FEDERAL GOVERNMENT OF SOMALIA

MINISTRY OF LABOUR AND SOCIAL AFFAIRS

PROJECT:

BUILDING OPPORTUNITIES AND OUTCOMES IN SOCIAL PROTECTION AND YOUTH EMPLOYMENT IN SOMALIA (BOOST-YOU) PROJECT (P507443)

SOCIAL MANAGEMENT PLAN (SMP)

DECEMBER 2025

ABBREVIATIONS, ACRONYMS

Acronym	Definition
AAP	Accountability to Affected People
AGYW	Adolescent Girls and Young Women
AML/CFT	Anti-Money Laundering / Countering the Financing of Terrorism
API	Application Programming Interface
CFM	Complaints and Feedback Mechanism (see also GRM)
CHS	Core Humanitarian Standard
CoC	Code of Conduct
CERC	Contingent Emergency Response Component
CPF	Country Partnership Framework (World Bank)
CPIU/PIU	(Central) Project Implementation Unit
CSO	Civil Society Organization
DAC	Development Assistance Committee (OECD)
DEI	Diversity, Equity and Inclusion
DFS	Digital Financial Services
DPO	Data Protection Officer
DPIA	Data Protection Impact Assessment
E&S / ES	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework (World Bank)
ESH	Environmental, Social and Health
ESHS	Environmental, Social, Health and Safety
ESIRT	Environmental and Social Incident Response Toolkit (World Bank)
ESS	Environmental and Social Standard (e.g., ESS1, ESS2, ESS4, ESS7, ESS10)
FGD	Focus Group Discussion
FGS	Federal Government of Somalia
FHH	Female-Headed Household
FMS	Federal Member State(s)
FSP	Financial Service Provider
GBV	Gender-Based Violence
GBVIMS	Gender-Based Violence Information Management System
GM / GRM	Grievance Mechanism / Grievance Redress Mechanism
GRC	Grievance Redress Committee
GTM	Grievance Triage Matrix
ICT	Information and Communication Technology
IDP	Internally Displaced Person
IGAD	Intergovernmental Authority on Development
IM	Information Management
IP	Implementing Partner

KPI	Key Performance Indicator
KYC	Know Your Customer
LMP	Labor Management Procedures
MEAL	Monitoring, Evaluation, Accountability and Learning
M&E	Monitoring and Evaluation
MIS	Management Information System
MoF	Ministry of Finance
MoLSA	Ministry of Labour and Social Affairs
MOU	Memorandum of Understanding
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PII	Personally Identifiable Information
PIM	Project Implementation Manual
POM	Project Operations Manual
PSEA / PSEAH	Protection from Sexual Exploitation and Abuse (and Harassment)
PwD / PWDs	People with Disabilities
RACI	Responsible, Accountable, Consulted, Informed (roles matrix)
SOP	Standard Operating Procedure
SORT	Systematic Operations Risk-Rating Tool (World Bank)
SEA	Sexual Exploitation and Abuse
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SLA	Service Level Agreement
SMP	Social Management Plan
SR	Social Registry
SSN	Social Safety Net
TPM	Third-Party Monitoring
ToR	Terms of Reference
ToT	Training of Trainers
2FA	Two-Factor Authentication
UN	United Nations
UNFPA	United Nations Population Fund
UNHCR	United Nations High Commissioner for Refugees
UNICEF	United Nations Children's Fund
USSD	Unstructured Supplementary Service Data
VSLA	Village Savings and Loan Association
VWG	Vulnerability Working Group
WASH	Water, Sanitation and Hygiene
WFP	World Food Programme

WB	World Bank
BOOST-YOU	Building Opportunities and Outcomes in Social Protection and Youth Employment (project)

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EXECUTIVE SUMMARY

The BOOST-YOU Project, led by the Federal Government of Somalia's Ministry of Labour and Social Affairs, is a US$112 million initiative to strengthen social protection and youth employment over four years. Targeting urban districts (Banadir, Bosaso, Baidoa, Hargeisa), the project aims to support approximately 738,000 individuals (123,000 households), focusing on the poor, vulnerable, youth, women, IDPs, and persons with disabilities.

The BOOST-YOU Project aims to enhance economic opportunities and resilience for poor and vulnerable populations by providing new or improved jobs, with a specific focus on employment outcomes for youth and women, as well as increased earnings. The project also seeks to strengthen resilience through nutrition services, climate risk adaptation, and enhanced household consumption. To achieve these objectives, the project is structured around several key components. First, it connects youth and women to better jobs by facilitating wage employment placements and entrepreneurship support for 168,000 urban youth, with at least 60% of participants being women and 5% persons with disabilities. This is supported through apprenticeships, life-skills training, business grants, mentorship, and financial literacy programs. Second, the project invests in people for better jobs in the future by providing cash transfers to chronically poor and climate-vulnerable households. These include conditional transfers tied to health and education, as well as shock-responsive emergency funds, all delivered digitally using biometric systems to ensure transparency and data protection. Third, the project focuses on adaptive social protection systems and robust project management by strengthening institutional frameworks, developing a Unified Social Registry, establishing crisis response mechanisms, and implementing continuous monitoring. Targeting is inclusive, prioritizing youth, women, internally displaced persons, minorities, and persons with disabilities. The legal and policy framework aligns with Somalia's Social Protection Policy (2019), the Labour Code (2024), and relevant gender, disability, and IDP policies. The project also complies with the World Bank Environmental and Social Framework, specifically applying ESS1, ESS2, ESS4, ESS7, and ESS10 standards.

The Social Management Plan (SMP) for the BOOST-YOU Project identifies several key social risks, including the potential exclusion of vulnerable groups, elite or clan capture, gender-based violence (GBV), security threats, grievances, and gaps in institutional capacity. To address these risks, the plan outlines mitigation measures such as transparent, system-based targeting, codes of conduct, a dedicated GBV Action Plan, confidential reporting channels, and a survivor-centered referral system. The SMP also features a Grievance Redress Mechanism (GRM) with multiple access points, ongoing capacity building, and adaptive management practices.

Implementation of the SMP is led by the Ministry of Labour and Social Affairs' Project Implementation Unit, supported by federal, state, and district focal points, and in partnership with organizations like WFP, UNICEF, NGOs, and financial service providers. Regular monitoring, reporting, and inclusive stakeholder engagement are emphasized to ensure transparency and accountability throughout the project. Lessons learned highlight the importance of gradual system

building, technical support, dedicated funding, inclusive targeting, shock-responsive mechanisms, and the integration of GBV prevention with broader economic empowerment efforts.

The SMP concludes with recommendations to further strengthen institutional capacity, enhance monitoring systems, promote inclusive stakeholder participation, maintain effective grievance mechanisms, and ensure integration of security measures and safeguards. It stresses the need for periodic review and adaptation of the plan, as well as sustained communication in local languages and robust feedback channels. Ultimately, active stakeholder participation and continuous feedback are considered critical to the project's long-term success and sustainability.

1.0 INTRODUCTION

The Social Management Plan (SMP) is an instrument developed to assess, and manage the potential social impacts and risks associated with the BOOST-YOU Project is implemented in a socially inclusive, conflict-sensitive, and sustainable manner. This SMP follows the World Bank Environmental and Social Framework (ESF) as well as the national laws and regulations of Somalia. The SMP aims to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. This ESMP should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), the Labour Management Procedures (LMP), the Security Management Plan, the Grievance Redress Mechanism, the Gender Based Violence (GBV) Action Plan and Medical Waste Template.

The BOOST YOU project is a is a US$112 million equivalent financing in support of three components, to be implemented over a four-year period. Project activities will be implemented in urban districts of Banadir, Bosaso and Baidoa, urban cities with high immigration driven partly by displacement due to droughts and floods and increasing urban poverty and climate vulnerability and Hargeisa, Somaliland. The project aims to support the poor and most vulnerable of the population by providing targeted interventions to improve their resilience for better jobs tomorrow and provide job opportunities now by addressing key barriers to better income-generating opportunities. The components are (i) connecting youths and women to better jobs today (ii) investing in people for better jobs tomorrow and (iii) Adaptive Social Protection Systems and Project Management. The proposed project will build on the results achieved and lessons learned from the design and implementation experience of the Shock Responsive Safety Net for Human Capital Project.

1.1 Project Objectives

To enhance economic opportunities and strengthen resilience of the poor and vulnerable.

PDO level Indicators

Progress toward achievement of the PDO will be specifically measured by the following outcome indicators

a) Enhance economic opportunities for the poor and vulnerable. New or better jobs (Corporate Results Indicator, CRI), disaggregated by women and youth. Youth beneficiaries employed either self-employment or wage employment at least 6 months after completing project package of interventions (Percentage). Women beneficiaries employed in either self-employment or wage employment at least 6 months after completing project package of interventions (Percentage) and increase in beneficiary average earnings (Percentage)

b) Strengthen resilience of the poor and vulnerable. Number of women and children who have received basic nutrition services (Number of people). Number of people with enhanced

resilience to climate risks (CRI), disaggregated by women and youth and increase in beneficiary consumption (Percentage)

1.2 Project Beneficiaries

Selection of project beneficiaries. With current financing, BOOST YOU will support 3,000 youth to be selected in Hargeisa, Somaliland. The project will reach about 123,000 households in particularly climate-exposed areas, which is equivalent to roughly 738,000 individual beneficiaries and just under 8 percent of the poor population of Somalia. The project will deliver regular cash transfers to 50,000 of the poorest households to meet basic needs, enhance climate-exacerbated food security, and prevent negative coping strategies during climate shocks, which in turn helps safeguard the health, nutrition, and education status necessary for productive participation in the labor force over time.

2.0 SMP STUDY AND METHODOLOGY

2.1 Introduction

The SMP preparation involved collecting secondary data on the social situation, consultations with stakeholders and data analysis. It followed a typical process of establishing the current baseline conditions, identifying specific social risks that need to be addressed. characterization of the effects the project will have and the impacts (positive or negative) they will result in. It also determined the significance of the issues identified, established mitigation and monitoring measures, and finally proposals for management plans to ensure effective implementation of mitigation and management of the anticipated issues. The approach and methodology chosen ensures that applicable National regulations and World Bank Environmental and Social Standards (ESS) processes have been followed and will be described in detail where applicable in consideration to identified social risks and impacts of BOOST YOU.

2.2 Literature Review

This included studying relevant documents including the project proposals and appraisals, legislation, and policies; national and local secondary data sources; and other reports and documents related to the proposed project including the World Bank Environmental and Social and associated guidelines. Key documents reviewed included:

(a) The Project Appraisal and Project Implementation documents

(b) The Project Environmental and Social Commitment Plan

(c) SNHCP project: Challenges and Lessons Learnt

(d) The Stakeholder Engagement Plan

(e) World Bank Environmental and Social Framework

2.3 Environmental and Social Baseline

The environmental and social baseline provides a snapshot of the existing conditions in the project area. It serves as the foundation for assessing potential impacts and designing mitigation measures. The baseline assessment provides a comprehensive understanding of the current conditions, which is essential for identifying potential social risks, planning interventions, and monitoring the project's impacts effectively

2.4 Impact Identification and Mitigation Measures

The primary tool for identification of impacts and mitigation was using expert judgment and consultations including recommendations from stakeholders. Impacts were identified from the socio-economic reviews guided by the World Bank Environmental and Social Standards. Impact assessments were also based on criteria developed from national legal frameworks and World Bank Environmental and Social Standards,

3.0 LEGAL POLICY, LEGISLATION, AND INSTITUTIONAL FRAMEWORKS

3.1 Social Protection in Somalia

Somalia is rebuilding its social protection system after decades of conflict, fragility, and recurring humanitarian crises. Persistent poverty where over 50% of the population lived below the poverty line in 2022 combined with recurrent shocks such as droughts, floods, and conflict, has historically left households reliant on informal support networks and emergency aid. Until recently, there was no government-led, nationally coordinated safety net of significant scale.

Progress has been made through emerging social protection in establishing foundational social protection systems. The Somali Social Protection Policy (2019), envisions an inclusive, shock-responsive safety net that targets the most vulnerable, including women, youth, IDPs, and persons with disabilities. Further the Baxnaano Program (2020–2022): Implemented by MoLSA with World Bank support, this was Somalia's first nationwide cash transfer program for poor households. Including the Shock-Responsive Safety Net for Human Capital Project (SNHCP) which piloted human capital cash transfers, strengthening the social registry, payment systems, and grievance mechanisms. These initiatives laid the groundwork for the BOOST-YOU Project, which builds on prior delivery systems to expand access to social transfers, integrate labor activation measures, and link cash assistance to improvements in health, nutrition, and education outcomes.

Somalia's federal system divides responsibilities across levels of government. Federal Government of Somalia (FGS) which sets national policy and standards for social protection. MoLSA leads project planning, coordination, and oversight and Federal Member States (FMS) and Local Administrations, coordinating state-level activities, mobilize local authorities, sharing data (e.g., from the social registry), and supervising field staff. BOOST-YOU's implementation is integrated into this structure, strengthening intergovernmental collaboration.

International organizations play a crucial role in building capacity and supporting delivery, World Food Programme (WFP) for instance brings expertise in large-scale cash transfer logistics and supports unconditional and shock cash transfers under BOOST-YOU.**UNICEF:** Provides technical support for Health & Nutrition and Education conditional cash transfers, ensuring links to services. Both agencies also support social risk management, including operating the Grievance Redress Mechanism (GRM).

3.2 National Legal Framework (Laws)

This section focuses on binding legislation that governs social protection, labor, gender, and the protection of vulnerable groups in Somalia. Key laws applicable to the BOOST-YOU Project include:

3.2.1 Provisional Constitution of Somalia (2012)

- Article 11 guarantees equality before the law and prohibits discrimination based on clan, gender, or social status.
- Article 15 prohibits violence against women.
- Article 27 enshrines the right to social welfare and assistance for vulnerable persons, including those affected by poverty, disability, or conflict.

3.2.2 Somalia Labour Code (2024)

- Modernizes the previous 1972 framework.
- Introduces protections for workers, including occupational health and safety (OHS), fair remuneration, and rights to organize.
- Aligns with ILO conventions on forced labor (C29, C105), discrimination (C111), and child labor (C138, C182).
- Applied to project workers through the Labor Management Procedures (LMP), ensuring fair treatment, safe conditions, and grievance mechanisms.

3.2.3. Gender and GBV-Related Legislation

- Sexual Offenses Bill (pending): Defines sexual violence, consent, and penalties for SEA/SH.
- Child Rights Bill (2020, draft): Protects children from abuse and exploitation.
- Penal Code (1962): Governs criminal offenses, including sexual and gender-based crimes (pending updates).

3.2.4. Protection of Vulnerable and Underserved Groups

- National Policy on Internally Displaced Persons (2019): Safeguards access to services, protection, and livelihoods for IDPs.
- Disability Act and Somali Disability Agency: Emerging frameworks to ensure inclusion of persons with disabilities.

3.3 Relevant National Policies

This section highlights Somalia's key policies that guide social protection, social inclusion, gender equality, and the protection of vulnerable groups, forming the basis for BOOST-YOU's interventions.

3.3.1. Somali Social Protection Policy (2019)

- Establishes a nationally owned, inclusive, and shock-responsive safety net system.
- Prioritizes vulnerable groups: women, youth, IDPs, and persons with disabilities.
- Emphasizes transparency, accountability, and inclusion in program delivery.

- BOOST-YOU operationalizes this policy through cash transfers, labor activation, and human capital improvement measures.

3.3.2 National Development Plan (NDP) and National Transformation Plan (NTP 2025–2029)

- Elevates social protection and human capital development as national priorities.
- Pillar 3 focuses on expanding social assistance and building resilience against shocks.
- BOOST-YOU supports this agenda by linking social transfers with nutrition, education, and employment programs.

3.3.3 National Gender and GBV Policies

- **National Gender Policy (2016):** Promotes gender equality, women's empowerment, and participation in decision-making.
- **National Action Plan on Women, Peace, and Security (2019–2023):** Strengthens women's protection and governance roles.
- **FGM Policy (2018):** Seeks to eliminate female genital mutilation through awareness, legislation, and enforcement.
- BOOST-YOU integrates these policies via a GBV/SEA/SH Action Plan, zero-tolerance codes of conduct, and survivor-centered response mechanisms.

3.3.4. Policies on Internally Displaced Persons (IDPs)

- **National Policy on IDPs (2019):** Provides a rights-based framework to safeguard IDPs' access to services, protection, and livelihoods.
- BOOST-YOU operationalizes these policies by targeting IDPs and other marginalized populations, ensuring equitable access to social transfers and project services.

Table 1: Legislative framework

Legislation / Framework	Interpretation	Relevance and Compliance Approach to the BOOST YOU Project
Somalia Labour Code (2024)	A newly enacted Labour Law (signed on 2024) aligned with ILO conventions, covering employment contracts, wages, working conditions, occupational safety, and non-discrimination.	The project will adhere to the Labour Code across all categories of workers (direct, contracted, and community). Contractor agreements and the LMP will integrate the Code's provisions on employment terms, grievance handling, safety, and gender equality.
Environmental Protection and	Establishes national standards for environmental protection,	The SMP and site-specific ESMPs will operationalize this Act through waste management, pollution prevention, and

Legislation / Framework	Interpretation	Relevance and Compliance Approach to the BOOST YOU Project
Management Act (2024)	pollution control, and sustainable natural resource management.	monitoring of construction impacts, aligning with ESS1 and ESS4.
Public Procurement, Concessions and Disposal Act (2015)	Governs transparent, fair, and competitive procurement processes for public projects.	Procurement under the BOOST YOU Project will incorporate E&S clauses in all contracts, ensuring that contractors and suppliers meet labour, safety, and environmental requirements consistent with the Act and ESF standards.
Law No. 134 of 2018 (Persons with Disabilities)	Establishes the National Disability Agency and mandates rights protection and services for persons with disabilities. However, the **National Disability Policy is not yet active** and its implementation framework is still under development.	The project will promote disability inclusion through recruitment, stakeholder engagement, and accessibility measures. Activities will align with the law's intent and ESS2 and ESS10's non-discrimination principles, while anticipating compliance with the forthcoming national policy once enacted.
Data Protection Act (2023)	Regulates the collection, storage, and sharing of personal data, ensuring confidentiality and lawful processing.	The project will safeguard sensitive information, including GRM records and GBV/SEA/SH data, in accordance with the Act and ESS10 confidentiality provisions.
World Bank Environmental and Social Framework (ESF)	Establishes ten Environmental and Social Standards (ESS) guiding World Bank-financed projects.	The BOOST YOU Project integrates relevant ESSs—ESS1 (Assessment and Management of E&S Risks), ESS2 (Labour and Working Conditions), ESS4 (Community Health and Safety), and ESS10 (Stakeholder Engagement)—into all safeguard instruments, ensuring full compliance.

3.4 World Bank Environmental and Social Standards Applicable

The BOOST-YOU Project is governed by the World Bank Environmental and Social Framework (ESF), which establishes a comprehensive system for managing environmental and social (E&S) risks and impacts throughout the project cycle. Under the ESF, the Borrower the Federal Government of Somalia (FGS) through the Ministry of Labour and Social Affairs (MoLSA) is required to ensure that project design and implementation comply with the relevant Environmental and Social Standards (ESSs)**.**

The following ESSs are applicable to the social dimensions of BOOST-YOU:

Table 2: Environmental and Social Standards and their Applicability to the BOOST-YOU Project

Environmental and Social Standard (ESS)	Applicability to the BOOST-YOU Project
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	**Applicable.** ESS1 is the overarching standard guiding the identification, assessment, and management of E&S risks. BOOST-YOU is classified as a **Substantial Risk** project for social aspects. The project has prepared this **Social Management Plan (SMP)**, an **Environmental and Social Commitment Plan (ESCP)**, and will apply screening and risk management measures to ensure that all project activities comply with ESS1 requirements.
ESS2: Labor and Working Conditions	**Applicable.** BOOST-YOU engages various categories of workers (direct, contracted, and primary supply workers). A **Labor Management Procedures (LMP)** document is in place to ensure fair treatment, non-discrimination, occupational health and safety (OHS), and accessible worker grievance mechanisms. The LMP includes a **Worker Code of Conduct** addressing SEA/SH and child/forced labor prohibitions.
ESS3: Resource Efficiency and Pollution Prevention and Management	**Partially Applicable.** Although the project has no major environmental footprint or civil works, it will promote **resource efficiency** in operations (e.g., responsible e-waste management for IT equipment and use of energy-efficient devices). No significant waste, emissions, or hazardous materials are expected.
ESS4: Community Health and Safety	**Applicable.** The project involves extensive community interaction through social assistance activities. Key risks include **security incidents**, **crowd control** at cash transfer sites, **SEA/SH**, and **COVID-19** or public health risks. The SMP and **Security Risk Management Plan (Annex 2)** outline measures to ensure community safety, safe distribution processes, and protection from exploitation or abuse.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	**Not Applicable.** BOOST-YOU does not finance civil works or activities involving land acquisition, restrictions on land use, or involuntary resettlement. All activities are implemented on existing government or partner premises.
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	**Not Applicable.** The project activities have no interaction with natural habitats or biodiversity areas. No construction, land use change, or natural resource extraction is involved.
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	**Applicable.** While Somalia has no formally recognized Indigenous Peoples, certain **minority and marginalized clans** and **pastoral communities** meet ESS7 criteria as historically underserved groups. The project will ensure their inclusion, cultural appropriate engagement, and equitable targeting mechanisms.

Environmental and Social Standard (ESS)	Applicability to the BOOST-YOU Project
ESS8: Cultural Heritage	**Not Applicable.** Project activities do not involve excavations, construction, or any actions that may affect tangible or intangible cultural heritage. Nonetheless, chance-find procedures will be observed if relevant incidents arise.
ESS9: Financial Intermediaries	**Not Applicable.** BOOST-YOU does not involve financial intermediaries or subprojects implemented through financial institutions.
ESS10: Stakeholder Engagement and Information Disclosure	**Applicable.** A Stakeholder Engagement Plan (SEP) has been developed to ensure inclusive, transparent, and continuous engagement with all stakeholders. A Grievance Redress Mechanism (GRM) is established with multiple entry points to handle complaints, including SEA/SH-related grievances, in a confidential and survivor-centered manner. The SEP is a living document and will be updated as implementation progresses.

A Gap Analysis Table 3 follows, highlighting discrepancies between Somalia's national framework and the ESF requirements, along with the specific measures adopted by the project to bridge these gaps.

