential elections, three local council elections, and two parliamentary elections. The international observers have declared these elections to be credible according to international standards and "reasonably free and fair".

2.   Somaliland's nominal domestic revenue collections have grown significantly in recent years. Trade taxes account for over half of the total revenue and are the largest source of income for the Somaliland Government. Income tax and corporate tax account for less than 10% of the Government's revenue. The budget appropriations are predominantly for staff salaries and recurrent administrative costs, based on annual expenditure plans submitted by ministries. The Bank of Somaliland (Central Bank -BoSL) is responsible for monetary policy and acts as a commercial bank for the Government.

3.   The Government of Somaliland (GoSL) and the international community formally began their partnership in 2006 when the United Nations (UN) and the World Bank (WB) conducted a Joint Needs Assessment (JNA). The goal of the JNA was to foster development cooperation based on consultative and locally driven priorities. The JNA process resulted in the Reconstruction and Development Program (RDP, 2007-2010), and a series of documents intended to guide the development initiatives in Somaliland. These international community-led efforts encouraged the GoSL to produce the Vision 2030 alongside Somaliland's first National Development Plan (NDPI, 2011- 2016) and subsequently the second National Development Plan (NDPII, 2017-21).

4.   However, much remains to be done to realize the Somaliland vision 2030, which outlines the path to stable, democratic, and prosperous Somaliland and summarizes the steps required to gradually transition from humanitarian aid to recovery and development across five key pillars of the NDPII. Throughout the years, the GoSL and internal development partners have engaged in various multi-donor funding instruments, such as the Somaliland Development Fund (SDF). These instruments culminated in the identification and prioritization of development funds destined for Somaliland. It also brought together the GoSL and partners to support Somaliland's development goals, fill critical funding gaps and helped to strengthen cooperation, transparency, and principles of aid effectiveness.

5.   For Somaliland, Despite the global pandemic, total revenue collection in 2020 was 12.4% higher than 2019 collections, primarily due to strong performance on import tax revenues (collecting an additional SLSh.86 billion in 2020) and tax on business incomes which grew by 190% (or an additional SLSh.24 billion). Key revenue items for 2020 included taxes on imports and sales taxes, making up over 54% of total revenue. Although the overall trend has

seen consistent growth over the last decade, the profile of revenues (revenue base) has remained relatively the same. Revenue collection in Somaliland is largely from customs duties and a number of fees and levies collected by the customs department at the point of importation (these comprise an average of 70% of revenue collections). The Inland Revenue Department (IRD) collects a broad range of inland taxes and fees, which amount to 20-30% of revenue collections.

6.   Budget discipline has been strengthened over the years with the budget planning and control modules of the Somaliland Financial Management Information System (SLFMIS) implemented at all Ministries, Departments and Agencies (MDAs), including for government funds and donor funds. The oversight by Parliament and its role in approving the national budget has also given more credibility to the budget.

7.   The recent comprehensive update of the Standard Chart of Accounts (SCOA) has helped in the accurate capture of both budget and expenditure, including for both government and donor funded projects, incorporating the components and subcomponents.

8.   Commitment control has been enhanced by implementation of the purchasing module across all MDAs such that no procurement is permitted without the necessary purchasing process on the SLFMIS that commits budget funds only when they are available. The domestic arrears position is therefore expected to substantially decrease.

9.   Foundational elements of accountability in public resource management have been put in place through strengthening the legal and regulatory framework. Notably, the legal framework for the civil service is in place together with a Public Finance Management (PFM) Act 2018, Public Procurement Act 2015, Revenue Act 2016, Revenue Regulations 2019, Customs Act 2016, Customs Regulations 2019, Comprehensive Operating and Finance Manual 2018.

10.   Key audit reforms have helped improve oversight and accountability while eliminating unnecessary red-tape. The National Audit Act is in place which led to the establishment of the Supreme Audit Institution (SAI). The SAI capacity has been built to audit the SLFMIS, from which government accounts are produced.

11.   The Government of Somaliland adopted the International Public Sector Accounting Standards (IPSAS) Cash basis of accounting and the SLFMIS was configure to support this paradigm shift, facilitated by the update of the SCOA. The Government financial statements generated off the SLFMIS are thus IPSAS Cash compliant.

12.   Tax compliance through tax payers' access to information about conversion of revenue into public services, as well as tax education and facilitation, contributes to better accountability and presents a great opportunity to improve revenue collection. Somaliland's tax collection departments are less trusted and there is a widespread tendency for tax payers to engage in tax avoidance practices. Some interventions like the introduction of the Electronic Fiscal Devices (EFDs) to selected taxpayers in the hospitality industry as a pilot has seen significant increase in revenue collection. The automation of the customs and inland revenue collection function albeit with limitations in functionality, has given a boost to

revenue collection. More needs to be done in acquiring a robust inland revenue and customs management system and rolling out the EFDs to more taxpayers, accompanied by an extensive tax education campaign.

13. The Government of Somaliland has over the years been implementing the Somaliland Financial Management Information System (SLFMIS), focusing on improving the functionality of the system and rolling it out to all central government MDAs, and LGs. Somaliland has achieved considerable success in the implementation of the SLFMIS, with all MDAs relying on the system for day-to-day transaction processing, while the implementation of core modules for LGs and GPEs has been piloted. The need to interface with other key stakeholder systems like BoSL, CSC (HRMIS and PMIS), ITAS and other core government systems together with the need to abandon the parallel manual processes that can be performed by the systems, is recognized, and adopted as a policy position of Government so that interventions like EFT, TSA and full automation can be achieved. The overall theme of the SERP project shall therefore be to complete the deepening of the SLFMIS to planned sites, including LGS and GPEs, while proceeding to interface with key stakeholder systems and pursuing full automation of business processes.

14. The SERP project will plug the gaps, consolidate and build on the reforms in DRM, PFM and HCM put in place by the predecessor WB funded DRM&PFMCSP AND CSSPII projects.

1.2. SEP objectives

6. This Stakeholders Engagement Plan (SEP), which is a key requirement of the World Bank's Environment and Social Framework (ESF) is aimed at:

    i. Identifying and analyzing different stakeholders at different levels;
    ii. Planning engagement modalities through effective communication, consultations and disclosure;
    iii. Outlining platforms for stakeholders to influence decisions regarding the project;
    iv. Defining roles and responsibilities for the implementation of the SEP;
    v. Defining reporting and monitoring measures to ensure the effectiveness of the SEP and periodic reviews of the SEP based on monitoring findings;
    vi. Defining roles and responsibilities of different actors in implementing the Plan;
    vii. Elaborating the grievance redress mechanism (GM) for the project;
    viii. Outlining the dissemination of relevant project materials, including explanations of intended project benefits and, where appropriate, the setup of a project website; and
    ix. Documenting 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.

1.3. World Bank requirements for stakeholder engagement

7. This project is being prepared under the World Bank's ESF. As per the Environmental and Social Standard (ESS) 10 on *Stakeholders Engagement and Information Disclosure*, the implementing agencies are required to provide stakeholders with timely, relevant,

understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. 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.

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

9.   The ESS 10 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 lifecycle; and
   iv.   Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.

2.   PROJECT DESCRIPTION

2.1. Project Development Objective (PDO)

10.   Strengthen efficiency and transparency in public financial management, domestic resource mobilization, and public sector management across Somaliland.

2.2. Project Components

11.   The project supports strengthening efficiency and transparency in public financial management, domestic resource mobilization, and public sector management across Somaliland through four components as summarized in Table 1.

