

THE REPUBLIC OF SOMALILAND



**MINISTRY OF WATER RESOURCES DEVELOPMENT
(MOWRD)**

STAKEHOLDER ENGAGEMENT PLAN

**HORN OF AFRICA GROUNDWATER FOR RESILIENCE
PROJECT (P174867)**

3rd April, 2023

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ABBREVIATIONS AND ACRONYMS

ASAL	Arid and Semi-Arid Land
CBO	Community-based organization
CoC	Code of Conduct
CSO	Civil society organization
DG	Director General
ESF	Environment and Social Framework
ESIRT	Environmental and Social Incident Reporting
ESMF	Environmental and Social Management Framework
ESS	Environment and Social Standards
FPIC	Free, prior, informed consent
GBV	Gender-based Violence
GRC	Grievance Redress Committee
GM	Grievance Mechanism
GRS	Grievance Redress System
IDPs	Internally Displaced Persons
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
MoWRD	Ministry of Energy and Water Resource
MoF	Ministry of Finance
NGO	Non-governmental Organization
PIU	Project Implementation Unit
OHS	Occupation health and safety
OIP	Other Interested Parties
PAD	Project Appraisal Document
PAI	Project Area of Influence
PDO	Project Development Objective
PMC	Project Management Committee
PWDs	Persons with disabilities
RPF	Resettlement Planning Framework
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
TOR	Terms of Reference
WASH	Water and Sanitation Hygeine
WBG	World Bank Group

1. INTRODUCTION

1.2. Background

1. The World Bank in consultation and collaboration with Horn of Africa Initiative target countries and regional authorities is preparing a project: the *Horn of Africa Groundwater for Resilience Project* the first phase will be implemented in Kenya, Somalia and Somaliland and Ethiopia. Subsequent phases may include Sudan and Djibouti. The Intergovernmental Authority in Development (IGAD) are also implementing a regional component covering member states. The Horn of Africa (HOA) is characterised by under-development, resource scarcity, conflict and violence, economic shocks, food insecurity and climate change impacts. The climate is characterized by short, rainy seasons and recurrent droughts and about 30% of the region is arid and semi-arid lands (ASALs). Approximately 70% of the population live in rural areas and exhibit high levels of poverty (from 69.4% in Somalia and Somaliland to 22.5% in Djibouti) and high unemployment rates. Most of the population depends on rain fed agriculture and pastoralism for their livelihoods. The HoA is also home to a large number of displaced people, as well as internally displaced populations.
2. Somaliland is generally arid with limited surface water resources and the country has no permanent rivers neither natural lakes. All rivers are seasonal, flowing only for hours after the rains. Somaliland is a water scarce country where renewable fresh water per capita has declined dramatically over time from 2,087 m³ in 1962 to approximately 411 m³ in 2017 which is far below the UN recommended threshold of 1,000 m³ per capita per year 2017 (World Bank, 2020). This continuous decline in freshwater availability has resulted in fierce competition over water resources and has resulted in conflicts in some regions of Somaliland. The deteriorating quality of groundwater resources as a result of overexploitation. Increasing population and pollution is another challenge. Furthermore, these challenges have been exacerbated by climate change which has been manifested through recurrent floods and droughts.
3. Groundwater (GW) is the most important and available water resource for most of the country. However, accessing it is difficult and expensive. Somaliland has insecure areas, with potential conflict over water and land use between agriculturalists, pastoralists, and domestic water users including IDPs, minority groups and castes. There are gender and age dynamics in water access and management with women focused on access for domestic use, while men are decision makers in water resource management and water use. Youth are under-represented in customary water sharing management arrangements. Land is generally under communal ownership and land rights and access to land can be complex, with women having less say on land matters.
4. The proposed project will be implemented at MoWRD national level. The project aligns with the National Water Resource Strategy, which identifies three Strategic Goals that provide basis for water sector development:

Goal 1: Establishing a Functional Water Sector Governance Framework. This provides the strategic approach and actions towards strengthening water sector governance.

Goal 2: Operationalizing Integrated Water Resources Management. For improved and integrated water resource management as a basis for ensuring sustainable water resource development and the provision of sanitation services.

Goal 3: Improving the Provision of Priority Water Services – strategic approach and actions to guide the development of water resources to realize improvements in the various services.

1.3. Project description

1.3.1. Project Development Objective

5. The Project Development Objective is ‘To increase the sustainable use and management of groundwater by beneficiary groups in the Horn of Africa’. By improved groundwater development, management and monitoring, the project will enhance sustainable management and use of groundwater in both rural and urban areas in Somaliland.
6. The project emphasizes community level use and engagement in the management, operation and maintenance of GW, cost-effective infrastructure interventions, GW information and knowledge, as well as institutional capacity building to ensure inclusive access and sustainability of the resource. This is intended to strengthen the sustainable management of GW in Somaliland, so as to ensure that the resource continues to be available for use by people and communities, and to foster economic growth over time, long after the project is concluded. This project will be funded, coordinated and monitored by the Government of Somaliland and implemented by the Somaliland national PIU team based in MoWRD.
7. Project implementation consists of an initial period focused on preparatory activities in order to strengthen the country’s GW supply and pilot field investments, followed by activities focused on delivering improved governance, management and monitoring, and building knowledge and capacity. All the activities will be implemented within a five-year period. Investments in improved water conditions in the initial stages will focus on so-called “low-hanging fruit”, i.e., interventions that are easy to initiate, manage and can deliver tangible results to people as well as preparing the project for the subsequent main investment period. The subsequent investments will be based on the experience gained in early activities.

1.3.2. Project Components

The project consists of three main components. In Somaliland these are:

8. **Component 1. Delivering inclusive groundwater services to priority areas.** This component addresses the urgent need for investments in groundwater development, community management, and use of groundwater for human consumption and livelihood development. The project will improve access to safe and clean water through investments in new supply and a rehabilitation of existing systems, address urgent WASH needs, and construct and rehabilitate distribution systems. Additionally, the project will conduct community mobilization and awareness-raising on health and hygiene, as well as community engagement and mobilization to build local capacity and set the basis for the co-management of priority investments. Finally, the project will support the development of sustainable, gender-sensitive, and productive uses of water.
9. ***Sub-component 1.1. Hydrogeological surveys and research, assessing aquifers, and identifying potential water point locations.*** This sub-component will undertake geological, hydrogeological and geophysical surveys in order to identify the location of promising aquifers and water points for development. Listed activities include the data and information required in order to locate, develop and construct new groundwater supply schemes and to rehabilitate old schemes.
10. ***Sub-component 1.2. Invest in groundwater infrastructure development, including community engagement and improved water distribution and water usage.*** This component covers investments in increased and better quality groundwater supply, community mobilization, and training and management of new supply and usage schemes. Increased supply is linked to the construction of new wells and boreholes, rehabilitation of old schemes, and to enhance rainfall harvesting and a collection of surface runoff.

Investments will also address demand-side options, including efficient distribution, sharing and use of water, thus delivering priority services and goods (e.g., WASH, food, milk), all in a sustainable and equitable manner. All investments include technical backstopping support. Ongoing operation and management of investments will be gradually shifted from government and the project to village development committees and water user associations, established and trained by the project, as a planned process.

11. ***Sub-component 1.3. Increasing private sector involvement in groundwater development and management.*** The private sector is a key actor in groundwater development, management, and distribution. It is to a great extent unregulated, working according to its own norms and standards, and representing both very small-scale entities and large urban utility-like entities. Promoting the private sector and enhance its cooperation with civil society and local authorities provide opportunities for improved water services to people. This activity will propose and seek the adoption of new business models, developed under Sub-component 2.1, and working according to a project-developed system of interim regulation and standards formulated in Sub-component 2.1.
12. **Component 2. Generating groundwater information and strengthening regional and national groundwater institutions.** This component will focus on establishing a uniform system for groundwater development and management across Somaliland. This includes developing a groundwater governance system, increasing capacity of professional staff and establishing appropriate groundwater offices in the Ministry of Water Resource Development, arranging access to required data and management, and developing a system and agree on how to develop and manage groundwater resources in the country. The system will be developed at the GoSL national level.
13. ***Sub-component 2.1. Develop a groundwater governance system for Somaliland.*** This sub-component seeks to contribute to the development of a uniform groundwater governance system for Somaliland that is also aligned with the Somaliland National Water Resources Strategy, starting with a diagnostics of existing groundwater governance conditions and practices, and proposing a new institutional set up, a new groundwater policy and regulation, clarification of the roles and responsibilities of government, civil society and the private sector in relation water resources and services and arrangements for cooperation and coordination between different authorities within governments and with civil society on groundwater management. Activities will also assess and propose new quality standards, regulation and monitoring arrangements to the new governance system will progressively enable the coordination of interventions between government, the private sector and civil society.
14. ***Sub-component 2.2. Establish and operationalize groundwater offices in the Ministry of Water Resource Development.*** The office will be supported to establish operational groundwater offices. The support will focus on (i) having suitable office, equipment, computer software, internet access and more; (ii) arranging an appropriate organizational structure, with clarity on positions, roles and responsibilities, work plans, and guidelines; and (iii) identifying and engaging staff for new positions. Activities will focus on upgrading existing conditions or establishing new offices.
15. ***Sub-component 2.3. Sector-wide capacity development in groundwater development, management and monitoring.*** Capacity to manage groundwater exists in Somaliland, but it is scarce and must be developed in numbers, topics, quality and equality. A needs assessment will be carried out, feeding into both national and regional projects. Access to groundwater is an issue for both men and women, and both must be empowered with capacity and knowledge to manage this critical resource. Capacity development will address many issues, like (i) engineering-supply, (ii) groundwater management, and (iii) monitoring and evaluation. Supported capacity development will take place in Somaliland MoWRD level.