3.5 Gap Analysis: National Framework vs. World Bank ESS Requirements

While Somalia's policies set important goals, there are notable gaps between national regulations and World Bank ESS standards. The following table outlines key areas of divergence and how the project will address each gap to ensure ESS compliance:

Table 3: Gap analysis

Aspect	Somali Framework	World Bank ESS Requirements	Identified Gaps	Project Measures to Bridge Gaps
Overall E&S Assessment	No unified law mandating social impact assessment; EIA laws in draft form and not applied to most projects.	ESS1 requires comprehensive E&S assessment and management plans for projects.	Lack of formal E&S screening process in government; limited capacity in MoLSA to do risk assessment.	Apply World Bank ESF: prepared SMP as the social risk management plan; use screening forms for activities. Build MoLSA capacity via training on ESF and SMP implementation. Bank oversight and No-Objection process ensures assessments meet ESS1.
Labor and Working Conditions	Somali Labour Code (2024) exists but is outdated; weak enforcement of OHS, no	ESS2 requires fair treatment, safe working	Gaps in law (e.g. no formal	Implement **Labor Management Procedures (LMP)** for the project: all contracts include ESS2 provisions

Aspect	Somali Framework	World Bank ESS Requirements	Identified Gaps	Project Measures to Bridge Gaps
	explicit requirement for worker grievance mechanisms. No national minimum wage or modern labor protection for NGO workers.	conditions, no child/forced labor, and a worker GRM. Also, code of conduct address SEA/SH.	worker GRM, weak OHS standards); many project workers are outside formal labor force.	(hours, leave, nondiscrimination, OHS). Establish a project-specific **Worker Grievance** mechanism. Mandatory Code of Conduct with SEA/SH clauses for all workers; regular training on conduct and safety.
Resource Efficiency / Pollution	Environmental regulations are nascent; no specific e-waste or pollution guidelines enforced for ICT equipment.	ESS3 requires managing resource use, hazardous waste, and pollution (including e-waste).	Potential e-waste from digital systems not addressed nationally; fuel usage/air emissions norms not specified.	Follow ESS3 good practices: procure energy-efficient equipment; develop **e-waste management** procedures in project Operations Manual for disposal of electronic devices. Any minor medical waste from health-linked programs (if any) to follow WHO guidelines via UNICEF.
Community Health & Safety	No dedicated legislation on community health and safety in projects. Security managed ad-hoc by police/military; community safety is often reliant on customary norms. No legal requirement for emergency response plans in civil projects.	ESS4 demands assessing security risks, traffic and infrastructure safety, emergency preparedness, and handling of any hazardous materials, plus SEA/SH risk management.	No formal requirement to plan for security or crowd safety in aid projects; GBV laws weaken, community feedback not mandatory.	Prepare and implement a **Security Risk Management Plan (SRAMP)** (Annex 2) addressing security escort, site safety, conflict sensitivity. Develop site-specific **incident response** procedures (Annex 6 flowchart). Implement **GBV/SEA/SH Action Plan** (Annex 4) since legal protection is weak – includes survivor referral protocols and confidential reporting channels. Ensure all staff sign Code of Conduct. Engage community leaders and police on safety at distribution sites.
Indigenous Peoples / Underserved Groups	No specific IP law: the 2019 Somali Social Protection Policy and IDP Policy recognize minorities and IDPs as vulnerable and call for inclusion.	ESS7 requires consultation and benefits for IP/Historically Underserved groups, with Free, Prior, Informed Consent (FPIC) for impacts on them.	Minorities (e.g. Somali Bantu) face risk of exclusion without formal FPIC processes; clan dynamics can	**Inclusive targeting approach** to ensure minorities/IDPs benefit: involve minority clan reps in community committees; use **Social Inclusion Action Plan** (Annex 3) with measures like accessible venues, separate consultations for minority groups, and monitoring of their inclusion. If any subgroup qualifies for FPIC, conduct special

Aspect	Somali Framework	World Bank ESS Requirements	Identified Gaps	Project Measures to Bridge Gaps
			marginalize some groups.	consultations to obtain broad support and document their input.
Stakeholder Engagement & Transparency	No law requires public consultation for such projects; however, the Provisional Constitution promotes public participation in governance. No formal grievance requirement, though the draft Citizen Engagement Framework is under development.	ESS10 mandates early and ongoing stakeholder consultations, disclosure of information, and an accessible Grievance Mechanism for project-affected people.	Institutional consultation habits are limited; communities may not be routinely informed of targeting decisions. Grievance systems in government are ad-hoc or NGO-run.	Implement **Stakeholder Engagement Plan (SEP)**: conduct community meetings in all target areas, disclosing project info (in local language); engage NGOs/CSOs to reach vulnerable groups. **Grievance Redress Mechanism (GRM)** established with toll-free hotline and local focal points. Widely publicize GRM and ensure it can handle anonymous SEA/SH complaints safely. Regularly report back to communities ("you said, we did").

3.6 Key Gaps and Gap-Filling Measures for Alignment with ESSs.

Through the above measures, BOOST-YOU will meet or exceed both Somali requirements and World Bank ESS obligations. The ESCP binds the government to implement these gap-filling actions. Corrective measures will be taken if any new gaps are identified during implementation – for example, if monitoring finds that certain groups are still left out, the project will adapt and strengthen mitigation actions. This adaptive approach ensures continuous alignment with best practice.

4.0 DESCRIPTION OF THE PROJECT

4.1 Project Activities

The project will comprise three components as follows:

4.1.1 Component 1: Connecting Youth and Women to Better Jobs Today.

This component supports approximately 168,000 urban youth (at least 60% women and 5% persons with disabilities) with wage employment placements and entrepreneurship support. It includes two pathways: (a) Wage Employment, facilitating on-the-job apprenticeships with master craftsperson's in high-demand trades, along with life-skills training and job placement support; and (b) Self-Employment, providing business skills training, startup grants, mentorship, and financial literacy support to help vulnerable entrepreneurs launch or expand small enterprises. Women's economic inclusion is a core focus – tailored packages (training, grants, mentoring, and financial literacy support) address the gender gap in employment, as female labor force participation is as low as 14% in Somalia's urban areas. The total allocation for Component 1 is US$ 28.5 million, covering all activities and reaching the targeted beneficiaries. Gender inclusion is central to the component's design. Targeted interventions such as tailored training, access to finance, financial literacy programs, and dedicated mentoring seek to address structural barriers that limit women's participation in the labor force. This approach aligns with the World Bank's Gender Strategy (FY23–30), emphasizing economic empowerment and closing gender gaps in access to jobs and productive assets**.**

4.1.2 Component 2: Investing in People for Better Jobs Tomorrow

This component enhances the human capital and climate resilience of poor and vulnerable households through targeted cash transfers, laying the foundation for a more productive and resilient future workforce. It is aligned with the World Bank Social Protection and Jobs (SPJ) Global Practice and the Climate Change Action Plan (2021–2025)**,** emphasizing adaptive social protection and inclusive human capital development. It has three subcomponents: (2.1) Unconditional Cash Transfers to chronically poor and climate-vulnerable households to support basic needs and prevent negative coping (with priority to female-headed households for receiving the cash); (2.2) Human Capital Co-Responsibility Cash Transfers, providing cash to 30,000 pregnant women and mothers of young children conditional on utilization of health services, plus a pilot supporting 5,000 children's primary education with attendance requirements; and (2.3) Shock Responsive Cash Transfers, an emergency fund to scale up assistance in response to droughts, floods, or other shocks, helping families avoid harmful coping strategies during crises. These transfers are geographically concentrated around schools and health centers in areas of high climate vulnerability, linking social assistance with improvements in health, nutrition, and education outcomes. Beneficiaries of cash transfers will also be linked to skills training opportunities under complementary programs to reinforce long-term employability.

Component 2 comprises three subcomponents:

Subcomponent 2.1- Unconditional Cash Transfers for chronically poor and climate-vulnerable households to meet basic consumption needs and reduce negative coping strategies, with priority given to female-headed households**.**

Subcomponent 2.2 Human Capital Co-Responsibility Cash Transfers, providing support to 30,000 pregnant women and mothers of young children conditioned on the use of essential health and nutrition services, and piloting education-linked transfers for 5,000 primary school children tied to school attendance.

Subcomponent 2.3 Shock-Responsive Cash Transfers, an emergency window designed to scale up assistance during climate-induced crises such as droughts or floods, enabling rapid and adaptive responses to shocks.

All transfers are digitally delivered using biometric systems to promote transparency, reduce leakage, and safeguard beneficiary data. Implementation will adhere to World Bank Environmental and Social Standards (ESS1, ESS2, and ESS10)**,** ensuring inclusive targeting, equitable access, and stakeholder participation. Beneficiaries will also be linked to skills development and livelihood programs to reinforce long-term employability and income stability.

Continuous monitoring and evaluation **(**M&E**)** will assess progress on income security, education, nutrition, and climate resilience indicators. A functional Grievance Redress Mechanism (GRM) will ensure accountability, timely feedback, and transparent resolution of complaints

4.1.3 Component 3: Adaptive Social Protection Systems and Project Management.

Component 3 of the BOOST-YOU Project focuses on strengthening Somalia's institutional systems, policies, and capacities for effective and sustainable social protection delivery. Aligned with the World Bank's Environmental and Social Framework (ESS1 and ESS10), it emphasizes transparency, inclusion, and accountability. Key priorities include establishing a Unified Social Registry for efficient targeting, developing adaptive mechanisms for crisis response, and conducting a National Socio-Economic Survey to inform data-driven policy. The component also reinforces institutional capacity at both federal and state levels, ensuring robust fiduciary management, evidence-based monitoring, and social accountability mechanisms such as grievance redress systems and participatory monitoring.

BOOST-YOU targets unemployed and underemployed youth (especially women), as well as poor and vulnerable households including IDPs, minority clans, persons with disabilities, and female-headed families to ensure equitable access to benefits. The Ministry of Labour and Social Affairs (MoLSA) leads project implementation, coordinating with Federal Member States, UNICEF, WFP,

and national NGOs to deliver cash transfers, manage grievances, and build institutional capacity. Through these partnerships, the project promotes community participation, transparency, and resilience in Somalia's evolving social protection system.

5.0 DESCRIPTION OF THE BASELINE ENVIRONMENT

This section outlines the existing environmental conditions in the project area, serving as a reference for assessing potential impacts and informing mitigation strategies.

5.1. Location and Size

The BOOST-YOU Project is aiming to be implemented in selected regions across Somalia, targeting both urban and rural areas vulnerable to climate shocks, displacement, and poverty. Key urban districts include Banadir (Mogadishu), Bosaso (Puntland), and Baidoa (South West State), with an additional 3,000 youth targeted in Hargeisa, Somaliland.

Targeting will use objective criteria from the Unified Social Registry (USR) including age, gender, location, disability, and welfare scores while Somaliland targeting will be adapted per the Operations Manual. The project aims to scale up economic inclusion and employment initiatives piloted under the SNHCP in Banadir, integrating social protection, skills development, and climate-resilient livelihoods to support vulnerable youth and women.

5.2.1. Climate

Somalia experiences a predominantly arid to semi-arid climate, characterized by high temperatures and low annual rainfall. The country faces recurrent droughts and erratic rainfall patterns, leading to significant challenges in agriculture, water availability, and overall livelihoods. These climatic conditions exacerbate vulnerabilities, particularly among youth and marginalized communities.

5.2.2. Vegetation

Vegetation in Somalia varies from coastal mangroves and savannah grasslands to thorny shrubs and acacia woodlands. However, overgrazing, deforestation for firewood, and land degradation have led to significant loss of vegetation cover. This degradation impacts biodiversity and the availability of natural resources essential for local communities.

5.2.3. Surface and Groundwater Resources

Water scarcity is a critical issue in Somalia. Surface water resources are limited, with few perennial rivers and seasonal streams. Groundwater is accessed through wells and boreholes, but over-extraction and contamination pose significant challenges. The limited and unreliable water supply affects agriculture, health, and daily living conditions, particularly in rural and peri-urban areas.

5.3 Socio-Economic Profile of Somalia

Somalia's development context is shaped by protracted fragility but also recent improvements in governance and macroeconomic stability. The population has grown rapidly, from an estimated 12.3 million a decade ago to about 19.7 million by mid-2025, with the majority being young and rural. Decades of conflict, compounded by cyclical droughts and floods, have caused large-scale displacement: over 3.2 million internally displaced persons (IDPs) and an additional ~700,000 refugees in neighboring countries. Displacement has weakened community support systems and concentrated poverty in IDP camps and host communities.

Poverty remains pervasive, with around 54% of the population living in poverty in 2022, especially in rural areas and among IDPs. Human development indicators are among the lowest globally, with Somalia ranking 170 out of 189 on the Gender Inequality Index (GII ~0.675). Literacy and school enrollment are low: roughly 4.8 million children (ages 5–17) are out of school, disproportionately girls in rural and displaced communities. This contributes to persistent skills gaps in the labor force, which BOOST-YOU aims to address through youth economic inclusion and skills development programs.

Somalia's economy is heavily dependent on agriculture, livestock, fisheries, and small-scale trade, with most households relying on subsistence farming, pastoralism, and informal business activities. Key economic activities for targeted youth include:

- **Urban centers (Banadir, Bosaso, Baidoa, Hargeisa):** retail and wholesale trade, small-scale manufacturing, construction, transport services, hospitality, and informal service provision.
- **Rural areas:** subsistence farming, livestock rearing, small-scale crop production, artisanal fisheries, and food processing.

- **Cross-cutting:** entrepreneurship, micro-business development, vocational and technical services, and climate-adapted green enterprises.

BOOST-YOU interventions aim to enhance participation in these activities by providing skills training, job placement, financial literacy, access to microfinance, and climate-resilient livelihood support, especially for NEET youth (18–29 years), women, and vulnerable populations.

Employment challenges remain high: only ~33% of youth are employed, with female youth far worse off, and women's labor force participation is ~13% nationally, constrained by cultural norms, low education, and early marriage. Most economic activities are informal, low productivity, and limited in scale, highlighting the need for targeted support through BOOST-YOU's multi-sectoral approach integrating social protection, economic inclusion, and climate resilience measures.

Public institutions are gradually strengthening under the Federal Government of Somalia (est. 2012). Achievements include reaching the HIPC Completion Point (Dec 2023), unlocking fiscal space for development financing. Governance challenges remain, including uneven institutional capacity, high security expenditures, and limited accountability mechanisms, emphasizing the importance of GRM systems and institutional capacity support for project implementation.

5.4 Baseline Conditions and Key Development Challenges

Humanitarian and Food Security Conditions: Somalia frequently teeters on the edge of humanitarian crises. After a severe famine threat in 2017 was narrowly averted by aid, the country was struck by the 2020–2022 drought, the worst in 40 years, affecting 7+ million people and causing massive livestock deaths and crop failures. At its peak in late 2022, 6.6 million people were acutely food insecure (IPC Phase 3+). The drought caused an estimated $3.25 billion in damage and losses, with recovery expected to take years. This was immediately followed by devastating floods in late 2023 (the *deyr* rainy season), which displaced over 1.2 million people in riverine areas. Historical patterns show that Somalia faces a major drought every 2–3 years and periodic major floods – a cycle of shocks that continually erodes household coping capacity.

The baseline food security situation entering the BOOST-YOU project is extremely fragile. According to the latest analyses, acute malnutrition and hunger are concentrated in certain regions and among certain groups. Geographically, chronic food insecurity is most severe in: the north (e.g. parts of Awdal, Bari, Sool, Sanaag, Togdheer), the central regions (Galgaduud, Hiraan, and parts of Mudug), and the south (Bay, Bakool, Gedo, Lower Shabelle, and Juba regions). Many of these areas have endured repeated drought and conflict. Urban centers are now also seeing rising food insecurity, largely due to the influx of rural migrants and IDPs, and high food prices. Urban poor populations, especially in Mogadishu and other big towns, face high living costs and sometimes lack traditional clan support networks, making them vulnerable to hunger as well.

The drivers of vulnerability in Somalia are multi-faceted and interlinked:

(i)   **Climatic Shocks:** Droughts led to crop failure and livestock deaths, removing livelihood sources; floods destroy shelters and infrastructure and can ruin planting seasons. With climate change, these shocks are becoming more frequent and intense.

(ii)   **Poverty and Lack of Livelihoods:** Widespread poverty and underemployment mean most households have no financial buffer. In rural areas, many are agro-pastoralists or small farmers with low productivity. In urban areas, informal day labor or petty trade predominates, yielding uncertain income. Limited formal jobs and high dependency ratios (many children per breadwinner) strain household ability to afford sufficient food, healthcare, and education.

(iii)   **Conflict and Security Issues:** Active conflict (notably with Al-Shabaab in south-central Somalia) disrupts markets, restricts movement (cutting off villages from aid or trade), and creates insecurity that can prevent people from tending farms or accessing assistance. Conflict and clan tensions also impede equitable resource distribution – those from weaker clans can be pushed aside from aid by local powerbrokers (a risk for the project to manage via transparent targeting and grievance systems).

(iv)   **Social Inequality and Exclusion:** Certain groups face systemic disadvantages. *Minority clans* often have less access to communal land or social support. *Women* in Somalia have less control over household resources and may eat last and least in times of scarcity. They also bear the burden of care (children, elderly), limiting their ability to earn income. *IDPs* and returnees, having left their home areas, may lack local clan protection or livelihoods, making them highly aid dependent. Persons with disabilities and the elderly often remain invisible and struggle to access humanitarian aid due to mobility or stigma barriers.

(v)   **Weak Basic Services:** Somalia's health and nutrition services are inadequate many settlements have no clinic, contributing to some of the world's worst health outcomes (e.g. high child mortality and maternal mortality). Malnutrition is persistent; without clinics or feeding programs, children's stunting and waste remain high. Education gaps (over 70% of rural children out of school) mean low awareness on nutrition, hygiene, etc., perpetuating vulnerability. Water and sanitation infrastructure is very limited (only a fraction of the population has access to safe drinking water and latrines), which leads to disease outbreaks that worsen malnutrition (SDG 6 challenges).

These baseline conditions underscore the importance of adaptive social protection. Safety net programs like BOOST-YOU are designed to address some of these issues: providing cash to boost

purchasing power, smoothing consumption during droughts, and linking households to health and education to break the intergenerational cycle of poverty. The project also inherently serves a peacebuilding function by promoting equitable resource sharing across clans and regions, which can reduce grievances that insurgents exploit.

Baseline social assessments indicate generally strong community support for cash assistance programs but also highlight risks such as potential clan bias in beneficiary selection and tensions if some community members are left out. These were evident in previous projects and are carefully considered in SMP measures (Section 4 and 5). Another baseline condition is the proliferation of social assistance actors – NGOs, UN agencies – often operating with parallel systems. BOOST-YOU aims to unify these efforts under government leadership, which will be a transition requiring trust-building with communities who are used to NGO-led aid distribution.

Finally, it's worth noting that despite hardships, Somali communities possess resilience and social capital. Remittance flows (estimated at $1-2 billion annually) form an informal safety net for many, and traditional community support (zakat, clan-based help) fills some gaps. However, these are not sufficient or equitable, hence the need for a formal safety net. The SMP's social assessments will continue to monitor these baseline factors – e.g., food prices, migration into project areas, security incidents – to adapt the project's response as needed

By understanding the country context and baseline conditions, BOOST-YOU's implementers can better target assistance, anticipate challenges, and work with communities to achieve the project's goals of reduced poverty, improved human capital, and greater resilience against the inevitable shocks that Somalia will face.

5.5 Lesson Learnt from previous relevant projects

Somalia's Baxnaano and Shock Responsive Safety Net for Human Capital Project (SNHCP) mark the country's first major steps toward government-led social protection. Implemented by the Ministry of Labour and Social Affairs with World Bank backing, these initiatives established essential frameworks—such as the Unified Social Registry, a Management Information System, and digital payment platforms—that now underpin the national social protection system. Critical progress was made in building institutional capacity, especially through the transition from partner-led to government-managed delivery, which improved ownership and accountability. However, the experience revealed that sustained technical support, gradual capacity-building, and dedicated funding are necessary, particularly at the Federal Member State level, to solidify these gains and ensure a robust and resilient system.

A notable achievement in these programs was the combination of objective, data-driven geographical targeting with community-based validation, which fostered greater local acceptance and perceived fairness. Targeting women as primary recipients not only advanced financial inclusion but also

improved household food security and welfare. Despite these successes, persistent issues remained, such as the underrepresentation of highly vulnerable groups—including minority clans, internally displaced people, and persons with disabilities—due to ongoing inclusion and exclusion errors and occasional clan-based influence during selection. The lessons underscore the need for transparent, system-driven targeting backed by clear criteria and effective grievance redress systems to ensure that program benefits reach those most in need and avoid elite capture.

The projects also highlighted the critical importance of flexibility and shock responsiveness. The SNHCP's emergency cash transfer mechanism demonstrated the feasibility of scaling up support during crises like droughts and floods, but logistical and financial constraints sometimes hindered rapid delivery in remote or insecure areas. Coordination among federal, state, and humanitarian actors emerged as a key area needing improvement for more effective crisis response. These insights point to the value of embedding pre-approved contingency financing, streamlined operational protocols, and pre-positioned delivery systems in future interventions, so that assistance can be rapidly mobilized when shocks occur.

Finally, the experience from Baxnaano and SNHCP emphasized that the sustainability and impact of social safety nets rely on continuous community engagement, robust monitoring, and an intentional approach to gender and social dynamics. Programs that communicated eligibility and processes transparently, utilized local languages and media, and established feedback mechanisms built greater trust and accountability. However, risks such as gender-based violence surfaced when women's empowerment disrupted established power relations, highlighting the need for integrated prevention and response measures. For long-term sustainability, the lesson is clear: a gradual fiscal transition plan and domestic resource mobilization are essential to reduce reliance on external funding. These foundational lessons directly inform the BOOST-YOU Project, which seeks to move beyond basic protection by linking cash assistance to skills, employment, and resilience outcomes, ultimately aiming for a more sustainable and inclusive social protection landscape in Somalia.

6.0 SOCIAL IMPACTS AND MITIGATION MEASURES

6.1 Social Impacts, Risks and Mitigation Measures

This section outlines the key social risks and potential impacts identified during appraisal and describes the procedures for screening, categorizing, and managing these risks throughout implementation. Risk classification and mitigation will be conducted in alignment with World Bank ESF principles, the Social Management Plan (SMP)**,** and national social protection frameworks, ensuring that all subprojects are implemented in a manner that prevents, minimizes, mitigates, and monitors adverse social impacts while enhancing inclusive and equitable benefits.

6.2 Key Social Risks and Impacts Assessment of the Project

The following negative social risks have been identified for the BOOST-YOU Project:

(i) **Exclusion of Vulnerable and Marginalized Groups:** Vulnerable populations—including minority clans, internally displaced persons (IDPs), women-headed households, and persons with disabilities face risks of exclusion from project benefits due to existing social hierarchies, access barriers, or limited outreach.
Mitigation: Targeted and inclusive beneficiary selection, participatory consultations, and monitoring of disaggregated data to ensure equitable access and inclusion.

(ii) **Elite or Clan Capture and Selection Bias:** There is a risk of undue influence by local elites, gatekeepers, or clan leaders in beneficiary identification or resource allocation.
Mitigation: Transparent and system-validated selection processes, public disclosure of criteria, and strengthened oversight through independent verification and grievance mechanisms.

(iii) **Gender-Based Violence (GBV) and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH):** Women's participation in cash-for-work and livelihood activities may heighten exposure to domestic violence, harassment, or exploitation.
Mitigation: Implementation of a GBV Action Plan, Codes of Conduct for project workers, safe reporting channels, survivor-centered referral pathways, and continuous community sensitization.

(iv) **Security and Conflict Risks:** Operating in fragile and conflict-affected areas presents security challenges that could endanger beneficiaries and project personnel, potentially disrupting implementation.
Mitigation: Conducting contextual security assessments, coordination with local authorities, adherence to World Bank guidance on use of security personnel,and integrating conflict sensitivity measures.

(v) **Grievance and Trust Deficits:** Low community trust, misinformation, or weak feedback systems may cause tension, resistance, or reputational risks.
Mitigation: Strengthening the Grievance Redress Mechanism (GRM), ensuring accessibility for all groups, and regular communication to enhance transparency and accountability.

(vi)**Institutional and Capacity Risks:** Limited institutional capacity at federal, state, and local levels could undermine effective implementation, monitoring, and compliance with ESF requirements.

Mitigation: Continuous capacity-building, technical assistance, and robust monitoring systems to reinforce social risk management and sustainability.

The summary of risks and proposed mitigation measures are shown in Table 5.