Table 1: Project components and subcomponents

Component	Subcomponent	Key activities
1. Public Financial Management	1.1 Support essential budget execution functions	(i) Strengthen the internal control environment and quality, comprehensiveness, and transparency of financial reporting (ii) Support the use of the Somaliland financial management information system (SLFMIS) (iii) Strengthen procurement processes. (iv) Support external audit and parliamentary oversight on public expenditure
	1.2 Strengthen PFM for service delivery in the health and education sectors	Support stronger health and education service delivery by ensuring sustainable and efficient planning, budget allocations, cash forecasting and expenditure management.
2. Domestic Revenue Mobilization	2.1 Improve tax policy capacity	(i) strengthen tax policy capacity by establishing the tax policy unit, reform tax instruments and putting in place related regulations and guidance notes for the new laws.
	2.2 Improve inland revenue and selected customs administration systems and capacity	(i) modernization and automation by acquiring a 'fit for purpose' ITAS and related ICT and infrastructure (ii) Capacity building of revenue staff and plan for establishment of a Revenue Authority. (iii) Taxpayer education and facilitation activities
	2.3 Strengthening and harmonizing taxpayer education and facilitation	Support needs-based establishment of taxpayer orientation programs, taxpayer service charters, facilitation and grievance help desks, reports for proactive disclosure of revenue performance and forecasting, tax forums, and a revenue academy
3. Public Sector Management	3.1 Strengthening the Capacity of central and Line MDAs	(i) Improvement of strategic staffing, informed by affordability (ii) Capacity development in Civil Service Commissions, MoF, the OAG, and selected priority MDAs.

Component	Subcomponent	Key activities
		(iii) Support the improvement of the quality of staff through blended approaches in training including building a pipeline of future civil servants, strengthened performance management, and support to peer learning networks.
	3.2 Implement P&G, pension, and other civil service management systems and policies	(i) support to HRMIS implementation (ii) Support to assessment and application of HRM policies and regulations.
4. Project Management, Coordination, and Support in Delivery	4.1 Project management	Support the management, coordination, and M&E for the three components.
	4.2 Results monitoring, and impact evaluation	

12.   The proposed project rests on the premise that synergies and sustainable improvements can be achieved by taking a comprehensive approach to governance reforms. In this regard, the project design aims to explore in detail the interlink between PFM, DRM, and the PSM. For instance, budget credibility sets the stage for strong PFM, and it rests heavily on improving DRM. Furthermore, improvements in the public sector are critical for sustainable reforms in DRM and PFM, while DRM and PFM create the fiscal space for improvements in the public sector.

13.   **Beneficiaries:** The primary beneficiaries of the proposed project will be the government, civil servants and employees of the implementing ministries, departments and agencies OF Somaliland. The citizens will also benefit from improved service delivery, particularly in health and education, greater government responsiveness – facilitated through the Citizen Engagement Component – and on a broader scale, from an improved public administration.

2.3. Project Risk Rating

14.   The overall risk rating for the project is <u>Substantial</u>, with one high-level macroeconomic risk, substantial risk: political and governance, fiduciary, and other (mainly comprising security risks). Technical design risks are <u>Substantial</u>. Risks include the broad geographic and technical scope of project activities.

15.   Institutional capacity for implementation and sustainability risks are <u>Substantial</u>. Risks related to the capacity of the Government to implement activities, considering the institutional capacity of the implementing agencies, implementation arrangements, and M&E arrangements are substantial. The GoSL commenced important public sector reforms. However, the public sector lacks skilled managerial and professional staff – the missing middle – while at the same time, it has been adding unskilled employees at the bottom of the pyramid. Therefore, the overall level of capacity in the public sector remains limited.

16.   The environment risk rating is <u>Low</u>. This is mainly because there is no anticipated construction. The environmental risks associated with capacity building activities are low and mainly hinge on Occupational Health and Safety (OHS). .

17.   The social risk rating is considered <u>Substantial</u> taking into account the following key social risks and impacts: (i) possible elite capture of project benefits; (ii) potential exclusion of disadvantaged and vulnerable groups in staff recruitment and training; (iii) labor risks including OHS and security risks, sexual harassment, and other forms of gender-based violence (GBV) that may occur in capacity building activities; and (iv) contextual risks of operating in a conflict zone and complex social context where effective and inclusive consultations, monitoring, and fostering effective citizen engagement and trusted grievance redress mechanism are challenging.

18.   Project activities associated with key social risks are related to ensuring security for project operations including the protection of project workers, beneficiaries and project-affected persons in the conflict Eastern conflict regions of Somaliland.. Harmful inward migration is likely to upset the delicate community dynamics caused by the project operating in a small number of sites and the systemic weakness as the capacity of the government to identify, understand and prevent adverse social impacts on the project is limited.

19.   Stakeholder engagement risk is adjudged <u>Substantial</u>. This is mainly due to the nature of the proposed project, which involves coordination between MDAs, complex management and reporting structures, the need to involve civil society and coordinate with donors. Risks related to stakeholders who might delay or halt activities and may affect successful project implementation and completion are substantial.

20.   Other risks, including security are considered <u>Moderate.</u> Insecurity poses a risk to human security (World Bank staff and client), project implementation and its sustainability. It can create limitations on access to the operating environment, which in turn poses additional project risks, creating challenges for project implementation and monitoring. Security costs can also significantly increase the overall cost of the project implementation and related reforms.

21.   All social and environmental risk mitigation measures have and continue to be detailed in the appropriate ESF instruments, including the ESMF, the GBV/SEAH Action Plan, , the Stakeholder Engagement Plan, and the Security Management Framework and Security Management Plan.

2.4. Legislative and Policy Requirements

22.   The World Bank's Environment and Social Standard 10 sets out that a Borrower has to engage with stakeholders as an integral part of a Project's environmental and social assessment and project design and implementation. The nature, scope and frequency of the engagement should be proportional to the nature and scale of the Project. Consultations with stakeholders must be meaningful and be based on stakeholder identification and analysis, plans on how to engage stakeholders, disclosure of information, actual consultations, as well as responses to stakeholder grievances, and reporting back to stakeholders[1].

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[1] World Bank, Environmental and Social Framework. Setting Environmental and Social Standards for Investment Project Financing, August 2016.

3.   PROJECT STAKEHOLDERS AND ENGAGEMENT PRINCIPLES

3.1. Project stakeholders

23.   Project stakeholders are defined as individuals, groups or other entities with an interest in the project at different levels. Engagement with the project affected persons will be conducted during project planning, upon project effectiveness and sustained throughout project implementation and closure. For effective engagement, project stakeholders are categorized into three main groups, as described below.

i.   **Affected Parties**: 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 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 may include the public, government officials, business entities and individual entrepreneurs who can benefit from employment/business opportunities, community-based organizations (CBOs), non-governmental organizations (NGOs) that advocate for transparency and government accountability, among others. For this project, the direct beneficiaries include the MoFD, staff in the various MDAs (PFM, DRM and PSM).

ii. **Other Interested Parties** (OIP): constitute 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 CSOs and NGOs who may become project partners. Others include business owners and providers of services, goods and materials, who may be considered for the role of project's suppliers; mass media and associated interest groups. The partners whose interests may be affected include development partners supporting the GoSL and state functioning (such as UN agencies), business companies and entities that may be involved in the provision of services for SERP including contractors and primary suppliers.

iii. **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 individuals and groups identified for this project include female employees, people with disabilities and those occupying low grades within the civil service.

3.2. Identification of Stakeholders

24.   Different categories of people and institutions with an interest in the Project at different levels will need to be consulted and engaged in the project activities, as summarized in Table 2.