16. **Sub-component 2.4. Groundwater data and information management.** Sustainable water management – whether surface or subsurface – requires strong input of data, turned into information, and information feeding into planning, decision making and managing the resource. As part of the new Somaliland National Water Resources Strategy and Roadmap, Flagship Project No. 7 focuses on data and information management in the water sector and the establishment of a water data and information centre at MoWRD in Mogadishu. The centre will compile data and information, and coordinate participation in joint regional studies and assessments. This sub-component is intended to feed into and support the establishment of a specific groundwater section within this centre, focused on supporting groundwater development, management and monitoring in Somaliland.
17. **Sub-component 2.5. The Merti transboundary aquifer.** The Merti aquifer, located mainly in Kenya but stretching into Somaliland, will be promoted as a case for regional cooperation and development, taking advantage of recently develop Feasibility Study on this aquifer developed by IGAD which identify the scope for cross boundary groundwater development opportunities. A focus on cooperation is critical, including trust building, fact finding missions, and establish a joint transboundary committee. Such work should lead pilot projects in the immediate border area and the Merti lessons could be developed as an example of transboundary groundwater cooperation and development for the region at large, that IGAD and the two states could help disseminate.
18. **Component 3. Project Management and M&E and Internalized Knowledge Management and Learning.** This component will finance the operational costs of one Project Implementation Unit (PIU) at the Somaliland, MoWRD national level. The PIU will be housed in new Groundwater Offices in the Ministry of Water Resource Development. This component will ensure that the project is implemented efficiently. The component would also be responsible for M&E, knowledge management and learning, and evidence-based policy inputs.
19. **Sub-component 3.1 Project management and structure.** This sub-component focuses on establishing a project management structure and management, from Somaliland, MoWRD national to community levels. The component includes all activities required to establish different units (identify members, develop Terms of Reference, confirm responsibility allowance structures).
20. **Sub-component 3.2 monitoring and evaluation, knowledge management, and internal learning.** This sub-component will develop a monitoring and evaluation system. Through the project, much will be learned about groundwater in Somaliland (geology, water resources, supply techniques, usage and how to arrange with community groups and town authorities to manage and maintenance the shared resource) as well as how to implement a large, long-term project. This learning (information) will be collected and shared across the country and project.

1.4. Project beneficiaries

21. Project beneficiaries will be communities that suffer from poor water supply in Somaliland, and that face increasingly difficult conditions relating to climate change, a rapidly growing population, and increasing conflicts over scarce resources. The total beneficiary number is estimated at 50,000. It includes:
- Rural communities. Lacking enough clean water to maintain healthy living conditions.
 - Livestock owners. Delivering about half of Somaliland’s food security and a very large share of the countries’ export value.
 - Women and girl-children. Traditionally being responsible for collecting household water, often from very far distances from the household.

- Urban populations. Depending on rural groundwater sources and trucked into cities by private operators, sold at often exceedingly high prices.

At the *institutional level*, Project beneficiaries will include institutions responsible for groundwater management at the Somaliland, MoWRD national level and districts.

22. Indirect beneficiaries are those who will benefit from the availability of groundwater information as well as policies developed at the Somaliland national level to inform decision making and enhance the sustainable use of the water resources.

1.5. Project implementation arrangements

23. All project intervention implementation will be led by the Somaliland of Water Resource Development, while overall coordination, tracking, and reporting of project progress will happen at the MoWRD, and PIU level.
24. A Project Implementation Unit (PIU), headed by a Project Coordinator, will be housed in the Ministry of Water Resource Development. The Project Coordinator will be an individual contracted by the (MoWRD). The National Project Coordinator will be selected through a competitive process. The Project Coordinator will work closely with counterparts in the World Bank.
25. **The Project Coordinator will be supported by a team of water engineers, senior groundwater specialists, and fiduciary specialists (procurement and finance), environmental, social, community development and M&E specialists from the MoWRD.** All supporting staff will be selected on a competitive basis and receive a responsibility allowance. If qualified staff cannot be found within government, then consultants may be contracted following the World Bank procurement policies and Capacity Injection Manual (CIM). Other specialists required for medium and short-term inputs will be appointed on an ad hoc basis. Drawing from prior Bank projects where improved project implementation outcomes were realized due to increased key roles for women in PIU, the GW4R, PIU will aim to be gender balanced. This will also help to develop a cadre of women engineers or water experts for Somaliland.
26. **Community level institutions and mobilization.** Project activities that are implemented at the community level will work through representative community institutions. These community level units should include representatives from various stakeholder groups within the village/community. The main role of these community level units will be to provide oversight to the GW4R activities implemented in their respective communities. The GW4R will channel community level project activities through existing Village Development Committees where possible. The GW4R project will draw significantly from the World Bank financed Biyoole Project which is enabling the government to pioneer country led community driven development.
27. **Community mobilization and planning-** Community level institutions will lead the identification and prioritization of water sector investments which fall under the scope of the GW4R. These local and district level committees will be in charge of operating, managing, and maintaining infrastructure in their respective district/community levels, this will include construction of infrastructure (hand dug and manual drilled wells by local entrepreneurs). Committees will ensure representation of disadvantaged groups including minorities, IDPs, women, youth and people living with disabilities through an appropriate quotas for representation.

1.6. Objectives and Scope of the SEP

28. Stakeholder engagement refers to a process of sharing information and knowledge in a meaningful manner, seeking to understand and respond to the concerns of individuals or groups potentially impacted or affected by the HOAGW4R project in a transparent, inclusive and timely manner and building relationships based on trust. The scope of the Stakeholder Engagement Plan (SEP) covers the HoA GW4R Project in its entirety in the Somaliland national level. As such, the SEP includes the various stakeholders positively, neutrally and adversely affected by the project.
29. The aim of the SEP is the identification and analysis of stakeholders (including disadvantaged groups), their characteristics and interests, and the methods of communication, engagement and consultation that are appropriate for different groups at different stages of the project. The SEP describes the timing and methods of engagement with stakeholders throughout the lifecycle of a project. Stakeholders are usually categorized as “project-affected parties” and “other interested parties”. Effective stakeholder engagement is expected to improve the environmental and social sustainability of projects, enhance project acceptance, and contribute to successful project design and implementation and sustainability.
30. This SEP is intended to be a ‘live’ document that is updated throughout the project lifecycle to document the implementation of community and stakeholder engagement, communication strategy and information disclosure in the changing Project landscape. This SEP will be reviewed regularly by the National Project Implementation Unit at national MoWRD level led by the social specialist.
31. The SEP has been prepared in line with the requirements of the World Bank’s Environmental and Social Framework (ESF) notably ESS10 on *Stakeholder Engagement and Information Disclosure* as well as the following Guidance Notes: “Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings” and the ESF/Safeguards Interim Note: “COVID-19 Considerations in Construction/Civil Works Projects”.

The specific objectives of the SEP include:

- i. Facilitate open and continuous communication and consultation between various groups including project managers, stakeholders, and the general public.
- ii. Provide timely and appropriate information prior to and during project implementation to enable informed participation in the project and definition of appropriate mitigation measures.
- iii. Assist in building strong relationships with the local community and reduce the potential for delays through the early identification of issues to be addressed as the project progresses.
- iv. Document practical engagement strategies, achievements and lessons learnt.
- v. To provide stakeholders with a clear process for providing comments and raising grievances.
- vi. To allow stakeholders the opportunity to raise comments/concerns anonymously using the existing hotlines.
- vii. To structure and manage the handling of comments, responses and grievances, and allow monitoring of effectiveness of the mechanism.
- viii. To ensure that comments, responses and grievances are handled in a fair, timely and transparent manner in line with international best practice and WB expectations.

1.7. World Bank Requirements for Stakeholder Engagement

32. The project is being prepared under the World Bank’s Environment and Social Framework (ESF). As per ESS10 on *Stakeholder Engagement and Information Disclosure*, the borrower/implementing agencies are required to provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

33. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. When properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for the successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.
34. World Bank Requirements on Stakeholder Engagement, specifically, the requirements set out by ESS10 include the following principles:
- The government will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
 - The government will engage in meaningful consultations with all stakeholders. The government will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
 - The process of stakeholder engagement will involve the following (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
 - The government will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.
 - The government shall seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement.
 - The GRM shall propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.
35. The objective of ESS10 as defined by WB ESF:
- i. Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them in particular project-affected parties.
 - ii. Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
 - iii. Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle on issues that could potentially affect them.
 - iv. Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
 - v. To provide project affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

1.8. Relevant Legal and Policy Provisions

36. The Constitution of the Republic of Somaliland 2001, and the Somaliland statistics laws gives citizen the right of information but the confidentiality of statistical units must be kept according to the UN-fundamental principal 6 “Individual data collected by statistical agencies for statistical compilation, whether or not they refer to natural or legal persons, are to be strictly confidential and used exclusively for statistical purposes”. Thus, data users must submit all data requests writing through official letter or via an institutional email not private to the Director of Statistics. Each request must have a contact person name, institution, phone number and an email. The Director will nominate a focal point person to handle the request. The request will be evaluated to determine if the data is available and meets the minimum dissemination standard. Then the requester will be given or informed where to get the data.

1.9. Summary of Previous Stakeholder Engagement Activities

The Somaliland Ministry of Water Resource Development PIU team held a stakeholder consultation meeting on the E&S instruments for the Somaliland Ground Water for Resilience Project on December 11th, 2022, at the Baraar Hotel in Hargeisa, Somaliland. 6 females and 11 male representatives of NGOs and CSOs and gave a number of suggestions on environmental and social risk management as A number of suggestions were made as detailed in Annex 1. The consultation meeting was held in collaboration with the Ministry of Planning and National Development, Barwaaqo project team. The projects, however, were presented separately.

2. STAKEHOLDER IDENTIFICATION AND ANALYSIS

2.1. Project stakeholders

37. Project stakeholders are individuals, groups or other entities who are affected by or have an interest in the Project and have to be informed and consulted about the project. Engagements with the project-affected communities will be conducted upon project effectiveness and will be sustained throughout project implementation and closure. For effective engagement, project stakeholders are categorized into three main groups, as described below:

- a. **Affected Parties:** persons, groups and other entities within the Project Area of Influence (PAI) that are impacted or likely to be impacted directly or indirectly, positively or adversely, by the project. Such stakeholders are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in design of the project, identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

For this project, the affected parties are districts, municipalities, communities and community institutions or groups that will be directly impacted positively or negatively from projects activities, including disadvantaged and marginalized groups as well as communities that are not directly targeted, but may be present in the water catchment. Affected parties also include technical institutions targeted for capacity building under the project. More project affected parties may be identified as the project is implemented and SEP will be updated with the information.

- b. **Other Interested Parties (OIPs):** constitute individuals/groups/entities who may have an interest in the project and who have the potential to influence project outcomes. OIP may not experience direct or indirect impacts from the Project but they may consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.