Table 5: Risks and mitigation measures

Risk Category	Identified Risk	Mitigation Measures	Responsible Entity	Monitoring & Reporting	Resources
Targeting & Selection	Exclusion of vulnerable groups (minority clans, women, PwDs, IDPs)	System-Based Participatory Targeting (CBPT); inclusive consultations with women/minorities; clear criteria shared publicly; one-week appeals window and an accessible GRM	MoLSA PIU, IPs/CPs, Community Selection Committees	Beneficiary lists validated publicly; GRMrecords; monthly partner reports	Built into programme ops
Benefit Capture	Cash/entitlements diverted by spouses, leaders, or armed groups	Biometric/digital authentication at redemption; GRM channels for reporting capture; sanctions/corrective actions	MoLSA PIU, FSPs, IPs/CPs	Redemption monitoring; GRM logs; quarterly audits	Programme ops + IT costs
Elite/Clan Capture	Local leaders biasing selection to benefit their group	Wide stakeholder consultations (govt, elders, women/youth/minorities); objective criteria; community validation; GRM reporting	MoLSA PIU, IPs/CPs, Local Authorities	Validation meetings; monitoring missions; GRM/CFM reports	Community consultations budget
Remoteness	Cultural/logistical challenges in rural areas	Partner with local NGOs; flexible delivery mechanisms, collection of grievances and provision of feedback by mobile teams, outreach	MoLSA PIU, IPs/CPs	Field monitoring; TPM reports; beneficiary feedback	Programme ops

Risk Category	Identified Risk	Mitigation Measures	Responsible Entity	Monitoring & Reporting	Resources
		programs; tailored sensitization			
Systemic Weakness	Weak partner or FSP systems	Transparent vetting & due diligence; capacity assessments; safe distribution training; MoLSA oversight checklists	MoLSA PIU, CPC, FSPs	Partner reviews; financial audits; compliance reports	Programme ops
Monitoring Challenges	Insecurity/access limits monitoring	Multi-layered monitoring (MoLSA staff, IPs, TPM, hotline cross-checks); remote data collection	MoLSA PIU, IPs/CPs, TPM	Monthly monitoring logs; triangulated reports	Programme ops
Inward Migration	Opportunistic movement to enrol in benefits	Pre-set caseload ceilings; time-bound registration; residency checks; transparent messaging	MoLSA PIU, IPs/CPs, Community Committees	Appeals data; monitoring reports	Programme ops
GBV & SEA/SH	Risks of exploitation, abuse, or gender-based violence	Survivor-centered referral pathways; SEA/SH training; SEA focal points; safe spaces for women; SEA/SH clauses in partner agreements; Implement SEP, GRM signed code of conduct and GBV Action Plan	MoLSA PIU, IPs/CPs, GBV actors	GRM/SEA referrals; quarterly safeguarding audits; partner reports	USD
Stakeholder Engagement	Lack of trust/transparency	Regular consultations (mixed and focus groups); 'you said, we did' feedback; information disclosure in accessible formats	MoLSA PIU, IPs/CPs	Consultation records; GRM trends; satisfaction surveys	USD

Each of these risk categories carries potential impacts on individuals, communities, and the project's success. If unmitigated, they could result in social harm (like inequity, conflict, or violence), reduce the effectiveness of interventions, or violate World Bank safeguard standards. Therefore, detailed mitigation strategies have been devised (Section 5) to address each risk.

It is important to note that these risks are interconnected. For example, weak capacity (systemic risk) can worsen exclusion or GBV response; clan capture, if unchecked, can lead to conflict that then further reduces access for monitors. The SMP adopts an integrated approach to manage them in combination.

Additionally, positive social impacts were identified: improved food security and nutrition for beneficiary households, increased women's empowerment (via controlling cash and participating in training), strengthened social cohesion through transparent and fair resource allocation (reducing grievances that can fuel conflict), and building trust in government as MoLSA demonstrates responsiveness. The SMP includes measures to enhance these positive impacts (like communications campaigns highlighting project fairness and linking beneficiaries to services that amplify outcomes).

6.3 Screening and Risk Categorization Procedures

To manage social risks throughout implementation, BOOST-YOU will implement a screening and categorization process for its activities, particularly relevant for Component 1 subprojects (e.g. selecting specific training programs, enterprise support activities, or partnering with local entities) and rollout in new geographic areas under Component 2. The objectives of screening are: (a) to ensure any high-risk activities are identified and adjusted or dropped, and (b) to determine the appropriate level of social assessment and mitigation for each activity.

Screening of Activities: Before activities commence in a new district or a new subcomponent, the PIU Social Safeguards Officer will conduct a Social Risk Screening using a checklist aligned with the criteria in this SMP and ESS1. The screening will cover questions such as: Will this activity involve any land acquisition or physical displacement? Does it affect particularly vulnerable groups or have clan sensitivity? Will it involve construction or the presence of security forces? Will it create labor influx or interact with minors? Since BOOST-YOU does not include civil work and mostly finance cash transfers and training, many typical E&S screening items (like land take, resource use, physical cultural resources) are not applicable. However, the screening will focus on contextual social risks e.g., local conflict dynamics, presence of minority clans, capacity of local partners, GBV incidence rates in the area, etc.

Each subproject or district activity will be categorized as Low, Moderate, Substantial, or High social risk based on the screening. All high risk activities will be excluded under this project. For example, if a particular district is found to be under active conflict or inaccessible such that no monitoring or safe implementation can occur (posing high risk to communities or workers), the project would defer activities in that area until conditions improve (replacing it with an alternate district as needed).

Moderate risk activities (most typical for delivering cash and training in stable areas) will proceed with the standard mitigation measures outlined in this SMP. Substantial risk activities (if any) – perhaps an area with some inter-clan tensions or higher GBV prevalence – will trigger a more focused Social Assessment or development of an activity-specific Social Management Plan. For instance, if

the project were to pilot a new youth jobs scheme in an area with known gang violence issues, the PIU might commission a rapid Context and Risk Assessment to inform additional safeguards (like working with local peace committees or adding psychosocial support). These instruments would need World Bank review and clearance prior to activity commencement.

Categorization and Documentation: The results of screening and assigned risk level will be documented in a Screening Report (kept on file by the PIU and shared with the World Bank). This will include recommended actions (e.g. "proceed under SMP measures" or "prepare a targeted mitigation plan" or "do not proceed"). The ESCP commits that no activities will start until required E&S instruments are in place. In practice, given the nature of BOOST-YOU, we expect most activities to fall within Moderate to Substantial risk range manageable through existing plans (SEP, LMP, GBV Plan, etc.). The SMP provides that if any unforeseen risk emerges (like a need for a small construction of offices or storage, which is not planned but hypothetically), an addendum to the SMP or a focused Environmental and Social Management Plan (ESMP) would be prepared in line with ESS1.

Exclusions: The project has built-in exclusions to avoid high risks. For example, it will not finance any activity requiring involuntary resettlement or land acquisition (ESS5 is not applicable) – if a need for land for a training center arises, it must be met through voluntary arrangements or existing facilities, otherwise the activity will not proceed. It will not engage in areas under active military operations. It will not hire security forces directly (and if security personnel are needed for escort, that will be handled by government under a security management protocol consistent with ESS4). The screening ensures these exclusions are adhered to by including knockout criteria.

Ongoing Risk Monitoring: Risk categorization is not a one-off. As part of adaptive management, the PIU and World Bank Task Team will review the overall project risk rating during implementation (at least during Implementation Status Reports and mid-term review). If certain risks escalate (for instance, a deterioration in security or an increase in SEA cases), the project risk level could be revised to High, which would prompt immediate strengthening of mitigation measures and could involve suspension of certain activities until safe to continue. Conversely, improvements (say, significant capacity built at MoLSA and zero major incidents in a year) might reduce residual risk. The SMP will be updated accordingly if such changes occur.

Social Risk Register: MoLSA will maintain a risk register logging identified risks, their ratings, and mitigation status (Annex 2's SRAMP provides a template for security-related risks, and Annex 1 for general social risks). This tool will be used for regular reporting and decision-making.

All BOOST-YOU interventions will undergo a fit-for-purpose social risk screening and categorization process to ensure that potential social issues are spotted early and managed appropriately. This systematic approach, coupled with continuous community engagement (Section

6) and robust grievance mechanisms (Section 8), will help maintain the project's social risk at an acceptable level and ensure responsive action as the context evolves.

6.4 Screening and Risk Categorization Procedures

6.4.1 Purpose

The screening and risk categorization process ensures that all project activities — particularly those implemented in new districts or under new subcomponents — are socially sound, inclusive, and compliant with the World Bank's Environmental and Social Framework (ESF). It helps to identify potential social risks early, determine appropriate mitigation, and ensure that no high-risk or ineligible activities are undertaken.

6.4.2. Screening Process

Before implementation of any activity, the Project Implementation Unit (PIU) through its Social Safeguards Officer conducts a Social Risk Screening using a standardized checklist aligned with ESS1. The screening covers:

(vi)   Nature of activity (cash transfer, training, outreach, etc.)
(vii)   Location and local context (conflict, clan composition, accessibility)
(viii)   Vulnerable groups present targeting a combined 75% inclusion with over 60% of that percentage to be women target (IDPs, minorities, PWDs, women)
(ix)   Potential risks of exclusion, discrimination, or social tension
(x)   Security and safety concerns (crowds, payment sites, GBV/SEA)
(xi)   Implementing Partner's capacity to manage social risks

6.4.3 Risk Categorization

After screening, each activity or location is assigned a social risk category based on World Bank definitions:

Table 6: Screening and Risk Categorization Procedures

Risk Category	Meaning	Typical Examples	Required Action
Low	Minimal or no social risks.	Administrative activities, training in stable areas.	Proceed under general SMP procedures.
Moderate	Predictable, limited risks manageable with standard measures.	Cash transfers or trainings in stable urban settings.	Apply SMP and LMP provisions; routine monitoring.

Risk Category	Meaning	Typical Examples	Required Action
Substantial	Significant but controllable risks needing additional measures.	Areas with clan tensions, GBV concerns, or low institutional capacity.	Prepare targeted mitigation plan or focused Social Assessment.
High	Severe or unmanageable social risks (e.g. active conflict, resettlement).	Conflict zones, unsafe areas for beneficiaries.	Activity excluded or deferred until risks are reduced.

Note: BOOST-YOU excludes all High-Risk activities no land acquisition, resettlement, or security force dependent operations are permitted.

6.5 Risk Mitigation Strategy

The BOOST-YOU Project applies the mitigation hierarchy avoid, minimize, mitigate, and redress in accordance with the World Bank Environmental and Social Framework (ESF).

6.5.1 Avoidance

(i) Project activities will exclude any involving land acquisition, resettlement, or displacement in line with ESS5.
(ii) High-risk and conflict-prone areas will be excluded following contextual security and social risk assessments.

6.5.2 Minimization

(i) System-based targeting with clearly defined and publicly disclosed eligibility criteria to prevent exclusion, biasness and elite capture.
(ii) Capacity building for implementing partners and staff on conflict sensitivity, GBV/SEA/SH prevention, ethical conduct, and stakeholder engagement.
(iii) Biometric registration and electronic payments to ensure transparency, prevent fraud, and safeguard beneficiary data.

6.5.3 Mitigation

(i) **Grievance Redress Mechanism (GRM):** accessible, confidential, and responsive system with toll-free hotline, local helpdesks, and multiple reporting channels. (See GRM manual in Annex 2). More details are also found in the project's operations manual.
(ii) **GBV/SEA/SH Action Plan:** includes Codes of Conduct, survivor-centered response, referral pathways, training, and community awareness.

(iii) **Stakeholder Engagement:** ongoing consultations, inclusive information sharing, and participatory monitoring through community scorecards.(Details on strategy for engagement are provided in the SEP on https://molsa.gov.so/reports/https://molsa.gov.so/wp-content/uploads/2025/08/Stakeholder-Engagement-Plan-SEP

(iv) **Security Management:** adoption of context-specific security measures, community acceptance strategies, and compliance with the World Bank's Environmental and Social Incident Response Toolkit (ESIRT)**.**

6.6 Redress and Monitoring

(i) **Corrective actions** for affected households, including re-verification, re-enrollment, or payment adjustment where applicable.

(ii) **Independent monitoring and periodic audits** to verify compliance, assess effectiveness, and inform adaptive management.

(iii) **Feedback mechanisms** integrated into monitoring to promote continuous learning, transparency, and accountability.

Table 8: BOOST – YOU Risk Mitigation Hierarchy Summary

Level	Objective	Typical Actions	Examples
1. Avoid	Prevent risk occurrence	Exclude high-risk activities; pre-screen all sites	Exclude areas with active conflict or displacement
2. Minimize	Reduce potential impact	Transparent targeting; capacity building; inclusive consultation	Train staff on GBV/SEA prevention
3. Mitigate	Manage ongoing risks	Implement SRM/GBV Plans; GRM follow-up	Correct inclusion/exclusion errors
4. Redress/Compensate	Remedy impacts or restore trust	Apply corrective measures, compensation, and survivor support	Replace missed transfers; refer GBV cases for support

Guiding Principle

"Prevent where possible, reduce where necessary, manage with accountability, and restore with fairness."

Throughout these steps, emphasis is placed on prevention and early action – it is far better to set things up correctly (through proper training, clear communication, robust selection criteria) than to deal with consequences after harm occurs. Many measures described below are therefore *upfront measures* (e.g. vetting partners, signing Codes of Conduct, community sensitization) to shape behaviors and expectations in a risk-informed way.

The mitigation strategies have been designed in a cumulative and reinforcing manner. No single measure stands alone; rather, they work in concert. For instance, to counter exclusion (Risk 1), the

project uses an objective targeting formula (avoid bias), inclusive community process (minimize oversight), plus a GRM appeals (mitigate errors), plus independent monitoring (verify and course-correct). Likewise, for GBV (Risk 8), there are prevention measures (Codes of Conduct, awareness campaigns), response measures (referral pathways, survivor-centered GRM), and an overarching policy of zero tolerance to set the tone.

In implementing mitigation measures, the project will ensure resource allocation and institutional support are in place. The SMP Action Plan provides a detailed matrix of risks, measures, responsible parties, monitoring indicators, and resources needed. This ensures accountability – for example, MoLSA PIU is clearly assigned to implement partner vetting; IPs must report on GRM cases monthly, etc. The next sub-section summarizes the technical measures by thematic areas of risk.

6.7. Documentation and Approval

Screening results are documented in a Screening Report including activity description, location, risk level, and recommended actions. No activity starts until screening and clearance are complete. Reports are reviewed by MoLSA PIU and, where required, by the World Bank.

6.8. Ongoing Monitoring and Re-Screening

Screening is not a one-time process. Risk levels are reviewed periodically, especially where social, conflict, or GBV dynamics change. Re-screening ensures adaptive management and continuous improvement. Updates are reflected in MoLSA's quarterly Social Performance Reports.

6.9 Exclusion Criteria

The project automatically excludes activities that:
- Involve land acquisition, physical resettlement, or asset loss (ESS5)
- Require security forces or pose life-threatening risks
- Have irreversible or unmanageable social impacts

6.10. Responsibilities

Table 7: Key roles and responsibilities

Actor	Key Roles in Screening & Categorization
MoLSA PIU (Social Safeguards Team Lead)	Leads screening, assigns risk category, prepares reports, ensures compliance.
Federal Member States (FMS) Ministries	Support data collection, local risk verification, and field monitoring.
Implementing Partners (UN/NGO)	Provide contextual information and assist in applying mitigation measures.

Actor	Key Roles in Screening & Categorization
World Bank Task Team	Reviews and clears risk categorization results; monitors overall compliance.

Principle: "Screen before you act — no activity under BOOST-YOU should proceed without assessing who could be affected, what could go wrong, and how it will be managed."

7.0 SMP IMPLEMENTATION, MONITORING, AND REPORTING

The Social Monitoring Plan outlines how the project will track and evaluate the effectiveness of social mitigation measures, stakeholder engagement, and the overall social performance of the BOOST-YOU project. It ensures that social risks are managed, vulnerable groups are protected, and project benefits are equitably distributed. Implementation arrangements for the Social Management Plan are essential to ensure that the community components are implemented responsibly and in compliance with ESS's.

The PIU will maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of social risks and impacts of the project including a qualified Environmental, Social and GBV Specialist and resources to support the management risks and impacts of the Project at district and local levels. The project will maintain existing PIUs established under SNHCP project as set out in the Financing Agreement.

7.1 Project SMP Implementation Structure

Table 8: Federal MoLSA – Project Implementation Unit (PIU) Counter Check

Component	Current Description	ESF/BOOST-YOU Alignment Check	Remarks / Recommended Updates
PIU Lead	Project Coordinator managing day-to-day operations	✅ Aligned	Still valid. No changes needed.
Social Safeguards Staff	E&S/ESS Specialist overseeing SMP and GRM	⚠️ Partially aligned	Need to explicitly include **SEP implementation** and **ESS capacity-building** responsibilities.
Accountabilities	SMP compliance, stakeholder engagement, GRM oversight, incident response, staff capacity building	✅ Mostly aligned	Include **monitoring of ESS compliance by implementing partners**.
Coordination	PIU communicates with FMS social affairs offices and other ministries	✅ Aligned	Ensure formal coordination mechanisms include **joint review of SEP and GRM activities**.
FMS Project Focal Points	Liaise with local authorities, monitor implementation,	⚠️ Partially aligned	Include **roles in SEP implementation, ESS/GRM**

Component	Current Description	ESF/BOOST-YOU Alignment Check	Remarks / Recommended Updates
	support grievance resolution		**reporting, and participation in capacity building**.
Incident Response	Social Incident Response Team	✅ Aligned	No changes, but ensure team receives regular **ESS/SEA/SH refresher training**.
GRM	Oversight and reporting through PIU	✅ Aligned	Ensure FMS staff are trained to **receive complaints safely and confidentially**, linked to SEP.

Federal Member State (FMS) Level – State Project Focal Points

Designation:

- Each participating FMS designates a Project Focal Point or team, including staff responsible for social safeguards/ESF activities**.**

Roles:

- Liaise with local authorities and communities to support project delivery.
- Monitor project implementation at the state level.
- Support grievance resolution using local governance structures.
- Implement SEP activities and report on stakeholder engagement.
- Report incidents, risks, or challenges to the PIU.

Integration:

- FMS officials integrate project oversight into regular duties and participate in coordination forums, ensuring compliance with ESS2, ESS4, and other relevant ESF standards**.**

District and Local Authorities

- Provide permissions and community entry support.
- Participate in Community Selection Committees for targeting.
- Assist in mobilizing communities and resolving minor grievances.
- Support incident response and conflict mitigation on the ground.

Implementing Partners (IPs) – UN Agencies, NGOs, and Companies

- **Field Execution:** Deliver project services (cash, training, targeting) according to SMP procedures.
- **Safeguards Focal Points:** Monitor staff compliance, liaise with MoLSA, manage grievance intake.
- **Compliance & Reporting:** Submit reports on SMP measures, consultations, and grievance resolution.
- **Community Engagement:** Lead facilitation of meetings and awareness campaigns.
- **Safeguards During Service Delivery:** Ensure accessibility, data privacy, and protection standards.

Other Support Entities

- **Financial Service Providers (FSPs):** Facilitate secure payments, maintain grievance channels.
- **Third Party Monitor (TPM):** Independent monitoring of SMP compliance and beneficiary feedback.
- **Security Personnel:** Ensure safe environments during activities while adhering to codes of conduct.

SMP Reporting

Table 9: Reporting respnsibilities

Material Measures and Action	Timeframe	Responsible Entity
MONITORING AND REPORTING		
Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.	Submit quarterly reports to the Association throughout Project implementation, commencing 90 days after the Effective Date. Submit each report to the Association no later than 45 days after the end of each reporting period.	PIU

Material Measures and Action	Timeframe	Responsible Entity
• E&S performance of contractors and subcontractors as reported through [monthly] contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below.		
INCIDENTS AND ACCIDENTS Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the [Bank/Association] upon request.	Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association	PIU

To ensure effective implementation of the Social Management Plan and to facilitate continual improvement, BOOST-YOU will carry out systematic monitoring and reporting of social performance. This section outlines the indicators and methods for monitoring SMP measures, the procedures and frequency of reporting, and how the project will utilize monitoring data for adaptive management.

7.2 Key Indicators for Monitoring Social Performance

The project has defined a set of **Key Performance Indicators (KPIs)** and qualitative measures to track social aspects. These indicators align with the mitigation measures and stakeholder engagement activities described in the SMP. Some of the principal indicators include:

- **Inclusion and Targeting Indicators:**

(i) Percentage of project beneficiaries from vulnerable groups: e.g., % of beneficiary households that are female-headed, % that are from minority clans, % IDPs, % persons with disabilities. These are tracked against baseline population proportions to gauge inclusion success. For instance, if 10% of population are from minority clan X, we aim at least ~10% of beneficiaries are from that clan in the area.

(ii) Grievance rate on exclusion: Number of grievances related to targeting decisions per cycle (targeting grievances ideally decrease over time as processes improve).

(iii) Appeals resolution rate: % of appeals during community validation that resulted in adjustments vs. appeals received. This shows how many initial targeting errors got corrected.

- **GRM Effectiveness Indicators:**
  (i) Grievances Registered and Resolved: (Core) Number of grievances received and % resolved within the stipulated timeframe. Disaggregate by type (service delivery, GBV, fraud, etc.) and gender of complainant. Aim for say >80% resolution within timeframe.

  (ii) GRM Utilization: Number of grievances per 1,000 beneficiaries (monitors if the GRM is being used proportionally to project size). If too low, maybe underreporting; if extremely high, might be issues generating complaints or good awareness.

  (iii) Satisfaction with GRM: measured by a follow-up survey or feedback from complainants about whether they were satisfied with outcome and process (target e.g. 70% satisfaction).

  (iv) SEA/SH case management: (kept confidentially) – we might track that 100% of SEA/SH allegations have survivor offered support within 24 hours, and that action plans for those cases implemented.

- **Labor and Working Conditions Indicators:**
  (i) Workers trained on CoC and OHS: % of project workers (including partner staff) who received training on Code of Conduct, GBV, and OHS as planned (target ~100%).

  (ii) Worker grievances: number of grievances raised by project workers (and resolved). Ideally few and all resolved amicably; if many, indicates internal issues.

  (iii) Accidents or incidents involving workers: tracked to ensure safe conditions.

- **GBV/SEA Risk Mitigation Indicators:**
  (i) GBV service referrals: number of survivors referred to services and assisted (without details, just count to ensure if any case arises, she got support).

  (ii) Staff/beneficiaries who know reporting channels for SEA: measured by a survey (target e.g., 90% of staff and 50% of female beneficiaries aware by midterm).

  (iii) CoC compliance: e.g., 100% of staff and partners have signed CoC.

(iv) Functional women's committees: number of communities with an active women's focal group liaising with project (targeting a certain proportion of sites).

- **Social Outcomes Indicators:** (If any outcome-level tracking such as improved community trust):
    (i) Community perception of fairness: measured by an independent survey or scorecard – e.g., % of respondents agreeing "project resources are distributed fairly".
    (ii) Reduction in clan grievances: anecdotal or number of clan-related conflicts around project (hoping to see note).
    (iii) Empowerment signals: e.g., number of female beneficiaries reporting increased decision-making power at home (though beyond SMP, could measure as part of project results).

- **Incident Reporting Indicators:**
    (i) Serious incidents reported to WB on time: 100% compliance (yes/no).
    (ii) Lessons learned implemented: e.g., after an incident, track recommended measures (like new training, protocol change) were done.

The SMP Monitoring Matrix (often included in Annex 1 action plan) cross-references many of these: e.g., "Monthly GRM/CFM reports (case counts, resolution rate)" is listed as something to produce; "GBV referrals; quarterly safeguarding audits" indicates an audit indicator.

7.3 ES Obligations

The PIU will:

- Adopt and implement the Social Management plan (SMP) prepared for the Project to assess and manage the social risks and impacts of the project, consistent with the relevant ESSs. Without limitation to the foregoing, include the requirements of the on Labour Management Procedures.
- Adopt the SMP prior to Project Effectiveness and thereafter implement the SMP throughout Project implementation.

7.4 Capacity Building and Training for SMP Implementation

The SMP preparation identified institutional capacity gaps with regards to the capacity to implement social management measures. Training of the E&S Focal point persons should be organized before project implementation to cover ESS requirements, and the SMP requirements. Partner Capacity Building and Management:

Considering systemic capacity gaps, the project puts a heavy emphasis on selecting capable implementing partners and building their safeguards capacity:

(i) Capacity Strengthening: For the partners that are engaged (including government FMS teams and local NGOs), the project will deliver training and technical assistance on SMP topics. Early in implementation, all partner focal points and field staff will receive an induction on the SMP, SEP, LMP, and GBV protocols. For example, training sessions will cover how to conduct community consultations, how to respond to a grievance, how to uphold the Code of Conduct, etc. Refresher trainings are planned every 6–12 months. MoLSA will distribute simplified field manuals or checklists extracted from the SMP for daily use by field teams (e.g., a one-pager on "what to do if a community dispute arises" or a "GRM intake form").

(ii) Supervision and Support: The PIU's social safeguards Team Lead and technical team will provide ongoing implementation support to partners. This may include joint supervision visits, a helpdesk for partners to ask questions, and sharing lessons between partners. If a partner is struggling (say, taking too long to resolve grievances), the PIU can send additional staff to mentor them or pair them with a stronger partner for peer support. This not only mitigates immediate issues but builds local capacity for the future.