Table 2: Stakeholder Description and Area of Interest

Level	Stakeholders	Description
Directly or Indirectly Project-Affected Parties		

National	• Ministry of Finance Development (MoFD),
	    o Accountant General's Office
	    o Inland Revenue Department
	    o Customs department
	    o ICT Department
	    o Budget Department
	    o Internal Audit Dept
	    o Macroeconomic and Statistics Department
	    o Procurements Department
	
	 • Central Bank of Somaliland,
	 • Auditor General's Office,
	 • House of Representatives
	 • Ministry of Health,
	 • Ministry of Education,
	 • Civil Service Commission
	 • National Tender Board
		• MoFD will house PCU which will provide coordination support across line Ministries and key agencies; will be responsible for M&E, and will lead prioritization of activities;
		 • MoF also houses all these other departments working with the SERP.
		 • Central Bank of Somaliland (CBoSL) – project finances shall be channeled through CBoSL.
		 • Auditor General's office provides oversight to the project finances.
		 • Ministry of Health and Min of Education will receive capacity building support; and will be consulted in regard to project activities under component 2 of the project.
		 • Civil Service Commission will be supported under component 3 and have systems that will be integrated with the SLFMIS which is supported by the project
		 • House of Representative also gives oversight to the project

Local Regional and District-Level Administrations	Region and District Administrations in proposed locations	MDA's like MOFD, and Ministry of Education have regional offices. Additionally, the district local governments play a vital role of revenue collection. The SLFMIS is being rolled out to the Local Governments.
Other interested parties		
Suppliers	Those who will be contracted to supply goods and services	The contractors and staff will be subject to the national provisions on labour and World Bank's ESS2 with a focus on recruitment, remuneration and overall management of the workers.
Civil society Organizations	These include partners supporting the government efforts in the country	Civil servants play a key role of resource mobilization, capacity building and advocacy. The project team will identify and engage CSOs throughout the project lifecycle.
Development partners	IMF, FCDO, UN, WB	Have been funding similar interventions at different ministries

Level	Stakeholders	Description
People working/ managing similar projects or projects in the same sites	PFM, DRM, , PROFR, CSSP	Likely to coordinate with the project to share experiences.
Communities	The public	These are the direct beneficiaries of the performance of the civil servants. They will need to be consulted to gather information on their experience in accessing services and their suggestions on the areas that need strengthening/improvement.
	Community leaders	Community leaders including clan and religious leaders play a vital role in community entry and the attainment and social license to operate. This may be necessary for the civil works and outreach activities
Media/ Strategic communication – Spotlight	Access to information	Ensure information about the project and importance is shared to all stakeholders including disadvantaged groups through communication modes that are appropriate. On social media – use more targeted messaging on Facebook and twitter and bearers of the message should be known influencers with integrity and following.
Disadvantaged and vulnerable individuals and groups		
Civil servants	Female workers, persons with disabilities	These workers may be left out of the engagement activities unless concerted efforts are made to include them. They may also not fully benefit from the project benefits.

3.3. Stakeholder Engagement Principles

25.   Stakeholder analysis generates information on the perceptions, interests, needs, and influence of actors on the project. Identifying the appropriate consultation approach for each stakeholder throughout the project lifecycle is necessary. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement.

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

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

iii.   *Inclusivity and sensitivity:* stakeholder identification will be undertaken to support better communication and building effective relationships. The participation process for the project will be inclusive. All stakeholders will be encouraged to be involved in the consultation processes. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups, particularly civil servants in low grades, female workers and those with disabilities.

4.   SUMMARY STAKEHOLDER ENGAGEMENT ACTIVITIES

4.1. Consultations Prior to the Development of this SEP

26.   The project team held several meetings leading up to the development of the various instruments including this SEP, the ESCP and PIM.

27.   The engagements and consultations on the project design and the planned activities and implementation arrangements were done with the Bank and key institutional stakeholders including the relevant Government Ministries and implementing agencies between October 4ᵗʰ and October 19ᵗʰ 2022 as summarized in Annex 1.

4.2. Stakeholder engagement matrix

28.   Table 3 presents the planned key stakeholder engagement activities to be implemented during the project preparation stage through to implementation and closure.

Table 3: Consultation Matrix for Stakeholders

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	**Beneficiaries**		
Screening of the proposed project and subprojects	PCU consultants, and other stakeholders	• MoFD • Affected groups (civil servants)	• Public announcements • Face-to-face meetings • Virtual meetings using Webex/Skype/zoom	Identification of concerns on project impacts, feedback from would-be affected persons
In-depth assessment of risks and benefits	• PCU, project • consultants, NGOs/CBOs and • Other knowledgeable persons	• Would-be affected individuals and groups • Key informants	• Formal/informal • interviews • Group discussions • Discussions on specific impacts, alternatives, and • Mitigation measures, etc.	More concrete views of project impacts and feedback on possible alternative mitigation and development measures
Implementation	• PCU Specialists • Consultants • NGOs/CBOs	• Individuals and groups of civil servants • Other stakeholders	• Implementation • Monitoring	Quick resolution of issues
Monitoring and Evaluation	• PCU Specialists • Consultants • NGOs & CBOs	Disadvantaged individuals and groups	Formal participation in review and monitoring activities	Identification and resolution of Implementation issues

4.3. Summary of Stakeholders' Needs, Methods, Tools and Techniques of Engagement

29.   Different engagement methods are proposed and cover different needs of the stakeholders as illustrated in Table 4.

Table 4:Plan for Stakeholder Engagement of the Different Groups

Level	Stakeholders	Description
Directly or Indirectly Project-Affected Parties		

National	• Ministry of Finance Development (MoFD),
	  o Accountant General's Office
	  o Inland Revenue Department
	  o Customs department
	  o ICT Department
	  o Budget Department
	  o Macroeconomic and Statistics Department
	  o Internal Audit Department
	  o Procurements Department
	
	• Central Bank of Somaliland,
	• Auditor General's Office,
	• House of Representatives
	• Ministry of Health,
	• Ministry of Education,
	• Civil Service Commission
	• National Tender Board
		• MoFD will house PCU which will provide coordination support across line Ministries and key agencies; will be responsible for M&E, and will lead prioritization of activities;
		• MoF also houses all these other departments working with the SERP.
		• Central Bank of Somaliland (CBoSL) – project finances shall be channeled through CBoSL.
		• Auditor General's office provides oversight to the project finances.
		• Ministry of Health and Min of Education will receive capacity building support; and will be consulted in regard to project activities under component 2 of the project.
		• Civil Service Commission will be supported under component 3 and have systems that will be integrated with the SLFMIS which is supported by the project
		• House of Representative also gives oversight to the project

Local Regional and District-Level Administrations	Region and District Administrations in proposed locations	MDA's like MOFD, and Ministry of Education have regional offices. Additionally, the district local governments play a vital role of revenue collection. The SLFMIS is being rolled out to the Local Governments.
Other interested parties		

Level	Stakeholders	Description
Suppliers	Those who will be contracted to supply goods and services	The contractors and staff will be subject to the national provisions on labour and World Bank's ESS2 with a focus on recruitment, remuneration and overall management of the workers.
Civil society Organizations	These include partners supporting the government efforts in the country	Civil servants play a key role of resource mobilization, capacity building and advocacy. The project team will identify and engage CSOs throughout the project lifecycle.
Development partners	IMF, FCDO, UN, WB	Have been funding similar interventions at different ministries
People working/ managing similar projects or projects in the same sites	PFM, DRM, , PROFR, CSSP	Likely to coordinate with the project to share experiences.
Communities	The public	These are the direct beneficiaries of the performance of the civil servants. They will need to be consulted to gather information on their experience in accessing services and their suggestions on the areas that need strengthening/improvement.
	Community leaders	Community leaders including clan and religious leaders play a vital role in community entry and the attainment and social license to operate. This may be necessary for the civil works and outreach activities
Media/ Strategic communication – Spotlight	Access to information	Ensure information about the project and importance is shared to all stakeholders including disadvantaged groups through communication modes that are appropriate to their needs, such, radio and mobile messaging On social media – use more targeted messaging on Facebook and twitter and bearers of the message should be known influencers with integrity and following.
Disadvantaged and vulnerable individuals and groups		
Civil servants	Female workers, persons with disabilities	These workers may be left out of the engagement activities unless concerted efforts are made to include them. They may also not fully benefit from the project benefits.