For this project, other interested parties include Civil Society Organisations (CSOs), UN organizations, and Development Partners engaged in the water sector in the country who may become partners. Others include local entrepreneurs, and the business community who may benefit from business opportunities and contracts; universities and colleges which main gain from technical expertise; and mass media and associated interest groups, including local, regional and national print and broadcasting media, digital/web-based entities, and their associations, among others.

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

The disadvantaged groups identified for this project include Internally Displaced Persons (IDPs), minority groups, female headed households, people living with disabilities among others.

3.2 Identification of Stakeholders

38. There are several categories of people and institutions that will be affected directly by the project and those with an interest in the Project at different levels that will need to be consulted and engaged in the project activities, as summarized in Table 1.

Table 1: Stakeholder Description and Areas of Interest and key characteristics in engaging them

Stakeholder Group	Nature of interest in the project	Interest	Influence	Key considerations in engaging them
Project-affected parties				
Communities that will benefit from water infrastructure investments for household consumption, livestock and farms.	<ul style="list-style-type: none"> • Interest in meaningful community engagement in the project decisions including designing the sub-project activities, identification of priority groundwater infrastructure needs and project site selections. • Involvement in project implementation. • Maximise benefit from the project activities so that they will be resilient to climate shocks. • Lack of interference in the selection of community project committee's formation of the CECs at the community level • Community project committees are trained and facilitated to perform their multiple roles. • Members of the community, particularly disadvantaged and vulnerable groups, will participate the project monitoring. • Employment opportunities from the project activities (e.g., construction workers, security guards, jobs for Internally displaced people, youth, men, women and other vulnerable groups with requisite education and skills in project management). 	High	High	<p>Often illiterate especially vulnerable and marginalised groups, not often accessible by social media, distrust, men dominate decision making</p> <p>May not have the time or resources to participate in meetings or may expect incentives</p>
Ministry of Water Resource Development officials and staff	<ul style="list-style-type: none"> • MOWRD meaningfully engaged with partners in all aspects of the project from project design and throughout project cycle. • Capacity of the staff is built to effectively deliver the project. • Communities benefit from the projects which will enhance government legitimacy. • National groundwater legal, policy and administrative actions are developed and/or reformed for effective groundwater management and use. • Principles of engagement are observed in all aspects of consultation at different levels • That they will be able to manage potential environmental and social risks and impacts as well as community health and safety. • They will be able to manage to deliver amid security challenges. 	High	High	
Ministry officials responsible for Water	<ul style="list-style-type: none"> • Meaningful and structured engagement within all aspects of the project from project design and throughout project cycle. • Capacity of the staff is built to effectively deliver the project. • Communities benefit from the projects which will enhance government legitimacy. • Groundwater legal, policy and administrative actions are developed and/or reformed for effective groundwater management and use. • Principles of engagement are observed in all aspects of consultation at different levels 	High	High	

Stakeholder Group	Nature of interest in the project	Interest	Influence	Key considerations in engaging them
	<ul style="list-style-type: none"> • Manage potential environmental and social risks and impacts as well as community health and safety. 			
Other Ministries at national level (e.g., Finance; Environment and Natural Resources and Land, Labour and Social Services, including Gender, Municipalities	<ul style="list-style-type: none"> • Principles of engagement are observed in all aspects of consultation at the different levels. • Information is shared in a timely manner and feedback is used to inform further engagement on the project. • Clarity on terms of engagement and ministry's role is provided from the beginning. 	Medium	Medium	
Other Interested Parties				
CBOs, CSOs, NGOs, operating in the districts and grassroots level involved in water and development projects	<ul style="list-style-type: none"> • That they receive information about the project and provide feedback in a timely manner especially on the issues of overlap, • There is transparency and accountability in all aspects of the engagement. • Principles of inclusive engagement are observed in all aspects of consultation. • That they will share their knowledge of the project sites, location and community for the benefit of the project. • They could benefit from the technical expertise and lessons learnt from the project. 	Medium	Medium	May not have the time or resources to participate (particularly local CSOs who may have limited funding).
Development Partners and UN organizations engaged in water and climate change and resilience sectors	<ul style="list-style-type: none"> • Benefit from the technical expertise and lessons learnt from the project. • To provide lessons learnt from their own work for the benefit of the project. • To promote improved policies and strategies that may be supported by the project. • They are interested in coordination of development work and build synergy and avoidance of duplication of efforts. 	Medium	Medium	Keen to contribute, but don't always understand community perspectives particularly in remote areas or disadvantaged groups
Business communities and contractors	<ul style="list-style-type: none"> • They will be awarded contracts to deliver specific groundwater infrastructure activities and/or provide services for the project. • There will be fair and transparent tendering process for works and service contracts. • That they will be able to manage potential environmental and social risks and impacts as well as community health and safety. • They will be able to manage to deliver amid security challenges. 	Medium	Low	
Academic institutions (e.g., universities, colleges,	<ul style="list-style-type: none"> • They will be interested to receive financial support for training and research in relevant topics. • That they will be called upon to provide technical knowledge and expertise on groundwater and related topics. 	Medium	Medium	

Stakeholder Group	Nature of interest in the project	Interest	Influence	Key considerations in engaging them
experts think tanks)	<ul style="list-style-type: none"> Potential concerns over environmental and social impacts of the project 			
Media (print and electronic) and online communication platforms.	<ul style="list-style-type: none"> Get and share accurate information about the project. To have clear channel of information flow from the project teams. Complaints and grievances shared on social media platforms will be addressed. 	Low	High	
Disadvantaged Groups				
Women and youth	<ul style="list-style-type: none"> That the project will involve them in project related decision-making processes to overcome traditional practices that relegated them to the side lines of decision making for example by including them in community committees. That women and women headed household will also benefit from the project. 	High	Low	
IDPs	<ul style="list-style-type: none"> That areas where they live are not overlooked in sub-project selection by ensuring they are represented in committees They benefit from sub-projects and have a voice in decision making. 	High	Low	
Minority groups	<ul style="list-style-type: none"> That areas where they live are not overlooked in sub-project selection by ensuring they are represented in committees They benefit from sub-projects and have a voice in decision making 	High	Low	
Nomadic pastoralists	<ul style="list-style-type: none"> Need water for their livestock but also want their rangeland protected e.g. no permanent water sources in dry season grazing areas that may cause degradation and in migration. That there will be investments in infrastructure at strategic sites and location to strengthen resilience. Due to mobility, they may miss out on community consultation process. Deliberate effort by projects teams to identify their locations and devise best way to reach them are needed. 	High	Low	
People Living with Disabilities (PLWD)	<ul style="list-style-type: none"> The project takes cognizance of the fact of the challenges faced by PLWD to access project information including ensuring the method/materials used to deliver information is accessible. That the project involve them in project decision making processes. That their priority needs are catered for by the project (as part of project target communities). 	High	Low	Maybe stigmatised by the community and not welcomed in community meetings or allowed to collect water at the same time if they are stigmatised. Important that their needs e.g. in accessing water are well represented, rather than requiring

3.3 Stakeholder Engagement Principles

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

- *Openness and life-cycle approach:* public consultations for the project will continue during the whole project lifecycle from preparation through implementation. Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation.
- *Informed participation and feedback:* information will be provided and widely distributed among all stakeholders in an appropriate format; conducted based on timely, relevant, understandable and accessible information related to the project; opportunities provided to raise concerns and ensure that stakeholder feedback is taken into consideration during decision making.
- *Inclusivity and sensitivity:* stakeholder identification will be undertaken to support better communication and building effective relationships. The participation process for the project will be inclusive. All stakeholders will be encouraged to be involved in the consultation processes. Equal access to information will be provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable and disadvantaged groups taking into consideration cultural sensitivities.
- *Meaningful Participation:* community members, especially the disadvantaged groups, will be engaged in designing the sub-project activities, identification of sites and monitoring of the project activities to maximize opportunities for the project's success and enhance project acceptance and ownership.
- *Gender sensitive approach:* Women's empowerment in the context of persistent gender inequalities and the existing gender gap in decision making process is critical. The stakeholder engagement will ensure women's inclusion in the decision making authority, such as project committees. The consultation meetings will prioritize separate discussions with women leaders, those who have been displaced, and those working with adolescent girls and boys and other at-risk groups to enable understanding of exclusion and GBV/SEA/SH risks and trends in the community. Women leaders will be encouraged to facilitate consultation meetings when possible.
- *Managing security risks:* Due to widespread security risks in Somaliland for communities, contractors, and project staff, security risks will be carefully assessed and managed. The use of security forces either during travel or to protect sites will be carried out in line with the World Bank's Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel.

4.0 STAKEHOLDER ENGAGEMENT PLAN

4.1 Stakeholder Engagement Program

40. Stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle. The stakeholder engagement program covers the following: purpose and timing; proposed strategy for information disclosure (when and how); proposed strategy for consultation (channels to be used, frequency); proposed strategy to incorporate the view of vulnerable groups; timelines; review of comments; and future phases of the project. Table 2 presents the key stakeholder engagement activities during the project preparation stage through to implementation and closure.

