



Government of Somaliland

**SOMALILAND CIVIL SERVICE
STRENGTHENING PROJECT II (P174875)**

STAKEHOLDER ENGAGEMENT PLAN

MAY 10, 2021

TABLE OF CONTENTS

ABBREVIATIONS AND ACRONYMS iii

EXECUTIVE SUMMARY iv

1. INTRODUCTION 1

 1.1 Background 1

 1.2 Project objectives and components 2

 1.3 Potential project risks and impacts 3

 1.4 SEP objectives 4

 1.5 World Bank requirements for stakeholder engagement 4

2. DEFINING PROJECT STAKEHOLDER AND ENGAGEMENT PRINCIPLES 6

 2.1 Project stakeholders 6

 2.2 Identification of stakeholders 7

 2.3 Stakeholder engagement principles 7

3. SUMMARY STAKEHOLDER ENGAGEMENT ACTIVITIES 9

 3.1 Consultations prior to the development of this SEP 9

4. STAKEHOLDER ENGAGEMENT 11

 4.1 Disclosure of project documents 12

5. GRIEVANCE MECHANISM 15

 5.1 Introduction 15

 5.2 Grievance redress structure 16

 5.3 GBV and SEA 18

 5.4 GM Appeals and Escalation Mechanisms 19

 5.5 WBG’s Grievance Redress Service (GRS) 19

6. RESOURCES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION AND MONITORING 20

 6.1 Management 20

 6.2 Resources 20

7. MONITORING AND REPORTING 22

Annexes 23

 Annex 1: Minutes of a consultation meeting held with the key stakeholders in Somaliland ... 23

 Annex 2: Information collection tool 25

 Annex 3: Complaints log 27

List of tables

Table 1: Project components and sub-components 2

Table 2: Stakeholders description and areas of interest 7

Table 3: Response to issues raised on stakeholder engagement 9

Table 4: Consultation matrix for stakeholders 11

Table 5: Disclosure of project information at different stages of the project cycle 12

Table 6: Summary budget for implementing the SEP 20

List of figures

Figure 1: Grievance management structure for CSSP II 16

ABBREVIATIONS AND ACRONYMS

CBO	Community-based organization
CoC	Code of Conduct
CSO	Civil society organization
CSSP	Civil Service Support Project
DLI	Deliverable Linked Indicators
ESF	Environment and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environment and Social Standards
FCV	Fragility, Conflict and Violence
GBV	Gender-based Violence
GM	Grievance Mechanism
GoSL	Government of Somaliland
GRC	Grievance Redress Committee
GRS	Grievance Redress System
HR	Human Resource
HRMIS	Human Resource Management Information System
ICT	Information, Communication Technology
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MESAF	Ministry of Employment, Social Affairs and Family
MoF	Ministry of Finance
NGO	Non-governmental Organization
OHS	Occupation health and safety
OIP	Other Interested Parties
PAI	Project Area of Influence
PBC	Performance Based Conditions
PCU	Project Coordination Unit
PDO	Project Development Objective
PMIS	Pension Management Information System
PSC	Project Steering Committee
PWDs	Persons with disabilities
SEA	Sexual Exploitation and Abuse
SecMP	Security Management Plan
SEP	Stakeholder Engagement Plan
SocMP	Social Management Plan
TA	Technical Assistance
ToR	Terms of Reference
UN	United Nations
UNDP	United Nations Development Programme
WBG	World Bank Group

EXECUTIVE SUMMARY

Introduction

1. The Civil Service Support Project (CSSP) II will build on the results and address the gaps recognized during the implementation of CSSP I. The ongoing project was designed, approved on June 30, and became effective on October 26, 2016. Initial delays and on-going difficulties common across Fragility, Conflict and Violence (FCV), made original implementation timetable unattainable. This was recognized by the Mid-Term Review that took place in September 2019. The project closing date has since been extended from June 30, 2021 till December 31, 2022.

2. The CSSP II project will fund technical assistance and capacity building in support of continuation and completion of reforms initiated under the original CSSP (P155123), limited expansion of these reforms (e.g. support to implementation of the public sector pension reform), few new activities in response to Covid-19 pandemic, and closing the financing gap resulted from the CSSP I design stage underestimated cost of doing business in Somaliland. The CSSP II design will emphasize creation of incentives for policy makers to support reforms and, therefore, it will consider using PBCs as a continuation of practices successfully implemented in CSSP I.

3. The project development objective (PDO) for CSSP II is to strengthen basic functions for payroll, human resources and policy management in selected central government agencies (SCSC and CSI) and line ministries (including Finance, Planning and National Development) and to establish a pension system for civil servants. The project components and sub-components are summarized in the table below.

Project components and sub-components

#	Component	Sub-components
1.	Strengthening Policies, Procedures, and Systems for Civil Service Management	1.1 Civil service headcount and payroll management to further support the headcount activities
		1.2 Technical support to implementation of the Human Resources Management Information System (HRMIS)
		1.3 Development and implementation of the new Pay and Grading (P&G) system
2.	Strengthening Core Capacity at the Center of Government and Targeted Ministries	2.1 Implementation of new policies and regulations
		2.2 Expansion of the distance and on-line learning for civil servants
3.	Rollout of the Public Service Pension System	This will fund TA for setting-up a pension unit which will entail: <ul style="list-style-type: none"> - setting up the institutional and technical aspects of operations; - setting up the Pension Management Information System (PMIS), training staff and hiring on-site advisors; and - providing on-going capacity building
4.	Support of Delivery and Project Management	4.1: Implementation delivery support subcomponent will fund consultations, implementation-related travel, hardware, equipment and furniture for newly units and agencies (e.g. pension unit), etc.
		4.2: Project management will include PCU salaries and benefits and operating costs for the new project

Rationale for the SEP

4. 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.

5. The documents to be disclosed for this project include the Social Management Plan (SocMP) which will contain the Labour Management Procedures (LMP), the Security Management Plan (SecMP), and the Gender-Based Violence (GBV) Action Plan; and this SEP that also includes a Grievance Mechanism (GM).

Social risks and mitigation measures

6. Under component 1, the overarching risk is the exclusion of disadvantaged members of the civil service from human resource audits and headcounts, P&G system and pension. There is similarly, the risk of challenges in access to beneficiaries for meaningful stakeholder engagements as well as grievance redress and monitoring where civil servants have been systematically or inadvertently left out of the HR audits and headcount, new P&G system and the public service pension system. In addition, perpetuation and/or exacerbation of sexual exploitation and abuse (SEA), sexual harassment (SH) and other forms for gender-based violence (GBV) could arise from the interaction of civil servants with personnel conducting HR audits and headcount activities as well as enrolment for P&G and pension activities. Further, limited number of staff may potentially see their pay reduced as a result of the P&G reforms. Other risks relate to the unauthorised access, leakage and corruption of personal data as project activities will see the collection, processing, storage and reproduction of large amounts of personal data. Data breaches and hacks can lead to unauthorised access, exposure to physical harm, extortion and infringement on personal privacy.