4.4. Proposed strategy for information disclosure

30.   The Government will ensure that information to be disclosed at the Central and Local Government levels:
   i.   Is accurate, relevant, up-to-date and easily accessible;
   ii.   Emphasizes shared values and encourages active participation
   iii.   Articulates the principle and rationale for the various strategies being used by the project at the different levels;
   iv.   Includes an indicative timeline and phasing of the project activities (more so where construction will be done);
   v.   Includes explanation of measures that will be used in the selection of contractors, supplier and how the effects on the public and communities will be minimized; and
   vi.   Includes information on where people can go for more information, ask questions, channel their complaints and grievances, and provide feedback (and contact persons as appropriate).

31.   Other key considerations will include:
   i.   Over time, based on feedback received through the grievance mechanism (GM) and other channels, information disclosed should also answer frequently asked questions by the public and the different concerns raised by stakeholders;
   ii.   During implementation, the Communication Officer will monitor social media regularly for any misinformation about the project and craft responses to be disseminated; and
   iii.   If the engagement of security or military personnel is considered for any aspect of the project, ensure that a communication strategy is in place to inform stakeholders of their involvement and the possibility of raising concerns and grievances on their conduct through the GM.

4.5. Stakeholder engagement plan

32.   The project team will prepare and disclose documents based on the schedule provided in Table 5. Updated versions of the various instruments will be developed as necessary and disclosed.

Table 5: Project Information Disclosure

Stakeholder Engagement Plan			
Project stage	**Target stakeholders**	**Information to be disclosed**	**Methods and timing proposed**
Before bidding process	• Directly affected ministries • MDAs and other agencies directly engaged in the delivery of some	Technical details of the project. The ESF instruments including the ESMF SEAH Prevention and	Public and individual meetings during the preparation of the project documents. Disclosure of written information - widespread

Stakeholder Engagement Plan			
Project stage	**Target stakeholders**	**Information to be disclosed**	**Methods and timing proposed**
	aspects of the project	Response Plan, LMP and the SEP. Awareness-raising on the GM. ESMF, ESMP, LMP, SEAH Prevention and Response Plan and SEP disclosures.	Radio, TV (in parts of the country), social media, mobile phone. Brochures/flyers translated in Somali. Face-to-face meetings: separate meetings specifically to people and groups directly affected by the project. Grievance mechanism.
	Other interested parties including development partners, CSOs, media, etc.	Technical details of the project. Compliance with national regulations and collaboration with relevant programs.	Social Media Public and individual meetings during the preparation of the project. Disclosure of written information - Brochures, posters, flyers, websites (Social Media Communication) – translated in Somali.
	Disadvantaged and vulnerable groups including IDPs, persons with disabilities, and minority groups and their representatives.	Awareness raising in the GM Site-specific ESMPs including SEAH Prevention and Response Plan, LMP and SEP. ESMF, ESMP, LMP, SEP disclosures.	Meetings with group representatives and members of the groups as necessary. Separate meetings specifically to affected disadvantaged and vulnerable groups and individuals. Grievance mechanism.
Project Implementation	Key stakeholders (listed above)	Area/subproject specific ESMPs including plans for implementation of SEP, ESMF, SEAH Prevention and	WB and MoFD website. Central and Local Government consultation meetings and community consultation meetings with all groups including disadvantaged and

Stakeholder Engagement Plan			
Project stage	**Target stakeholders**	**Information to be disclosed**	**Methods and timing proposed**
		Response Plan, and LMP.	vulnerable group representatives.
Annual reports	Key stakeholders and project beneficiaries at including disadvantaged and vulnerable groups.	Annual report on progress and lessons learnt, complaints resolution and feedback.	MoFD website, stakeholder consultation meetings.

4.6. Proposed Strategy to Incorporate the Views of Disadvantaged and Vulnerable Groups

33. The project will carry out targeted stakeholder engagement with vulnerable and disadvantaged groups and individuals to understand their concerns/needs in terms of accessing information, services, and any other challenges they face at home, at workplaces and in public offices. Groups working with or those representing voices of minority and disadvantaged individuals, including CSOs, CBOs and activists will be consulted in the respective areas of operation. Special attention will be paid to engage with women as intermediaries. The details of strategies that will be adopted to effectively engage and communicate to vulnerable and disadvantaged individuals and groups will be considered during project implementation. The project will promote inclusion of disadvantaged and vulnerable groups and individuals by ensuring their involvement in consultations in the subproject design and the development of the ESMPs.

34. The participation of disadvantaged and vulnerable groups in the selection, design and implementation of project activities will largely determine the success and sustainability of the project investments. Where adverse impacts are likely, the PCU and will undertake consultations with the likely affected civil servants and communities and those who work with and/or are knowledgeable of the local development issues and concerns. The primary objectives will be to:

i. Understand the operational structures in the respective project sites:
ii. Identifying CSOs, community groups and activists working with the disadvantaged and vulnerable individuals and groups;
iii. Seek input/feedback to avoid or minimize the potential adverse impacts associated with the planned interventions;
iv. Identify socially and culturally appropriate impact mitigation measures; and
v. Implement targeted actions to ensure accommodation and inclusion of the vulnerable and disadvantaged individuals and groups.

35.   Consultations will be carried out broadly in two stages. First, prior to the commencement of any project activity, the implementing agency will arrange for consultations with those people and agencies directly affected about the need for, and the probable positive and negative impacts associated with the project activities as part of the development of the ESMPs. Second, there will be continuous stakeholder engagement that will ensure the active involvement of the key stakeholders as part of the contractors' SEP and monitoring activities.`

36.   The implementing entities will:
    i.   Facilitate broad participation of disadvantaged and vulnerable individuals and groups with adequate gender and generational representation and CBOs;
    ii.   Provide the disadvantaged and vulnerable individuals and groups with all relevant information about the project including on potential adverse impacts;
    iii.   Ensure communication methods are appropriate given the low level of literacy and communication challenges for PWDs;
    iv.   Organize and conduct the consultations in forms that ensure free expression of their views and preferences;
    v.   Document details of all consultation meetings with disadvantaged and vulnerable individuals and groups on their perceptions towards the project activities and the associated impacts, especially the adverse ones;
    vi.   Share any input/feedback offered by the target populations; and
    vii.   Provide an account of the conditions agreed with the people consulted.

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

    i.   Provision of an effective mechanism for monitoring implementation of the project activities by the PCU and PMTs, social safeguards team and contractors;
    ii.   Involve suitably experienced CBOs/NGOs to address the disadvantaged and vulnerable individuals and groups through developing and implementing targeted action plans that are issue focused (e.g. on recruitment of women and PWDs by contractors);
    iii.   Ensure appropriate budgetary allocation of resources for the contractors' ESMPs; and
    iv.   Provision of technical assistance for sustaining the activities focused on the needs of the disadvantaged and vulnerable individuals and groups.

4.7. Reporting Back to Stakeholders

38.   Stakeholders will be kept informed through regular meetings and dissemination of information through other means as the project develops, including reporting on project environmental and social performance and implementation of the SEP and grievance mechanism on bi-annual basis.

5.   RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Resources

39.   The Communications Specialist, embedded in the PCU will be in charge of stakeholder engagement activities, together with the Project Coordinator. The communications specialist will ensure that the SEP is fully implemented. Table 6 presents a tentative budget for implementing the SEP.

Table 6: Estimated Budget for Implementing the SEP[2]

Stakeholder Engagement Activities	Timeline	Q-ty/per years (months)	Unit Cost, USD per year	No. of years	Total cost (USD)
Training of all staff and contractors on GM	Before sub-project implementation	Per year	5,000	1 year	5,000
Annual stakeholder consultation and feedback meeting	Before sub-project implementation	Once a year	2,000	3 years	6,000
FM radio press conferences and call ins (one per year at)	Before sub-project implementation	Once a year	10,000	3 years	30,000
Communication materials (leaflets, posters on project and GM, GM forms, registers in Somali)	Before sub-project implementation	Per year	10,000	3 years	30,000
Monitoring visits by PCU officers	Once component activities start	Per quarter	5,000	3 years	30,000
Annual stakeholder feedback survey (call Centre) as part of TPM survey	End of the year	Per year			N/A
Subtotal					101,000
Contingency 5%					5,050
Total					106,050

5.2. Project Management Structure, Functions and Responsibilities

40.   The SERP governance coordination arrangement will take into consideration the involvement of multiple stakeholders in implementing the SERP reforms, including representation from all levels of government, development partners and civil society. The Ministry of Finance Development will take the lead in coordinating the implementation of

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[2]Does not include general communication, or staffing including communications specialists, which will be included in PCU contracts.

the project, under stewardship of the Minist er of Finance and the Director General (DG) of MOFD, with the assistance of the Project Implementation Unit (PIU) headed by the Project Coordinator. The Joint Steering Committee (JSC and the Joint Technical Committee (JTC) are the two most important committees in the SERP governance structure and form the main forum for strategic directions on reforms.