Table 2: Stakeholder Consultation Matrix

Consultation Stages	Consultation Participants		Consultation Method	Expected Outcome
	Project Authority	Project stakeholders and Beneficiaries including disadvantaged individuals and groups		
Consultation on the preparation of project documents for concept note and appraisal.	<ul style="list-style-type: none"> MoWRD leadership and technical staff. Project implementation Units Project consultants (technical experts, project management specialists, social and environmental safeguards, finance and procurement specialists). 	UN, CSOs Development Partners, Universities	<ul style="list-style-type: none"> One on one meetings Stakeholder engagement workshop. Virtual meetings using WebEex/Skype/zoom/teams, etc. Face-to-face meetings (The PIU will assess the COVID19 situation in regard to in-person meetings and take guidance from Government COVID19 guidelines and WB Technical Note on Public Consultations) 	<ul style="list-style-type: none"> Contribute to the development of robust project and inclusive processes. Lessons learnt on mitigation of social and environmental risks and impacts considered in project design. Agreement on project target beneficiaries and implementing entities. Staff trained/sensitized on World Bank tools and processes. Gain a preliminary understanding of the scope of the Project, appropriate policy and legal requirements and relevant stakeholders.
Consultation after project approval and effectiveness	<ul style="list-style-type: none"> MoWRD leadership and technical staff. Project Implementation Unit Project consultants (technical Experts, project management specialists, social and environmental safeguards, finance and procurement specialists). 	<ul style="list-style-type: none"> GoSL - MDAs Other stakeholders implementing related projects 	<ul style="list-style-type: none"> Virtual meetings using WebEex/Skype/zoom/teams Face-to-face meetings (The PIU will assess the COVID19 situation in regard to in-person meetings and take guidance from Government COVID19 guidelines and WB Technical Note on Public Consultations) Incorporation of E&S issues and lessons learnt 	<ul style="list-style-type: none"> Awareness created on the project design and E&S mitigation measures. All stakeholders brought on board. POM details robust process of inclusive consultations and management of E&S risks.

			into the Project Operation Manual	
Selection and verification of existing and new location/sites for projects	<ul style="list-style-type: none"> PIU project team Project Consultants 	<ul style="list-style-type: none"> Groups, CBOs, community leaders/elders 	<ul style="list-style-type: none"> Public announcements Face-to-face meetings (The PIU will assess the COVID19 situation in regard to in-person meetings and take guidance from Government COVID19 guidelines and WB Technical Note on Public Consultations) Virtual meetings using WebEx/Skype/zoom 	<ul style="list-style-type: none"> Appropriate selection of project sites based on need and equity, E&S risks are identified and mitigated/managed. First-hand assessment of the local people's perceptions of potential project benefits and risks Community ownership and sustainability. Inclusive project committees formed.
Screening of the proposed sub-project/projects	PIU social and environmental specialists and technical team	<ul style="list-style-type: none"> Affected groups including IDPs, minority groups, nomadic pastoralists, women, PLWDs etc. CBOs Community leaders/elders Key informants 	<ul style="list-style-type: none"> Public announcements Face-to-face meetings (adhering to government guidelines on COVID-19) 	<ul style="list-style-type: none"> Identification of E&S risks and management to strengthen project implementation.
ESMPs: In-depth study of risks and benefits taking into consideration, inter Somaliland, the conditions that led to community consensus	<ul style="list-style-type: none"> PIU/MoWRD Project consultants Social specialists Other knowledgeable government officers 	<ul style="list-style-type: none"> Would-be affected individuals and groups Locally-based CBOs/NGOs Community leaders/elders Key informants 	<ul style="list-style-type: none"> Formal/informal meetings interviews Focus Group Discussions (FGDs) The PIU will assess the COVID 19 situation in regard to in-person meetings and take guidance from Government COVID 19 guidelines and WB Technical Note on Public Consultations Discussion on specific impacts, alternatives, and mitigation, etc. 	<ul style="list-style-type: none"> Robust plan for E&S management and clear responsibilities of project staff and contractors. Clear documentation of community agreements and consultation processes.
Implementation	<ul style="list-style-type: none"> PIU (social specialists) Project Consultants MoWRD 	<ul style="list-style-type: none"> Individuals and groups of disadvantaged groups Community and community groups Leaders/elders and other stakeholders NGOS/CBOs 	<ul style="list-style-type: none"> Implementation Monitoring Committees (formal or informal) face to face meetings (The PIU will assess the COVID19 situation in regard to in-person meetings and take guidance from Government COVID 19 guidelines and WB Technical Note on Public Consultations) Public announcements 	<ul style="list-style-type: none"> Mitigation and management of environmental and social risks with clear responsibilities. Quick resolution of issues and grievances Effective implementation of the Inclusion Plan. Information on project progress communicated. Beneficiary communities' views and perception of

			<ul style="list-style-type: none"> • Use of print and electronic media to inform 	the project and improvements obtained.
Monitoring and Evaluation	<ul style="list-style-type: none"> • PIU (social specialists) • Consultants 	<ul style="list-style-type: none"> • Project affected and interested persons and entities including Disadvantaged individuals and groups • NGOs & CBOs 	<ul style="list-style-type: none"> • Formal participation in review and monitoring sessions. • Focused Group Discussions. • The PIU will assess the COVID 19 situation in regard to in-person meetings and take guidance from Government COVID 19 guidelines and WB Technical Note on Public Consultations • Questionnaires. • Interviews • Virtual meetings using WeBex/Skype/zoom/teams 	<ul style="list-style-type: none"> • Identification and resolution of implementation issues and grievances. • Effectiveness of SEP and Inclusion Plan. • Project results identified, documented and communicated/disseminated using language and methods accessible to stakeholders including disadvantaged groups.

4. 4.2 Project Information Disclosure

42. Information will be packaged and shared with the key stakeholders using different methods. The PIU will be responsible for ensuring that the information gets to the stakeholders in a timely manner and through the most appropriate channels. Feedback from stakeholders will be taken into view and improvements will be made to ensure robust and consistent information flow. Table 3 presents a summary of the information disclosure for the project. The SEP is a living document that may be modified and changed following input and suggestions from project stakeholders.

Table 3: Disclosure of project information at different stages of the project cycle

Information to be disclosed	Method used	Target stakeholders	Responsibilities	location
Before Appraisal				
<ul style="list-style-type: none"> • Draft documents shared with key stakeholder for feedback and comments at stakeholder consultation workshop • Disclosure of project documents (PAD, ESMF, RPF, SEP, ESCP) 	<ul style="list-style-type: none"> • Websites - MoWRD and WBG • stakeholder workshops • Brief summaries of the main features of the project SEP 	All key stakeholders	<ul style="list-style-type: none"> • MoWRD • PIU 	National Level
After Appraisal				
Publicity on project approval and roll-out plans	<ul style="list-style-type: none"> • MoWRD, PIU's Stakeholder workshops • Audio-visual messages on project information (radio, TV in different local languages) • Newspaper stories and supplements • Printed materials on project information 	All key stakeholders	<ul style="list-style-type: none"> • MoWRD • PIU • Communication expert 	National Level

Information to be disclosed	Method used	Target stakeholders	Responsibilities	location
	<ul style="list-style-type: none"> • Social Media (Twitter, Facebook, Instagram, WhatsApp) • Emails • Press releases • Speeches • Websites (MoWRD & WBG) 		<ul style="list-style-type: none"> • Social specialists 	
Disclosure of all the project documents including summary in Somali (ESMF, RPF, updated SEP, LMP, GBV/SEAH action plan, Code of Conducts (CoCs), among others with the exception of the Security risk assessment and management plans. The documents disclosed will provide clear information on what constitutes a violation and how a violation can be reported. The information on GBV/SEAH will include the Local GBV service providers, how to contact them, and the support services offered.	<ul style="list-style-type: none"> • Websites - MoWRD and WBG • Brief summaries of the main features of the project SEP • Audio-visual messages on the project (radio, TV in different languages) • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails • Press releases • Speeches • Community meetings • Focus group discussion with women groups • Mobile phone mass messages 	<ul style="list-style-type: none"> • MoWRD and all partners involved in the project • Open access to all interested parties • Development and distribution of printed project flyers 	<ul style="list-style-type: none"> • MoWRD, PIU • WBG Team 	National Level
During implementation				
Roll-out of project activities	<ul style="list-style-type: none"> • Key informant interviews with key stakeholders • Community discussions (through public meetings and call-in radio sessions/activations) including screening, awareness raising on SEAH and GM mechanism and memorandums of understandings and land agreements documented in summary safeguards reports in C-ESMPs • Disclosed and published ESIA's • Newsletters • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails • Press releases • Speeches • Mobile phone mass messages 	<ul style="list-style-type: none"> • Community members including vulnerable and disadvantaged groups • Government departments • Community Project Committees • Target Universities/ Colleges administrations. • Media houses 	<ul style="list-style-type: none"> • MOWRD • PIU • Communication expert • Social and environmental specialists • Project management specialist 	National Level
Highlights of project activities, progress, achievements and lessons learned	<ul style="list-style-type: none"> • Annual reviews including community feedback. • Annual MoWRD, PIU and the project stakeholder workshops • TV/Radio spots/activations and announcements • Print materials (newsletters and flyers) 	<ul style="list-style-type: none"> • Project affected persons and entities and interested parties 	<ul style="list-style-type: none"> • MOWRD PIU • MoWRD, PIU • Social specialists 	National Level

Information to be disclosed	Method used	Target stakeholders	Responsibilities	location
	<ul style="list-style-type: none"> Town hall meetings Newspaper stories/supplement Social Media (twitter, Facebook, Instagram WhatsApp) Emails Press releases Speeches Mobile phone block message 	<ul style="list-style-type: none"> World Bank 		
Complaints/Compliments about the project implementation and GBV/SEAH	<ul style="list-style-type: none"> Logs and reports from the national GM focal person, The project GM focal persons and local/district level GBV service providers Community meetings Focus group discussion with women groups 	<ul style="list-style-type: none"> Receivers of information and services Information or Data managers 	PIU social specialists and Gender specialist Grievance Redress Committee	National Level
	<ul style="list-style-type: none"> Surveys and direct observations of the project beneficiaries 	<ul style="list-style-type: none"> All stakeholders including vulnerable and disadvantaged groups 	<ul style="list-style-type: none"> MOWRD, PIU Communication Officer M&E Officer 	National/Local
Monitoring and reporting				
Community feedback of effectiveness of different modalities of engagement	<ul style="list-style-type: none"> Semi-structured interviews Online surveys Satisfaction surveys KoboToolbox GIS monitoring 	<ul style="list-style-type: none"> All Project primary beneficiaries and all stakeholders 	<ul style="list-style-type: none"> MOWRD, PIU Social specialists M&E Officer 	National Level
Quarterly reviews and reporting	Progress report includes reflections and lessons learnt and summaries of complaints and resolution	<ul style="list-style-type: none"> MoWRD, PIU offices at the national level 	<ul style="list-style-type: none"> MoWRD, PIU M&E officer Social specialists 	National Level

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

5.0 INCLUSION PLAN

5.1. Types of Vulnerable and Disadvantaged Groups

44. The project will give special consideration to disadvantaged groups. These include:
- i. Minority castes and groups;¹
 - ii. Internally Displaced Persons;
 - iii. Those who live in remote rural areas or areas characterized by violence that are bereft of social services and amenities;
 - iv. Nomadic pastoralist communities;
 - v. People Living with Disabilities;
 - vi. Widows and women heads of households;
 - vii.