7. Under component 2, the social risks are associated with the expansion of web-based and e-learning. Through weak or undefined and poorly implemented selection criterion, the roll-out of these activities may end up excluding civil servants from poor, remote and marginalized areas as well as those without the requisite information communication and technology (ICT) skills and gadgets. In addition, civil servants with key disabilities may be systematically excluded from project benefits where digital modes of learning do not take advantage of universal design and inclusivity principles. There are also risks of perpetuation, and/or exacerbation of SEA/SH and other forms for GBV by implementers of the head count and web-based and e-learning interventions. Whereas the web-based mode of delivery significantly reduces the risks of SEA/SH, the risk of demands for and/or exchange of sexual favours for head count or enrolment in learning opportunities is conceivable.

8. Under component 3, key social risks arising from policy implementation relate to the exclusion of the disadvantaged members of the civil service and ensuring security for project operations including the protection of project workers, beneficiaries and affected persons during policy implementation activities.

9. These risks and impacts will be mitigated by the preparation of a Social Management Plan (SocMP) which will: (i) provide the criteria and procedures for screening sub-projects, assessing institutional capacity and outlining risk mitigation strategies commensurate with the risks; (ii) review the mapping process for the HR audits and headcount activities and the roll-out of the web-based and e-learning interventions to ensure that they are disability inclusive; and (iii) elaborate measures to ensure that standards on handling and processing a large amount of information, including personal data of its beneficiaries and prospective beneficiaries are robust.

The main implementing agencies of this project, similar to CSSP I, will be the Somaliland Civil Service Commission (SCSC) and the other key GoSL relevant stakeholders including but not limited to MESAF, MoNPD, MoF, CSI and MoP. . The CSC will work in close collaboration with the Ministry of Finance (MoF) (on the payroll reform), Ministry of Employment, Social Affairs and Family (MESAF) (on pension policy) and other MDAs on implementation of policies developed under CSSP I. The CSSP II will support activities which are either direct continuation or expansion of those supported by CSSP I, therefore, day-to-day project management will be performed by the Project Coordination Unit (PCU) that

was established and staffed to support implementation of CSSP I. The PCU has the requisite experience and it is well regarded by the implementing agencies.

Key project stakeholders

10. 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 this project, the **direct beneficiaries** are the civil servants who will be directly targeted for the project benefits and the institutions that shall receive support to implement the various activities including SCSC, CSI and the sector ministries including MoF, MESAF, Ministry of Planning and National Development, Office of the president, among others. **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. The partners whose interests may be affected include labor unions in GoSL, development partners supporting civil service (such as UN agencies), business companies and entities that may be involved in the provision of services for CSSP II. **Disadvantaged and vulnerable groups** who will need to be targeted with benefits include people working in low grades within the civil service who tend to be mainly women, people with disabilities and those occupying low grades within the civil service.

11. The project team has identified the following as the key stakeholders to be involved at the different phases of the project: Civil servants (at all levels of the civil service), Contractors/consultants, Somaliland CSC and CSI, Ministries: MESAF, MoF, Planning and National Development, the Office of the President, Good Governance and Anti-Corruption Commission and sector ministries, Labor unions, Technical institutions providing services to the Civil Service, Civil Society Organizations, The public, UN and other agencies working in Somaliland, and the private sector.

12. The engagements and consultations on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant Government and implementing agencies. A consultation meeting was held on January 03, 2021, which was attended by 7 participants (4 in Somaliland and 3 in Nairobi). The key issues discussed and agreed upon were: (i) the need to ensure that all the key stakeholders are identified and consulted upon on the project. This was considered important since the ministries and agencies understand CSSP but the private sector and CSOs may not have a good understanding of the project; (ii) the need to develop a tool to support the collection of information from the key stakeholders. This tool was developed and has been deployed (see Annex 2); (iii) the tool would need to be translated into the local language (Somali) for ease of administration and this was done with the support of MESAF and the CSSP PCU; and (iv) the need to identify and assign an officer to spearhead the SEP process in the country.

13. In addition, there were consultations held with the Ministry of Employment, Social Affairs and Family (MESAF). It is notable that further consultations will be arranged to get input into the SEP. The information gathered will be used to update this document before project effectiveness. It is notable that all consultations will take a precautionary approach due to COVID-19. Measures to be considered, based on Government restriction, will include small meetings with few people observing physical distancing and online sessions. Other means of communication will include phone calls, email, WhatsApp, among others.

14. In order to ensure that disadvantaged members of the civil service (including civil servants from poor, remote and marginalized areas as well as those disabilities) who may be systematically excluded from project benefits are reached and their issues document and resolved, the following measures will be put in place:

- i. Organize separate consultation meetings with the civil servants identified as vulnerable and disadvantaged;

- ii. Ensure broad participation of vulnerable and disadvantaged individuals and groups through adequate representation on all organs involved in the project management;
- iii. Provide the vulnerable and disadvantaged individuals and groups with all relevant information about project activities including on potential adverse impacts;
- iv. Document details of all consultation meetings with vulnerable and disadvantaged individuals and groups on their perceptions of the project activities and the associated impacts;
- v. Disseminate information on the GM and encourage the members to use this system to communicate any complaints they might have on the project;
- vi. Share any input/feedback offered by the target populations; and
- vii. Provide an account of the conditions agreed upon with the people consulted.

Grievance mechanism

15. Complaints may be raised by staff, partners, consultants and members of the public regarding any aspect of the project. Potential complaints include: fairness in sharing project benefits; fraud or corruption; payment related complains social impacts; quality of services; poor use of funds; workers' rights; gender based violence/sexual exploitation and abuse (GBV/SEA) and sexual harassment; forced labor; and threats to personal or public safety. As per World Bank standards, the GM will be operated in addition to a GBV Action Plan, which includes reporting and referral guidelines (there will be a GBV Action Plan developed for this project, developed as part of the SocMP). The GM will also operate in addition to specific workers' GMs, which are laid out in the LMP as part of the SocMP.

16. There is Public Sector Reform Steering Committee (PSRSC) that will providing oversight and guidance and oversaw the overall performance of the CSSP II project. MESAF which is the chairperson of this committee will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with the laws of GoSL and the World Bank ESSs. The entry point for all grievances will be with the social specialists at the PCU level who will receive grievances by phone, text or email to publicized toll free mobile phone lines and email addresses at both the national level. The social specialists will acknowledge, log, forward, follow up grievance resolution and inform the complainant of the outcome. The complainant has the right to remain anonymous, thus their name and contacts will not be logged and whistleblower protection for complaints raised in good faith will be assured. The social specialist will carry out training of all PCU staff and all staff directly involved in the project, and consultants on receiving complaints.

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

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

SEP implementation

19. The main implementing agencies will be the SCSC and the other key GoSL relevant stakeholders including but not limited to MESAF, MoNPD, MoF, CSI and MoP . It will work in close collaboration with the MoF (on the payroll reform), MESAF (on pension policy) and other MDAs on implementation of

policies developed under the original CSSP (P155123) and CSSP II. The PCU has experienced staff and well regarded. The social safeguards officer will ensure that the SEP is appropriately implemented, monitored and evaluated. He/she will share the monthly reports with the PCU and the quarterly reports with the World Bank.

20. The total cost of implementing this SEP is USD 140,700 for the project period. The costs may be adjusted based on the project needs.