41.   There is need to create an institutional arrangement that will ensure implementation of the project in a well-coordinated manner and address any issues that arise from the respective institutions. As such, a four-tier governance arrangement will be adopted and will include: (i) a Joint Steering Committee (JSC), (ii) Joint Technical Committee (JTC), (iii) Project Implementation Unit (PIU), and (iv) Technical Working Groups (TWGs) as shown in the figure below:

Figure 1: SERP Governance Institutional Arrangement
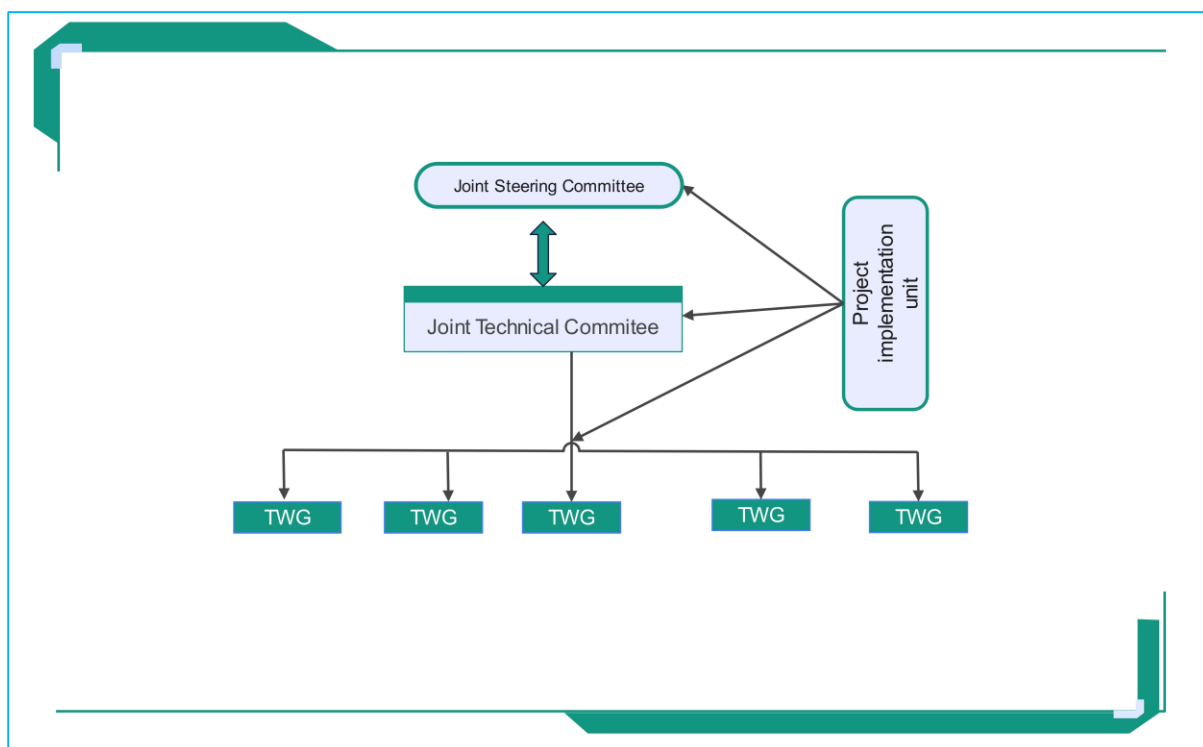
42.   Table 7 outlines responsible implementing agencies by component. Focal points from the MDAs and their internal units/offices will be appointed to work with the RCU.

Table 7: Responsible MDAs by Component

Component	Responsible Implementing Agencies
Component 1: Public Financial Management	- MOFD - Accountant General's Office - MoFD Budget Department - MoFD IT Department - MoFD Procurement Department - MoFD Internal Audit Department - MoFD Macroeconomic and Statistics Department - Office of the Auditor General - National Tender Board

	• House of Representatives
Component 2: DRM	• MoFD Inland Revenue Department • MoFD Customs Department
Component 3: PSM	• Ministry of Labor and Social Affairs • Civil Service Commission • Ministry of Education • Ministry of Health

43.   The SEP will be implemented and monitored by the RCU. The direct responsibility of its implementation will be designated to the Communication Specialist within the RCU. The Communication Specialist and Coordinator will work with implementing agencies to ensure that lessons are learnt from other projects, that the objectives of the plans are met and with the appropriate allocation of the necessary resources for its implementation. Adequate budget for stakeholder engagement will be allocated from the overall project cost, which will include cost for organizing meetings, workshops and training, hiring of staff, field visits, translation and printing of relevant materials, and operating GMs.

44.   Reports on stakeholder engagement and a summary of grievances will be received by the RCU and implementing partners every three months.

6.   GRIEVANCE MECHANISM (GM)

6.1.   Requirements for GM

45.   Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project[3]. One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances'[4]. This Project GM facilitates the Project to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SERP provides mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance mechanisms (GM) for the SERP.

46.   As per World Bank standards, the GM operates in addition to a GBV/SEAH and Child Protection Prevention and Response Plan, which includes reporting and referral guidelines. It also operates in addition to specific workers' grievance redress mechanisms, which are laid out in the LMP.

47.   The GM are designed to capture the high potential for conflict in Somaliland. There is concern that there may be disagreements over local level planning and implementation processes. Furthermore, the project itself may cause grievances, or existing community and inter-community tensions may play out through the project. The source of grievances in relation to project implementation can also sometimes be the very nature local governance or power distribution itself. It will therefore be key in the fragile environment of Somaliland to ensure that grievances and perceived injustices are handled by the project, and that the project aids mitigating general conflict stresses by channeling grievances that occur between people, groups, government actors and beneficiaries and project staff, NGOs, CSOs or contractors/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 GM provides an effective avenue for expressing concerns, providing redress, and allowing for general feedback from community members.

48.   The GM aims to address concerns in a timely and transparent manner and effectively. It is readily accessible for all project-affected parties. It does not prevent access to judicial and administrative remedies. It is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties.

49.   The project risk rating is <u>Substantial</u> and there is potential that the project may have some unintended consequences, e.g., risk of further exacerbating existing exclusion patterns or tensions between groups who feel they are under/misrepresented and undermine trust

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[3] Under ESS 2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labour Management Plan (LMP). 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 prevention and response action plan, which will be defined in a separate GBV/SEA and Child Protection Risks Action Plan.

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

between citizens and government if transparency, equity and appropriate citizen engagement is not fostered. The GM to be developed for the project will enable the effective resolution of any grievances of the project stakeholders, including civil servants and communities where the services will be provided. The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM will:

i.   Provide an effective avenue for aggrieved persons/entities to express their concerns and secure redress for issues/complaints caused by the project activities;
ii. Promote a mutually constructive relationship among community members, PAPs, the GoSL and the World Bank;
iii. Prevent and address community concerns;
iv. Assist larger processes that create positive social change; and
v.   Identify early and resolve issues that would lead to judicial proceedings.