(iii) Performance Monitoring and Remedies: The project monitors partner performance through monthly reports and key performance indicators (KPIs) related to social management (e.g., % of grievances resolved on time, % of staff trained in SEA/SH). If a partner consistently underperforms or violates agreements (e.g., a partner staff is found demanding bribes, or the partner fails to report incidents), MoLSA can invoke remedial actions: warning letters, required corrective action plans with deadlines, withholding payments until compliance is restored, or in worst cases termination of the contract. SMP's inclusion in partner agreements means that serious violations (like a cover-up of a SEA incident) are grounds for contract termination. Ensuring partners know this from the start creates incentives for compliance.

7.5 Security Management Plan

The Security Management Plan has been prepared in Annex 3 and outlines measures to ensure the safety and security of project staff, beneficiaries, assets, and operations, while respecting human rights and adhering to national laws and international standards (including World Bank ESS4 on Community Health, Safety, and Security). The plan is meant to protect project personnel, beneficiaries, assets, and infrastructure from security threats, minimize risks associated with working in insecure areas, ensure compliance with national security regulations and ESS4 standards and integrate security considerations into project planning, monitoring, and reporting. Key risks that the BOOST-YOU project may encounter include: (i) Theft, vandalism, or looting of project asset, armed conflict, terrorism, or localized clan disputes, sexual exploitation and abuse (SEA) or harassment

during distributions or field activities and health and safety risks arising from emergency situations or uncontrolled gatherings.

The BOOST YOU PIU will ensure that security procedures and criteria are fully designed and updated, and available to ensure the security for project operations. The project will also leverage in using the existing national and local security infrastructure to access and share security related information

7.6 Labour Management Procedures

The Labour Management Procedures (LMP) have been prepared for BOOST YOU to identify the main labour requirements and risks associated with the project and help the government to determine the resources necessary to address project labour issues and in doing so, promote sound worker-management relationships and enhance the development benefits of a project by treating workers fairly and providing safe and healthy working conditions for the direct, contracted workers, community workers and primary supply workers.

LMP (Annex 4) is a living document and may be adjusted as the project advances and as new categories of workers become involved in the various activities.

7.7 Gender-Based Violence (GBV) / SEA/SH Action Plan

Annex 1 of the SMP contains the GBV/SEA/SH Action Plan, which provides a dedicated framework for preventing and responding to gender-based violence within project operations. It includes detailed risk assessments, training schedules, awareness-raising initiatives, referral pathways for survivors, and designated responsibilities across implementing agencies. The SMP and GBV Action Plan share a unified implementation approach, with the latter maintaining a dedicated budget line. Any updates such as addition of new survivor service partners will be incorporated across both instruments to ensure continuity.

8.0 PROCEDURES AND IMPLEMENTATION ARRANGEMENTS

The existing SNHCP Project PIU in MoLSA is expected to implement the project and will be embedded within MoLSA's Somalia Social Protection Program (Baxnaano). MoLSA will be the implementing agency of the project, which will leverage existing implementation arrangements and capacities established under SNHCP. In addition, the project will support the MoLSA's USR Unit. An effective management structure is already in place within the SNHCP PIU, and it has demonstrated its capacity to deliver results efficiently. The PIU established a strong track record of performance, is familiar with the World Bank's fiduciary guidelines and ESF and has functioning M&E systems in place. Key positions from the SNHCP PIU will be transitioned to BOOST-You.

The MoLSA PIU structure would be as follows: The PIU will be headed by a Program Manager and key positions will include Operations team leader, Systems team leader, USR Operations Specialist, Financial Management Specialist, Procurement Specialist and Safeguards team leader. The PIU will include support for hiring consultants to support key technical functions to ensure effective implementation of the project.

FGS has formalized its Social Protection Program (SPP) through a dedicated ministerial decree, embedding the program within the MoLSA. The SPP is managed by a Program Manager reporting to the Director General of MoLSA and is implemented by core units—including operations, safeguards, and fiduciary functions—supported by both consultants and civil servants where possible. Governance of the SPP is ensured through two key committees: the Governance Committee, chaired by the Federal Minister of Labor and Social Affairs and the Executive Committee, chaired by the Director General of MoLSA. To former sets strategic direction, coordinates policies, allocates resources, and oversees crisis response, and the latter provides technical oversight and ensures adherence to operational guidelines. Importantly, these bodies include the participation of FMS through their respective Ministers and Directors General of Labor and Social Affairs, creating a collaborative platform for consensus-based decision-making between FGS and FMS leadership. In addition to participation in governance, FMS will play an active role in supporting the rollout and monitoring of project activities within their jurisdictions, ensuring that interventions are tailored to local contexts and that feedback from subnational levels informs program adjustments. This structure strengthens institutional ownership and sustainability of social protection interventions, including shock-response, while enhancing MoLSA's long-term capacity to deliver on its mandate.

Complementing this, the governance of the USR has been significantly enhanced through a dedicated ministerial decree that establishes robust data protection, privacy, and oversight mechanisms**.** The USR, managed by a dedicated unit within MoLSA, is overseen by a multi-stakeholder Oversight Board chaired by the Director General of MoLSA, with members including the National Information Regulation Authority (NIRA), the Data Protection Authority (DPA), the Office of the Attorney General, the SPP Program Manager, and the USR Manager/USR Operations

Specialist. This board provides final approval for data sharing, ensures adherence to Somalia's Data Protection Law, and guides technical direction and risk mitigation efforts. A Data Protection Advisor, reporting independently to the board, conducts regular audits, system penetration tests, and provides technical advice to ensure compliance with national laws and international best practices. Together, these governance reforms mark a critical step in building the government's capacity to manage social protection delivery systems responsibly, enabling the SPP and USR to work in synergy to improve the transparency, effectiveness, and sustainability of Somalia's social protection system

MoLSA would sign service contracts with WFP to provide backstopping support and assist with any field implementation activities as required**.** The service contracts will follow the 'Standard Form of Agreement for Use by World Bank Borrowers: Delivery of Output Service Contract.' WFP was selected to support the FGS due to its longstanding relationship with MoLSA, experience and track record of implementation in Somalia.

For Somaliland, a Hybrid PIU will be established at MoLSAF. The PIU will be established with a selection of positions staffed by civil servants contributed by the Ministry and other positions staffed by consultants hired under the project. BOOST-You will be implemented through the PIU.

The Somaliland PIU structures at the federal level would be as follows. The PIU at the federal level will be headed by a Project Coordinator and key positions will include Operations Team Leader, Systems Team Leader, Financial Management Specialist, Procurement Specialist, Safeguards Specialist. The PIU will include other consultants hired to execute key technical functions to ensure effective implementation of the project.

The World Bank will provide the implementation support and TA necessary to help the Government achieve the PDO. The World Bank will bring in expertise in the technical areas of project activities, as well as in cross-cutting areas of fiduciary, E&S, M&E, grievance redress, GBV, communications, and others, as needed. It will also provide training and guidance on procurement, FM, and social and environmental management, among others. Implementation support and oversight to project activities will be provided through regular communication and meetings, implementation support missions (ISMs) and technical missions, midterm review, and project completion evaluation. Cooperating partners will also be engaged to participate in all relevant implementation and TA support as well as oversight mechanisms, as appropriate.

The World Bank will continue to conduct semi-annual ISMs, jointly with the Government. The missions will be in person, hybrid, or virtual and with or without field visits, as appropriate. The objectives of the ISMs will be to review implementation progress and track progress toward the PDO, as well as of fiduciary performance and compliance with Environmental and Social Framework. Training will be provided to support the implementing agencies and PIUs build and maintain capacity. The World Bank will hold monthly technical meetings with the implementing agencies on their

specificcomponents, as well as on cross-cutting issues of GRM, GBV, communications, and others, as deemed necessary.

9.0 STAKEHOLDER ENGAGEMENT, DISCLOSURE AND CONSULTATIONS

A dedicated Stakeholder Engagement Plan (SEP) has been prepared for BOOST-YOU, fully aligned with ESS10 and the national context. The SEP was disclosed publicly on 10 May 2025 in Mogadishu, ensuring transparency and access to information. https://molsa.gov.so/reports/https://molsa.gov.so/wp-content/uploads/2025/08/Stakeholder-Engagement-Plan-SEP. The Environmental and Social Commitment Plan (ESCP) for the project, which captures the Government's commitments to implement safeguard measures, was also disclosed on [26, August 2025.]. https://molsa.gov.so/environmental-and-social-commitment-plan-escp-august-2025/.

Consultations for the BOOST-YOU project were conducted in Mogadishu, Somalia. The essence and main objectives of the meeting included; i) to present the Boost-you proposed project objectives, expected results, interventions and overall project details and how it impacts the lives of the various stakeholders and beneficiaries, ii) capture the feedback, input concerns of the various stakeholders, and iii) discuss the risks, challenges and effective ways of minimizing risks and maximizing the inclusion, contribution and impact of the project overall. The meeting was attended by 30 participants of which 12 were female and the rest men. The attendees came from different groups and categories including civil societies, NGOs, vulnerable persons groups, women and youth. However, further, consultations will be held with TEMs and updated in the SEP to allow for meaningful engagements as indicated in ESS7. The outcome of the consultations emphasized the importance of the BOOST-YOU project for the districts, institutions, and the Somali people, notably the vulnerable groups. Participants unanimously affirmed the project's relevance to the local context, addressing significant challenges like higher unemployment, poverty, mortality rates, and inequalities among marginalized and ethnic minority communities. There is optimism that effective implementation could bring substantial positive changes, particularly for young people, women, and disadvantaged populations. Suggestions to manage GBV and SEAH within the BOOST project included enforcing a strict code of conduct, capacity building for stakeholders, enforcing government laws against perpetrators, and raising awareness about the hotline number for reporting cases. Details of these consultations are included in the SEP.

To ensure the effective management of stakeholder concerns and complaints, a Grievance Redress Mechanism (GRM) the GRM for SNHCP has been adopted. This will ensure that stakeholders have accessible channels for feedback and grievances, fostering transparency, trust, and accountability throughout the project lifecycle. SEP ensures continuous communication, consultation, and participation of stakeholders (e.g., beneficiaries, local communities, workers, and government) while the GRM provides stakeholders with structured channels to raise concerns or complaints and ensures timely resolution. As part of stakeholder engagement activities, public awareness campaigns on the use of the GRM will be conducted, particularly targeting beneficiaries and vulnerable groups.

9.1 Grievance Mechanism

A grievance redress mechanism is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely manner and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties with redress and helps address issues at an early stage. The objective of the GRM is to satisfactorily address complaints (grievances) from beneficiaries and non-beneficiaries of the BOOST YOU project. The goals of the GRM are to ensure people use the system, staff understand what is going well or poorly with program design and implementation, and communication messages around the GRM are tested and improved. The Baxnaano program is committed to resolving complaints and grievances from beneficiaries and community members through a structured Grievance Redress Mechanism (GRM). The process is designed to ensure transparency, accountability, and timely resolution of issues, supporting both program integrity and beneficiary trust.

Complaints may range from several issues, including service quality concerns such as lack of response, mistreatment, errors, fraud, or corruption, as well as payment-related problems like non-receipt, discrepancies in payment amounts, delays, unauthorized charges, deductions, or commissions including fees or bribes. The GRM has implemented a specialized process for reporting grievances related to GBV/ SEAH. This dedicated framework ensures that such grievances are addressed in a sensitive, confidential, and survivor-centered manner.

A core pillar of the SMP is the GRM, which provides a formal avenue to mitigate and resolve issues Key mitigation features of the GRM include:

(i) Multiple Intake Channels: Complaints can be submitted via a toll-free hotline (2668), email (grm@baxnaano.gov.so), suggestion boxes, in-person at facilitation centers, or online. Call-center operators log all enquiries and complaints into the Social Protection Delivery System (SPDS), ensuring every case is tracked.

(ii) SEA/SH-sensitive protocols: The GRM has a special pathway for GBV/SEA/SH cases (detailed in Annex 2). All operators are trained to handle such calls with confidentiality and empathy, and to immediately route SEA/SH allegations to PSEA focal points, bypassing normal investigation to protect the survivor. Complainants can choose female operators and remain anonymous. This mitigates the harm that could be caused by mishandling sensitive cases, encouraging survivors to safely come forward.

(iii) Timely Triage and Response: The GRM system logs every case with date and category. It uses a risk-based triage: High-risk cases (e.g. serious safety issues, SEA, large fraud) are escalated immediately to project leadership. Moderate cases are investigated within 10 working days, minor ones within 30 days. These service standards ensure that grievances are not left unresolved, thereby preventing frustration that could lead to protests or conflict. Complainants (if known) are informed of receipt and outcome in appropriate languages and channels, closing the feedback loop.

(iv) Link to Corrective Actions: A grievance is not just resolved on a case-by-case basis; the GRM team analyzes trends monthly. If patterns emerge (e.g. many complaints from a certain district about staff misconduct), management will take systemic corrective action like re-training staff or sending a fact-finding mission. Lessons learned on the GRM have been provided under section 5.5.

10.0 ESTIMATED BUDGET FOR SMP IMPLEMENTATION

Adequate budgeting is crucial for effective SMP implementation. BOOST-YOU has allocated funds within the project budget (likely under the Project Management or dedicated Safeguards component) to cover all necessary social risk management activities. Below is a summary budget table indicating main cost categories for SMP measures over the project duration:

Table 10: Estimated Budget

Budget Item / Activity	Estimated Cost (USD)	Notes
Capacity:		
Training & Capacity Building (materials, venue, trainers)	$10,000	For multiple workshops: initial and refreshers (national and state-level).
Grievance Redress Mechanism:		
Hotline setup and operations (phone lines, equipment, operator salaries)	$80,000	e.g. $20k/year for call center operations.
GRM Information materials (posters, leaflets, radio spots)	0	Design/printing and local media costs for awareness.
Suggestion boxes and logistics	$5,00	Fabrication, distribution, keys management. Minor cost.
Stakeholder Engagement:		
Community consultation meetings (refreshments, venue support, travel)	$20,000	Over 4 years, for numerous local meetings in all target areas (approx. $5k/year).
Translation and disclosure costs	$10,000	Translating docs into Somali, printing.
GBV/SEA/SH Prevention & Response:		
SEA/SH Focal Point training & network	$5000	Additional to main training, specialized workshops.
Monitoring and Third-Party Verification:		
Third Party Monitor contracts (social risk management monitoring)		If hiring firm/TPM for periodic verification (could be part of overall TPM budget).
MIS enhancements for GRM/data (software, tablets)		Possibly to customize GRM database, integrate with MIS.
Total Estimated SMP/SEP/GBV Budget:	$125,100	Covers entire project duration (~5 years).

(Costs are illustrative and rounded for planning purposes.)

The budget will be financed from the project's component (like the project management component which often includes E&S management costs). It may also leverage parallel-in-kind support from partners (e.g.,

11.0 CONCLUSION AND RECCOMENDATIONS

With this Social Management Plan, the BOOST-YOU project has a clear roadmap to manage social risks and enhance positive impacts. The plan is structured, resourced, and integrated into project operations. Through diligent implementation of the SMP – from engaging communities and enforcing fair processes, to monitoring grievances and protecting against GBV – the project will promote inclusion, transparency, and community trust. This will not only safeguard against harm but also contribute to the project's development objectives of reducing poverty and vulnerability in Somalia in a socially sustainable manner. All stakeholders, from government to communities, have a role in this plan, and their continued participation and feedback will be key to its success.

To enhance the effectiveness of SMP implementation, the following recommendations are proposed:

1. **Strengthen Institutional Capacity:** Continue investing in training and capacity building for MoLSA PIU staff, FMS focal points, local authorities, and implementing partners to ensure full understanding of SMP requirements.
2. **Enhance Monitoring Systems:** Maintain timely and accurate collection of social data, and use monitoring results to adjust interventions and address emerging risks promptly.
3. **Promote Inclusive Participation:** Ensure active engagement of women, youth, persons with disabilities, and other vulnerable groups in project planning, implementation, and feedback processes.
4. **Maintain Effective GRM Operations:** Regularly review and update the grievance redress mechanism to ensure accessibility, transparency, and prompt resolution of complaints.
5. **Integrate Security and Safeguards Measures:** Continue training and coordination with local security actors, ensuring that security measures uphold human rights and protect beneficiaries.
6. **Periodic Review and Adaptation:** Conduct annual or mid-term reviews of the SMP to incorporate lessons learned, emerging risks, and evolving community needs.
7. **Promote Coordination with Stakeholders:** Strengthen collaboration with other ministries, community structures, and development partners to enhance alignment, reduce duplication, and maximize positive social outcomes.

By implementing these recommendations, the BOOST-YOU project can achieve its objectives while safeguarding the social well-being of beneficiaries and communities, ensuring a sustainable and responsible project impact.

FEDERAL GOVERNMENT OF SOMALIA

MINISTRY OF LABOR & SOCIAL AFFAIRS (MOLSA)

Project:

BUILDING OPPORTUNITIES AND OUTCOMES IN SOCIAL PROTECTION AND YOUTH EMPLOYMENT IN SOMALIA (BOOST-YOU) (P507443)

SEXUAL EXPLOITATION AND ABUSE/SEXUAL HARASSMENT PREVENTION AND RESPONSE ACTION PLAN

Contents

ABBREVIATIONS & ACRONYMS

BOOST-YOU	Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia
CoC	Code of Conduct
CRW	Crisis Response Window
FGM	Female Genital Mutilation
FGS	Federal Government of Somalia
GBV	Gender Based Violence
GRC	Grievance Redress Committee
GM	Grievance Mechanism
GPN	Good Practice Note
IEC	Information Education and Community
IASC	inter-agency standing committee
IP	Implementing Parties
OHS	Occupational, Health and Safety
PIUs	Project Implementation Units
PSEA	Principles of Sexual Exploitation and Abuse
MoWHRD	Ministry of Women and Human Rights Development
SGBV	Sexual and Gender Based Violence
SEA	Sexual Exploitation and Assault
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SPD	Standard Procurement Documents
SNHCP against Children	Shock Responsive Safety Net for Human Capital Project VAC Violence
WB	World Bank

1. INTRODUCTION

1.1 Project Information

Somalia has made significant progress in the recent years, consolidating its federal system of governance, strengthening capacity of government institutions, and supporting inclusive private sector-led growth. Despite incremental headway on financing and building the capacity of state institutions to deliver basic services, overall service delivery remains limited, especially in areas experiencing violence and conflict. Frequent and severe climate and security-related shocks erode resilience in the context of deep poverty and food insecurity. According to the Somalia Poverty and Equity Assessment 2024, 54 percent of the population lives below the national poverty line.

Somalia established the building blocks of a national social protection program, Baxnaano, launched by the Ministry of Labor and Social Affairs (MoLSA) on behalf of Federal Government of Somalia (FGS), with support from development partners including the World Bank to tackle multiple challenges through multiple window: Regular window which addresses chronic poverty and food insecurity while enhancing the human capital of beneficiary households through a cash transfer program; Shock response window: This window supports poor and vulnerable households affected by economic shocks, particularly climate related shocks; Human Capital: This window aims to improve uptake of available human capital (health and education) services by poor and vulnerable beneficiaries; Economic Inclusion: This window aims to improve access of youth particularly women and persons with disability, to labor market opportunities.

The World Bank has financed two projects in support of Baxnaano, Safety Net for Human Capital Project (SNHCP and Shock Responsive Safety Net for Locust Response Project (SNLRP, P174065). SNHCP has supported provision of unconditional nutrition linked safety net support to 200,000 poor households, emergency cash transfers to over 650,000 households (including SNLRP beneficiaries), developed a USR, and social protection delivery systems, introduced pilots to test feasibility of a social protection led service delivery platform, co-responsibility cash transfers to promote uptake of health and nutrition services (H&N CCT) and a new youth employment intervention and supported households mitigate immediate food security issues, while also laying the foundations for human capital investment over the longer-term. The complementary SNLRP used the Baxnaano platform to deliver Emergency Cash Transfers (ECTs) to households affected by locust infestation and recently, SNHCP.

Somalia's wider social protection landscape comprises a range of donor-supported initiatives aimed at mitigating poverty, enhancing food security, and promoting economic inclusion. The

proposed Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia (**BOOST-YOU**) reinforces and complements the existing World Bank Group portfolio in Somalia while further leveraging relevant and more recent diagnostics. Building on the foundational blocks established through SNHCP and SNLRP, the proposed project will leverage the analytical work under the Somalia Social Protection Programmatic Advisory Services and Analytics (PASA): Building an Adaptive National Social Protection System (P500503). This approach will help Somalia transition from humanitarian relief to a long-term development programming, investing in human capital for sustainable and equitable economic growth.

The Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia (**BOOST-YOU**) will reach the poorest and most vulnerable households, with majority being female beneficiaries. to maintain high standards of service delivery and safeguard the rights and dignity of all beneficiaries, the program prioritizes the prevention of Sexual Exploitation, Abuse, and Harassment (SEAH). The SEAH Action Plan is designed to comprehensively address these risks across all projects, ensuring that beneficiaries, community members, and stakeholders have access to safe, confidential, and survivor-centered mechanisms for expressing hypersensitive Gender-Based Violence (GBV), SEA and SH complaints. This plan establishes operational measures, protocols, and a response framework to mitigate SEAH risks and promote a culture of accountability, equity, and safety throughout the program's implementation.

Addressing GBV including Sexual Exploitation and Abuse and Sexual harassment, is vital as it's recognized as a major obstacle to gender equality, peace and development. It affects women's and girl's health, educational attainment, economic productivity, and capacity to care and provide for themselves and their families. In both public and private settings, GBV limits women's and girls' mobility, agency and empowerment and inhibits economic and social development. Gender equality is essential for sustainable development as it allows women and girls to reach their full potential and contribute to their communities and economies. Addressing GBV is therefore critical to achieving many of the Sustainable Development Goals (SDGs).

In providing financial and technical support to the Federal Government of Somalia, the World Bank Group pays close attention to risks that can undermine development impact of its assistance. A set of policies and procedures have been developed to address specific risks such as fiduciary (the risk that the financing could be misused) and negative social and environmental impacts.

Gender-based violence (GBV) and in particular sexual exploitation and abuse and sexual harassment, is one of the most pernicious types of risk that the WBG is deeply concerned about worldwide and is stepping up its efforts to address these in its operational environment. This concern is also relevant for this project focusing on the poor community, where there is a high representation of women and girls who may be at risk of varying types of GBV, including sexual

violence, sexual exploitation and abuse, sexual harassment, denial of services and psychological abuse if preventive and risk mitigation measures are not put in place by the Government.

This SEA/SH prevention and response action plan details the necessary operational measures and protocols that will be put in place to address gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH) that are project-related and how they will be integrated over the life of the project. This includes how to address any SEA/SH allegations that may arise and procedures for preventing and responding to SEA/SH. The action plan includes an accountability and response framework, which details how allegations of SEAH will be handled (investigation procedures) and disciplinary action for violation of the Code of Conduct (CoC) by workers.

1.2 SEA/SH Action Plan Purpose and Objective.

The objectives of the SEA:SH action plan is summarized below

(i)   To provide tools and frameworks that will support the Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia (BOOST-YOU) Project Implementing Committee (PIU) in preventing, mitigating and responding to the Project-induced SEA/SH and GBV risks.

(ii)   To develop protocols that will be adopted to manage any SEAH allegations that may arise during implementation of the Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia BOOST-YOU project.

(iii)   To provide procedures for preventing, mitigating and responding to SEA/SH, how complaints of SEA/SH will be handled in a survivor-centered manner, and disciplinary action for violation of the Code of Conduct (CoC) by all project workers and personnel.

(iv)   To inform affected community groups of the project' related SEA and SH risks as well as consulting and sensitizing them about the project' risks mitigating measures.

1.3 Definition of Concepts

i. **Gender Based Violence:** GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially-ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life.[1] GBV broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families and in the community, at large. These include sexual violence, domestic or Intimate Partner Violence (IPV), trafficking, forced and/or early marriage, and other traditional practices that cause harm.[2]

ii. **Sexual Abuse:** Sexual abuse refers to the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.[3]

iii. **Sexual Harassment:** Sexual harassment is defined as any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.[4] It occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

iv. **Sexual Exploitation:** Sexual Exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.[5]

v. **The Survivor-Centred Approach:** The Survivor-Centred Approach is based on a set of principles and skills designed to guide professionals—regardless of their role-in their engagement with survivors (predominantly women and girls but also men, boys, and gender minorities) who have experienced sexual or other forms of violence based on their gender.[6]

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[1] Good Practice Note on Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works
[2] The Inter-Agency Standing Committee-IASC)
[3] Good Practice Note – Addressing SEA/SH in IPF Involving Major Civil Works
[4] Ibid
[5] Ibid
[6] Ibid

1.4 Approach and Methodology

The plan was prepared using the methodology below.