1. INTRODUCTION

1.1 Background

21. The Civil Service Support Project (CSSP) II will build on the results and address the gaps recognized during the implementation of CSSP I. The ongoing project was designed, approved on June 30, and became effective on October 26, 2016. It was appraised for \$10 million and funded from the Multi-Partner Fund (SOMPF). Initial delays and on-going difficulties common across Fragility, Conflict and Violence (FCV), made original implementation timetable unattainable. This was recognized by the Mid-Term Review that took place in September 2019. The project closing date has since been extended from June 30, 2021 till December 31, 2022.

22. The CSSP I used several performance-based conditions (PBCs) of which PBC 5 (talent management program manual) has been achieved, verified and funds disbursed against achievement of the PBC; and PBC 2 (payroll audits to identify control weaknesses and ghost workers”) has been achieved and the Bank has accepted the documentary evidence on achievement of the PBC. The GoSL is working on submitting documentary evidence on the achievement of PBC 1 (share of civil servants with verified and completed personnel records in central HR personnel database of satisfactory quality), PBC 3 (number of improved HR procedures approved by the Public Sector Reform Steering Committee and submitted to Cabinet); and PBC 4 (newly established or reorganized HR units in targeted MDAs adequately staffed).

23. The CSSP I supports several areas of institutional strengthening with technical assistance (TA) and capacity building activities that are at different stages of implementation. This is done through focusing on strengthening policies, procedures and systems for civil service, including strengthening digital government (component 1 of the CSSP); strengthening core capacity of targeted ministries (component 2); and strengthening policy management capabilities at the centre of government (component 3). Following an assessment of the existing policy management capacities of the Office of the President, an action plan for strengthening this function has been developed and procurement of TA to support this activity will begin once policy and legal staff attached to the cabinet secretariat office are recruited.

24. The CSSP II project will fund technical assistance and capacity building in support of continuation and completion of reforms initiated under the original CSSP (P155123), limited expansion of these reforms (e.g. support to implementation of the public sector pension reform), few new activities in response to Covid-19 pandemic, and closing the financing gap resulted from the CSSP I design stage underestimated cost of doing business in Somaliland. The CSSP II design will emphasize creation of incentives for policy makers to support reforms and, therefore, it will consider using PBCs as a continuation of practices successfully implemented in CSSP I.

25. The main implementing agencies of this project, similar to CSSP I, will be the Somaliland Civil Service Commission (SCSC) and with the other key GoSL relevant stakeholders including but not limited to MESAF, MoNPD, MoF, CSI and MoP . The CSC will work in close collaboration with the Ministry of Finance (MoF) (on the payroll reform), Ministry of Employment, Social Affairs and Family (MESAF) (on pension policy) and other MDAs on implementation of policies developed under CSSP I. The CSSP II will support activities which are either direct continuation or expansion of those supported by CSSP I, therefore, day-to-day project management will be performed by the Project Coordination Unit (PCU) that was established and staffed to support implementation of CSSP I. The PCU has the requisite experience and it is well regarded by the implementing agencies.

1.2 Project objectives and components

26. The project development objective (PDO) for CSSP II is to strengthen basic functions for payroll, human resources and policy management in selected central government agencies (SCSC and CSI) and line ministries (including Finance, Planning and National Development) and to establish a pension system for civil servants. The achievement of the PDO will be measured against following PDO indicators:

- i. Advance of pension reforms will be measured by its successful implementation, i.e., first by successful retiring and placing on pension of all Somaliland civil servants above retirement age, and thereafter timely retiring and placing on pension all civil servants reaching pension age in due course;¹
- ii. Strengthening basic functions of the payroll will be assessed by two sub-indicators: measuring operationalization of the human resource management information system (HRMIS); and measuring operationalization of the pay and grading system; and
- iii. Improvements in the human resource and policy management will be measured by two sub-indicators: actual implementation of policies developed under CSSP I and CSSP II (including the National Employment Policy, Pension Policy, among others); and operationalization of second HR audit results (removal of ghost workers from the payroll and entering all collected HR data in the HRMIS).

27. Table 1 presents a summary of the project components and sub-components.

Table 1: Project components and sub-components

#	Component	Sub-components
1.	Strengthening Policies, Procedures, and Systems for Civil Service Management	1.1 Civil service headcount and payroll management to further support the headcount activities
		1.2 Technical support to implementation of the HRMIS
		1.3 Development and implementation of the new Pay and Grading system
2.	Strengthening Core Capacity at the Center of Government and Targeted Ministries	2.1 Implementation of new policies and regulations
		2.2 Expansion of the distance and on-line learning for civil servants
3.	Rollout of the Public Service Pension System	This will fund TA for setting-up a pension unit which will entail: <ul style="list-style-type: none"> - setting up the institutional and technical aspects of operations; - setting up the Pension Management Information System (PMIS), training staff and hiring on-site advisors; and - providing on-going capacity building
4.	Support of Delivery and Project Management	4.1: Implementation delivery support subcomponent will fund consultations, implementation-related travel, hardware, equipment and furniture for newly units and agencies (e.g. pension unit), etc.
		4.2: Project management will include PCU salaries and benefits and operating costs for the new project

¹It is not clear from the project description the actions that will be taken to support civil servants that have already retired and who may require support. However, it is assumed at the point of developing this SEP that this process will be prospective rather than retrospective.

1.3 Potential project risks and impacts

28. Under component 1, the key social risks are associated with the implementation of human resource audits and headcount, the roll-out of the new P&G system and establishment of the public service pension system. The overarching risk is the exclusion of disadvantaged members of the civil service from human resource audits and headcounts, P&G system and pension. There is similarly, the risk of challenges in access to beneficiaries for meaningful stakeholder engagements as well as grievance redress and monitoring where civil servants have been systematically or inadvertently left out of the HR audits and headcount, new P&G system and the public service pension system. In addition, perpetuation, and/or exacerbation of sexual exploitation and abuse (SEA), sexual harassment (SH) and other forms for gender-based violence (GBV) could arise from the interaction of civil servants with personnel conducting HR audits and headcount activities as well as enrolment for P&G and pension activities. Further, limited number of staff may potentially see their pay reduced as a result of the P&G reforms. There is no risk of downstream impacts from retrenchment as the audit's main goal is to count, collect information and identify ghost workers but exclude retrenchment. Other risks relate to the unauthorised access, leakage and corruption of personal data as project activities will see the collection, processing, storage and reproduction of large amounts of personal data. Data breaches and hacks can lead to unauthorised access, exposure to physical harm, extortion and infringement on personal privacy.

29. Under component 2, the social risks are associated with the expansion of web-based and e-learning. Through weak or undefined and poorly implemented selection criterion, the roll-out of these activities may end up excluding civil servants from poor, remote and marginalized areas as well as those without the requisite information communication and technology (ICT) skills and gadgets. In addition, civil servants with key disabilities may be systematically excluded from project benefits where digital modes of learning do not take advantage of universal design and inclusivity principles. There are also risks of perpetuation, and/or exacerbation of SEA/SH and other forms for GBV by implementers of the head count and web-based and e-learning interventions. Whereas the web-based mode of delivery significantly reduces the risks of SEA/SH, the risk of demands for and/or exchange of sexual favours for head count or enrolment in learning opportunities is conceivable.