50.   Types of grievances: Complaints may be raised by partners, consultants, contractors, beneficiaries - members of the community where the programme is operating or members of the general public, regarding any aspect of project implementation. Potential complaints may include:

i.   Fairness of contracting;
ii.   Fraud or corruption issues;
iii. Inclusion/exclusion;
iv.   Inadequate consultation;
v.   Negative social and environmental impacts;
vi.   Payment related complaints;
vii. Quality of service issues;
viii. Poor use of funds;
ix.   Workers' rights;
x.   GBV/SEAH;
xi.   Forced or child labour; and
xii. Threats to personal or communal safety.

51.   The RCU will initially brief all its staff, and the staff of the implementing agencies, on the GM procedures and formats to be used including the reporting and resolution processes. A public awareness campaign will be conducted to inform all communities and staff on the mechanism. A one-pager will be developed providing summary details on the GM, while a poster and leaflet will be produced for ease of reference. Various mediums will be used to sensitize the communities on the project GM including social media and FM radio to reach out to communities at the different project locations, including call-ins with panels including community and government representatives. The radio stations will be strategically selected to reach different groups within project target communities. The GM details will also be published on MoFD website indicating a phone number, email address and physical address for further information. The GM will be represented in simple visual formats as well as in Somali dialects, as needed.

6.2. Project GM Implementation Steps

6.2.1. GM Value Chain

Step 1: Grievance receipt and processing

52.   Multiple channels must be available for aggrieved parties to file their complaint, grievance, or feedback. The aggrieved party must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

53.   <u>Means of Filing a Grievance:</u> There are four distinct means, at least two of which must be made available at the project locality for people to file a grievance.

i.   *A phone number for a hotline operator*: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator is available from 7.00am to 12.30pm every working day (Sunday to Thursday) through a toll-free number. The hotline operator is set up and managed by the RCU. Any concerned party can call the hotline number and file a grievance with the Project. Hotline Operators will respond in Somali or English. The Hotline Operator will register the grievance in the grievance log (see below). The Hotline Operator will be initially trained by the PCU in (a) the registration of a grievance; (b) the interaction with complainants; (c) appropriate responses to GBV/SEAH related grievances; (d) workers' GM; and (e) SERP project components. After providing first appropriate responses to the complainant, and registering the grievance, the Hotline Operator will transfer the grievance to the relevant IP responsible for the grievance-related activity.

ii.   *A help desk* must be set up by the respective relevant department during the implementation of sub-project activities. They should be manned by assigned staff, in close coordination with local authorities. At the help desk, Project affected persons can inquire about information in relation to project activities, or they can file a grievance directly with the person manning the desk. Grievances can be filed in writing or verbally at the Help Desk. The staff manning the desk will register the grievance in a GM log. The staff will be trained in (a) the registration of a grievance; (b) the interaction with complainants; (c) appropriate responses to GBV/SEAH related grievances; and (d) workers' GM. The help desk can be open at hours decided on by the relevant department, which must be clearly indicated in a public space, and the Help Desk must be set up at a public space easily accessible and in close proximity of the sub-project activities. The PCU will train relevant assigned staff on the GM procedures, including the implementation of Help Desks.

iii. *Relevant assigned personnel* available in each project site will be required to accept formal grievances and ensure that avenues for logging grievances are accessible to the public and all PAPs. The first point of contact for all potential

grievances from community members may be the contractor, implementing agency or the local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no other reasonable modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance. Each relevant staff or local government official will be trained by the RCU or implementing agency in: (a) the registration of a grievance; (b) the interaction with complainants; (c) appropriate responses to GBV/SEAH related grievances; and (d) workers' GM. Each relevant department will appoint a focal person for the GM during project activities. This focal person will be trained by the RCU and will be in direct contact with the RCU for any assistance.

iv. A *suggestion box* must be installed at the nearest local administration office of the sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the Suggestion Box must be expressed in writing. Suggestion Boxes are installed at the closest official administration office in the sub project area. Boxes are clearly marked as SERP-related feedback and grievance mechanism. The relevant department in the respective area is responsible for the setup and management of the box. The GM focal person will man the box and hold the key. The box must have writing to indicate the frequency at which the Box is emptied.

54.   Details of grievance logged: While grievances can be submitted anonymously, the more information is made available, the better the Project can respond to the grievances, investigate the matter where necessary, or provide feedback to the aggrieved party. The minimum information that should be made available is the following (except for SGBV/SEAH cases, which follow a different process as described in Box 1 below.

Box 1: Information to be Captured in GM Log

Information to be captured in the GM log	
1) Name of complainant	
2) Information on whether the identity of the complainant should remain confidential or can be made available where necessary	
3) Contact details: physical address, telephone number, email address	
4) Details of the grievance: - What happened - Where did it happen - Parties involved - Time when it happened - Description of the case - Supporting documents if available.	

55.   Submission of incomplete information for a grievance may not allow a case to be investigated or may delay investigations.

56.   Confidentiality: All grievance recipients and anyone handling the GBV/SEAH related grievances must maintain absolute confidentiality relevant to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example (a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to lifesaving services should be sought; (b) if the survivor is a child and there are concerns for the child's health and safety. The survivors need to be informed about these exceptions.

57.   Informed Consent: The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up.

58.   Asking for Consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or relevant agencies), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent.

59.   Where possible, the consent form can be used (in cases of direct person-to-person reporting). By signing this form survivor can formally agree (or disagree) with the further processing of the case. The form will clearly state how information will be used, stored and disseminated.

60.   If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on.

61.   In the case of children, informed consent is normally requested from a parent or legal guardian of the children. In cases where the parent or legal guardian is the perpetrator, no such consent is required and the child will be referred to the appropriate services.

62.   Severe Incident (an incident that caused significant adverse effect on the environment, the affected communities, the public or workers, e.g. fatality, GBV, forced or child labor): If severe incidents are reported through the described GM pathway, the GM Operator needs to report the case within 24 hours to the RCU with copy to the World Bank following informed agreement by the survivor.

63.   Third party reports: In case of any reports of third parties on GBV/SEAH – related grievances to the SERP's GM, the grievance recipient will register the case. The case will then be passed to the GM focal point, who will make contact with the survivor, or an advocate that was appointed by the survivor, and will a) request for informed consent from the survivor to follow-up on the case; and b) offer any available referral services. In case the survivor does not provide consent for the case to proceed, the SERP has to close the case.

Step 2: Sort and Process

64. All registered grievances will be transferred to the GM Focal Point at the respective department either by the Hotline Operator, local personnel, or the Help Desk Officer. The GM focal point will categorize the complaint accordingly. Worker-related grievances will be handed over to a workers' GM (see below). Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the relevant department has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEAH and Child Protection Prevention and Response Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEAH will be required for all GM operators and relevant project staff (see further below).

65. For grievances handled under the general Project GM, the GM Focal Point will determine the most competent and effective level for redress and the most effective grievance redress approach. The focal point will further assign timelines for follow-up steps based on the priority of the grievance and make a judgment and reassign the grievance to the appropriate staff or institution. The person will exclude grievances that are handled elsewhere (e.g. at the court). The focal point should offer the complainant option/s for resolution of their grievance.

66. The GM Focal Point will also transfer the grievance information into a more comprehensive grievance register. All relevant departments must maintain a grievance register. The format should be similar for ease of reporting to the RCU.

67. Where a relevant department has an existing GM in place, the GM will be assessed by the RCU as for its compliance with the SERP GM and streamlining requested where necessary. The RCU will maintain a central grievance register for the logging, management and monitoring of grievances. Where IPs wish for complainants to remain confidential, they only must share the nature of the case and the outcome/resolution with the RCU.

68. It is likely that at the local level, IPs will use books to maintain a record of grievances. The information will then be migrated to a digital platform at IP headquarters or when reported to the RCU. The GM will then be linked to the Project MIS. All cases will be treated confidentially.

69. <u>Incident Reporting:</u> Severe incidents: will be reported by the IP - within 24 - to the RCU and the World Bank. All staff involved and relevant departments will be trained in the detection of 'incidents' and in how to report an incident, including severe incidents.

Step 3: Acknowledgement and Follow-Up

70. The respective relevant department will decide whether a grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GM Focal Point the appropriate individuals that could be addressed with the case, if the case can be solved at the local level.