(i)   Literature review of World Bank guidelines, global and national laws and policies on GBV-SEA/SH.

(ii)   Identification of potential project-induced GBV-SEA/SH risks related to BOOST-YOU interventions.

(iii)   Development of mitigation measures which included an assessment and plan for strengthening capacity of project workers and personnel to be engaged under the BOOST-YOU project.

(iv)   Identification of key actions to be taken, such as institutions responsible and time frames for the implementation of each of the identified actions.

2. LEGAL FRAMEWORK AND GAP RELATED TO SEAH AND GBV

2.1 Somalia Context

The Somali legal system is a mixture of systems, which comprises of statutory law, customary law (Xeer) and Sharia law. Although Sharia law is not applied in statutory courts, it is integrated into customary law where it is also not adhered to strictly. While formal laws define crimes and punishment, their application is continuously negotiated through the customary power dynamics and their upholders. In practice, the primacy of Xeer is accepted and is the most accessible, used and preferred system for dispute resolution. The state also perpetuates the Xeer supremacy when its officers – police, prosecutors and judges – refer cases back to clan elders, who still remain the most powerful force behind justice and access to it.

The same is witnessed in Somaliland, where "Xeer remains the main source of law, especially in remote and rural areas where government presence is scarce." [1]The Xeer is made by clan leaders or elders, selected for their assumed wisdom, courage, experience and knowledge to arbitrate disputes and deliver verdicts.

Statutory laws introduced during the colonial era and after independence were disdained and seen to be incompatible with the nature and norms of Somali society. There was an overwhelming and paramount preference for customary law over statutory law by politicians, who mainly happen to be the clan elders or men from major clans.

Table 1: Somalia Laws

Principle	Details
The Provisional Constitution of Somalia (2012)	The constitution stipulate general principles of human rights accorded to all Somali citizens. Under these Titles, there are 31 Articles that specify the fundamental rights accorded to all Somali citizens and those set out for permissible limitation on rights provided. Relevant articles are: **Article 10:** protects human dignity. **Article 11**: protects equality of all citizens regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect. **Article 15**: protects liberty and security of the person, including freedom from all violence against women including Female Genital Mutilation (FGM), which is explicitly prohibited. **Article 27:** protects social and economic rights.

Principle	Details
	Articles 34 and 39: guarantees access to courts and redress for violations of human rights.
The 1962 Penal Code	The 1962 Penal Code is still current law in the legislation that addresses GBV. It criminalizes rape (Article 298) and other forms of sexual violence, such as sexual exploitation and abuse and sexual harassment as well as forced prostitution (Article 408). Articles 398–9 provide that 'carnal intercourse' and 'acts of lust committed with violence' are punishable with 5–15 years' and 1–5 years' imprisonment respectively. However, crimes are too narrowly defined in accordance with international law standards of protection from GBV. Furthermore, the legislation contains no age of consent. This omission leaves children particularly vulnerable to abuse.
Rape, fornication and other related offences bill-law no.78/2020-Somaliland	The House of Representatives in September 2020 passed the Rape, Fornication and other Related Offences Bill-Law No. 78/2020. Article 11 of the Act address Sexual Harassment and Assault, it provides that "Any Mature and mentally sane individual who inappropriately touches a person other than their spouse, or compels a person to touch him/her inappropriately, or forces to touch another person inappropriately, has committed a criminal act of unwelcome sexual advances and inappropriate touching and is liable to a penalty of 1-3 years of imprisonment. If the criminal act stated in Paragraph 1 of this Article, is committed against a minor, or a vulnerable person, the offender will be liable to 3-5 years of imprisonment". The Law does not provide any details of legal age of a minor in Somalia or sex consent. However, according to the Family Code (1975), the legal age for marriage in Somalia in 18 for both men and women. This law is applicable in Somaliland only.

Sexual offences continue to primarily be adjudicated through customary legal systems, the most accessible and preferred justice system in Somalia including Somaliland, in which sexual crimes are not perceived as a violation against an individual, but as a crime against the family or clan and as an issue of morality and honor.[6] Preference for customary law is due to both the limitations of the statutory system, i.e. the lack of protections from intimate partner violence under the law, and because of the compensation and redress afforded by customary processes. There is a need for greater engagement with each of the different legal systems in operation to gain an improved understanding of changes required to strengthen gender-sensitive justice for GBV survivors and their families and address impunity

Key bills have been drafted to criminalize sexual offences and FGM/C, although as yet they have not been legislated across all regions. The Sexual Offences Bill, which criminalizes a wide range of sexual offences, has been legislated in Puntland and Somaliland, and successfully used in the former, but is

yet to be legislated by the Federal Government of Somalia.[7] There remains gaps in both legislative protections and in enforcement of law and administration of justice in relation to sexual violence, and survivors and their families seriously undermine the protection of women and girls from GBV which continue to face significant barriers in accessing the formal justice system in Somalia. While statutory legal protections against GBV in Somalia have been strengthened in recent years, statutory judicial structures overlap with the customary system[8] and remain governed by traditional cultural systems that seek to preserve social stability between communities and families over an individual's rights.

In Somaliland, statutory law has largely left matters within the field of family law to be resolved through Shari'a law. [8] In 2018, the Somaliland government took significant steps by drafting and announcing the possibility of adopting the Sexual Offences Bill (SOB). However, to date there has been no progress toward actually integrating the bill into the Somaliland criminal code. Rather the Sexual Offences Bill has undergone significant changes and may not be very affective, if implemented.

2.2 International Legal Instruments

The international human rights instruments that define GBV and that Somalia has signed and ratified include: the recently ratified Convention on the Rights of the Child (CRC) in January 2015; the International Convention on the Elimination of All Forms of Racial Discrimination in 1975; and the African [Banjul] Charter of Human Rights in 1985 and 1986. Somalia is yet to sign or ratify many of the international instruments that are derived from the universal human rights that define GBV, including Convention for Elimination of Discrimination against Women CEDAW and the Protocol to the African Charter on Human Rights and Peoples' Rights on the Rights of Women in Africa.

2.3 The WB Good Practice Note

The WB Good Practice Note (GPN) provides a comprehensive understanding of the nature and types of GBV that project funded by the Bank may exacerbate. The GPN establishes an approach to identifying risks of GBV, particularly SEA and SH that can emerge in major infrastructure projects with civil works contracts. The GPN builds on World Bank experience and good international industry practices, including those of other development partners.

The GPN which provides tailored information and tools to understand GBV risks and considerations in infrastructure projects; addressing GBV risks and capacities to respond using the Bank's GBV Risk

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[7] International Alert/CISP (2015)
[8] A Policy Paper by the Strategic Initiative for Women in the Horn of Africa (SIHA Network) November 2020

Assessment Tool; addressing GBV risks in design and implementation phases including during bid processes, codes of conduct with contractors and laborers; safeguards to collect and respond to GBV and SEA/SH including Grievance Mechanisms, consultations and responding to GBV incidents, and suggestions for improving safety of, and consultations with, women and girls throughout the project.

2.4 Key Principles of World Bank Good Practice Note

1. **Survivor-Centered Approach**
   - The rights, needs, and wishes of the survivor are prioritized.
   - Ensures confidentiality, safety, respect, and non-discrimination in all responses.
2. **Confidentiality**
   - Information about SEA/SH incidents is shared strictly on a need-to-know basis and only with the survivor's informed consent.
3. **Safety and Security**
   - Protect survivors, witnesses, and those involved in managing SEA/SH cases from retaliation or harm.
4. **Non-Discrimination and Equity**
   - All survivors—regardless of gender, age, disability, ethnicity, or status—have equal access to services and protection.
5. **Accountability and Transparency**
   - Clear responsibilities, reporting channels, and oversight mechanisms are established to prevent and respond to SEA/SH.
6. **Prevention through Awareness and Training**
   - Ongoing training, awareness campaigns, and community engagement to prevent SEA/SH at all levels.
7. **Access to Safe and Ethical Reporting Mechanisms**
   - Multiple, accessible, and confidential channels are provided for survivors or witnesses to report SEA/SH concerns safely.
8. **Coordination and Collaboration**
   - Close coordination among the PIU, Implementing Partners, GBV service providers, and relevant government institutions to ensure effective response and referral.
9. **Do No Harm Principle**
   - All actions taken to address SEA/SH must avoid causing further harm or trauma to survivors or communities.
10. **Integration into Project Design and Implementation**
    - SEA/SH risk prevention, mitigation, and response measures are integrated into project planning, staffing, procurement, and supervision processes.

3. SEAH PREVENTION AND RESPONSE ACTION PLAN

The project development objective of the project is to enhance economic opportunities and strengthen resilience of the poor and vulnerable. The Project has the following components:

Component 1: Connecting Youth and Women to Better Jobs Today

Component 1 will support 28,000 youth aged 18-29 years (60% women and 5% people living with disability) to access wage and self-employment activities contributing directly to inclusive job creation and economic resilience. Targeting will be based on objective criteria using information available within the Unified Social Registry (USR). Which will include indicators on age, gender, location (including climate vulnerability considerations), disability, and welfare scores generated through the USR. The Component will have two pathways:

Component 2: Investing in People for Better Jobs Tomorrow

Component 2 forms the cornerstone of the project's direct support to vulnerable households by integrating social protection with human capital development, climate resilience, and future job readiness. Utilizing a multisectoral approach for best outcomes, the component includes three subcomponents designed to address different aspects of human capital development and resilience through cash transfers. The cash transfer program will be geographically concentrated around schools and health centers in areas of high climate vulnerability to maximize their complementarity and therefore impact linking social assistance to the building blocks of a productive, inclusive, and climate-resilient workforce, with the ultimate aim of building inclusive and sustainable jobs of the future.

Component 3: Adaptive Social Protection Systems and Project Management

Component 3 supports three key areas crucial for the long-term sustainability and effectiveness of social protection interventions in Somalia (including Somaliland): the enhancement of an adaptive social protection system, the National Socio-Economic Survey and project management including institutional capacity building for FGS's social protection program management and new systems as well as capacities at Ministry of Labor, Social Affairs and Family (MoLSAF). The focus on adaptive systems reflects a forward-thinking approach, preparing Somalia's social protection framework to respond swiftly and effectively to changing needs and unforeseen shocks, including shocks that threaten jobs and livelihoods. A key focus will be on further expanding the already robust citizen engagement function and enhance the social accountability processes through the delivery systems, USR, M&E, and GRM.

3.1 Contextual GBV Risks

GBV is widespread in Somalia, and considered to be a major obstacle to equality, peace and development in the country. Despite the lack of comprehensive and reliable national population based GBV prevalence data, information that does exist indicates that GBV is common in the lives of women and girls across the life course in Somalia, with some forms of GBV endemic. Female Genital Mutilation (FGM) has in the past been near universally practiced. Intimate partner violence and sexual violence, the most prevalent types of GBV globally, are both commonplace in the lives of Somali women and girls, although there is limited data on which to estimate reliable prevalence and trends in perpetration and victimization rates over time.

Some forms of GBV are widespread and "normalized" in Somalia, including FGM, child marriage and some intimate partner violence behaviors, in particular a man's use of physical violence to discipline or control his wife under certain circumstances. Other common forms of GBV in Somalia include cultural practices of abduction and forced marriage and widow inheritance. The extent to which each type of GBV varies across regions of the country, and there are indications of apparent shifts in beliefs and attitudes that support FGM, child marriage and intimate partner violence within Somalia, as discussed in more detailed in the next section. However, in the absence of reliable quantitative and qualitative research, it is hard to assess the degree of attitudinal change.

According to Relief Web International, the already large number of recorded incidences of GBV in 2021 continued to increase in 2022, especially for sexual violence and Intimate Partner Violence (IPV), due to multiple displacements, flooding, droughts and armed conflicts. An estimated 4.3 million people have been affected by natural disasters and armed conflict, while some 554,000 have abandoned their homes in search of water, food, and pasture in December 2021. The number of people requiring humanitarian assistance in 2022 has been estimated to 7.7 million. The political instability reinforced insecurity and limited mobility for people to seek livelihoods. As the drought and food insecurity persist in Somalia, women, and girls experience alarming levels of poverty and economic depravity: a precursor for increased vulnerability to GBV.

3.2 Potential Project-related SEA/SH Risks

The project's scope, the Social Risk and the vulnerability of its beneficiaries, the SEA/SH risk is classified as **Substantial**, in line with the World Bank SEA/SH Risk Rating Framework and highlighting the need for strong prevention and response measures. There is the possibility of increased risk of GBV-SEA/SH committed against women and children in situations of poverty, hunger, conflict, insecurity and displacement. Women's lack of access to and control of assets, services and income increases their economic dependence as well as their vulnerabilities to abusive and exploitative situations. Food or cash assistance may also unintentionally contribute to SEA. Special safeguards

need to be put in place to ensure that these risks are averted and or mitigated and redressal mechanisms put in place.

For the Building Opportunities and Outcomes in Social Protection and Youth Employment in Somalia (BOOST-YOU) potential GBV cases will be triggered through:

- Cases of SEA through the exchange of sexual favors in exchange for registration or transfer of funds,
- The spousal abuse to receive cash are the key points of GBV/IPV risks for the project.
- Risk related to female recipient of the mobile payment who not have control over the phone asset used for delivery - this can increase exposure to male relatives or even senior women in the household and or even the exposure to SEA from vendors and staff etc.
- Risks of SEA and gender-based discriminatory behaviors during the selection of beneficiaries.
- Risks of SEA and gender-based discrimination during the distribution of social safety nets by partners to poor and vulnerable households/women beneficiaries
- Indirect risks of GBV particularly an increase in intimate partner violence (IPV).
- Risks of SEA/SH in the selection of beneficiaries and the implementation of communication activities targeting community groups
- Management of project's opportunities/services carries SEA risks, as project staff could abuse their authority by offering access to project's opportunities/services in exchange for sexual relations.
- Unsupervised project's activities may lead to gender-based discrimination, harassment, or sexual abuse among beneficiaries, particularly affecting refugee women due to their heightened vulnerability in Somalia.
- Selection for economic inclusion programs, access to vocational training, and individual grants for income-generating activities or business support may expose beneficiaries to EAS risks. Project staff could exploit their power by demanding sexual relations in exchange for access to project opportunities.

3.3 Key Mitigation Measures to Address GB/SEAH Risks

To properly manage the risks of SEA and SH inherent in project activities, specific actions must be implemented to mitigate these risks. The action plan details precise risk mitigation measures and the budget for their operationalization. The project will adopt below discussed approach to address potential GBV-SEA/SH risks are as follows:

3.3.1   During the Identification and Assessment Phase

- Conduct GBV risks assessments at project sites. GBV risk assessments will be conducted by MoLSA PIU Safeguards team using the safety audits methodology before commencement of the BOOST-YOU.
- MOLSA must put in place solid and effective protocols to counter SEA/SH risk in the selection of beneficiaries.
- Ensure that the project's Social Safeguards Specialist provides continuous technical support for the implementation and monitoring of the SEA/SH action plan, in coordination with the World Bank's GBV and Environmental and Social Safeguards Specialists.
- Provide training to project teams (Project Management Unit, implementing partners, and service providers) on the World Bank's Environmental and Social Framework, particularly the "Good Practice Note on Preventing and Responding to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development project" (2022).
- Ensure the Project Implementation Unit (PIU) has specialized staff trained to lead prevention, coordination, and monitoring of gender-based violence (GBV). A national GBV consultant should be recruited before project activities begin.
- Map local actors involved in preventing and combating GBV in project-affected communities. Assess their capacity to provide survivor-centered services, including case management, advocacy, and referrals to other services. Review and update of GBV service providers[9]: The project will review and update GBV service providers mapping in each location for timely referral of GBV survivors to provide relevant services based on survivors' needs will be identified. The MoLSA staff (PIU/GRM) will all be informed of the actors working in different project locations. The list of service providers will be mapped out before the commencement of any activities and will inform on key gaps where remedial measures may be required.
- Ensure the Code of Conduct is understood and discussed by PIU staff, subcontractors, workers, and local communities. The code explicitly addresses unacceptable behaviors and consequences for SEA and SH violations.
- Sensitization of PIU and community on SEA/SH risks and reporting protocols.
- Detail accountability and response procedures for handling SEA/SH allegations, including investigation processes, disciplinary measures, internal reporting procedures, survivor referral mechanisms, and confidentiality protocols.
- Establishment of a Reporting Protocol including Accountability and Response framework. A survivor-centered SEA/SH reporting Protocol will ensure timely and safe reporting of SEA/SH incidents. Beneficiaries and communities should be informed of the availability of varying channels of reporting for allegations related to GBV-SEA/SH. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information.

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[9] Somalia Referral Pathway

To strengthen the project's GBV/SEA/SH prevention and response mechanisms, a Project's Liaison Officers will be designated by the PIU and Implementing Partners (IPs). The Liaison Officer will serve as the focal point for receiving and managing GBV/SEA/SH-related complaints at the field level, ensuring that survivors are referred safely and confidentially through established pathways. The GBV Specialist will provide technical guidance by defining the Liaison Officer's specific roles and responsibilities, and will conduct targeted training to build their capacity on survivor-centered approaches, reporting protocols, and coordination with grievance redress and service providers

Project's Liaison Officers will focus on below listed,

- Communities, including children, are aware of the risks of GBV, their rights and the mechanisms available to them to report GBV cases;
- Referral pathways in place and functional;
- Appropriate GBV services and referral pathways are provided to survivors and accountability processes are followed;
- Monitor project areas actively to ensure compliance with norms and measures. A monitoring framework should be implemented by the Environmental and Social Safeguards Specialist.
- Develop awareness campaigns for targeted communities and train local leaders and authorities on women's rights, GBV, and SEA/SH risks.
- Consult stakeholders (political, cultural, and religious authorities, health teams, local administrations, social workers, women's organizations, and child-focused groups) at the start and throughout the project to gather feedback on SEA/SH risks and project design.
- Ensure women, girls, and organizations supporting them participate meaningfully throughout the project cycle. Include SEA and SH issues in the Stakeholder Engagement Plan (SEP) to keep local populations informed.
- Engage an independent third-party monitor (e.g., civil society organization, local/international NGO, university, or private firm) with expertise in GBV to oversee the implementation of the SEA/SH prevention and response action plan.
- Collaboration with institutions at national and sub-national levels on the GBV response by involving the relevant Government units such as the Ministry of Women and Human Rights Development (MoWHRD) in the strengthening of the GBV package of services and referral system in project areas. To this end, the project will strengthen the reporting mechanism and procedures of local systems to ensure a survivor centered referral and response.

3.3.2   During Procurement

- Clearly define SEA/SH requirements and expectations in tender documents.

- Include SEA/SH provisions in tender documents to ensure contractors adopt a Code of Conduct addressing these issues.
- Consider applying international tender requirements for SEA/SH prevention in national competitive bidding processes.
- Specify how SEA/SH-related costs will be covered in contracts (e.g., budget lines for prevention activities or provisional funds for unforeseen needs).
- Explain the Code of Conduct to bidders before they submit proposals.
- Assess the contractor's accountability framework for SEA/SH and confirm their capacity to meet project requirements before finalizing contracts.

3.3.3   During Project Implementation

- Review the Environmental and Social Management Plan (ESMP) to ensure appropriate mitigation measures are included.
- Verify that the GRM receives and processes complaints diligently, following established protocols for SEA/SH cases.
- Disseminate the Code of Conduct (including visual illustrations) and discuss it with employees and local communities.
- Sensitization and training all project staff on expectations around SEAH. PIU, will ensure that their direct workers, partners, sub-contractors, suppliers and those appointed as SEA focal points are trained in CoCs and GBV/SEA and child protection risk issues as part of their induction as well as throughout course of employment on quarterly basis. All categories of workers will be induced and will sign a Code of Conduct (CoC), which includes expected standards of behaviors regarding GBV/SEA according to the World Bank´s 2017 Standard Procurement Documents (SPDs) [10]. IPs will ensure that all contractors, suppliers, NGOs and other implementing partners' workers have been induced and have signed a CoC PSEA[11]. PIU and IPs will roll out direct training activities for all contracted as well as community workers deployed for their activities – prior to the start of such.
- Communication to project affected communities about GBV/SEAH risks and mechanisms: Community awareness on GBV/SEAH, education and raising of awareness for women, adolescents and children of SEA. Project beneficiaries should be made aware of the laws and services that can protect them and provide redress in case of an incident. CoCs will be made available to the public in the project areas, especially to identified project stakeholders; to raise awareness of expected behavior of any project- related worker and mechanisms for reporting should those workers be in breach of the CoC

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[10] The World Bank has not "endorsed" a template CoC for projects. The SPDs provide guidance on the minimum content of issues to be addressed in the CoC.

[11] IASC (2002), Six Core Principles for Relating to Sexual Exploitation and Abuse, accessed at:
https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexual- exploitation- and-abuse-2002

- Regularly monitor and evaluate progress in SEA/SH prevention and response activities, including risk reassessment as needed.
  - ✓ Conducting requisite Sexual and Gender Based Violence (SGBV) trainings to the target Units / Groups
  - ✓ Reviewing the adequacy of existing Contractor's SGBV policies
  - ✓ Developing SGBV Framework including Reporting and Investigation procedures
  - ✓ Implementing the measures outlined in the SGBV action plan

SEA/SH Action Plan indicators will include**:**

- Number of community-sensitization activities delivered, disaggregated by sex and age;
- 100% of workers that have signed a CoC; and/or,
- 100% of workers that have attended the CoC training.
- GBV/SEAH cases are timely referred to services for multi-sectoral response

4. GBV/SEAH MATRIX

ANNEX – 2 GRM Manual

Introduction

In the dynamic landscape of humanitarian efforts, the Baxnaano program stands as a beacon, addressing the pressing needs of the chronically poor and vulnerable populations in Somalia. Launched in late 2019 and administered by the Ministry of Labor and Social Affairs (MoLSA) on behalf of the Federal Government of Somalia (FGS), this program has emerged as a vital lifeline program through its Regular and Shock Response windows; and providing unconditional cash transfers to households in need interventions.

As the program expands its reach with the Third Additional Financing including the Conditional Cash Transfers (CCT) and Unified Social Registry update surveys, there is recognition of the need for Standard Operation Procedures (SOP) Manual to guide in program and investment management; Stakeholders and Citizen Engagements; and articulate the paramount importance of a robust Grievance Redressal Mechanism (GRM) that will address project related concerns, grievances, and disputes of projected affected parties and ensure closing of the feedback loop. This specialized SOP delineates the procedures and protocols , ensuring accessibility, accountability, transparency, non-discrimination and fair treatment.

The journey outlined in this document is not just a procedural guide; it symbolizes the commitment of the Baxnaano program to inclusivity and responsiveness. Aligned with the World Bank's Environmental and Social Standard ESS 10, the GRM SOP establishes a systematic approach to stakeholder engagement, adhering to principles that include timely and relevant communication, cultural sensitivity, and an unwavering commitment to fairness.

Within these pages, we navigate the intricate web of stakeholders and citizen engagement principles, and the structured process of receiving, assessing, and resolving relevant grievances. This SOP is not merely a set of guidelines; it is a living framework designed to facilitate a harmonious and constructive relationship between the program and its stakeholders.

Objectives

To ensure an inclusive transparent and accountable registration and delivery Baxnaano delivery system, it is essential to establish robust citizen engagement, social accountability, stakeholder engagements and grievance redress mechanisms for effective project implementation. This is achieved through, firstly, the establishment of citizen engagement and social accountability systems provide people with mechanisms for robust two-way engagements with MoLSA including channels for providing feedback. This also includes the opportunities for citizen and stakeholders to inform the design, implementation, oversight, and accountability of the Baxnaano activities. Secondly, the information disclosure systems establish a systematic approach to stakeholder engagement to help MoLSA build and maintain constructive relationships with key

stakeholders through engagements and timely disclosure of relevant information. Thirdly, a functional Grievance Redress Mechanism (GRM) outlines a set of procedures, processes, and protocols to be used as a means to resolve issues and complaints related to the Baxnaano programme.