5.1.1. Sub-Saharan Historically Underserved Traditional Local Communities (SSAHUTLCs)

45. MoWRD will confirm the presence of Sub-Saharan Historically Underserved Traditional Local Communities as per ESS7 to determine the applicability of the standard, and if groups fitting the ESS7 criteria are found in the areas of implementation SSAHUTLC plans will need to be prepared. SAHUTLCs often have difficulties participating in national development processes and may not benefit from World Bank-financed projects in an inclusive manner without pro-active measures. SSAHUTLCs are frequently among the most economically marginalized and vulnerable segments of the population. Their identity and culture are uniquely tied to their land and natural resources, hence vulnerable to changes caused by projects, e.g., dispossession or restriction of access. SSAHUTLCs are often unable to participate and benefit from projects in a manner that is culturally appropriate, and they might not be consulted about projects, which would profoundly affect their lives or communities, and they may not access the benefits of the development process, particularly if development could impact their way of life.

45. Specifically, for traditional local communities, ESS7 seeks to ensure that the development process fosters full respect for the affected parties' human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods; promotes sustainable development benefits and opportunities in a manner that is accessible, culturally appropriate, and inclusive; obtains the free, prior, and informed consent of affected parties under some circumstances; recognizes, respects, and preserves the culture, knowledge, and practices of indigenous peoples; and provides them with an opportunity to adapt to changing conditions in a manner and timeframe acceptable to them.
46. In Somaliland, the World Bank has not triggered Operational Procedure 4.10 Indigenous People for previous projects in Somaliland, and unlike Somalia there are no vulnerable groups known as the 0.5 groups, such as the Aweer/Boni and Eyle, and possibly some Bantu/Jareer groups could meet the requirements for being considered a SSAHUTLC under ESS7 which is not present in Somaliland territories.

5.1.2. Other Disadvantaged Groups

47. *Minority groups:* Minority groups (ethnic minorities such as Midgan/Gaboye, Tumul, Yibro) that are estimated to represent small population in Somaliland, continue to be excluded from political participation, have limited access to justice, are denied multiple rights and are disproportionately affected by natural hazards and conflicts. Women from minorities and/or among IDPs are particularly affected by multiple

¹ This shall include all groups falling outside the main four clans in a specific district or geographical area including ethnic and occupational groups.

violations of their rights, both as women and as members of a minority group. The marginalization and social segregation of vulnerable groups is one of the key driving forces of the protracted massive displacement of people and the difficulty to find durable solutions for them.

48. Minorities in Somaliland can be considered to be those who fall outside the four main clans. There are three main groups of minorities.
 - i. *Occupational groups* - these communities, including Gabooye, Tumaal and Yibro - traditionally fulfilled a particular function that was considered taboo by the main Somaliland clans. This included leatherworking, pottery, metalworking, hunting and some traditional health practices. These communities are found all over Somaliland. They experience extreme daily social discrimination. Inter-marriage between young people from these communities and those from the four main clans is socially unacceptable – with at times tragic consequences when reprisal actions are taken when occasionally such marriages have taken place in spite of social disapproval and threats.
49. As of January 2012, Somaliland was hosting 85,000 IDPs living in 29 IDP settlements. During the first half of the year this population has increased by 6000 persons. Drought and on-going conflicts continue to be the cause of the displacement. While the Protection Cluster conducted several profiling and protection assessment missions, no comprehensive IDP registration has taken place yet. Extrapolating from sample demographic breakdowns, IDP women and children constitute the majority of the population. The majority of IDPs from Somaliland are illiterate and their main source of income in their place of origin was livestock trading. IDPs from South Central Somalia are carpenters, mechanics or handcrafts producers². This period marks the end of prolonged droughts for the majority of Somalis living in the HoA region. It is believed that the majority of drought-affected people migrated to nearby urban centers, increasing the number of IDPs.
50. In Somaliland between Februarys – March 2022 the estimated number of IDP in Togdheer region alone reached 36,427 households scattered in 44 different sites which 97% have been affected by droughts³.

While data on the demographic profile of migrating populations is needed, it is likely these drought-related internal displacements may be from minority clans, who have lost assets including their homes, livestock, and livelihoods. Camps are heavily congested and have also proportionally received the largest number of new arrivals. Displaced women and girls are among the most vulnerable populations and face multiple constraints including lack of access to adequate shelter, livelihoods and access to critical resources, including land. The attendant separation of many women and girls from community and familial support structures, as well as from traditional livelihoods activities, also contributes to an increased reliance particularly of women on marginal, inconsistent and hazardous livelihood strategies, which often increases exposure to violence.
51. IDPs commonly settle in informal urban settlements, where access to services and conditions are poor, and where they often become victims of forced eviction. Conditions of displacement often compound existing conditions of vulnerability and poverty. They are therefore part of the poorest strata in Somaliland and are often in dire need of access to food, water, sanitation, health services, shelter and education (Internal Displacement Monitoring Centre (IDMC 2020, p.30).

² UNHCR, Participatory Assessments Report: The Lives of Internally Displaced People in Somaliland, 2012.

³ REACH, Detailed Site Assessment (Dsa), 2022.

5.2. Proposed strategy to incorporate the views of disadvantaged groups

52. There are social, economic and physical barriers that prevent disadvantaged individuals and groups from engagement in projects, which include lack of financial resources, inaccessibility of meeting venues, social stigma, lack of awareness and/or poor consultation. In this regard, the project will deploy viable strategies to engage target communities and other stakeholders and overcome social stigma and encourage inclusion. These strategies will include ensuring that these groups are included in public consultations, their opinions are considered in the siting and selection of subprojects, and water use and distribution and their inclusion in community management committees. Other measures include access to contracts and diversity in employment and training opportunities. Project teams will be trained on inclusion of disadvantaged and vulnerable individuals and groups. In addition, the monitoring tools will also have questions on inclusion, whose results will be used to strengthen these strategies.
53. Social mapping will be conducted before the project sites are identified. While the selection of the subproject sites will be based on technical considerations and needs, inclusivity should be considered given that there are likely to be many potential areas and that areas with IDPs or minority clans may otherwise be overlooked due to clannism and elite capture. The project team will conduct a mapping of clans and the presence of minority groups and IDPs will be carried out before the site selection.
54. **Inclusive community consultations and management structures are critical to the achievement of the inclusion plan.** The primary objectives will be to:
 - i. Understand the operational structures in the respective communities;
 - ii. Seek their input/feedback to avoid or minimize the potential adverse impacts associated with the planned interventions;
 - iii. Identify culturally appropriate impact mitigation measures; and
 - iv. Assess and adopt economic opportunities, which the MoWRD could promote to complement the measures required to mitigate the adverse impacts.
55. **Consultations will be carried out broadly in two stages.** First, prior to commencement of any project activities the PIU will arrange for consultations with community leaders, the existing local level development committees and representatives of disadvantaged groups about the need for, and the probable positive and negative impacts associated with, the project activities. Secondly, more in depth consultations to agree on the project sites, as well as community agreements for land allocation, water sharing agreements, etc.
56. **The PIU will:**
 - i. Facilitate broad participation of disadvantaged groups and individuals with adequate gender minority group and generational representation; community elders/leaders; and CBOs;

- ii. Provide disadvantaged groups and individuals with all relevant information about project activities including on potential adverse impacts;
 - iii. Organize and conduct the consultations in forms that ensure free expression of their views and preferences;
 - iv. Document details of all consultation meetings with disadvantaged and vulnerable groups on their perceptions of project activities and the associated impacts, especially the adverse ones;
 - v. Share any input/feedback offered by the target populations;
 - vi. Provide an account of the conditions agreed with the people consulted; and
 - vii. Allocate funds to support the participation of the disadvantaged groups in the relevant activities such as consultation meetings and benefiting from the labour activities considering that most of the disadvantaged groups such as IDPs and minorities stay away from the main settlements. Transport system to enable their participation must be put in place.
57. **Once the disadvantaged groups and individuals are identified in the project area, the provisions in this Inclusion Plan will be rolled out.** This will ensure mitigation measures of any adverse impacts of the project are implemented in a timely manner. In any community, the selection of the site for interventions is determined by the technical suitability (feasibility study). However, the project can ensure that the disadvantaged and vulnerable individuals and groups are considered to benefit from the labor opportunities. Additionally, the project should proffer benefits to the disadvantaged individuals and groups by ensuring that they are consulted, have accessible and trusted complaints mechanism and benefit from project activities.
58. **The following issues will be addressed during the implementation stage of the project:**
- i. Provision of an effective mechanism for monitoring the implementation of the Inclusion Plan;
 - ii. Development of accountability mechanisms to ensure the planned benefits of the project are received by disadvantaged individuals and groups;
 - iii. Involve suitably experienced CBOs/NGOs to address the disadvantaged individuals/groups through developing and implementing action plans;
 - iv. Ensuring appropriate budgetary allocation of resources for the Inclusion Plan;
 - v. Provision of technical assistance for sustaining the activities addressing the needs of the disadvantaged and vulnerable; and
 - vi. Ensuring that disadvantaged groups' traditional social organizations, cultural heritage, traditional political and community organizations are protected.

6.0 GRIEVANCE MECHANISM

59. The objective of the Grievance Mechanism (GM) is to strengthen accountability and ensure transparency to beneficiaries and to provide channels and structures for project stakeholders to provide feedback and/or express grievances related to project supported activities. By increasing transparency and accountability, the GM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve the project impacts.
60. The GM aims to address project-related concerns in a timely and transparent manner and effectively. Information on the GM will be readily available to all project-affected parties, interested parties and vulnerable and disadvantaged groups. The GM is designed in a culturally appropriate way and is able to respond to all needs and concerns of project-affected parties. The availability of these GMs does not prevent recourse to judicial and administrative resolution mechanisms.