71.   At all times, the GM Focal Point will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Table 8: Typology of Cases and the Recommended Actions

Type of Case	Actions Required	Response Required
Straight-forward cases with little anticipated complications	Minimal checks and consultations.	• Acknowledge reception of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, investigate, if need be, and communicate outcomes and next steps based on outcomes. • 1-3 days
Cases that require some minimal processes	Delete misleading information, collect information, analyze existing information, prepare communication materials to disclose delayed information, clarify existing information, and correct misleading information.	• Acknowledge reception of the grievance, detail the steps to follow, and provide the appropriate practical timelines. • 7 -14 days.
Cases that requires investigation	Access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches.	• Acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response. • 14 to 21 days.
Cases that require escalation	Transfer case to relevant higher level.	• Acknowledge reception of the grievance.

72.   All feedback is documented and categorized for reporting and/ or follow-up as necessary.

Step 4: Verify, Investigate and Act

73.   The GM Focal Point will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redress action and plan.

Verification

- Check for eligibility (objectively based on set standards and criteria) of complaint in terms of relevance to the project. Refer to the SERP PAD, POM, EMSF, ESMPs/ESIAs, sub-project agreements or other documentation to determine the validity of the grievance.
- Escalate outright grievances that require high level interventions within the relevant department.
- Refer outright grievances that are outside the IP jurisdiction (e.g. refer to RCU or relevant external institution).

74.   Once eligibility is determined, the IP will categorize the complaint into the categories presented in Table 9.

Table 9: Complaints Management

Grievance category (questions, comments and suggestions)	Required Action Acknowledgement / Clarification
Complaints and concerns which do not require formal investigation.	Grievances should be handled and resolved by the immediate manager within the GM structure, e.g. the GM Focal Point or a dedicated staff. The relevant department should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.
Complaints and concerns that involve allegations that require investigation or interventions of a different kind.	As appropriate, conduct verification, negotiation, mediation or arbitration, coordination with respective authorities, decision-making, escalation to judicial or administrative institutions, proposed solutions, implementation of agreed actions, etc. The IP should appoint a grievance redress committee, which includes relevant staff in the IP organization and can include a selected local authority (ideally the committee consists of an equal number of men and women), which can hear both parties and ideally solve the matter within the organization.

75.   Investigation
   i.   GM Focal Point to appoint an independent investigator (Safeguards Experts, Professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation.
   ii. Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos).
   iii. Collect and preserve evidence.
   iv. Analyze to establish facts and compile a report.

76.   Grievance Action Plan

    i.   Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction.

    ii.   Undertake mutually agreed follow-actions.

    iii.   Update of complainant relevant department GM team.

    iv.   Provide users with a grievance redress status update and outcome at each stage of redress, update the relevant team on grievance redress across the GM value chain.

Step 5: Monitor, Evaluate and Provide Feedback

77.   The GM Focal Point will provide feedback to GM users and the public at large about:
    i.   results of investigations;
    ii.   actions taken;
    iii.   why GM is important;
    iv.   enhance the visibility of the GM among beneficiaries; and
    v.   Increase in users' trust in the GM.

78.   The relevant department will report on its GM to the RCU on a monthly basis. Monthly reporting to the RCU should provide information on the grievance and how it was handled as well as all information from the grievance register. However, it can omit the names of the aggrieved parties where necessary.

79.   The RCU will undertake the following monitoring actions:
    i.   develop indictors for monitoring the steps of GM value chain;
    ii.   track grievances and assess the extent to which progress is being made to resolve them;
    iii.   conduct a stakeholder satisfaction survey for the GM services;
    iv.   conduct analysis on the raw data on the following: average time to resolve grievances, percentage of complainants satisfied with action taken, and number of grievances resolved at first point of contact;
    v.   provide a report on grievance redress actions pertaining to the steps of GM value chain.

80.   The PCU will evaluate the GM by:
    i.   analyzing grievance data to reveal trends and patterns,
    ii.   sharing GM analysis in management meetings; and
    iii.   taking corrective action on project implementation approaches to address the grievance.

6.3. GBV/SEAH

81.   This Project assumes a strictly survivor-centered approach to GBV/SEAH cases. A survivor centered approach aims to create a supportive environment in which a survivor's rights are respected and in which s/he is treated with dignity and respect. The approach helps to promote a survivor's recovery and his/her ability to identify and express needs and wishes,

as well as to reinforce his/her capacity to make decisions about possible interventions[5]. Key of the survivor-centered approach is that no steps can be taken without the survivor's informed consent.

82.   All entities reporting on GBV/SEAH-related cases will ensure that reports do not contain any information with the potential of identifying survivors (including names of survivors, families and perpetrators). Furthermore, the grievance recipient needs to provide ongoing feedback to the survivor throughout the process. After conclusion of any investigation, the survivor must be informed first to determine whether the perpetrator can be informed and proposed sanctions against the perpetrator can be taken.

83.   The RCU GBV and Gender Specialist will be the key focal point for management of such grievances and concerns and will work closely with respective GBV Specialist counterparts or assigned personnel at the relevant departments in the implementation of the GBV/SEAH Action Plan, which contains all information on the GBV/SEAH referral system.

6.3.1. Management of GBV/SEAH Reports

84.   Given the sensitive nature of GBV complaints, the GM provides different ways to submit grievances. All grievance uptake channels can be used to report on GBV/SEAH-related grievances. No grievance uptake mechanism can reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of GBV/SEAH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GM. This will allow protect the survivor-centered approach from mandatory reporting.

85.   The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor's informed consent – report the case to one of the SERP's formal grievance recipients. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

86.   Cases of GBV/SEAH can be reported through the general Project GM – any project staff, staff manning help desks, through the suggestion box, or through the GM Hotline Operator. In addition, the RCU GBV Specialist will man a dedicated SMS, email address and phone number, through which cases can be reported directly to the RCU.

87.   The grievance recipient will be responsible for the recording and registration of the complaint. A GM operator cannot reject a GBV/SEAH complaint. At the same time, however, the project can only respond to a GBV/SEAH complaint if it is directed into the designated GM channels. All potential first recipients of GBV/SEAH cases will be trained in the guidelines for empathetic, non-judgmental listening to a survivor when recording a complaint.

88.   Once a case has been taken in by a GM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the SERP GBV Specialist.

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[5]Global Protection Cluster, Guidelines for Integrating Gender Based Violence Interventions in Humanitarian Action.

The GBV Specialist will first ensure that the survivor has been provided with all necessary GBV referral services and will ensure that the survivor is in safety.

89.   Where the GBV/SEAH grievance was allegedly committed by an SERP project worker, the grievance will be reported to the respective employing agency (relevant department, sub-contractor, RCU, government agency). The RCU GBV Specialist will follow up and determine jointly with the GM Focal Point of the respective partner the likelihood that the allegation is related to the SERP. The GBV Specialist will follow up and ensure that the violation of the Code of Conduct is handled appropriately, e.g. the worker is removed from his or her position and employment is ended (in the case of UN agencies, SEA processes are strictly followed). The responsibility to implement any disciplinary action lies with the employer of the perpetrator, in accordance with local labor legislation, the employment contract, and the code of conduct The GBV Specialist will report back to the survivor on any step undertaken and the results.

90.   Where the survivor has opted to take a formal legal route with the case, the RCU GBV Specialist will ensure that the survivor has all the support required to file a case at court. The GM process will still proceed with the survivors' consent.

91.   Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GM's remit to conduct investigations, to make any announcements, or to judge the veracity of an allegation. The GM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.

92.   Since this Project assumes a fully survivor-centered approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered access to referral services and the GM operator or grievance recipient should note that the survivor did not wish for the case to be pursued, and the case is considered solved.

93.   Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions; and appropriate actions have been taken against the perpetrator according to SEA mechanisms; b) the service provider has initiated accountability proceedings with the survivor's consent.