30. The risks of collective union, and or industrial action is minimal. Nevertheless, the project will take deliberate measures to identify and meaningfully consult labour relations groups, labour unions and collective bargaining organizations. The SEP will detail targeted mechanisms by which these organizations will be consulted and their views incorporated in the project design and how information on project activities, risks and impacts will be disseminated.

31. Under component 3, key social risks arising from policy implementation relate to the exclusion of the disadvantaged members of the civil service and ensuring security for project operations including the protection of project workers, beneficiaries and affected persons during policy implementation activities.

32. These risks and impacts will be mitigated by the preparation of a Social Management Plan (SocMP) which will: i) provide the criteria and procedures for screening sub-projects, assessing institutional capacity and outlining risk mitigation strategies commensurate with the risks; ii) review the mapping process for the HR audits and headcount activities and the roll-out of the web-based and e-learning interventions to ensure that they are disability inclusive; and iii) elaborate measures to ensure that standards on handling and processing a large amount of information, including personal data of its beneficiaries and prospective beneficiaries are robust.

33. In addition, Labour Management Procedures (LMP) for PCU (direct workers) and contracted workers will be prepared as part of the SocMP, consulted upon and disclosed. Government civil servants

working in connection with the project, whether full-time or part-time, will remain subject to the terms and conditions of their existing public sector employment arrangements. The LMP will detail occupation health and safety (OHS) requirements for project workers and set about provisions to ensure proper working conditions and management of worker relationships, codes of conduct (CoCs) and OHS; and prevention of GBV/SEA/SH. The LMP will also detail procedures for protection of workers against discrimination and forced labour while setting a mechanism for a project workers grievance mechanism. The SEP, SocMP (that will include the SecMP and LMP) will be prepared within three months after Project effectiveness.

34. Security risks in Somaliland is considered lower compared to Somalia. However, as the specific risk of the project to the local context remain unknown, a security risk assessment will be conducted to inform the preparation of a SecMP, as required, to support the mitigation of security threats to project operations.

1.4 SEP objectives

35. The 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 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.

1.5 World Bank requirements for stakeholder engagement

36. 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.

37. 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 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.

38. 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 life-cycle; and
- iv. Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.

2. DEFINING PROJECT STAKEHOLDER AND ENGAGEMENT PRINCIPLES

2.1 Project stakeholders

39. 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.

- a. **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 are the civil servants who will be directly targeted for the project benefits and the institutions that shall receive support to implement the various activities including SCSC, CSI and the sector ministries including MoF, MESAF, Ministry of Planning and National Development, Office of the president, among others.

- b. **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 labor unions in GoSL, development partners supporting civil service (such as UN agencies), business companies and entities that may be involved in the provision of services for CSSP II.

- c. **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 people working in low grades within the civil service who tend to be mainly women, people with disabilities and those occupying low grades within the civil service.

2.2 Identification of stakeholders

40. 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. The consultation process has been initiated. Meetings have been held with the current PCU team members and the MESAF leadership as summarized in Section 3 of this SEP.

Table 2: Stakeholders description and areas of interest

#	Stakeholder	Description
1.	Civil servants (at all levels of the civil service)	These are staff that are formally employed to provide services under the Somaliland Civil Service Commission. They may be found at the headquarters and all other offices in Somaliland. They are subject to the Civil Service employment contract and Code of Conduct (CoC).
2.	Contractors/consultants	These are workers who are recruited for a specific period of time to offer specified services to the government. They are guided by the contracts for the terms of reference (ToR) assigned to them.
3.	Somaliland CSC and CSI	These institutes are mandated to deal with all matters related to the civil service. They will receive additional support to strengthen their capacities and ensure that they are more able to serve the civil servants
4.	Ministries: MESAF, MoF, Planning and National Development, the Office of the President, and sector ministries	These ministries are either involved in the actual recruitment and remuneration of the civil servants and their social welfare..
5.	Labor unions	The unions address all labor issues related to workers including agitating for workers' rights on equal pay and welfare.
6.	Technical institutions providing services to the Civil Service	These are entities that have been brought on board, due to their expertise, to build the capacity of the Civil Service in Somaliland especially in this nascent stage of strengthening operational structures.
7.	Civil Society Organizations	CSOs are key in capacity building and advocacy. There are some CSOs active in Somaliland that will be consulted upon including INGOs, community based organizations. However, they need to have a role to play in the project, an issue that will be jointly discussed.
7.	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
8.	UN and other agencies working in Somaliland	There are several UN bodies that support the work of Civil Service in Somaliland including UNDP that will need to be consulted and informed about the project.
9	Private sector	

2.3 Stakeholder engagement principles

41. 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.

- *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.
- *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.

- *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.

42. In order to ensure that disadvantaged members of the civil service (including civil servants from poor, remote and marginalized areas as well as those disabilities) who may be systematically excluded from project benefits are reached and their issues document and resolved, the following measures will be put in place:

- i. Organize separate consultation meetings with the civil servants identified as vulnerable and disadvantaged;
- ii. Ensure broad participation of vulnerable and disadvantaged individuals and groups through adequate representation on all organs involved in the project management;
- iii. Provide the vulnerable and disadvantaged individuals and groups with all relevant information about project activities including on potential adverse impacts;
- iv. Document details of all consultation meetings with vulnerable and disadvantaged individuals and groups on their perceptions of the project activities and the associated impacts;
- v. Disseminate information on the GM and encourage the members to use this system to communicate any complaints they might have on the project;
- vi. Share any input/feedback offered by the target populations; and
- vii. Provide an account of the conditions agreed upon with the people consulted.

3. SUMMARY STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1 Consultations prior to the development of this SEP

43. The engagements and consultations on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant Government and implementing agencies (the minutes are summarized in Annex 1). The meeting held on January 03, 2021 was attended by 7 participants (4 in Somaliland and 3 in Nairobi). There were 4 women and 3 women in the virtual meeting. The key issues discussed and agreed upon were:

- (i) The need to ensure that all the key stakeholders are identified and consulted upon on the project. This was considered important since the ministries and agencies understand CSSP but the private sector and CSOs may not have a good understanding of the project;
- (ii) The need to develop a tool to support the collection of information from the key stakeholders. This tool was developed and has been deployed (see Annex 2);
- (iii) The tool would need to be translated into the local language (Somali) for ease of administration and this was done with the support of MESAF and the CSSP PCU; and
- (iv) The need to identify and assign an officer to spearhead the SEP process in the country. Mr. Rooble Mohamed, the PCU Manager was assigned to provide this leadership.

44. Following the above meeting, the information gathering tool was developed and shared with relevant agencies and ministries for completion. However, the process was delayed with the translation process and it is anticipated that the results will be compiled as they trickle in. Table 3 presents the responses provided by MESAF in response to the tool.