6.1 Types of grievances:

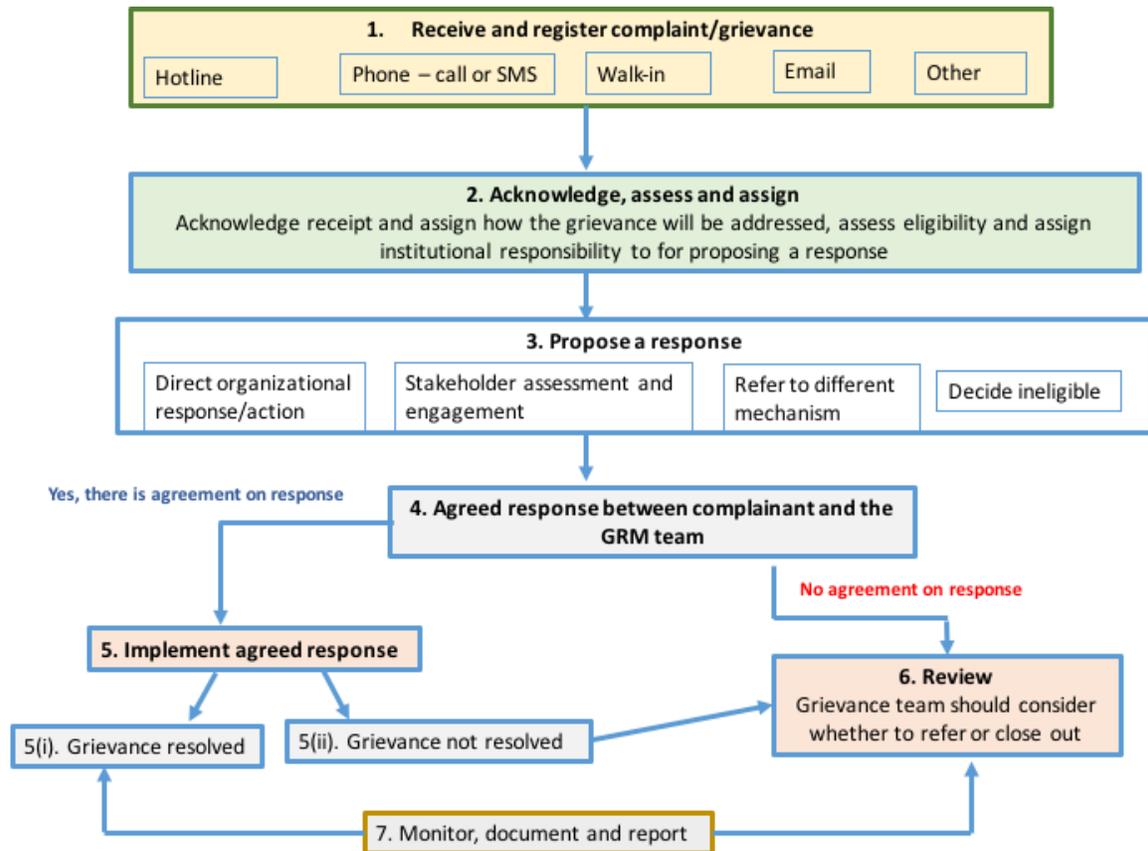
61. Complaints may be raised by stakeholders including partners, local contractors, members of the community where the project is operating or members of the general public regarding any aspect of project implementation. Potential complaints include:
 - i. Selection of sites for project activities;
 - ii. Fairness in contracting;
 - iii. Fraud or corruption issues;
 - iv. Inclusion;
 - v. Social and environmental impacts;
 - vi. Quality of service issues;
 - vii. Poor use of funds;
 - viii. Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH);
 - ix. Forced labour, including human trafficking and use of prison labor;
 - x. Child labour; and
 - xi. Threats to personal or communal safety.

6.2 GM structures and processes

62. As per World Bank standards, the GM will be operated alongside the GBV/SEAH Action Plan, which includes reporting and referral guidelines (included in the ESMF). The GM will also operate alongside a specific workers' GMs, which are laid out in the LMP.
63. MoWRD will have the responsibility of overseeing the resolution of all grievances related to the project activities in accordance with the laws of the Republic of Somaliland, and the World Bank Environmental and Social Standards through a clearly defined GM that outlines its process and is available and accessible to all stakeholders. The entry point for all grievances will be with the social specialists at the MoWRD, PIU level who will receive grievances by phone, text or email to publicized toll free mobile phone lines and email addresses at PIU level. Based on the learning from NGOs, the toll free lines are not often used to report serious cases for fear of retribution or assumption that there will be no follow up. Limited awareness is also another issue, thus widespread awareness raising on the GM to promote an understanding and trust in the system. The social specialists will acknowledge, log, forward, follow up grievance resolution and inform the complainant of the outcome. The complainant has the right to remain anonymous, thus their name and contacts will not be logged and whistle-blower protection for complaints raised in good faith will be ensured. The MoWRD, PIU social specialist will carry out training of all Government staff involved with the project, and contractors on receiving complaints, referral, complaints handling and reporting, and will oversee awareness raising on the GM at the national level.

64. A grievance redress committee (GRC) will be established at national levels 6 months after project effectiveness chaired by the project manager. The relevant staff will be included as necessary depending on the complaint (procurement, finance, monitoring and evaluation, GBV advisor and communication). The social specialists will compile minutes for the meetings and follow up the grievance resolution process. The GRC will meet monthly to review minor complaints, progress on complaints resolution, review the development and effectiveness of the grievance mechanism, and ensure that all staff and communities are aware of the system and the project. Immediate meetings will be held in case of significant complaints to be addressed at the MOWRD, PIU. Significant complaints will be outlined in the GM manual. For serious or severe complaints involving harm to people or the environment, or those which may pose a risk to the project reputation, the social specialist should immediately inform the head of the PIU, who will inform the World Bank within 48 hours as per the Environmental and Social Incident Reporting (ESIRT) requirements.
65. All contractors and suppliers will be expected to sensitize their workers on the Project GM and have a focal person to receive complaints regarding the construction and their workers and put in place complaints structures specific to the workers (as detailed in the LMP).
66. At the community level, local committees with strong representation of disadvantaged groups will receive complaints directly from the community, contractors, etc., and forward to the social specialist to support resolution and follow up. Figure 1 presents the structure to be adopted by the project in managing grievances.

Figure 1: Grievance process for the project



6.3 GBV/SEAH

67. Cases of GBV/SEAH can be reported through the general Project GM. However, additional channels for reporting will be identified and integrated into the GM (details to be provided in the GBV/SEAH action plan). The GBV survivor has the freedom and right to report an incident to anyone: community member; project staff; GBV case manager; or service provider. Given the sensitive nature of GBV complaints, the GM will provide different ways to submit grievances such as phone, text message and email. All relevant staff of the PIU will receive training on handling GBV/SEAH complaints and referral systems, ideally during the project initiation phase and as part of the staff welcome package. The GM focal persons will be trained on key protocols including referral, reporting and informed consent protocols to receive those cases in an appropriate manner and immediately forward them to the GBV/SEAH referral system. The GM focal persons will ensure appropriate response by: (i) providing a safe caring environment and respect the confidentiality and wishes of the survivor; (ii) if survivor agrees, obtain informed consent and make referrals; and (iii) provide reliable and comprehensive information on the available services and support to GBV/SEAH survivors.
68. The GM proposes the following key features on preventing GBV/SEAH: (i) establish quotas for women in community level grievance management to facilitate safe reporting; (ii) provide multiple channels to receive complaints (channels to be determined after community consultation); (iii) resolve complaints at the point of service delivery to reduce information and transaction costs and gender sensitive independent channels

for redress; and (iv) communicate GM services at the community level to create GBV/SEAH awareness and enable project-affected persons to file complaints.

69. Beneficiaries and communities will generally be encouraged to report all GBV/SEAH cases through the dedicated referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information. The referral system will guarantee that survivors have access to necessary services they may need, including medical, legal, counselling, and that cases are reported to the police should the survivor choose to do so. Formal processes for disclosing, reporting, and responding to cases of GBV/SEAH will be articulated within the GBV/SEAH and GBV/SEAH action plan.
70. If a GBV/SEAH case is reported through the Project GM, the GM focal person at relevant level will report the case within 24 hours to the PIU, and the PIU is obliged to report this case to the WB within 24 hours. Furthermore, cases of SH will be reported through the workers' GM, if it concerns a direct worker or a worker from a sub-contractor, NGO partner or even a community worker following a survivor-centred approach. The PIUs will be in charge of holding sensitization sessions for contractors and primary suppliers regarding the Code of Conduct obligations and awareness raising activities in communities. All reporting on GBV/SEAH will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

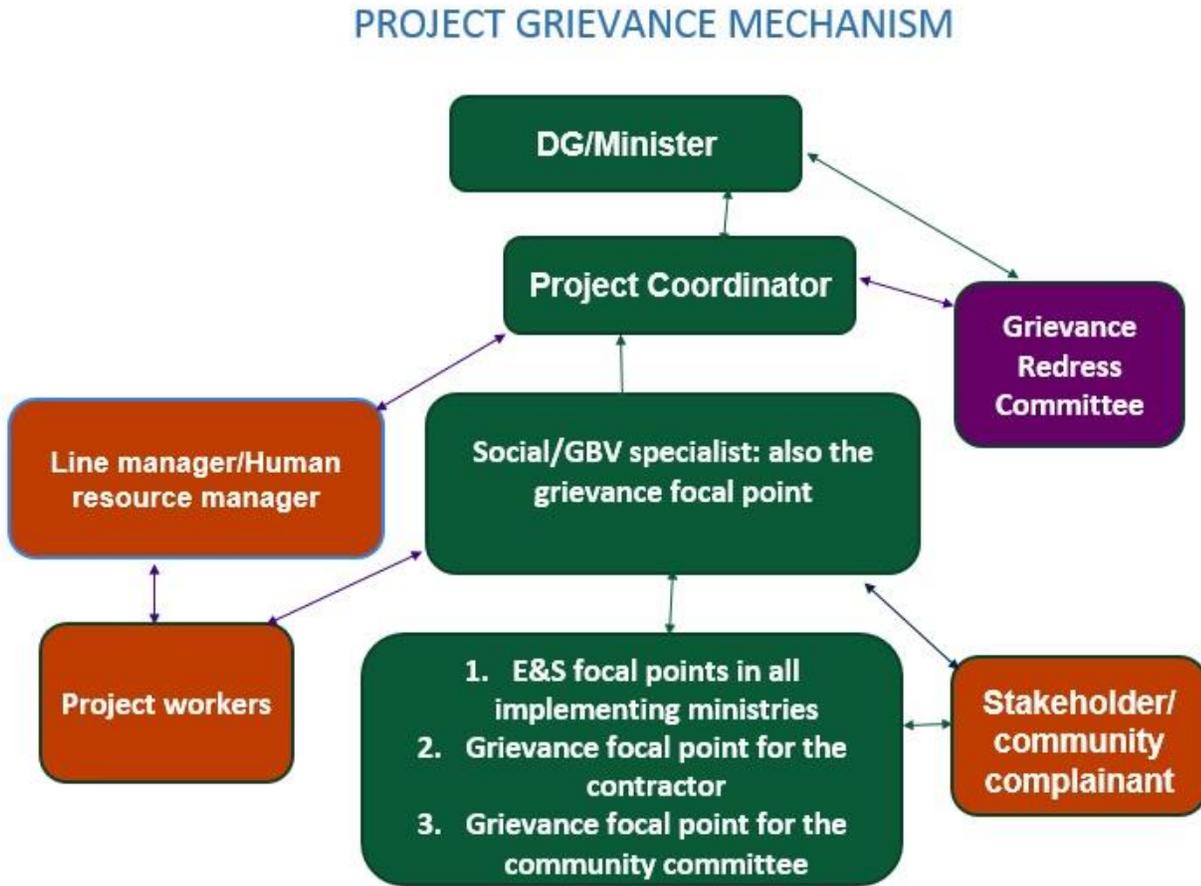
Table4: Grievance Redress Mechanisms structures and processes