94.   If the survivor does not want to launch a complaint with the employer, the case is closed. If the complaint proceeds, the case is reviewed by GBV Specialist in the RCU and a course of action is agreed on with the respective IP/employer. The alleged perpetrator's employer takes agreed-on disciplinary action. Once the action is deemed appropriate by the GBV Specialist, the case is recorded as closed.

95.   Beneficiaries and communities should generally be encouraged to report all GBV/SEAH cases through the dedicated GBV/SEAH referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information.

96.   The GM Operator, and all other GM case recipients (staff manning Help Desks, and local personnel) will ensure appropriate responses vis-à-vis the complainant/survivor by a) providing a safe caring environment and respect the confidentiality and wishes of the survivor; b) If survivor agrees, obtain informed consent and make referrals, c) provide reliable and comprehensive information on the available services and support to survivors of GBV.

6.3.2. Referral process for GBV/SEAH

97.   Referrals are a process through which the survivor gets in touch with professionals and institutions regarding her case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient will instantly provide the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient will provide allowances. Referral services are provided even in cases where the survivor opts to not pursue the case through the GM or through legal channels. See SEAH Prevention and Response Plan and ESMF for further details on referral services. The GBV/SEA Action plan should list available referral services in the different SERP Project areas. This list will be continuously kept up to date by the SERP GBV Specialist, updates will be provided on a regular basis to all GM recipients. The grievance recipient explains to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor will be informed about his or her right to place limitations on the type of information they want shared. The survivor's consent must be documented.

6.3.3. Managing GBV/SEAH Data

98.   All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

99.   Data on GBV cases recorded will only include the nature of the complaint (what the complainant says in her/his own words), whether the complainant believes the perpetrator was related to the project and additional demographic data, such as age and gender, will be collected and reported, with informed consent from the survivor. If the survivor does not wish to file a formal complaint, referral to available services will still be offered even if the complaint is not related to the project, that referrals will be made, the preference of the survivor will be recorded and the case will be considered closed.

100.   If the survivor provides informed consent, the grievance recipient should inform the GBV Focal Point and the GBV Specialist at the RCU. The GBV Specialist at the RCU will inform the World Bank. The report will be on the anonymized incident as soon as it becomes known to the RCU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the SERP; the survivor's age and sex' and whether the survivor was referred to other services.

Figure 2: SERP Grievance Redress Mechanism Flowchart
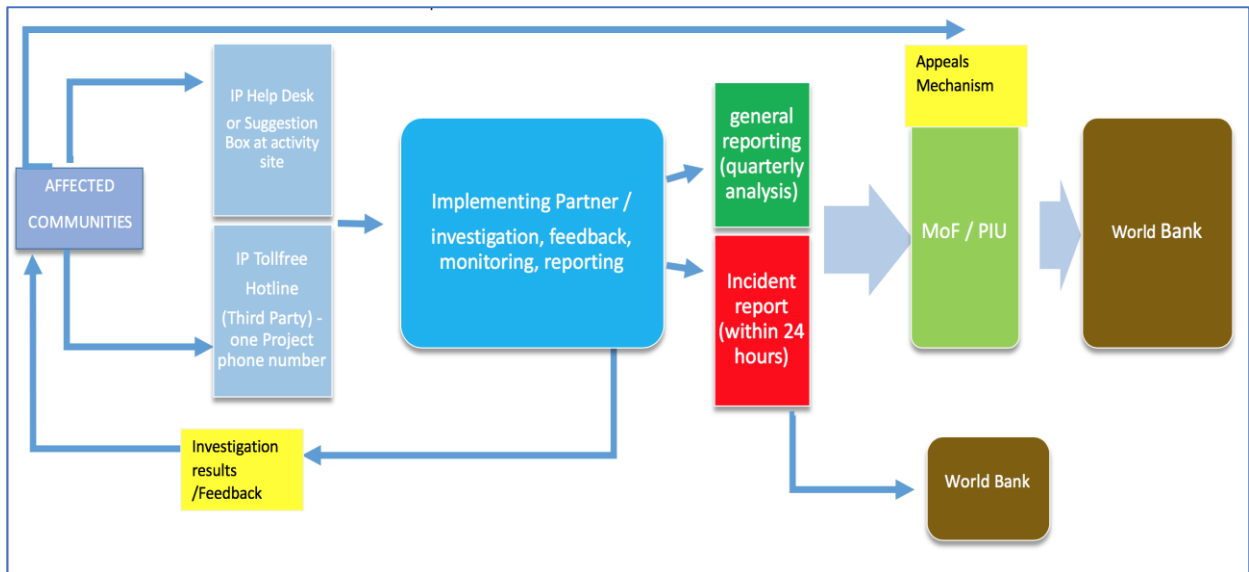
6.3.4. World Bank's Grievance Service

101.   *World Bank Somaliland Office:* If no satisfactory resolution of complaints has been received from the NPCU, complaints can be raised with the World Bank Kenya office on somaliaalert@worldbank.org. **World Bank's Grievance Redress Service:** Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level GMs or the WB's Grievance Redress Service (GRS).   For   more   information: http://www.worldbank.org/grs,   email: grievances@worldbank.org or address letters to:

> **The World Bank**
> Grievance Redress Service (GRS)
> MSN MC 10-1018
> 1818 H St NW
> Washington, DC 20433, USA
> Email: grievances@worldbank.org
> Fax: +1 – 202 – 614 – 7313

102.   Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and World Bank's country office has been given an opportunity to respond. Project affected communities and individuals may submit their complaints to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. For information on how to submit complaints to the World Bank Inspection Panel visit www.inspectionpanel.org.

6.4. Interim Grievance Mechanisms

103.   Pending the establishment of the project GM, the office of the RCU will be responsible for managing project-related complaints. The Social Safeguards Specialist will receive all complaints and channel them to the relevant offices for redress. The Specialist contacts will be shared with the key stakeholders to ensure that they know who to talk to. Once the GM system is fully established and running, information on the GM focal points and guidance on how to channel complaints will be shared broadly and at all levels.

ANNEXES

Annex 1: List of participants during Virtual Preparation Mission (Oct 4th to 19th, 2022)

SN	Name	Designation	Agency	Email Address	Tel. No.
	Ministry of Finance Development (MoFD)				
1.	Dr, Sa'ad Shire	Minister	MoFD	Saadshire123@gmail.com	
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3.	Mohamed Gurhan	Director General	MoFD	gurxan12@hotmail.com	0634240141
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6.	Hassan Farah Mohamed	DRM&PFM Coordinator	DRM&PFM Project	hassan@somalilandpfm.org	0634475005
7.	Hana Said Yousuf	Monitoring and Evaluation Officer	DRM&PFM Project	hana@somalilandpfm.org	0634152644
8.	Abdirasaq Khalif Adan	Deputy of Internal Audit department	MoFD	ducaale001@hotmail.com	0634414981
9.	Suad Mohamed Dahir	Revenue Reform Focal Point	DRM&PFM Project	suad@somalilandpfm.org	0634418035
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13.	Yasin Dualeh Barre	Director of Budget and Planning	MoFD	dualeh606@gmail.com	0634421028
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15.	Abdinour Mohamed Ali	Head of the EAFS	Auditor General Office	abdinor.moh@gmail.com	0634406006
	Ministry of Employment, Social Affairs and Family				
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	Ministry of Planning and National Development				
17.	Hassan Hussien Ahmed	Director of Planning	MoPND	Aideed007@gmail.com	0634424706
	Ministry of Education and Science				
18.	Said Jama		Ministry of Education		
	Civil Service Commission				
19.	Hersi Abdillahi	Coordinator	Public Service Reform	hersi.abdillahi@hotmail.com	0634240510
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	Ministry of ICT				
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	Good Governance and Anti-Corruption Commission				
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	Public Account Committee				
24.	Hassan Omar Hassan	PAC	PAC	Caawiye2004@gmail.com	0634422841
25.	Osman Ahmed Raygal			Reygal04@gmail.com	063443835