Table 3: Response to issues raised on stakeholder engagement

#	Issue	Response
1	How to administer the SEP tool to people who do not understand the project well	<ul style="list-style-type: none"> • Need to organize virtual meetings (due to Covid-19 restrictions), introduce the project to them and then ask them to complete the tool
2	Perception about the project and its implementation	<ul style="list-style-type: none"> • CSSP is relevant according to the Civil Servants of Somaliland. For the last 3 decades since independence, the Civil Service has been constantly transforming. Currently, the main social risk is to remove old people from the system without appropriate pension policies and acts. The risk can be mitigated by establishing a public pension scheme. • In CSSP I, many lessons have been learnt but one of key ones were the civil service system building.
3	Stakeholder engagement	<ul style="list-style-type: none"> • The Head Count of Civil Servants has already been done during CSSP I, which means Somaliland Civil Servants are engaged in the project. In addition, different policies for Civil Servant motivation have been applied and there are many ways to engage in these policies as they are finalized and rolled out. • The establishment of strong Social Media ONLY for Civil Servants can capture their voices including other stakeholders. • Currently, CSOs are not engaged in the project but it is important to draw them in CSSP II in order to be part of the process • Since the beginning of the CSSP I, the civil service performance has improved which implies that the public has enjoyed better services. It is therefore important to get the perspectives of the public on the project. • We need for CSSP II to have strong communication with stakeholders, especially the private sector.
4	Security issues and	<ul style="list-style-type: none"> • The Government has a functional system with security protocols in place.

	conflicts	<ul style="list-style-type: none"> • The project will not experience security risks.
5	Occupational safety and health	<ul style="list-style-type: none"> • There is shortage of funds for civil servants to use for injuries or anything related to health risks during the course of their work. • It is important for the CSSP II to look at the OHS for the civil servants. Somaliland civil servants need to work in safe environments with high standards of health facilities. • The civil servants need protection from Covid-19.
6	Grievance redress mechanism	<ul style="list-style-type: none"> • There is a need to establish under the CSC a special complaint handling department with limited scope because without scope every type of complaint will come directly to department, which will get overwhelming. • A sub-office for Information Management System needs to be created under the complaint department for effective GM communication to stakeholders.
7	Monitoring of the SEP	<ul style="list-style-type: none"> • There is need for indicators that show how the SEP has engaged stakeholders, specifically a realistic and effective monitoring system. • A quarterly monitoring report will be a best practice for information sharing with the beneficiaries and other key stakeholders. • Official channels must be established for sharing monitoring reports, such as sharing reports with the steering committee, technical committee and key stakeholders for effective communication.
8	Recommendations	<ul style="list-style-type: none"> • Somaliland needs to have strong pension institutions guided by pension policies and Act of parliament. • Social risks can be at least reduced by putting new blood in the civil service and getting older people out of the system. • Most important challenge of the project is on the implementation of the project activities timely and based on a yearly work plans.

45. This section of the report will be continuously updated as more data come in from the various key stakeholders. The team also plans to hold consultation meetings in the country, the outcomes of which will be synthesized and included in this plan. It should be noted that consultations have been limited due to Covid-19 containment measures that have restricted in-person meetings.

4. STAKEHOLDER ENGAGEMENT

46. Stakeholder engagement is an inclusive process that should be conducted throughout the project life cycle. Table 3 presents the key stakeholder engagement activities during the project preparation stage through to implementation and closure.

Table 4: Consultation matrix for stakeholders

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Beneficiaries		
Screening of the proposed project	PCU consultants (social specialists) and other stakeholders	<ul style="list-style-type: none"> Affected groups (civil servants) SCSC and CSI 	<ul style="list-style-type: none"> Public announcements Face-to-face meetings (adhering to government guidelines on COVID-19) Virtual meetings using Webex/Skype/zoom 	Identification of concerns on project impacts, feedback from would-be affected persons
In-depth study of risks and benefits	PCU, project consultants (social specialists), NGOs/CBOs and Other knowledgeable persons	<ul style="list-style-type: none"> Would-be affected individuals and groups Key informants 	<ul style="list-style-type: none"> 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 (social specialists) -Consultants -NGOs/CBOs	<ul style="list-style-type: none"> Individuals and groups of civil servants Other stakeholders 	<ul style="list-style-type: none"> Implementation Monitoring 	Quick resolution of issues
Monitoring and Evaluation	- PCU (social specialists) -Consultants -NGOs & CBOs	Disadvantaged individuals and groups	Formal participation in review and monitoring activities	Identification and resolution of Implementation issues

47. The project team will take precautionary approaches to the planned consultations to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The project team will take the following measures into account while planning stakeholder engagement:

- Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings;
- If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group discussions. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently.

Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;

- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators; and
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

4.1 Disclosure of project documents

48. Information will be packaged and shared with the key stakeholders using different methods. The PCU will be responsible for ensuring that the information gets to the stakeholders in a timely manner. Feedback from stakeholders will be taken into view and improvements made to ensure robust and consistent information flow. Table 4 presents a summary of the information disclosure for the project. It is notable that the SEP is a living document that may be modified and changed following input and suggestions from project stakeholders.

Table 5: Disclosure of project information at different stages of the project cycle

Information to be disclosed	Method used	Target stakeholders	Responsibilities
Before appraisal			
Disclosure of project documents (PAD, SEP, ESCP)	<ul style="list-style-type: none"> • Websites – GoSL and WBG • Brief summaries of the main features of the project SEP 	All key stakeholders	<ul style="list-style-type: none"> • PCU
After appraisal			
Publicity on project approval and roll-out plans	<ul style="list-style-type: none"> • Audio-visual messages on project information (radio, TV) • Newspaper stories/supplements • Printed materials on project information • Social Media (Twitter, Facebook, Instagram, WhatsApp) • Emails • Press releases • Speeches • Websites (GoSL, WBG) 	All key project stakeholders	<ul style="list-style-type: none"> • PCU • Communication expert • Social specialists
Disclosure of the project documents SocMP and updated SEP, among others	<ul style="list-style-type: none"> • Websites - GoSL and WBG • Brief summaries of the main features of the project SEP • Audio-visual messages on the project (radio, TV) • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails 	<ul style="list-style-type: none"> • GoSL and all partners involved in the project • Open access to all interested parties 	<ul style="list-style-type: none"> • PCU • WBG Team

	<ul style="list-style-type: none"> • Press releases • Speeches 		
During implementation			
Roll-out of direct support to the SCSC, CSI and other institutions/agencies and civil servants	<ul style="list-style-type: none"> • Key informant interviews with stakeholders • Newsletters • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails) • Press releases • Speeches • Mobile phone block messages 	<ul style="list-style-type: none"> • Civil servants • Supported institutions • The public 	<ul style="list-style-type: none"> • PCU • Communication expert • Social specialists
Highlights on project activities, achievements and lessons learned	<ul style="list-style-type: none"> • TV/Radio spots/activations and announcements • Print materials (newsletters and flyers) • Town hall meetings • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails • Press releases • Speeches • Mobile phone block message 	<ul style="list-style-type: none"> -Project beneficiaries -Other interested parties 	<ul style="list-style-type: none"> • Social specialists
Update on project process	<ul style="list-style-type: none"> • Print materials (newsletter, flyers, etc.) • Project progress reports • Town hall meetings 	All stakeholders	<ul style="list-style-type: none"> • Social specialists • PCU
Complaints/compliments about the project implementation	Logs and reports from the GM focal person on the PCU	<ul style="list-style-type: none"> • Receivers of information and services • Information or Data managers 	PCU and social specialists
	Surveys and direct observations of the project beneficiaries	<ul style="list-style-type: none"> • Different stakeholders • Disadvantaged populations 	<ul style="list-style-type: none"> • GoSL • Communication Officer • M&E Officer
Monitoring and reporting			
Feedback of effectiveness of different modalities of engagement	<ul style="list-style-type: none"> • Semi-structured interviews • Online surveys • Satisfaction surveys 	Project primary beneficiaries	<ul style="list-style-type: none"> • Social specialists • M&E Officer
Quarterly	Progress report including summaries of complaints and resolution	GoSL offices at the Federal and State level offices	M&E officer

49. The GoSL and the PCU will provide appropriate background and relevant technical information to stakeholders whose feedback will be sought on various project issues with sufficient advance notice (7-10 business days) so that the stakeholders have enough time to prepare to provide meaningful feedback.