The Stakeholders and Citizen Engagement, and Grievance Redressal Mechanis (GRM) Standard Operating Procedure (SOP) for the Baxnaano Program is crafted with a set of clear and purpose-driven objectives, ensuring the program's commitment to transparency, fairness, and stakeholder satisfaction. The GRM is designed to handle various types of grievances, encompassing but not limited to issues such as service delivery related complaints, staff errors/mistakes, actions by the staff against the program SOPs, Payment related complaints against the PSP and labor-related concerns.

Operating Principles and Guidelines

Stakeholder Engagement and Inclusivity: Encourage active engagement of stakeholders and citizens in program/projects activities as well as in the grievance resolution process, ensuring inclusivity and sensitivity to diverse needs, with special attention to vulnerable groups. Guide concerned stakeholders (i.e. Baxnaano, NIRA, FMoH, Payment Service Provider, District Administration and Beneficiaries) on their key functions, roles, and responsibilities to resolve beneficiaries' complaints in relation to enrolment, payments, and quality of service, and updating household information.

Compliance with Standards: ensures alignment with the internationally acceptedm standards for Environmental and Social Standard for instance the World Bank ESS 10, adhering to the requirements for stakeholder engagement, information disclosure, and the establishment of a systematic approach to engagement.

Continuous Improvement: Establish a framework for ongoing evaluation and enhancement of the stakeholders and citizens and GRM SOP, promoting a culture of continuous improvement and adaptability to evolving stakeholder needs and program dynamics.

Documentation and Learning: Systematically document stakeholder, and resolutions, creating a repository of valuable insights that contribute to organizational learning and the refinement of future strategies.

Effective Communication: Facilitate effective communication channels between the Baxnaano Program and its stakeholders, ensuring that information is disseminated in a timely, understandable, and culturally appropriate manner.

Fair and Just Resolution: Ensure that the grievance resolution process is fair, just, and free from coercion or discrimination, fostering an environment where all stakeholders feel heard and respected.

Building Stakeholder Confidence: Enable project beneficiaries and non to understand the procedures to lodge GR cases. Build and maintain stakeholder confidence in the Baxnaano Program by demonstrating a genuine commitment to addressing grievances and improving program delivery based on constructive feedback.

Comprehensive Training and Awareness: Provide comprehensive training programs to stakeholders and program staff involved in the grievance redressal process, ensuring a shared understanding of procedures and objectives.

Timely Resolution: Facilitate timeliness in stakeholders and citizens well as prompt and efficient resolution of grievances to address concerns and issues raised by project beneficiaries or stakeholders in a timely manner.

Transparency and Accessibility: Promote transparency in the grievance, ensuring that information about the mechanism is accessible to all stakeholders, fostering an environment of openness and trust.

These objectives collectively form the foundation of the stakeholders and citizen engagements and GRM SOP, embodying the program's dedication to fostering a culture of accountability, responsiveness, no individual who submits a grievance, complaint, or feedback through the GM shall be subject to any form of retaliation, reprisal, abuse, or discrimination and collaboration with its diverse range of stakeholders.

Applicability:

This Standard Operating Procedure (SOP) for Stakeholders and Citizen Engagements, and Grievance Redressal Mechanism (GRM) is crafted to ensure universal applicability across all projects initiated by Baxnaano. Tailored to address grievances related to concerned stakeholders within the organizational framework, the SOP is designed to be comprehensive and inclusive. The applicability of this SOP extends to the following key groups:

Communities: Individuals and groups directly impacted or likely to be affected by the project, including those within the Project Area of Influence (PAI). This encompasses beneficiaries of the Baxnaano program as well as non-beneficiaries, ensuring that their grievances are heard and addressed.

Government Officials and Local Administration: Officials from administrative structures responsible for both beneficiary and non-beneficiary communities. This includes representatives at the local and regional levels who play a crucial role in project implementation and sustainability.

International Agencies and NGOs: Collaborators and partners from international agencies and non-governmental organizations actively involved in providing support and expertise in various project components, such as health, nutrition, and implementation support.

Financial Service Providers: Institutions such as banks and telecommunication

entities that play a role in the implementation and operational support of the cash transfer components of the project.

Project Implementation Units (PIUs): Entities responsible for delivering the project's objectives in collaboration with federal, regional, and district health authorities, as well as other relevant stakeholders.

Vulnerable Groups: Individuals or groups, including female household heads, children-headed households, people with disabilities, and other vulnerable members of the community who may be disproportionately impacted by the project.

By considering the needs and perspectives of these key groups, the GRM SOP ensures a holistic and inclusive approach to grievance redressal, fostering a collaborative environment for effective resolution and continuous improvement across all Baxnaano initiatives.

SOP for Stakeholders and Citizen Engagement
Objective
Objectives of stakeholders and citizen engagements and information dissemination are: (a) understanding of the needs of the affected populations; (b) ensuring coordination between all government and community authority structures; (c) reception of feedback and comments as well as grievances from all stakeholders on project design and implementation; and (d) provision of transparent and accountable mechanisms on all aspects of Project design and implementation.

Key institutional stakeholder meetings and consultations
Engagements and consultation on the project design and the planned activities and implementation arrangements should be done with key institutional stakeholders including the relevant Government agencies, and development partners. Engagements and consultations should be documented in simple tabular form provided below:

Stakeholder	Date	Participants	Key points raised
Ministry of Finance			
Ministry of Planning and Economic Development			
Development Partners			

The nature of the project dictates the unique requirements necessary for effective consultation of the beneficiary communities and affected parties. MOLSA will put in place stakeholders, communities, and beneficiaries' directories, profile systems, and procedures for the engagement of the different sub-categories within the stakeholder groups and communities for effectiveness. Additional engagements will be in place for

the beneficiary communities with a focus on the vulnerable and minority groups within the communities (widows, single mothers, and the disabled).

Stakeholder Mapping and Analysis

Stakeholder engagement is the interaction with, and influence of project stakeholders to the overall benefit of the project and its advocates. ESS 10 recognizes two broad categories of stakeholders; those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods (project-affected parties) and other interested parties.

MoLSA and all the other collaborating agencies will roll out effective stakeholder engagements, build mutual trust, and foster transparent communication with both the project beneficiaries and other stakeholders. Full impact and risk assessment on stakeholders will be conducted as necessary and a stakeholders engagement plan (SEP) and Stakeholder Management Plan (SMP) developed and regularly updated.

Effective engagements with the project-affected communities will be conducted.

Stakeholder	Description	Potential issues of concern
Women beneficiaries		
Women non-beneficiaries		
Alternate caregivers		
Beneficiary household		
Non-beneficiary communities		
Vulnerable Members of the community (widows, disabled, single women) including minorities		

Key stakeholders

The Key stakeholders are first and foremost the various departments and units within MoLSA.
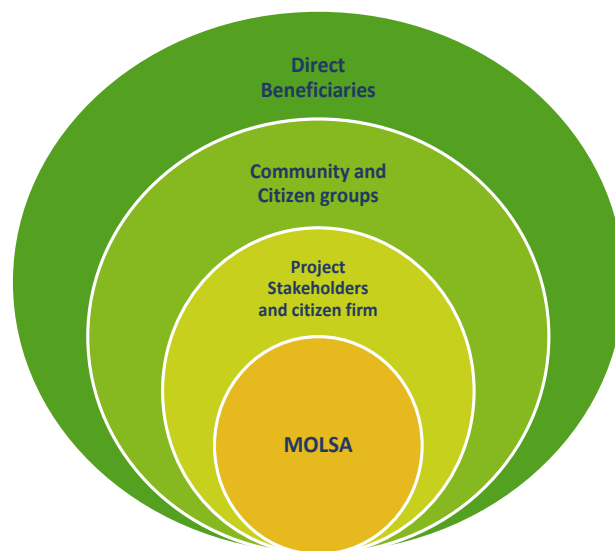
 Other key stakeholders include but are not limited to:

- Baxnaano PIU
- Federal Ministry of Health
- National Identity Registration Authority (NIRA)
- Federal Member States
- International Development Partners
- Benadir Regional Administration
- District Administration
- District Health Administration

- Beneficiaries
- Female Health Worker program
- Communities
- Immunization program
- Better Lives (Health Program by FCDO)
- Payment Service Providers
- Civil Society Organizations (Local and international)

Schematic visualization of the stakeholder engagement process.

MOLSA seeks to engage the various stakeholders and works closely with the citizen engagement firm. Through the firm and other stakeholders, the community is organized (into CBOs, Villages, SHGs, among others) and there are opportunities for communities to participate directly or through these formations in influencing decisions.

Citizen Engagement

MOLSA interventions will build on strong citizen engagement principles. Through established citizen engagement frameworks, MOLSA shall support and facilitate community engagements in the delivery of the various facets of program. This includes gathering opinions and feedback, evaluating public awareness of government ownership of the program, public perception of the program, and the government's social investments among beneficiary communities. This necessitates enhancing the general public's awareness of the purpose and design features of the safety net and its relation to the broader social protection policy of the government.

As the project transitions into government-led service delivery, establishing a citizen engagement platform is paramount. This platform will bring together the Federal Government of Somalia (FGS), the Federal Member States, and Somali communities to raise awareness and promote inclusive and empowering citizen engagement in about

Baxnaano. It will cover its purpose, design, expansion, implementation arrangements, alignment with the Government's Social Protection Policy, and operationalization with various investments. The schema below articulates the requirements and responsibilities of the different actors for effective citizen engagement platforms and inputs (for engagement).

Citizens' Engagement Framework

The figure below provides the overview of the required inputs by the different actors to ensure effective stakeholder and citizen engagement.

Levels of Citizen Engagement

Levels or stages of public involvement range from passive involvement to active public participation or citizen engagement. At its very lowest level, public involvement is passive and one directional where the government seeks to inform, persuade, or mobilize for public support. The next level moves from where the public is passive recipient to one where the public has a voice and their inputs can be incorporated in decision-making. The third level provides the public with opportunities to share their views during public consultations. At the highest level of engagement government consider citizens as true partners and processes, mechanisms and procedures for engagement allow the public to set the agenda, and to participate in decision-making. In the latter, the public participation mechanisms are institutionalized. Government agencies should seek to engage the public in the highest level of involvement.

Figure x below provides the different elements at the different levels of public or citizen engagement and table y provides more details on the differences in objectives, elements, and results of the different levels of public involvement.

Levels of Public/Citizen Involvement

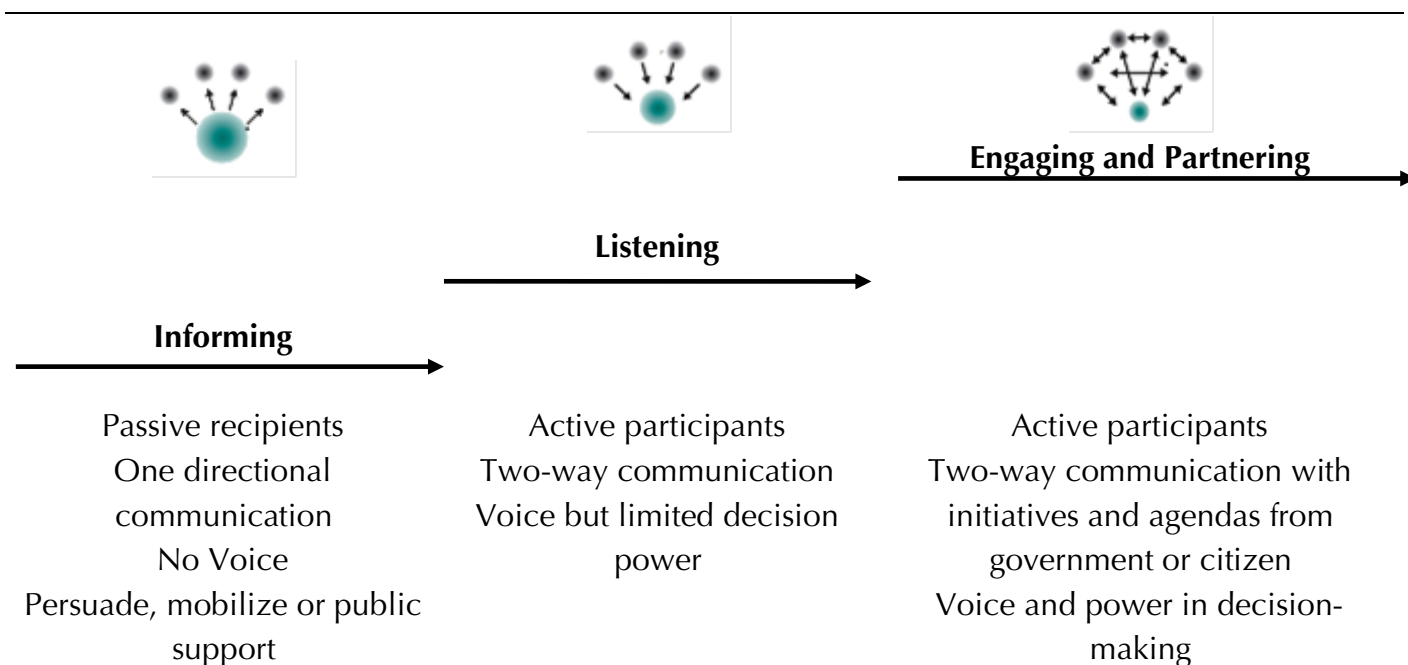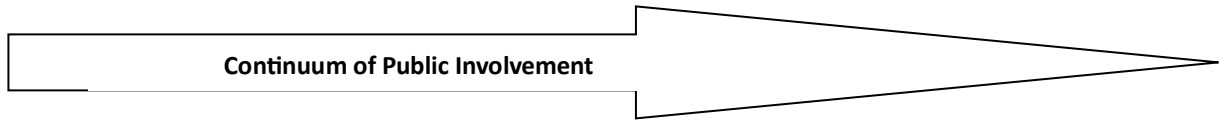| LEVEL 1 AND 2 INFORMATION & EDUCATION	LEVEL 3 CONSULTATIONS	LEVEL 4 PARTICIPATION

Engaging and Partnering

Listening

Informing

Passive recipients	Active participants	Active participants
One directional communication	Two-way communication	Two-way communication with initiatives and agendas from government or citizen
No Voice	Voice but limited decision power	Voice and power in decision-making
Persuade, mobilize or public support		

Table y: Public/Citizen involvement Continuum

Information/Publicity	Public Education	Public Consultations	Public Participation
Purpose: To make the public aware of the comprehensive planning project.	**Purpose:** To provide the public with balanced and objective information to assist them in better understanding the Government processes	**Purpose:** To obtain public feedback on issues, alternatives and/or decisions.	**Purpose:** To work directly with the citizens, citizen groups or organizations throughout the process to ensure that public issues and concerns are consistently understood and considered.
Pledge to the public: We will keep you informed.	**Pledge to the public:** We will try to help you understand.	**Pledge to the public:** We will provide a variety of opportunities for your input, and will provide feedback on how the public input was used in the planning process.	**Pledge to the public :** We will work with you to ensure that your concerns are directly reflected in the alternatives developed and provide feedback on how public input influenced decisions.
Example methods: Word of mouth, public address, direct mail, news releases and mass media, displays, and exhibits.	**Example methods:** Public education meetings, websites, newsletters.	**Example methods:** Open houses, public hearings, visual preference surveys, opinion surveys, focus groups.	**Example methods:** Visioning, co-creation, citizen planning committees
Elements/Results -unilateral announcement by authorities; - no room for response byn others; - people are told what will happen or has happened	**Elements/Results** - organized education forums or workshops - Complex issues may require a long-term approach rather	**Elements/Results** . participants are consulted; . views are	**Elements/Results**

	than one-off training workshops.	. problem definition and solutions may be modified; no obligation to accept participants' views.	. people participate in a joint analysis of options; - Consensus-building and participatory decision making Formation or strengthening of local groups occurs.

Continuum of Public Involvement

The continuum has also been described using five (5) levels which recognize empowerment as the ultimate desire of the public/citizen engagement process. The 5-level continuum is made of informing, consulting, involving, collaborating, and empowering, which are further described below:

   i. **Informing**: to enhance understanding, of problems, alternatives, opportunities

   ii. **Consulting**: to obtain public feedback on analysis, alternatives, and decisions

   iii. **Involving**: ensure public concerns and aspirations are consistently understood and considered.

   iv. **Collaborating:** in all aspects including the development of alternatives, and identification of preferred solutions.

   v. **Empowering:** empowers the public to make decisions regarding a public issue and in other contexts to be involved in the implementation process.

Tools for Engagements

There are various tools used for citizen engagement. The officials have to identify the tools that would be most appropriate depending on the objectives of the engagement process. Below is a list of tools for various modes of citizen engagement:

- Public Meetings/forums
- Public Hearing (mostly spearheaded by citizens after social audits)
- Workshops (for civic education or policy reviews)
- Invitations for public submissions
- Partnerships and collaborations
- Voting/polls
- Petitioning
- Payment of charges, fees (for services) and taxes
- Planning processes
- Policy and legislation reviews
- Budgeting Monitoring

- Implementation (provisions for citizen representation during implementation)
- Community Led Project Management Committees (PMCs)
- Service to country
- Surveys
- Focus group discussions (FDGs)
- Direct mail (letters of proposals or inquiries)
- Internet-based interactions
- Grievance redress mechanisms

In most cases many of the tools and methods above are used listed above are not used individually but rather in a collective. For instance, in a large forum, the host may choose to also use focus group discussions at the same time. A workshop could also be used as a platform for engaging in developing plans or reviewing policies or legislation. Below is a description of some of the tools/methods.

(a) **Public forums**: are mostly useful when there is a need to communicate and also draw feedback from a large cluster of citizens or stakeholders. The engagement in the public forums should be two-way to ensure that citizens are also given an opportunity to speak through their representatives, in focus groups, or in plenary sessions.

(b) **Planning, policy, and legislative processes**: consulting citizens in policy, planning, and legislative processes will ensure their contributions are included.

(c) **Focus Group Discussions**: this is used to generate information from a representative group of people. It is important to ensure that the selection of those who will form the focus group represent well all those who may be interested or affected by the issue under discussion.

(d) **Workshop**: this is useful approach when the facilitators are interested in sharing information, skills or knowledge to a small group of people and at the same time may seek to get feedback or engage the group in a co-creation process. This is effective in facilitating detailed exchange process that may led to co-creation, consensus building, or different strands of knowledge that is useful for further engagement beyond the workshop setup.

(e) **Voting/polls**: to confirm citizens' positions on policy and program matters, the deliberation or discussions may result in those participating voting for a position. Therefore, voting or polling can be used to provide fairness in decision-making processes. At the same time, citizen engagement may result in the election of representatives for various positions, and therefore voting, instead of nomination or selection may be considered more favorable or fair in certain citizen engagement processes.

(f) **Payment of fees, charges, or taxes**: this is a sure way of active citizenship. In certain aspects, citizens may also give in kind for instance they may volunteer to carry out certain activities for free, and they may also give land, food, and clothes as part of their participation.

(g) **Petitions and memorandums**: these are written requests or calls for change signed by individuals, institutions, or groups of people, in support of a shared cause or concern. would be solicited from citizens in consideration for decisions that require citizens' views or confirmation.

(h) **Internet-based Interactions**: the institution can provide an online engagement process. Popular online engagement through tools such as Zoom, Google Meet, WhatsApp, X-

space, and other social media provide opportunities for sharing and feedback process. So long as there is a two-way conversation and a feedback loop.
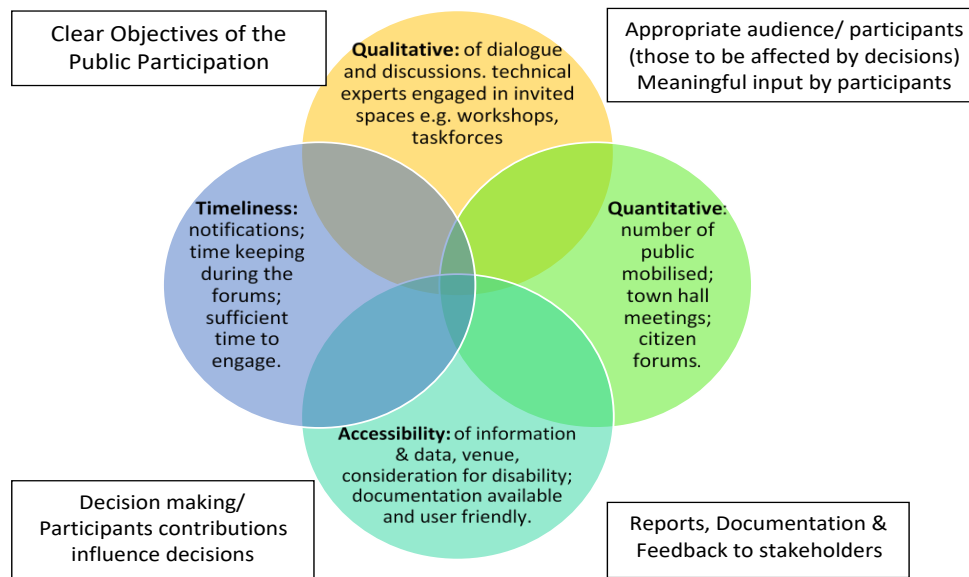
(i) **Survey**: generate scientific evidence and data of people's position, views, or status.

(j) **Project Management Committee**: the citizen-led PMCs can be involved in oversight of the ongoing project. They help to buttress the project monitoring process if they are well-trained and provided with project documents/data and delegated authority.

(k) **Partnerships and collaboration**: are projects where a component of the implementation is being carried out by the citizen institutions. The partnership approach implies strong delegating authority from government to citizen agencies.

(l) **Public Hearing**: this is a tool that is used in combination with social audit or budget monitoring. The citizens who have carried out social audits using tools like scorecards, citizen report cards, and Public Expenditure Tracking (PETs), invite government officials to a public forum where they present their scorecards, report cards, or PETs to the government officials and seek their feedback or explanations for the issues that went wrong or things that were not well addressed.

Principles of Citizen Engagements

i. **Accessibility**: Provide clear, accessible information and engage with the public transparently.

ii. **Inclusivity**: Reach out to all segments of society, provide multiple platforms, and consider diverse perspectives. This ensures demographic diversity brings on board diverse people, voices, ideas and information for quality outcomes and democratic legitimacy.

iii. **Respect**: Value public input and allow for diverse forms of engagement and preferences of how to engage.

iv. **Responsiveness**: Incorporate public feedback into decision-making and respond to the needs of all.

v. **Depth and Quality**: Provide comprehensive information about policy options and their potential impacts.

vi. **Consistency over time**: Participation requires procedures for decision-making to be stable and predictable, and that changes to decision-making procedures are explained and justified.

vii. **Proportionality**: Tailor engagement to the scale and impact of the issue or policy concerned

viii. **Complementarity:** Ensure mechanisms for public participation and citizen engagement complement and increase the effectiveness of existing governance and accountability systems

ix. **Accountability:** Be transparent about the engagement process and its expected outcomes.

x. **Detailed planning and preparation** ensure that the design, organization, and convening of the process serve a clearly defined purpose.

xi. **Openness and learning** that promotes effective exploration of new ideas unconstrained by predetermined outcomes; learning

xii. **Transparency and trust** which ensures that the process is clear and open, and provides a public record of the organizers, sponsors, outcomes, and range of views and ideas expressed.

xiii. **Impact and action** as each participatory effort has real potential to make a difference.

xiv. **Sustained engagement and participatory culture** promoted through frameworks, programs and institutional processes and mechanisms. This ensures sustainability in citizen engagement.

Eight Key Elements for Effective Citizen Engagement

Clear Objectives of the Public Participation

Qualitative: of dialogue and discussions. technical experts engaged in invited spaces e.g. workshops, taskforces

Appropriate audience/ participants (those to be affected by decisions) Meaningful input by participants

Timeliness: notifications; time keeping during the forums; sufficient time to engage.

Quantitative: number of public mobilised; town hall meetings; citizen forums.

Accessibility: of information & data, venue, consideration for disability; documentation available and user friendly.