S/No.	Step	Description of process	Timeframe	Responsibility
1.	GM implementation structures	<ul style="list-style-type: none"> • Grievance redress committee (GRC) will be established at MoWRD, PIU national levels chaired by the project manager. Social specialists at the PIU level will receive grievances using various channels and address them in consultation with relevant entities, escalating to different levels depending on the complaints. The GRC will meet every 2 months to review the functioning of the GM and the Grievance log. • Community Committees, e.g., Village Development Committees (VDCs), will also have a Grievance focal point. 	Throughout project implementation	Project managers at MoWRD, PIU level.
2.	Grievance uptake	<ul style="list-style-type: none"> • Grievances can be submitted via the following channels: by phone, text or email to publicized toll free mobile phone lines, suggestions boxes, and email addresses, website and in-person at the project offices. 	Throughout project implementation	Social specialist
3.	Receipts, Sorting, assigning	<ul style="list-style-type: none"> • Any complaint received is forwarded to GRC, Logged in GM register, and categorized according to the complaint types. The social specialist will assess the complaint in conjunction with the PM and forward it to the relevant level of entities. If the grievance cannot be easily resolved, the social specialist in conjunction with the project manager will call a meeting of the GRC and develop a course of action. 	Upon receipt of complaint	GRC and social specialist
4.	Acknowledgement, and follow-up	<ul style="list-style-type: none"> • Receipt of the grievance is acknowledged to the complainant by the project manager. 	Within 7 days of receipt	Local grievance focal points, GRC

S/No.	Step	Description of process	Timeframe	Responsibility
5.	Verification, investigation, action/response	<ul style="list-style-type: none"> Investigation of the complaint is led by GRC Feedback /response to grievance is drafted by GRC and communicated to the complainant through appropriate channel. Where a negotiated grievance solution is required, the GRC will invite the aggrieved party (or a representative) and decide on a solution, which is acceptable to both parties and allows for the case to be closed – based on the agreement of both parties. If the aggrieved party is dissatisfied with the response, they can appeal to the next highest level including World Bank. Escalation protocol will be developed. 	Within 10 working days	GRC
6.	Implementation of the response	<ul style="list-style-type: none"> The GM focal point will follow up on the recommended response and ensure the resolution of the complaints. In case the resolution is successful, the case will be closed out. In cases where the complainant is dissatisfied with the response, the GM focal point will guide the individual or group to seek alternative grievance resolution mechanisms including mediation, arbitration and judicial processes. 	Monthly	GM focal point
7.	Monitoring and reporting	<ul style="list-style-type: none"> Data on complaints are collected in and logged in GM register and reported to the social specialist every month. The social specialist will include the GM in his/her supervision and monitoring missions and conduct spot checks on its implementation, The contractors and primary suppliers will provide analytical synthesis reports on a quarterly basis to the PIU, which will include the number, nature and status of grievances. These reports will form the basis of all regular reports from the PIU to the World Bank. The PIU will provide an excel sheet summary of the feedback and grievances reported, which will be linked to the Project's Management Information System (MIS) and to the M&E Results Framework. The summary will also include a breakdown of different categories complaints such as those related to GBV/SEA. The viability of having a separate GBV/SEA/H GM will also be considered. The project team will further maintain a documented record of stakeholder engagements, including a description of the stakeholders consulted, a summary of the feedback/grievances received during community consultations. The PIU will extract lessons from the GM and conduct an analysis on the overall grievances, and share the results with all contractors and key project team members. 	<p>Monthly</p> <p>Quarterly</p> <p>Annually</p>	<p>IP/contractors</p> <p>Social Specialist</p> <p>IP/Contractors</p> <p>PIU</p>
8.	Provision of feedback	<ul style="list-style-type: none"> Feedback from complainants regarding their satisfaction with complaint resolution is collected and recorded in the register as well. 	As they come in.	Social specialist
9.	Training	<ul style="list-style-type: none"> Training needs for staff/consultants in the Project, Contractors and Supervision Consultants will be assessed and necessary training provided. 	At the beginning of project implementation	PIU
10.	Incident reporting	<ul style="list-style-type: none"> Severe incidents, those that caused significant adverse effect on the environment, the project affected parties, the public or workers, e.g., fatality, GBV, forced or child labour, will be reported by the IP to the PIU and the WBG (details on this process will be described in the Labour Management Procedures). 	within 24 hours	IP/PIU

S/No.	Step	Description of process	Timeframe	Responsibility
11.	Grievance about SEAH	<ul style="list-style-type: none"> Where grievances are of sexual nature and can be categorized as GBV/SEA or SEAH Action Plan, the IP will handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the GBV/SEA and SEAH Action Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEA will be required for all GM operators and relevant project staff. 	Within 24 hours of reporting	IP/Contractors
12.	GM Appeals and Escalation Mechanisms	<ul style="list-style-type: none"> Where agreement on grievance resolution has not been reached, the project team will offer the complainant with appeal options and processes available in the country. The approaches will include an Independent Panel; internal or external offices or individuals with appreciable degree of independence, and third-party fact-finding, facilitation, and mediation missions as applicable. Depending on the grievance, the appeal may entail offering the aggrieved person the option to seek redress through statutory referral institutions operational in the country. 	When required	PIU
13.	WBG's Grievance Redress Service (GRS)	<ul style="list-style-type: none"> World Bank Somaliland Office: Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank Somalis office at: Somalilandalert@worldbank.org. 	When required	World Bank Somaliland Office
14.	World Bank Grievance Redress services (GRS)	<ul style="list-style-type: none"> If no response has been received from the World Bank Somaliland office the grievance can be raised with the World Bank Grievance Redress Service email: grievances@worldbank.org. The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service_2. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org 	When required	World Bank Independent Inspection panel

Figure 2: Project grievance mechanism



7.0 RESOURCES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION AND MONITORING

7.1 Management

71. Overall project implementation and coordination will be led by the Somaliland MOWRD. A dedicated PIU will be formed at MoWRD national level. The PIU will be headed by a project coordinator and include small team of experts: (a) financial management specialist (FMS); (b) procurement specialist; (c) M&E specialist; (d) communication specialist; and (e) safeguards officers. The project coordinator will coordinate the implementation of day-to-day administration of the project activities. The PIU will conduct quarterly review and annual review with all stakeholders including the WB and other implementing Partners.
72. The social specialist will ensure that the SEP is appropriately implemented, monitored and evaluated. He/she will share the monthly reports with the PIU and which will consolidate all report and share quarterly reports and annual reports with the World Bank. PIU will provide collaborative management of project activities, decision-making around co-design and co-management of activities including the annual work plan and budget, co-monitor project activities, conducts quarterly progress reviews, make joint decisions on issues pertaining to implementation and ensure open communication and maximum accountability. The PIU team will consist of project coordinator, technical component leads, procurement specialist, finance manager, environmental and social specialists and M&E officers.
73. The PIU will be based in the MOWRD and will be responsible for technical oversight, coordination, financial and administrative management of the project activity. The PIU will be responsible for day-to-day project management activities, including monitoring and reporting on project progress to all the relevant stakeholders (please see the table on Information Disclosure). For this purpose, the PIU will organize, at regular intervals, workshops involving representatives of all stakeholders to present project progress and seek stakeholder input. The costs for all these activities are budgeted under the Component 3 of the project and may be adjusted on need basis.

7.2 Resources

74. The project will set aside funds to ensure that the planned stakeholder engagement activities are implemented and monitored effectively. The main budget items are staff salaries and related expenses; events and workshops; communication campaigns; trainings; allowances for substantial contribution to the project especially for disadvantaged groups who may not otherwise be able to participate, SEP related surveys; Grievance Mechanism. The summary budget is presented in Table 6.