5. GRIEVANCE MECHANISM

5.1 Introduction

50. 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.² 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’.³ This GM should facilitate the SCSC to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The CSSP II will provide mechanisms to receive and facilitate resolutions to such concerns.

51. **Types of grievances:** Complaints may be raised by staff, partners, consultants and members of the public regarding any aspect of the project. Potential complaints include:

- i. Fairness in sharing project benefits;
- ii. Fraud or corruption;
- iii. Payment related complains
- iv. Social impacts;
- v. Quality of services;
- vi. Poor use of funds;
- vii. Workers' rights;
- viii. GBV/SEA and sexual harassment;
- ix. Forced labor; and
- x. Threats to personal or public safety.

52. As per World Bank standards, the GM will be operated in addition to a GBV Action Plan, which includes reporting and referral guidelines (there will be a GBV Action Plan developed for this project, developed as part of the SocMP). The GM will also operate in addition to specific workers’ GMs, which are laid out in the LMP as part of the SocMP.

53. The GM is designed to ensure that grievances and perceived injustices are handled by the project, and that the project facilitates mitigating general conflict stresses by channeling grievances that occur between workers, groups, government actors, project staff, NGOs, CSOs or consultants. 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 therefore provides an effective avenue for expressing concerns, providing redress, and allowing for general feedback from the public.

54. The GM aims to address project-related concerns in a timely and transparent manner and effectively. Information on the GM will be readily available to all project-affected parties. The GM is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties. The availability of this GM does not prevent recourse to judicial and administrative resolution mechanisms.

55. MESAF will have the responsibility of overseeing the resolution of all issues related to the project

²Under ESS2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labour Management Plans (LMPs). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanisms, which will be defined in a separate GBV/SEA and GBV Action Plan.

³World Bank, Environmental and Social Framework, 2018, p. 131.

activities in accordance with the laws of GoSL and the World Bank ESSs. The entry point for all grievances will be with the social specialists at the PCU level who will receive grievances by phone, text or email to publicized toll free mobile phone lines and email addresses at both the national level. The social specialists will acknowledge, log, forward, follow up grievance resolution and inform the complainant of the outcome. The complainant has the right to remain anonymous, thus their name and contacts will not be logged and whistleblower protection for complaints raised in good faith will be assured. The social specialist will carry out training of all PCU staff and all staff directly involved in the project, and consultants on receiving complaints.

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

5.2 Grievance redress structure

57. The structure represented in Figure 1 will be used to channel, resolve and close grievances on the project.

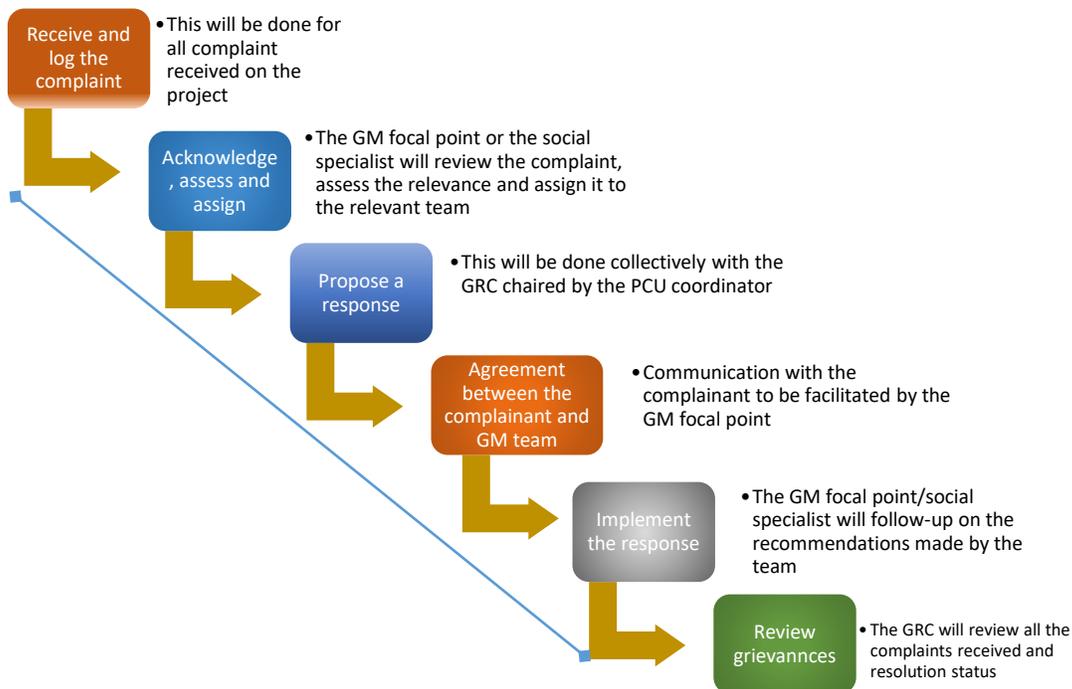


Figure 1: Grievance management structure for CSSP II

Receive and log complaints

58. The beneficiaries will have multiple ways of channeling complaints on any aspect of the project. This will be through email, mobile phones, structured meetings and websites. There will also be opportunities for in-person reports at the district level through project staff. All complaints will be channeled to the relevant social specialist, who will log them into the Complaints Register (see a template in Annex 3).

Acknowledge, assess and assign

59. An acknowledgement of receipt will be sent to the complainant within 7 days of receipt of the complaint. The social specialist will assess the complaint in conjunction with the Coordinator and forward it to the relevant level of implementation (e.g. national and/or district). If the grievance cannot be easily resolved, the social specialist in conjunction with the Coordinator will call for a meeting of the GRC (made up of relevant members of the project team), during which a course of action will be agreed upon. The GRC will meet every 2 months to review the functioning of the GM and the grievance log. All cases will be treated with utmost confidentiality.

60. Incident reporting. Severe incidents, those that cause an incident *that cause significant adverse effect on the public or workers*, e.g., fatality, forced labor, will be reported by the social specialist to the PCU and the WBG within 24 hours (details on this process are described in the LMP).

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

62. For all other grievances, the social specialist will determine whether the grievance can be solved locally, with local teams, and whether an investigation is required. The first port of call will have in-depth knowledge on the project, hence will be able to address the appropriate individuals, if the case can be solved at the local level.

63. At all times, the social specialist/GM focal point will provide feedback promptly to the aggrieved party, for example through the phone or through the other structures established for addressing GM. Feedback will also be communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback will be given to the concerned persons bilaterally.

64. Records of all feedback and grievances reported will be kept by the PCU. All feedback will be documented and categorized for reporting and/or follow-up, if necessary. Data will be captured in an excel spreadsheet. The information collected, where possible and for only for non-GBV/SEA related complaints, will include the name of the person reporting, district, project activity, and the nature of the complaint or grievance.