Decision making/ Participants contributions influence decisions

Reports, Documentation & Feedback to stakeholders

Description of the Eight Key Elements

These eight key elements are found in all citizen engagement processes. The facilitator should ensure that they define the standards for each of them.

i. **Setting the Objectives**: This is overarching as it determines the nature and how the other elements for ensuring effective citizen engagement are organized. For instance, the appropriate tools, methods, or approaches for engagement are best determined by the objectives that are intended to be met.

ii. **Audiences**: Appropriate audiences should be mobilized depending on the issue. Those who are going to be affected and those interested in the issues should be mobilized using multiple channels. It is also important to ensure good representation

across gender, age, and tribes/clans, ensuring the marginalized and minorities are also included.

iii. **Quality**: this implies that all efforts should be made to ensure there is quality engagements or deliberation. This implies that where necessary, technical experts should be involved to raise awareness on the issues, or provide technical inputs during the deliberation. It also implies that relevant data should be shared; and that time should be allocated to update all those participating with the relevant information. If civic education is ongoing over time, contributes towards citizens being informed and aware to make decisions in the participation processes.

iv. **Quantitative**: this element implies that those organizing need to be clear about the number of people required to meet the threshold of effective participation. This is dependent on the target population. It should ensure adequate numbers for all representative groups. This also affects the spaces and materials for distribution. These should be adequate.

v. **Timeliness**: Engage the public early and consistently throughout processes. Engage early while a range of options is still open but not when most decisions have been dispensed with.

vi. **Accessibility**: the citizen engagement platforms (forum, workshop, town hall, virtual) should be accessible to all who are the target. In the context of long distances, it is preferable to have several meetings in the same region to make the venues accessible to the citizens. Alternatively, transport should be provided. The provision of transport introduces costs that may make the forums less accessible since the agency has to determine how much funds they can allocate to transport reimbursements and reduce participants or the citizen has to cover the costs. The issue of disability is also critical. Those with various disabilities – physical, hearing, sight – should have their needs for access to the venue or material considered before the meeting.

vii. **Decision Making**: citizen engagement should result in clear decisions that the citizens can explain to others who were not present in the process. The agreements are co-owned by both the government and citizens. The facilitation process should therefore be clear from the onset what nature of the decision is being made and when will the final decision be made. If the final decision is beyond the forum/process, a clear channel for communicating the final decisions should be agreed upon and used at the end of the process.

viii. **Reports and Feedback**: all citizen engagement processes should be well documented so that all those who participated and those who did not participate can have good references on how the decisions were arrived at. These reports can also be used to provide the final decision in case these were made after the engagement process (cascaded processes). There should be a way to extract the final decisions and

implementation process and communicate this to the citizen who were involved in the decision making process. The sharing of the information completes the feedback loop.

Ten Steps for Rolling Out a Citizen Engagement Process

Step 1: Choose the **general strategy** (Objectives, target, where, what commitment, when)

Step 2: Prepare the **organizational model** (who is facilitating? What are the rules of engagement? etc.)

Step 3: Develop **informational material** (what information will be required for decision making, what updated information do citizens need) and **mobilization** of citizens (media, notices, etc)

Step 4: **First Public meeting** (identify citizens' priorities and choices; ensure consultation with as many people as possible. Make the process/venue easily accessible by going to where the people are (don't ask them to come to you); incorporate people's values and needs.

Step 5: Technical evaluation of proposal(s) (right solutions, right projects, quality projects – the professions, and government officials ensure that the proposed ideas are feasible before the next public forum where the ideas are further listed and deliberated upon)

Step 6: Publicize the list of alternative proposals; develop the final list, or report (list of proposals on notice board, reports on websites, hard copies can also be availed). Also, a complaint mechanism should be provided to address issues arising from the proposals.

Step 7: Further consultations and invitations to ensure broad-based decision making through providing a **Voting-day** (may include use of ballots, online voting, sms, or queues) or seek or consensus building for the final decision.

Step 8: Creation of voluntary working groups on winning proposals (the project committees comprising of citizens own the projects and ensures it is implemented); get civil society to be involved

Step 9: **Approval of the budget (Policy, Bill, Project)**; **sign off, agreement document,** (considered a transparent and valid process). Streamline the budget to ensure that all the approved citizen projects have budget allocation. Or approved Policy or Law are published.

Step 10: Evaluation (what went well, what didn't go well; effectiveness and efficiency of the interventions and projects; impact and sustainability of the projects)

Monitoring and Evaluation of Citizen Engagement

Monitoring and evaluation of citizen engagement and applying the lessons learnt should be regularly carried out. The parameters that could form the monitoring framework include:

a. Objectives set and public participation/citizen engagement mechanisms or methodology set to achieve them.
b. Quality of public participation/citizen engagement which may be assessed using levels of participation from information, consultations to empowerment where lower levels are ranked lower.
c. Quantity aspects of public participation/citizen engagement could cover measurements on the numbers of participants and their diversity against gender, age, regions. This component could also assess the mechanisms and tools of mobilization that determine the numbers that are made aware of the meetings and their response rate.
d. Accessibility (info – user-friendly; disability; venue
e. Timeliness (notices, duration, adequacy)
f. Decision making (level of decision making)
g. Documentation (verbatim, decisions/memorandum)
h. Responsiveness and Feedback mechanism?

Social Accountability

Social accountability tools enable citizens to hold public officials and service providers accountable for the use of public resources and services delivered. Social accountability tools commonly used include public hearings and social audits.

Social audits espouse citizen-driven tools to engage citizens, community members, or civil society organizations in collecting and publicly sharing information on available resources allocated for service delivery and public works and their usage.

Social audit processes seek to verify and provide feedback on the extent to which the work done on or through public projects benefits the people to whom it is intended. It involves understanding, measuring, and reporting the status of public works, projects, or programs to promote corrective actions and improvements. Social audits build accountability and transparency in the use and management of public resources. They enlighten the citizens on the projects/programs being undertaken in their locality and empower them to demand accountability and transparency in project implementation or service delivery.

Social audits focus on citizens as stakeholders and include information disclosure, demystification, and dissemination; beneficiary/user participation and consultation;

complaints handling; and independent and participatory monitoring of key components and requirements.

The Objectives of the Social Audit include but are not limited to:

- Assessing the physical and financial gaps between needs and resources available for development projects/programs.
- Creating awareness among beneficiaries and providers of local social and productive services.
- Increasing efficacy and effectiveness of local development projects/programs
- Promotes collective decision-making and sharing of responsibilities
- Enhancing public participation in local development projects/programs

Steps in Social Audits

The social auditing process should

i) Bringing together the stakeholders in a forum. These should include Beneficiaries/stakeholders; Implementers; Supervising authorities; and Financiers, among others.

ii) Viewing the project to be done by the Beneficiaries/stakeholders

iii) Data collection including desk review (reports, budgets, financial accounts), focus group discussions; score cards and key informant interviews, among others

iv) Stakeholders reporting on the implementation and beneficiaries giving feedback on the accuracy of the reports

v) Beneficiaries providing recommendations for further action by relevant stakeholders

Principles of Social Audit

Social audit is an evolving area with a number of basic principles outlined as follows:

Multi-perspective: Aim to reflect the views (voices) of all those people (stakeholders) involved with or affected by the organization/department/ program

Comprehensive: Aims to (eventually) report on all aspects of the organization's work

Participatory: Encourages participation of stakeholders and sharing of their values.

Multidirectional: Stakeholders share and give feedback on multiple aspects.

Regular: Aims to produce social accounts on a regular basis so that the concept and the practice become embedded in the culture of the organization covering all the activities.

Regular: Aims to produce social accounts on a regular basis so that the concept and the practice become embedded in the culture of the organization covering all the activities.

Comparative: Provides a means whereby the organization can compare its own performance each year and against appropriate external norms or benchmarks; and provide for comparisons to be made between organizations doing similar work and reporting similarly.

Verified: Ensures that the social accounts are audited by a suitably experienced person or agency with no vested interest in the organization.

Disclosed: Ensures that the social audited accounts are disclosed to stakeholders and the wider community in the interests of accountability and transparency.

Benefits of Social Audits

The table below compares financial government audits and social audits and indicates the benefits of conducting social audits

Financial Government audit	Social audit
Financial auditors are involved without significant involvement of affected people	It is done jointly by the government and citizen representatives who are affected or intended beneficiaries
It assesses procedural integrity, inputs, and outputs	It looks at outcomes and not merely outputs
There is little ability to get public perceptions or verify outcomes	Brings on board perceptions and knowledge of citizens and beneficiaries
The reporting is to the parliament	Reporting is to both the government and the citizens

Information Disclosure and Dissemination

Information disclosure to the affected populations and beneficiaries will rely on the following key methods: radio broadcasting, different social media channels, community meetings in coordination with local authorities (district administration, community leaders), Focus Group Discussion (FGDs) and phone communication (SMS). At the national level information will be disclosed mainly by email, reports and consultative forums. Information will be disclosed in Somali or English languages. Local authorities, such as District Administrators or community leaders will be requested to inform communities in community meetings and through disclosure on social media. The citizen engagement firm will be mainly responsible to create the content radio broadcasting, CD

and FGDs. The table below provides an example of the tools to be used for reporting and monitoring the level of information disclosure and dissemination.

Project Stage	List of information to be disclosed	Methods proposed	Timetable: locations/ dates	Target Stakeholders	Percentage reached	Responsibilities
Project Design	SEP	Stakeholder meetings		District level		
		Email		National Level		
		websites		National level		
	ESCP	Stakeholder meetings		District level		
		email		National level		
		websites		National level		
	ESMF (including GRM)	Stakeholder meetings		District level		
		email		National level		
		websites		National level		
Project Initiation and Implementation	Activity – or site specific ESMPs	Community meetings		Community level		
		email		National level		
		website		National level		
		Stakeholder meetings		Districts and State level		
	GRM	Community meetings		Community level		
		radio		Community, district and State level		
		Mobile phone		Community, district and State level		
		website		National level		

Strategy for Engagement

The overall consultative processes of different stakeholders and engagements with the citizens require different approaches, methods, and tools. In principle, the participatory engagement and consultation methods, especially with affected communities and beneficiaries should seek to identify the best combination of approaches, tools and methods. The table below provides a planning table that if well prepared and used annually will ensure the standards are adhered to.

Project stage	Topic of consultation	Suggested Method (will be refined by IP)		Timetable location and dates	Target stakeholders	Responsibilities
Project Design	Overall Project activities		Community meetings		Community level stakeholders	PIU / IP
			Stakeholder meetings		District, state level, national level stakeholders	PIU / IP
			Email		National level stakeholders	PIU / IP
Project Initiation and Implementation	Cash transfers	Community meetings, selected communities for cash transfer			Community level stakeholder	IP
		mobile phones, beneficiaries selected			Community level stakeholders	IP
		radio			Community level, district and state level stakeholders	IP
	Cash transfers,	Community meetings, selected communities for cash transfer			Community level stakeholder	IP
		mobile phones, beneficiaries selected			Community level stakeholders	IP
		Radio			Community level, district and state level stakeholders	

	Rehabilitation of risk mitigation infrastructure	Email		National, state level stakeholders	IP
		Radio		State, district and community level stakeholders	IP
		Stakeholder meetings		State, district and community level stakeholders	IP

Channels of Communication to be adapted to context and stakeholders

These include but are not limited to:
- ✓ Short Text Message (SMSs) Campaigns
- ✓ Radio broadcasts announcements and programs
- ✓ Pamphlets and posters
- ✓ Meetings with project beneficiaries
- ✓ Training and other outreach programs
- ✓ Outgoing project communication
- ✓ Project website (preferably on the home page) and project's page on Social Networking Sites (e.g., Facebook, Twitter etc.)

Messages to Build Trust

- ✓ Stakeholders are encouraged to complain if they are dissatisfied or feel aggrieved
- ✓ Grievances are treated confidentially; there are no adverse repercussions for a complainant.
- ✓ Grievances are valued by the facility/agency because they help improve its policies, systems and service delivery.
- ✓ There is no cost for filing a grievance

Grievance Redress Mechanism SOP
Scope of Definitions

These definitions are fundamental to the Grievance Redress Mechanism (GRM) and provide clarity on the types of issues that fall within its purview. By clearly defining the relevant terms, the GRM ensures a common understanding among all stakeholders, facilitating effective communication and resolution of concerns. It underscores the

commitment to addressing a broad spectrum of issues, promoting a safe and respectful environment within the project   framework.3. Grievance Redressal Mechanism Structure.

Word	meaning
Grievance	Any expression of dissatisfaction or concern related to project activities, services, conduct, or outcomes. This can include issues raised by individuals or groups participating in or affected by the project
GBV (Gender-Based Violence)	Encompass acts that cause physical, sexual, or psychological harm based on gender-related factors at the place of work. This includes violence or discrimination directed at project employees because of their gender identity or gender roles.
SEA (Sexual Exploitation and Abuse)	Covers actions that involve the improper use of power to exploit individuals sexually at the place of work of the project. This includes any behavior of a sexual nature that is non-consensual, coercive, or exploitative
SH (Sexual Harassment):	Any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with any employee of the project.
Labor-related issues:	Any grievances linked to employment, working conditions, or remuneration within the context of project activities. This includes concerns raised by project participants or staff related to their employment terms, workplace conditions, or compensation. Issues could range from contractual disputes to workplace safety concerns or fair remuneration matters. These will be registered as employee complaints.

Process of Receiving Grievances

A grievance can be submitted either in writing, telephonically or physically. It can be submitted at the GRM offices within the MoLSA headquarters, which have a dedicated contact centre that operates a toll-free hotline. It can also be submitted by physically visiting Baxnaano PIU or Baxnaano Facilitation Centers in the field. Grievances may be submitted through the following channels:

Medium	Contact address
Email address	grm@baxnaano.gov.so

Suggestion box	*MoLSA Labour GRM Office located at Jubba Road, Mogadishu, Shangani, Somalia.*
Telephone	**2668**
Toll free-line	*2668*
BFC	*Baxnaano Facilitation Centers established in Benadir Region*

The Grievance Redress Mechanism (GRM) has established a streamlined and accessible process for receiving grievances from stakeholders involved in Baxnaano initiatives. This process is designed to facilitate the submission of concerns, complaints, or grievances in a clear, confidential, and responsive manner. The steps involved in the process of receiving grievances are as follows:

Submission Channels

The affected parties can submit grievances through various channels to ensure flexibility and accessibility. The designated submission channels include:

Written Submissions: Grievances can be submitted in writing, either through postal mail or hand-delivered to specified locations. Written submissions should include relevant details to facilitate a comprehensive review.

Helpline Services: A designated helpline is available for stakeholders who prefer to communicate their grievances telephonically. Trained personnel manage the helpline to assist stakeholders in articulating their concerns effectively.

Baxnaano Facilitation Centers: dedicated GR counters will be established at Baxnaano Facilitation Centers (FCs) to lodge beneficiary grievances including the service delivery and payment complaints.

Information Required

To ensure the efficient processing of grievances, stakeholders are encouraged to provide comprehensive information when submitting a grievance. Key details include:

Stakeholder Details: Name, contact information (mobile number which will be used as primary key to track the grievances lodged by any particular beneficiary), and any other relevant identification details.

Nature of Grievance: A detailed description of the grievance, including specific incidents, locations, and department/organization/individuals involved.

Supporting Documents: Stakeholders are encouraged to attach any supporting documents that substantiate their grievance, such as photographs, official documents, or witness statements (if available).

Acknowledgment

Upon receiving a grievance, the GRM acknowledges the submission promptly. Acknowledgment may be in the form of an automated email, or system generated short message sent to registered mobile number of the complainant, providing assurance that their concerns are under review. A unique GR number will be assigned to each grievance to track it in future which will be shared with the complainant through the reply email or short message.

Initial Review

An initial review is conducted to assess the nature and merit of the grievance. This stage involves categorizing grievances, verifying provided information, and determining the appropriate level of response required.

Case Registration

Validated grievances are officially registered within the GRM system. Each case is assigned a unique identifier for tracking purposes, ensuring accountability and transparency throughout the resolution process. The system will also have the provision to track grievances through complainant's mobile number, provided at the time of GR lodging.

The process of receiving grievances is fundamental to the success of the Grievance Redress Mechanism, as it sets the stage for fair and effective resolution. The social specialist of the PIU is responsible for the process of receiving and categorizing grievances. Stakeholders can trust that their grievances will be received with diligence, respect, and a commitment to addressing their concerns in a timely and equitable manner.

GBV/SEAH grievance resolution process

The Grievance Redress Mechanism (GRM) has established a specialized process for lodging grievances related to Gender-Based Violence (GBV) and Sexual Exploitation, Abuse, and Harassment (SEAH) for project employees at the work places only. This dedicated framework ensures a sensitive, confidential, and survivor-centered approach to resolving such grievances, under the already established SOPs of concerned departments to address such grievances. The GBV/SEAH grievance resolution process consists of the following key stages:

Reporting

Concerned individuals are encouraged to report grievances through designated channels, already mentioned.

The SEA/SH GM should not ask for, or record, information other than the following: (i) the nature of the complaint; (ii) if possible, the age and sex of the complainant; and (iii) if, to the best of the complainant's knowledge, the perpetrator is associated with the Project;

Case Management

GBV/SEAH grievances enter a comprehensive case management process. This stage includes:

Case Registration: Assigning a unique identifier to each case for tracking and documentation purposes.

Specialized Investigation: Conducting a thorough and survivor-centered investigation , involving trained personnel with expertise in GBV/SEAH matters. An external independent entity will be accessed to provide this service, if/when required.

Monitoring and Learning

The GRM continually monitors and evaluates the effectiveness of the grievance resolution process. Learning from each case contributes to ongoing improvements.

The Baxnaano GR MIS portal will have a dashboard facility where multiple reports including the counts of lodged, resolved and pending complaints will be available. The system will have the facility to generate alerts on any complaints which are pending for more than 30 days. GR supervisor will be responsible to coordinate with concerned department and resolve all such pending complaints on high priority.

Confidentiality

Confidentiality is a cornerstone principle within the Grievance Redress Mechanism (GRM), ensuring the protection of individuals involved in the grievance resolution process. The organization is committed to upholding the highest standards of privacy and confidentiality throughout all stages of the grievance handling process.

Privacy Protection

Secure Information Handling: Information related to grievances is treated with the utmost care and is accessible only to personnel directly involved in the resolution process. All documents and electronic records are stored securely, with restricted access to authorized individuals.

Anonymous Reporting Options: The GRM provides anonymous reporting options to encourage individuals to come forward without revealing their identity. Anonymous reports are diligently investigated while maintaining the confidentiality of the reporter.

Legal Compliance

Adherence to Applicable Laws: The GRM operates within the framework of relevant   laws and   regulations governing privacy and confidentiality. Legal obligations to report certain incidents are observed while respecting the rights and privacy of the individuals involved.

Ongoing Training and Awareness

Staff Training: Personnel involved in the grievance resolution process undergo specialized training on confidentiality protocols, ethical considerations.

Community Awareness: Community outreach programs are conducted to educate stakeholders about the organization's commitment to confidentiality, encouraging trust in the reporting and resolution mechanisms.

Grievance Registration and Acknowledgment

Upon receiving a grievance, Baxnaano follows a systematic process for recording details in a central register. This register serves as a centralized database for managing and tracking all grievances. The registration process includes

Accessible Channels: The organization provides multiple accessible channels for grievance registration, including online platforms, dedicated helplines, physical submission points, dedicated desks at Baxnaano Facilitation Centers and engagement with community focal points. This multi-channel approach aims to facilitate easy reporting for individuals with diverse needs and preferences.

Standardized Grievance Form: A standardized grievance form is made available to complainants, ensuring that essential information is captured uniformly. This form includes details such as the nature of the grievance, date, time, location, and any supporting documentation. The uniform format streamlines the intake process and facilitates comprehensive documentation.

Assistance for Vulnerable Groups: Special provisions are in place to assist vulnerable groups, ensuring that they can articulate their grievances comfortably. Trained personnel or community advocates may provide support to individuals who face challenges in navigating the registration process independently.

Acknowledgment and Reference Number

Timely Acknowledgment: Upon successful registration of a grievance, the complainant receives a prompt acknowledgment, through an email or text message on a registered mobile number. This acknowledgment serves as confirmation that the grievance is officially in the system and under review.

Unique Reference Number: Each registered grievance is assigned a unique reference number. This reference number is crucial for tracking and referencing the grievance throughout the resolution process. Complainants can use this number to inquire about the status of their grievance at any stage.

Information on Resolution Timeline: The acknowledgment communication includes information on the expected timeline for grievance resolution. While the organization

endeavors to address grievances promptly, transparency about the process helps manage complainant expectations and fosters trust in the GRM.

Centralized Database

Central Repository: All registered grievances and associated details are securely stored in a centralized database managed by the Grievance Redress Unit. This database facilitates efficient tracking, monitoring, and reporting on the status and outcomes of grievances.

Confidentiality Measures: Strict confidentiality measures are applied to safeguard the information within the database. Access is restricted to authorized personnel directly involved in the grievance resolution process.

The Grievance Registration and Acknowledgment process not only formalize complainants' concerns but also initiates a structured pathway for resolution. By emphasizing accessibility, transparency, and confidentiality, this stage sets the foundation for a fair and accountable grievance redress process.

Grievance Review
Preliminary Assessment:

The Grievance Review process plays a pivotal role in ensuring that grievances are thoroughly assessed and addressed in a timely and effective manner. This stage involves a collaborative effort from various stakeholders within the Baxnaano program, each contributing their expertise to provide a comprehensive resolution. The key personnel involved in the Grievance Review process include

Social Development Specialist

The Social Development Specialist brings in-depth knowledge of social dynamics and community engagement. Their role includes analyzing grievances with a focus on social implications and community welfare. The specialist ensures that the resolution aligns with the overarching social development goals of the Baxnaano program.

GBV/ Risk Management Specialist

The GBV Specialist specializes in addressing gender-based violence (GBV) concerns within the grievances. With a deep understanding of GBV issues, this specialist ensures that cases involving violence or discrimination based on gender are handled with sensitivity and in accordance with established protocols.

Call Center Operators

The Call Center Operators are on the front line of grievance management, directly engaging with complainants to gather essential information. Their role involves initial assessment,

documentation, and categorization of grievances. The Operators play a crucial role in ensuring that all relevant details are captured accurately.

The Grievance Review process

Receipt of Grievance: Grievances are received through various channels, including the call center, Facilitation Centers, or direct outreach to PIU.

Initial Assessment: Call Center Operators conduct an initial assessment to categorize the grievance and gather essential information.

Assignment to Specialists: Depending on the nature of the grievance, it is assigned to either the Social Development Specialist or the GBV Specialist.

Specialist Analysis: The assigned specialist thoroughly analyzes the grievance, considering social and GBV implications, and proposes a resolution strategy.

Collaborative Review: The proposed resolution is reviewed collaboratively, incorporating inputs from both specialists.

Resolution Planning: The Project Operation Manager for GBV Resolution develops a comprehensive resolution plan, ensuring that recommended actions align with project objectives. However, for non GBV complaints the Social Specialist prepares the resolution plan.

Communication of Resolution: The resolution, along with any necessary actions, is communicated to the complainant through appropriate channels.

This integrated approach to grievance review ensures that each case receives the attention and expertise required for an equitable and effective resolution. The collaboration between specialists and operational managers enhances the overall impact of the grievance redress mechanism within the Baxnaano program

Data Collection

The investigative team collects relevant data, documents, and statements from all involved parties. This may include interviews, site visits, and a review of project records to gain a comprehensive understanding of the circumstances surrounding the grievance.

Analysis and Evaluation

All gathered information undergoes a rigorous analysis and evaluation process. The investigative team assesses the validity of the grievance, considers any contributing factors, and determines the extent to which project policies and procedures were followed.

Stakeholder Consultation

During the investigation, the team may engage in consultations with relevant stakeholders to obtain their perspectives on the grievance. This inclusive approach ensures a well-rounded understanding of the issues at hand.

Timely Resolution

Baxnaano is committed to timely grievance resolution. The investigation phase is conducted promptly, balancing thoroughness with efficiency to ensure that resolutions are reached within reasonable timeframes.

Confidentiality and Sensitivity

Maintaining the confidentiality of the investigative process is paramount. The investigative team exercises discretion and sensitivity to protect the privacy and security of all parties involved.

Final Report

The inquiry team compiles a comprehensive final report detailing their findings, conclusions, and recommended actions. This report serves as the basis for the subsequent steps in the Grievance Redress Mechanism.

Adjudication and Decision

Following the inquiry, the grievance enters the adjudication phase, where a decision is made based on the findings. The decision-making process is characterized by fairness, objectivity, and adherence to established policies and procedures

Labor-related Investigations:

Labor-related grievances are handled with utmost diligence and adherence to fair labor practices within the framework of Baxnaano programs. These investigations specifically address concerns related to workplace conditions, and any alleged violations of project standards. However, complaints against matters pending in court of law or any other regulatory body of the Government will not be registered in GRM.

Impartiality and Objectivity

The investigative process maintains a commitment to impartiality and objectivity. The team examines cases without bias, taking into account the perspectives of both the complainant and the accused, and seeks to establish the facts objectively.

Compliance with Labor Laws

Baxnaano is dedicated to upholding local and international labor laws. The investigative team assesses cases against established labor standards, ensuring that any resolution aligns

with legal requirements and ethical employment practices. The laws of Government of Somalia will prevail in case of any conflict with international laws.

Worker Representation

Recognizing the importance of worker representation, the investigative process allows for the involvement of workers or their representatives to ensure their voices are heard and considered in the resolution of labor-related grievances.

Confidentiality in Labor Investigations

Confidentiality is paramount in labor-related investigations. The identities of individuals involved, as well as the details of the case, are treated with the utmost discretion to protect the privacy of both the complainant and the accused.

Transparent Communication

Throughout the investigation, transparent communication is maintained with all relevant stakeholders, including the complainant, accused parties, and, where applicable, workers' representatives. Regular updates are provided to ensure stakeholders are informed of the progress.

Remedial Measures and Corrective Action

When a violation is substantiated, Baxnaano takes prompt remedial measures and corrective actions to address the issue. This may include revising policies, providing training, or implementing changes to improve workplace conditions.

Resolution and Follow-Up

The organization is committed to timely resolution of labor-related grievances. Aftern resolution, follow-up mechanisms are implemented to monitor the effectiveness of corrective actions and prevent recurrence.

Continuous Improvement

Baxnaano adopts a continuous improvement approach in handling labor-related investigations. Insights gained from each case contribute to refining processes and implementing proactive measures to prevent future grievances.

Table of Case Types and Actions Required

Type of Case	Actions Required	Response Required
General Grievance	- Receipt and acknowledgment of grievance	- Initial response within 5 working days

	- Preliminary assessment	- Resolution within 30 days, withn updates if required
GBV/SEAH Grievance	- Immediate attention Specialized investigation	- Prompt and appropriate action against perpetrators
Labor-related Grievance	- Detailed investigation	- Timely resolution and necessary corrective actions as per laws

Resolution and Action

The resolution and action phase is the culmination of the grievance handling process, where the organization takes decisive steps to address the identified issues and implement corrective measures. This phase is characterized by a commitment to fairness, transparency, and accountability.

Decision-Making

Decisions regarding the resolution of grievances are made based on a thorough examination of the facts, evidence, and relevant context. The decision-making process is guided by the principles of fairness, impartiality, and adherence to established policies and procedures.

Remedial Measures

Upon reaching a decision, the organization implements remedial measures tailored to the nature of the grievance. These measures aim to address the root cause of the issue, prevent recurrence, and promote a positive and inclusive working environment.

Communication of Decision

Clear and timely communication of the decision is a crucial aspect of the resolution process. The organization ensures that all relevant parties, including the complainant, accused parties, and any involved stakeholders, are informed of the decision, along with the rationale behind it.

Accountability

Accountability is a core value in the resolution and action phase. The organization holds itself accountable for addressing grievances effectively and transparently. Additionally, accountability measures may be applied to individuals or entities found responsible for policy violations or improper conduct.

Documentation

Thorough documentation of the entire grievance resolution process is maintained. This includes records of the complaint, investigation details, decisions made, remedial actions taken, and any follow-up measures. Documentation serves as a reference for future reviews and audits.

Continuous Improvement

The resolution and action phase contributes to the organization's commitment to continuous improvement. Insights gained from grievance resolution experiences are analyzed to identify systemic issues, refine policies and procedures, and implement proactive measures to prevent similar grievances in the future.

Feedback Mechanism

A feedback mechanism is established under M&E component of the project to gather input from the involved parties regarding their satisfaction with the resolution process and outcomes. This feedback is valuable for assessing the effectiveness of the grievance handling system and making further improvements.

Monitoring and Evaluation

The organization conducts ongoing monitoring and evaluation of the implemented remedial measures to ensure their effectiveness. Regular assessments help identify areas for improvement, track progress, and maintain a proactive approach to addressing emerging challenges.

Reporting

Summarized reports of grievance resolution activities, including trends, challenges, and lessons learned, are periodically shared with relevant stakeholders. Transparent reporting promotes accountability and demonstrates the organization's commitment to addressing grievances in a responsible manner.

Closure and Follow-Up

The resolution and action phase concludes with the closure of the grievance. Follow-up procedures are initiated to confirm the successful implementation of remedial measures and to provide any necessary support to individuals or entities affected by the grievance.

Communication
Review and Evaluation

A comprehensive review and evaluation are conducted to assess the overall effectiveness of the grievance redress mechanism on quarterly basis. This includes an analysis of the entire process, from the initial receipt of the complaints to the resolution and action phase.

Identification of Lessons Learned

Insights gained from the grievance handling process are crucial for organizational learning. The identification of lessons learned involves recognizing patterns, trends, and systemic issues that may require additional attention. This reflective process informs improvements to policies, procedures, and stakeholder engagement.

Stakeholder Feedback

Collecting feedback from the involved parties and stakeholders is a key component of the lessons learned phase. Understanding the perspectives of complainants, accused parties, and other relevant stakeholders provides valuable insights into the strengths and weaknesses of the grievance redress mechanism.

Continuous Improvement Measures

Based on the lessons learned and stakeholder feedback, the organization implements continuous improvement measures. This may involve refining existing policies, enhancing communication strategies, providing additional training, or making structural adjustments to the grievance redress system.

Training and Capacity Building

Continuous improvement extends to ongoing training and capacity-building initiatives. Ensuring that staff members involved in the grievance redress process are well-equipped with the necessary skills and knowledge contributes to the effectiveness and professionalism of the entire system.

Adaptation to Changing Contexts

The organization remains adaptable to changing contexts and emerging challenges. Periodic reviews of external factors that may impact the grievance redress mechanism are conducted, allowing for timely adjustments to address evolving needs and ensure the relevance of the system.

Reporting and Transparency

Transparent reporting on the lessons learned and improvements made is shared with relevant stakeholders. This commitment to transparency fosters trust and confidence in the organization's ability to address grievances responsibly and continuously enhance its mechanisms for redress.

Best Practices Dissemination

Sharing best practices within the organization and, where appropriate, with external partners contributes to the broader discourse on effective grievance redress. Disseminating successful approaches and innovative solutions encourages a culture of learning and collaboration.

Periodic Review of SOP

The Standard Operating Procedure (SOP) itself undergoes periodic reviews to ensure its continued relevance and effectiveness. Updates are made in response to changes in organizational structure, changes in project design, external regulations, or feedback from stakeholders, ensuring that the SOP remains a dynamic and responsive guide for grievance redress.

Integration with Organizational Culture

The lessons learned from grievance resolution activities are integrated into the broader organizational culture. Emphasizing a commitment to fairness, accountability, and continuous improvement becomes embedded in the values and practices of the organization.

Training

Ensuring the effectiveness of the Grievance Redressal Mechanism (GRM) relies on the knowledge and skills of staff involved in the grievance resolution process. Here are detailed notes on the training component:

Training Objectives

Clearly define the objectives of the training program, emphasizing key principles such as sensitivity, confidentiality, and impartiality. The training aims to equip staff with the necessary competencies to handle grievances effectively and in accordance with established protocols.

Target Audience. Identify and categorize the staff members who will undergo training. This includes Grievance Redressal Officers (GROs), Call center staff, members of the Grievance Redressal Committee (GRC), and any other personnel directly involved in the grievance resolution process. Tailor the training content to the specific roles and responsibilities of each group.

Content of Training. Develop comprehensive training modules covering the entire grievance resolution process. Topics should include understanding different types of grievances, legal and ethical considerations, effective communication skills, and the use of

the Grievance Redressal Committee's (GRC) decision-making framework. The training should also address the psychological aspects of dealing with sensitive issues.

Interactive Learning Methods. Implement interactive learning methods to enhance engagement and knowledge retention. Consider incorporating case studies, role-playing scenarios, and simulations to provide practical insights into the complexities of grievance resolution. Interactive sessions foster a deeper understanding of the principles underpinning the GRM.

Ongoing Training Opportunities. Establish a framework for ongoing training opportunities. Regularly update training content to reflect any changes in policies, procedures, or legal requirements. Encourage staff to participate in periodic refresher courses to reinforce their skills and stay abreast of evolving best practices in grievance resolution.

Monitoring and Evaluation of Training. Implement a robust monitoring and evaluation process for training sessions. Solicit feedback from participants to assess the effectiveness of the training program. Use this feedback to refine and improve future training initiatives continually.

Awareness

Creating awareness about the Grievance Redressal Mechanism (GRM) is essential for ensuring accessibility and transparency. The steps below need to be taken in order to create an effective GRM awareness campaign.

Target Audience. Identify the key stakeholders who need to be aware of the GRM, including project beneficiaries, staff, community members, and external partners. Tailor awareness campaigns to the specific needs and expectations of each group.

Communication Channels. Utilize diverse communication channels to reach a broad audience. This may include printed materials, project website, social media platforms, radio programs, community gatherings, and project-related events. Employ a multi-channel approach to ensure comprehensive coverage.

Clear and Accessible Information. Provide clear and accessible information about the availability and functioning of the GRM. This includes outlining the grievance submission process, the role of the Grievance Redressal Officer (GRO) and Grievance Redressal Committee (GRC), and the expected timelines for grievance resolution.

Cultural Sensitivity.

Tailor awareness campaigns to be culturally sensitive, considering the diverse backgrounds and perspectives of the target audience. Use language and visuals that resonate with the local community, fostering a sense of inclusivity and understanding.

Promotional Materials. Develop visually appealing and informative promotional materials that succinctly convey key messages about the GRM. This may include brochures, posters, and digital content. Ensure that these materials are distributed through relevant channels to maximize visibility.

Engagement Events. Organize engagement events such as town hall meetings or community forums to directly interact with stakeholders. These events provide opportunities to address questions, clarify misconceptions, and build trust in the GRM.

Feedback Mechanism. Establish a feedback mechanism as part of awareness campaigns. Encourage stakeholders to provide feedback on the clarity and effectiveness of the information provided. Use this feedback to refine awareness materials and communication strategies.

Continuous Monitoring of Awareness Levels. Continuously monitor awareness levels through beneficiary feedback surveys or feedback loops. Regularly assess the effectiveness of awareness campaigns through M&E techniques and make adjustments based on emerging needs or challenges.

By combining comprehensive training for staff with targeted awareness campaigns, the GRM can establish a solid foundation for transparent and effective grievance resolution processes.

GRM VALUE CHAIN

| Uptake (loacation and channels) | → | Sort and Process | → | Acknowledge and follow up | → | Verify, Investigate and Act. | → | Monitor and evluate | → | Provide Feedback |

Roles & Responsibility of Stakeholders
Baxnaano - MoLSA

Baxnaano shall ensure the following roles and responsibilities in lieu of the Operation Manual:

- Establish grievance counters at all Beneficiary Facilitation Centers.
- Establish a toll-free helpline, accessible to general public, to lodge grievances and get information about project.
- Collaborate with relevant stakeholders for resolution of grievances.
- Develop and maintain the grievance management system including MIS reporting.

- Provide workforce to register grievances within case management system.
- Electronically share all registered complaints with concerned stakeholders on daily basis through MIS
- Ask beneficiary to provide supporting documents, if deemed necessary.
- Prepare training materials and conduct periodic refresher trainings of relevant staff of all stakeholders

FMoH/ NIRA/ PSP/EI Firm/IPF/WFP

- Facilitate Baxnaano in setting up grievance counters at BFCs for lodging grievances.
- Provide dedicated resource for the review and redressal of the forwarded GR cases as per the approved case management guidelines.
- Responsible to resolve GR cases within stipulated time.
- Electronically integrate the system with Baxnaano server and share feedback of all resolved cases with Baxnaano to update on central database.

Payment Service Provider

- Nominate a focal person for the review and redressal of the forwarded grievances as per approved case management guidelines.
- Ensure that all lodged complaints are resolved in given timelines.
- Provide staff for GR related trainings, as and when scheduled by MoLSA/ Baxnaano team.
- Facilitate beneficiaries in resolution of payment related complaints e.g. lost Personal Identification Number (PIN) or corrupt/rent seeking behaviour associated with a bank staff member.
- Electronically integrate the system with Baxnaano server and update all resolved cases in central database.
- Provide staff for GR related trainings, as and when scheduled by MoLSA/ Baxnaano team.

Ministry of Health (MoH) Staff

- Nominate a focal person for the review and redressal of the forwarded grievances as per the approved case management guidelines.
- Facilitate beneficiaries regarding H&N CCT/ immunization relevant queries and awareness sessions.
- Provide staff for GR related trainings, as and when scheduled by MoLSA/ Baxnaano team.

Key Stakeholders

Key stakeholders of the project include:

- Ministry of Labour and Social Affairs (MoLSA)
- Baxnaano PIU
- Federal Ministry of Health
- National Identity Registration Authority (NIRA)
- Federal Member States
- International Development Partners
- Benadir Regional Administration
- District Administration
- District Health Administration
- Beneficiaries
- Female Health Worker program
- Communities
- Immunization program
- Better Lives (Health Program by FCDO)
- Payment Service Providers
- Civil Society Organizations (Local and international)

Grievance Categories Cases registered under Grievances Redressal Mechanism (GRM) are categorized into two types:

a) Grievances related to quality of service, errors, and any action by Baxnaano, USR, NIRA, Health staff or PSPs in contradiction with policy/rules and SOPs of SDM and H&N CCT;
b) Payment related claims.
c) Employee related grievances including SEAH and Labour related issues

Following are the main types/categories of grievances:

Main Types of Grievances/Complaints related to quality of service:

- Lack of response to queries/questions/information requested by the beneficiaries by staff related to H&N CCT, USR etc.
- Beneficiary is not able to receive required services.
- Mistreatment or misbehavior of staff with the beneficiary;
- Error, fraud, and corruption.

Cases of Payment related Claims:

- Payment not received.
- Discrepancy in payment amount received.

- Payment not received on time;
- Any additional amount was charged/deducted as any fees, bribe or commission.
- Unable to withdraw the payment
- PIN code not working or any other Baxnaano wallet management issue
- Amount stolen/ theft cases

Table of Potential Grievances & Remedies

Description of Grievance	Responsibility	Time Frame
Payment not received	PSP	2 Weeks
Partial payment received	PSP	2 Weeks
Account/ wallet marked as dormant or blocked	PSP	2 Weeks
Pin code not working	PSP	2 Weeks
Bank staff was not available	PSP	1 Weeks
Money was stolen/ was threatened	PSP	2 Weeks
Staff behaviour was not pleasant	Baxnaano	4 Weeks
Security personnel misbehave with beneficiary	Baxnaano	4 Weeks
No one came to village to survey the household	Baxnaano	4 Weeks
Someone came to survey the household**, but they did not assess my house**	Baxnaano	4 Weeks
The home owner's name was included not the tenant's	Baxnaano	4 Weeks
They included the wrong person in the household/not Head of HH	Baxnaano	4 Weeks
A**sked to pay kickback by bank staff**	Baxnaano	4 Weeks
asked to pay kickback by MoH staff	Baxnaano	4 Weeks
Drinking water not available at BFC	Baxnaano	1 Weeks
Vaccines were not available at BFC	Baxnaano	1 Weeks
MoH staff was not available	Baxnaano	1 Weeks
No proper waiting area at BFC	Baxnaano	4 Weeks
Complaint against NIRA staff	NIRA	1 Week
Any act of physical violence	Baxnaano/ concerned agency	4 Weeks
Sexual violence/ abuse/ harassment	Baxnaano/ concerned agency	4 Weeks
Psychological or emotional abuse	Baxnaano/ concerned agency	4 Weeks

Process of lodging grievances

Grievance, complaints, and claims can be submitted through

(i)   Baxnaano toll free helpline where the call center agent will enter the complaint directly into the system,

(ii)   In person at BFC GR counter.

(iii)   Complaints forwarded through email on given project email address

The helpline will support beneficiaries lodge grievances and receive information about decisions on their application/complaints through a reply email or text message on their mobile phone. All the complaints will be lodged in the system against mobile number and a unique GR number, generated by the system.

In addition to the Baxnaano helpline, the PSP will also establish a toll free dedicated 24/7 call center to facilitate the beneficiaries requiring information or lodging of complaints related to payments. The agents deployed at call center must provide services in all local languages.

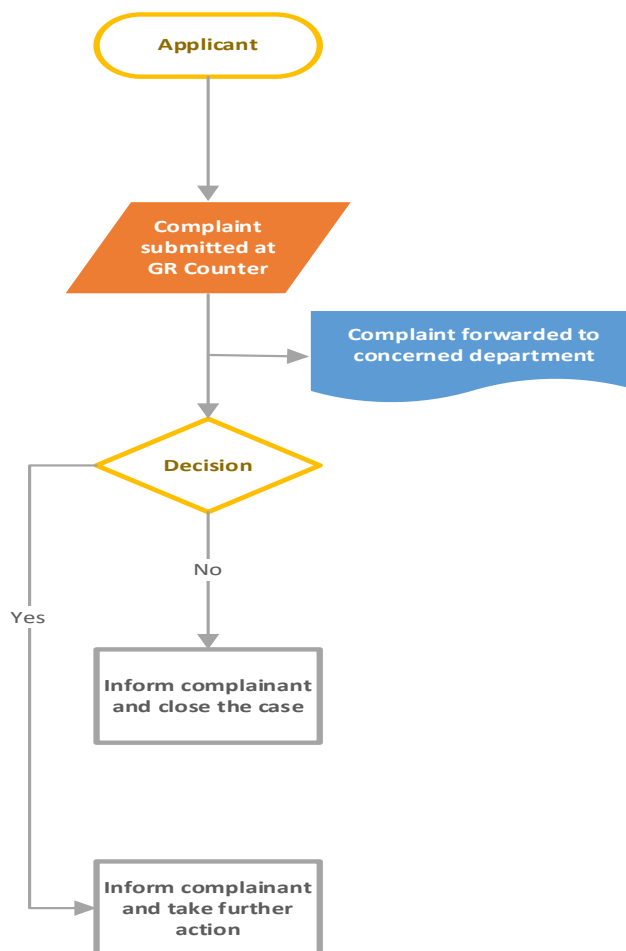**Grievance Redressal Process of Complaints Related to Quality of Services**

- Grievance, complaints, and claims can be submitted through Baxnaano toll free helpline where the call center agent will enter the complaint directly into the system or at a BFC GR counter.
- The system will generate a grievance number which will serve as a reference number; however, the grievances will be also tracked through Cellphone number.
- The toll-free number and grievances lodging process will be publicized through the information, education and communication (IEC) material.
- On the entry of the grievance into system, the GRM module will automatically route the grievance to the concerned office/officials for taking necessary action.
- The concerned official assigned for the GRM resolution by the service provider will further examine the case and resolve it accordingly, within 30 days of lodging the complaint.
- Upon resolution, the resolution status of the case will be entered into the system.
- The system shall send an automatic response to beneficiary either on his/her provided email address or a text message on mobile number.
- The system will generate the alerts to Baxnaano Project Manager if certain cases have not been resolved or concluded within 30 days.
- Baxnaano PIU will review such cases and coordinate with the service provider/concerned officials to get an early resolution of such pending cases;

- The MIS will generate a monthly list of cases lodged, resolved and pending for monitoring purposes.

Grievance Redressal Process Related to Payment

- The grievance, complaints, and claims can be submitted through Baxnaano or PSP toll free helpline where the call center agent will enter the complaint directly into the system.
- The payment complaints can also be lodged from the BFC.
- The system will generate a grievance number which will serve as a reference number; however, the grievances will be also tracked through Cellphone number.
- The toll-free number and grievances lodging process will be publicized through the IEC material.
- On the entry of the grievance into system, the GRM module will automatically route the payment grievance to the concerned office/officials of PSP for taking necessary action.
- The concerned official assigned for the GRM resolution at PSP will further examine the case and resolve it accordingly, within 15 days of lodging the complaint.
- Upon resolution, the resolution status of the case will be entered into the system.
- The system shall send an automatic response to beneficiary either on his/her provided email address or a text message on mobile number.
- The system will generate the alerts to Baxnaano Project Manager if certain cases have not been resolved by PSP or concluded within 15 days.
- Baxnaano PIU will review such cases and coordinate with the Payment service provider/concerned officials to get an early resolution of such pending cases.
- The MIS will generate a fortnightly list of payment cases lodged, resolved and pending for monitoring purposes;
- GRM Officer will coordinate to ensure that all the payment cases are resolved within fifteen (15) days of receipt of the grievance/complaint.

Process Flowchart

Grievance Redress Principles

The Grievance Redress Mechanism (GRM) adheres to a set of fundamental principles to ensure a fair, transparent, and efficient process for addressing concerns and complaints. These principles guide the implementation of the Grievance Redressal Mechanism Standard Operating Procedure (SOP) and underscore the commitment to accountability, inclusivity, and continuous improvement. In consideration of the peculiarities of handling SEA/SH in GRM's, in addition to the general principles that guide effective GMs such as accessibility, fairness, and transparency, among others; additional key guiding principles to ensure systematically implemented ethical handling of SEAH allegations include safety, survivor-centeredness and a strong emphasis on confidentiality. The key principles governing the GRM include:

- **Accessibility:** The GRM is easily accessible to all stakeholders, ensuring that the process is open and available to those who may have grievances related to the

project. Efforts are made to eliminate barriers and facilitate the submission of complaints.

- **Transparency:** All stages of the grievance redress process are conducted transparently. Information about how to file a grievance, the steps involved, and the expected timelines is clearly communicated to stakeholders, promoting a clear understanding of the process. A comprehensive beneficiary awareness and mobilization campaign will be implemented to sensitize and inform potential beneficiaries about GR mechanisms. Standardized communication guidelines for beneficiary facilitation will also be prepared to apprise them about provided services and GR lodging processes.

- **Fairness and Impartiality:** The GRM operates with a commitment to fairness and impartiality, treating all grievances with equal importance. No stakeholder will face discrimination or bias in the resolution process, and decisions are based on merit and evidence.

- **Timeliness:** Grievances are addressed in a timely manner to ensure swift resolution. The GRM establishes clear timeframes for each stage of the process, promoting efficiency and preventing undue delays in addressing stakeholders' concerns.

- **Effectiveness**: The GRM aims to achieve effective resolution outcomes. Mechanisms are in place to investigate grievances thoroughly, identify appropriate solutions, and implement corrective actions when necessary to prevent recurrence.

- **Confidentiality:** Stakeholders can submit grievances with the assurance that their information will be treated confidentially. The GRM prioritizes the protection of the identity of those filing complaints, Confidentiality is a key to protecting survivor's and witnesses' safety. Confidentiality requires that information gathered about the allegation not be shared with persons or entities unless there is explicit permission granted by the complainant. Even in such cases, information-sharing should take place on a strict need-to-know basis, limited to essential information, and based on pre-established information sharing protocols which are in line with best practices for the handling of SEA/SH cases. Escalation of reports of grievances should include an anonymized summary of allegations based on pre-established information-sharing protocols.

- **Participation and Empowerment**: The GRM encourages active participation from stakeholders throughout the grievance redress process. Empowering stakeholders by involving them in the resolution of their grievances contributes to a sense of ownership and accountability.

- **Continuous Improvement:** The GRM is a dynamic process that embraces continuous improvement. Feedback from the grievance redress process is systematically

collected and analyzed to enhance the effectiveness of the mechanism and prevent future grievances.

These principles collectively form the foundation of the Grievance Redress Mechanism, emphasizing a commitment to justice, responsiveness, and collaboration among all stakeholders involved in Baxnaano initiatives.

ANNEX 3 – Security Management Plan

ANNEX -4 Labour Management Procedures

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LMP- December 2025