Propose a response

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

Agreement of a response between the Complainant and the GM Team

66. Where a negotiated grievance solution is required, the GRC will invite the aggrieved party (or a representative) and decide on a solution, which is acceptable to both parties and allows for the case to be

closed – based on the agreement of both parties.

67. After deciding a case, the GRC will provide an appeals mechanism to the aggrieved party, which is constituted through the PCU. This is important in cases where the aggrieved party is dissatisfied with the solution provided by the GRC. In these instances, the PCU will step in and provide an appeals mechanism. The appeal should be sent to the PCU directly (a phone number will be provided), where it will be reviewed by the PCU GM Team and will be decided on jointly with the PCU Coordinator. Where aggrieved parties are dissatisfied with the response of the PCU, they can report cases directly to the World Bank or use the available national grievance resolution mechanisms (see below). This process will not work as barrier to the dissatisfied parties to seek further redress from the country's judicial systems.

Implement the response

68. The social specialist/GM focal point will follow up on the recommended response procedures 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 social specialist/GM focal point will guide the individual or group to seek alternative grievance resolution mechanisms including mediation, arbitration and judicial processes.

Review the Grievances

69. The GM team will conduct a review of the cases reported on a monthly basis and agree on the next steps on cases that have not been closed out. The GM focal point will record the actions recommended by the GM team and file a monthly report to the PCU. Most importantly, all cases filed will need to be logged and monitored by the project team. Repeated cases of the same kind might necessitate the need to increase monitoring and training to avoid continuous recurrence.

5.3 GBV and SEA

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

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

72. Beneficiaries and communities will generally be encouraged to report all GBV/SEA cases related to the project through the dedicated GBV/SEA referral system and complaints resolution mechanism. This will be made explicit in all project awareness sessions, as well as be part of the publicly disclosed

information. The GBV/SEA referral system will guarantee that survivors have access to necessary services they may need, including medical, legal, counselling, and that cases are reported to the police should the survivor choose to do so. Formal processes for disclosing, reporting, and responding to cases of GBV/SEA will be articulated within the GBV/SEA Action Plan.

73. If a GBV/SEA case is reported through the Project GM, the GM Operator will report the case within 24 hours to the PCU, and the PCU is obligated to report this case to the WB within 24 hours. Furthermore, cases of SH will be reported through the workers' GM, if it concerns a direct worker or a worker using the survivor-centered approach. The social specialist will be in charge of holding sensitization sessions for all key stakeholders. All reporting on GBV/SEA will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

5.4 GM Appeals and Escalation Mechanisms

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

5.5 WBG's Grievance Redress Service (GRS)

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

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

6. RESOURCES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION AND MONITORING

6.1 Management

77. The main implementing agencies will be the SCSC and the other key GoSL relevant stakeholders including but not limited to MESAF, MoNPD, MoF, CSI and MoP. It will be working in close collaboration with the MoF (on the payroll reform), MESAF (on pension policy) and other MDAs on implementation of policies developed under the original CSSP (P155123) and CSSP II. The CSSP II will support activities which are either a direct continuation or expansion of those supported by the CSSP, therefore, day-to-day project implementation management will be performed by the PCU that was established and staffed to support implementation of the CSSP. The PCU has experienced staff and well regarded.

78. The social safeguards officer will ensure that the SEP is appropriately implemented, monitored and evaluated. He/she will share the monthly reports with the PCU and the quarterly reports with the World Bank.

79. The PCU will provide collaborative management of program activities, decision-making around co-design and co-management of activities including the annual work plan and budget, co-monitor program activities, conducts quarterly progress reviews, make joint decisions on issues pertaining to implementation and ensure open communication and maximum accountability. The PCU team consists of program director, program coordinator, technical component leads, procurement specialist, finance manager, communication, safeguards and M&E officers.

80. The PCU will be based at SCSC will be responsible for technical oversight and support to the PCU, partner coordination, and financial and administrative management, project activity monitoring and reporting to the donor. The PCU will be responsible for day-to-day project management activities, including monitoring and reporting on project progress to all the relevant stakeholders (please see the table on Information Disclosure). For this purpose, the PCU will organize, at regular intervals, workshops involving representatives of all stakeholders to present project progress and seek stakeholder input. The costs for all these activities are budgeted under the Component 4 and may be adjusted on need basis.

6.2 Resources

81. The project has set aside funds to ensure that the planned stakeholder engagement activities are implemented and monitored effectively. The summary budget is presented in Table 5.

Table 6: Summary budget for implementing the SEP

Stakeholder Engagement Activities	# Qty (Yrs)	Unit Cost, USD	Total cost (USD)
GM, MIS case management process, database (including record keeping, etc.)	4	5,000	20,000
Travel expenses of staff on stakeholder engagement missions	8	3,000	24,000
Communication materials (leaflets, posters)	1	10,000	10,000
Project press conferences or radio broadcasts (twice per year)	4	5,000	20,000
Training (social issues, outreach, GM, etc.) for PCU and other key stakeholders	8	5,000	40,000

SEP CSSP II - 05102021

Project structures to receive complaints and grievances related to the project (TA and Airtime)	1	20,000	20,000
Subtotal			134,000
Contingency (5%)			6,700
Total			140,700

7. MONITORING AND REPORTING

82. The project will design and use a dedicated M&E system that incorporates the PDO and intermediate indicators to track the performance of project activities. Two indicators have been identified as PBCs. Details of the Results Framework and the Deliverable Linked Indicators (DLI) verification protocols will be attached to this document as soon as they are finalized.

83. Monitoring of results will be coordinated by the CSC/PCU, which will have a dedicated M&E specialist and develop a more detailed M&E plan. The PCU will rely on reports from the implementing government agencies and survey-based data collection exercises. A monitoring plan, to be drawn up by the PCU, will outline timing and responsibility in reporting requirements against the indicators and milestones. Results will be used to inform any recalibration of implementation efforts, including necessary mid-course corrections. The M&E reports will be discussed internally at CSC and validated by the Public Service Reform Steering Committee (PSRSC) that will agree on any measures for corrective action, if needed.

84. The project will also fund the services of an independent reviewer (third-party monitoring agent) to validate data collection for two PBC indicators in the Results Framework and to provide for independent verification of PBCs on the basis of an agreed verification protocol (see annex 1). The Bank and the CSC/PCU will agree on the terms of reference (ToR) for the independent reviewer and take necessary precautions to avoid potential conflicts of interest between the role of the independent verifier and other activities planned under the project.

85. The Bank will also monitor the project through its supervision and implementation support missions.

Annexes

Annex 1: Minutes of a consultation meeting held with the key stakeholders in Somaliland

Meeting	Environmental and Social Framework
Location	Ministry of Employment, Social Affairs and Family (MESAF)
Date	January 03, 2021
Time	10:00 – 11:30am

Attendees

Name	Gender	Designation
Awale Mohamed	Male	Director of Social Affairs, MESAF
Filsan Hussein	Female	Director of Planning, MESAF
Abdi Aden	Male	CSSP Manager
Rooble Mohamed	Male	CSSP Communications Specialist
Raymong Kirwa	Male	World Bank
Farhiya Mohamed Farah	Female	World Bank
Mary Nyamongo	Female	World Bank

Agenda Items

S/N	Agenda Item
1	Introduction
	Update on CSSP II and SEF Process
2	Stakeholder Engagement and Tools
3	The Way Forward
6	Closing

The meeting started with introductory remarks from the officers and the importance of collaborating on issues regarding the civil service reform programs and support to the ongoing activities run by the CSSP project. Since the Ministry team are familiar with the project and have been working with the Civil Service Commission on some of the main project activities, the officials understood well about the project objectives and the main achievements.

The members discussed the ongoing process for CSSP II and the requirements for SEP process which is crucial for the development of the new project. The members went through the SEP presentation to understand the requirements, tools and the overall process to support the CSSP.

As an important element in SEP, the Ministry officials showed the willingness to lead this process and make the necessary arrangements in finalizing the tools and conduct the stakeholder engagement process. As a start, the ministry will officially explain the SEP arrangements and assign a focal point for this process.

Since the Ministry is in charge of the Social Affairs, it has the ability to mobilize the social protection stakeholders and Social working groups for this purpose. It will share the list of current stakeholders and will facilitate any actions needed. The ministry was in agreement with the key stakeholders identified in the draft SEP but also noted that the list will be updated as the project gets rolled out.

Regarding the stakeholder engagement, there was a discussion on how the Ministry can engage the private sector and unions since they have not been part of the CSSP and their understanding of the project is limited unlike the public and government stakeholders who have been part of the process.

This remains a key issue to be further discussed in the coming meetings.

At the end of the meeting the following action points have were agreed by all:

- The Ministry to work with the CSC and PCU on the Environmental and Social Framework for CSSP II;
- The Ministry to officially appoint a focal person for SEF and write an official letter regarding this arrangement;
- Director of Planning for MESAF to share the list of Social Stakeholders with the PCU;
- Rooble to be the contact person for SEP from the PCU side; and
- To work together to finalize the stakeholders list, review the SEP tools and start the arrangement of conducting the stakeholders meeting.

The meeting was officially closed at 11:30am

Annex 2: Information collection tool

SOMALILAND CIVIL SERVICE STRENGTHENING PROJECT II**STAKEHOLDER CONSULTATION FORM****1. Introduction**

The Government of Somaliland (GoSL) is seeking financial support from the World Bank to implement a Civil Service Strengthening Project. This project is aimed fund technical assistance and capacity building in support of continuation and completion of reforms initiated under the original CSSP (e.g. support to implementation of the public sector pension reform); few new activities, in response to COVID-19 pandemic; and closing the financing gap that resulted from the CSSP design stage underestimated cost of doing business in Somaliland. The project development objective is to strengthen basic functions for payroll, human resources and policy management in selected central government agencies and line ministries, and to establish a pension system for civil servants.

The Government would like to request your organization to respond to the questions below to help it develop an appropriate stakeholder engagement plan (SEP) for the project. The information provided by your organization will only be used for the purposes of inform the (SEP). If you have any questions, please contact: Mr. Awale Mohammed on email: awale@slmesaf.com.

2. Information gathering tool

Theme	Key issues for consideration
Name, position and organization	
Key themes	Questions
Perception about the project and its implementation	<ul style="list-style-type: none"> • How relevant is this intervention? What problems do you foresee it solving? • What social risks can this project cause/exacerbate? How can these risks be prevented/mitigated? • What lessons have you learnt from CSSP I that can be implementing by this project? • What are the major obstacles or impediments to the success of this project? How can these challenges/risks be mitigated?
Exclusion during project implementation	<ul style="list-style-type: none"> • What is the risk of exclusion either in consultations or benefits (i.e. the exclusion is specific cadre of staff, gender or those in certain districts) during project implementation? How can these be overcome? • What is the risk of creating tension among different groups and/or cadres of workers? • Beside discrimination, what are other causes of exclusion in the civil service?
Stakeholder engagement	<ul style="list-style-type: none"> • How best could civil servants be effectively engaged in this project? • How and when are the best times/ways to engage them? • How do we ensure that we capture the voices of all civil servants and other key stakeholders in consultations? • How can the project draw in civil society organizations and development partners that involved in civil service reforms? • How can the citizenry, that receive services from civil servants be effectively involved in the planning of the project? • How best can the project be communicated to the different stakeholders?

Labor-related risks	<ul style="list-style-type: none"> • What labor risks can this project cause/exacerbate? If so, how can this be overcome and mitigated? • What are your views regarding compliance with Somali labor laws, e.g. child labor, pay and working conditions and fairness in recruitment, promotion and dismissal of workers? If so, how can these risks be prevented/mitigated? • What is the status of workers' unions in the State and what risks do you foresee in labor movements? • What is the risk of exclusion practices of recruitment processes in the civil service? • What is the risk of SEA/H in the project and what mitigation measures do you propose?
Security issues and conflicts	<ul style="list-style-type: none"> • Have there been any security-related incidents, local conflict in this State? • What are some of the key security threats to the workers in the country (at the national and district levels)? • Are there any armed groups in the area, if so, how do they relate to recent incidents? • How would security protocols for workers be enhanced?
Gender-based violence (GBV)	<ul style="list-style-type: none"> • What dangers do female workers face at their work places? • What are the potential risks of the proposed project (including head count, etc)? • What are the reporting channels for GBV-related cases in the area? What is the level of confidentiality? • How has the civil service been responding to GBV? What provisions guide the civil service on GBV/SEA/SH? • What is the possibility that project workers or security forces likely to cause GBV?
Occupational health and safety	<ul style="list-style-type: none"> • What is the risk of civil servants likely to witness violence that will cause injuries and death? • What is your view of your view regarding the capacity of the civil service to protect its workers from infectious diseases e.g. Covid-19?
Grievance redress mechanism	<ul style="list-style-type: none"> • What is your view of the civil service complaints handling process? What are the key limitations? How can this be redressed? • Which channels would beneficiaries feel most comfortable raising the following complaints with: <ul style="list-style-type: none"> • Poor performance of civil servants? • Corruption? • Cases of abuse among workers? • Cases of abuse of public by civil servants? • Discrimination in the provision of services? • How can information on GM be effectively communicated to the key stakeholders?
Monitoring of the SEP	<ul style="list-style-type: none"> • What indicators do you consider important for monitoring the SEP? • How should information on the project progress be shared with the beneficiaries? • What channels would be most effective for communicating on the SEP and the project generally?
Recommendations	<ul style="list-style-type: none"> • What are your recommendations to minimize the social risks of the project? • What are the most important problems to avoid during the implementation of the project? • What suggestions do you have regarding how the project team should implement the project in this community?
Any other comments	

Annex 3: Complaints log

Date and complaint from	Complaint (e.g. not being included in the head count)	Officer/ department complained against (e.g. CSC office)	Nature of complaint/ service issue, (e.g. missing name)	Type of cause – physical (e.g. system failure), human (e.g. inefficient officers, slow, unresponsive) or organization (e.g. policies, procedures, regulations)	Remedy granted/ Solution (e.g. name verified)	Corrective/ preventive action to be taken (e.g. name included in the list)	Feedback given to complainant (e.g. issue resolved)