Table 2: Summary budget for implementing the SEP Budget category

Table 1: Summary budget for implementing the SEP Budget categories	Unit	Quantity	Unit costs (USD)	Times/	Month/Year/Quarterly	Total costs Per year	Remarks
				Years			
Staff expenses							
1a. Travel costs for staff	Sites	3	600	Quarterly	4	4,800	Travel cost for community/district liaison officers
1b. Allowances for consultation meeting participants	Per consultation	3	1000	Yearly	4	12,000	Depending on the project sites and frequency of visits
Total Staff salaries and related expenses						16,800	
2. Events							
2a. E.g. Organization of focus groups	Per FGD	3	800	twice	2	4,800	Depends on travels!
Total Staff events cost						4,800	
3. Communication campaigns							
3a. Printing of documents e.g. Posters, flyers	Lump sum	1	1,500	Yearly	1	1,500	Budget revised so that we don't exceed the total budget allocated for the SEP activities
Total communication						1,500	
4. Stakeholder engagement meetings							
4a. Annual stakeholder progress and feedback meetings	Annual	1	2,000	First year	1	2,000	At national level
5. Beneficiary surveys							
5a. E.g. Mid-project perception survey	Per survey	1	4,000	Yearly	1	4,000	This depends on the survey design. It is expensive if this will be onsite but when done

							<i>through phone call it is cheaper.</i>
<i>5b. E.g. End-of-project perception survey</i>	<i>Per survey</i>	<i>1</i>	<i>4,000</i>	<i>Yearly</i>	<i>1</i>	<i>4,000</i>	<i>Same as above</i>
Total Stakeholder engagement						8,000	
6. Grievance Mechanism							
<i>6a. E.g. Training of GRC</i>	<i>Lump sum</i>	<i>1</i>	<i>1,000</i>	<i>First year</i>	<i>1</i>	<i>2,000</i>	
<i>6b. Grievance lines for the PIU level and airtime</i>	<i>Lump sum</i>	<i>3</i>	<i>50</i>	<i>First year</i>	<i>12</i>	<i>1,800</i>	
<i>6c. E.g. GM communication materials</i>	<i>Lump sum</i>	<i>1</i>	<i>1000</i>	<i>Yearly</i>	<i>1</i>	<i>5,000</i>	
Total Grievances Mechanism						8,800	
Total Stakeholder engagement Budget without Contingency						39,900	
7. Other expense							
<i>7a. Contingency (5%)</i>						<i>1,995</i>	
Total Stakeholder engagement Budget without Contingency						41,895	

8.0 MONITORING AND REPORTING

8.1 Monitoring

75. The SEP will be periodically revised and updated as necessary in order to ensure that the information and the methods of engagement remain appropriate and effective in relation to the project context and COVID-19 protocols. Any major changes to the project related activities and to its schedule will be duly reflected in the updated SEP. Monthly and/or quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventive actions will be collated by responsible staff and referred to the senior management of the project and grievances committees at PIU national and community level.
76. The monthly and/or quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the project during the year may be conveyed to the stakeholders in two possible ways:
 - i. Publication of a standalone annual report on project's interaction with the stakeholders; and
 - ii. A number of Key Performance Indicators (KPIs) presented in table 7 below will also be monitored by the project on a regular basis and reported on. The indicators will be revised and updated during the initial project implementation period.
77. The project team will conduct surveys on the project components at the entry, mid-point and end of the project to ensure project activities are implemented according to the plans, ensure all project instruments were adopted, and measure the project success and satisfaction level. The results from these surveys will be used to inform the World Bank and the government on the necessary steps to take towards meeting the SEP objectives and project goals.
78. Participatory monitoring approach will be adopted for this project. The community members including disadvantaged groups will be involved in monitoring of the projects through the village development committees and other relevant fora. The PIU will ensure the village development committees is inclusive and includes representative from the disadvantaged groups are included. There will be review meetings and focused group discussions on stakeholder engagements and project managements issues to get their feedback.
79. A mobile based data collection systems will be used to conduct surveys to provide real time data from the field. The data collected will be presented periodically in the MIS systems of the project to track real time performance of the project against the SEP indicators. The data collected through the SEP survey forms will feed into the overall project M&E framework.

Table 3 SEP monitoring indicators

Activities	Indicators
Project committees established	<ul style="list-style-type: none"> • Number of project committees established • Number of women included in the project committees established • Number of individuals from marginalized groups included in the project committees established • Number of youth included in the project committees established
Stakeholder training on gender sensitivity and inclusion	<ul style="list-style-type: none"> • Number of committees trained on gender sensitivity and inclusion • Number of national, and local government staff trained on gender sensitivity and inclusion • Number of people from disadvantaged group participating trainings on gender sensitivity and inclusion • Number of women participating trainings on gender sensitivity and inclusion
Community participation and public engagement	<ul style="list-style-type: none"> • Number of local consultative meetings held • Number of local and National Government leaders engaged/briefed about the SEP • Number of Civil Society representatives engaged/briefed about the SEP • Number of PAP consultative meetings held • Number of vulnerable / marginalized persons participating meetings and monitoring activities • Number of women, youth and internally displaced people participating meetings and monitoring activities
Grievance management	<ul style="list-style-type: none"> • Number of grievances related to project activities received • Number of grievances related to GBV/SEAH received • Number of grievances resolved promptly (in allowed time) • Number of grievances not resolved in time but completed • Number of outstanding grievances not resolved • Number of grievances referred Nature of outcomes from • Number of referred grievances

8.2 Reporting

80. The Project PIU will develop regular reports (typically quarterly) which will be required by the World Bank and the line Ministry, in this case MoWRD. The reports will present all activities, including stakeholder engagement activities, for the period and summarize the grievances. The report and its annexes will also detail the measures taken to address the grievances, timeline of responses, as well as corrective and mitigation measures to address grievances and analysis of trends.

Data reported on will include the following activities:

- i. information distribution of disclosure materials;
- ii. public announcements and engagement of media;
- iii. disclosure and consultation meetings; and collection and incorporation of comments and feedback
- iv. Grievance summaries

ANNEXES

ANNEX 1: Stakeholder consultations on the E&S instruments for the Somaliland Groundwater for Resilience Project, 11th December 2022, 8:00 am -12.30

Approach and Objective

As guided by the World Bank ESS10, the borrower or the recipient of the World Bank grant should provide stakeholders with timely, relevant, understandable and accessible information. Consultations should be conducted in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The Stakeholder Consultation Meeting process began with a discussion of potential stakeholders who would like to attend this meeting. Then, one week before the consultation meeting, a joint team from both the GW4R and Barwaaqo PIUs began inviting potential stakeholders. Throughout the process, the team relied on the World Bank team for support and guidance. The Somaliland Ministry of Water Resource Development PIU team held a stakeholder consultation meeting on the E&S instruments for the Somaliland Ground Water for Resilience Project on December 11th, 2022, at the Baraar Hotel in Hargeisa, Somaliland. In addition, the consultation meeting was held in collaboration with the Ministry of Planning and National Development, Barwaaqo project team. The projects, however, were presented separately, as were the discussion points.

The main stakeholders engaged include government departments at national level, Local NGOs, Disadvantaged groups, Women groups, development partners (bilateral partners) and community representatives including Minorities and people with disability in Somaliland.

Objective: The objective of this stakeholder consultation meeting is to collect ideas, opinions, suggestions and insights from the relevant stakeholders of the project to use their inputs on improving the stakeholder engagement plan, and the environmental and social management framework instruments.

Participants: water sector representatives from government agencies, MoWRD bilateral partners, NGOs (both local and international), and various parts of the community and civil society organizations, including minorities and people with disabilities.

Time	Session	Lead
8:00 – 8:30 Am	Arrival & Welcoming	MoWRD/GW4R PIU MoPND/Barwaaqo PIU
8:30 -8:45 Am	Opening Remarks	Eng. Abdirahman Farah Belel Director General Ministry of Water Resource Development (MoWRD)
8:45 – 9:00 Am	Introduction on Barwaaqo Project	Eng. Mahamoud Qawdhan, Barwaaqo Project Coordinator
9:00 – 9:15 Am	Introduction on Somaliland Ground Water For Resilience Project	Eng. Hamse Hussein, MoWRD GW4R project Coordinator

9:15 – 10:15	Social risks and mitigation measures and Stakeholder engagement plan and discussion Inclusion plan and Resettlement Management Framework and discussion SEAH prevention and response	Ramla Ali, Hibo Mohamed, Social Specialist & Abdirasheed Ahmed, SL_GW4R Environmental Specialist
11:15 -11:30Am	Health break	
11.15-11.45Am	Environmental risks and mitigation measures	Abdirasheed Ahmed, Environment specialist
11.45-12.40 Pm	Discussion and close	Eng. Mahamoud Qawdhan, Barwaaqo Project Coordinator. Eng. Hamse Hussein, MoWRD GW4R project Coordinator

Participants

Name	Role, Organization	Email
Filsan Hussein Khalif	Somaliland Ministry Employment, Social Affairs and Family (MESAF)/Director of Planning & Coordination	filsanxkh@hotmail.com
Hibaq	Voice of Somaliland Minority Women (VOSOMW)	vosomwomonitors@gmail.com
Hibo Mohamed Suleiman	MESAF/Protection officer	hibomaxamed86@gmail.com
Abdi Duale Ali	Representative from Candlelight for Environment, Education and Health	a.duale@candlelight.org
Abdoulkarim Mohamed Mostafe	Daami Youth Development Organization (DYDO), Somaliland minorities/ Social Safeguard Consultant	abdoulkarim.moh45@gmail.com
Mohamed Aden	Horn of Africa Voluntary Youth Committee (HAVOYOCO)	mohamed.aden@havoyoco.org
Ahmed Mohamed Adan	Society for Animal and Range Development (SARD)/Representative	sardbay23@gmail.com
Ahmed Abdillahi Mohamed	Society for Animal and Range Development (SARD)/Representative	ahmed.abdulahi@sardorganization.org ,
Abdi Jama Elmi	Representative from Ministry of Livestock and Fisheries Development (MoLFD)	abdixaafid009@gmail.com
Daud Ali Salad	Representative from Ministry of Water Resource Development (MoWRD)	Daudali332@gmail.com
Abdirahman Adan	YOVENCO	abdirahman.adam08@gmail.com
Ibrahim Omer Osman	Representative from Ministry of Livestock and Fishery Development (MoLFD)	gulaidtn@gmail.com

Abdihakim	Somaliland Human Rights Commission	indhayare1020@gmail.com
Ramla Ali Ismail	Ministry of Water Resource Development (MoWRD)/ Social GBV Specialist	ramla77700@gmail.com
Huda Ibrahim Hassan	Ministry of Water Resource Development (MoWRD)/ Community Development Specialist	hudaibraahim36@gmail.com
Hodan Hassan	Islamic relief	hodan.Hassan@islamic-relief.or.ke
Aisha Roobleh	BAHIKOOB	aroobleh@hotmail.com

Minutes

	<p>The opening remarks were done by the Director of General of the Ministry of Water Resource Development. Encouraging the participants to closely follow the presentations and discussions on Environmental and social management framework, and other relevant project ESSs instruments. Also pleased that we will continue to draw from the accumulated knowledge and wisdom of the meeting. The Barwaaqo project coordinator followed by giving an Introduction and scope of the project. Then, GW4R project coordinator presented the project background, scope and the main intervention areas which the project will focus on.</p> <p>The Ministry of Water Resource Development (MoWRD), GW4R PIU Project Environmental Specialist provided a detailed presentation on the Social and Environmental issues in the GW4R project as well as the proposed mitigation measures outlined in the ESMF, Stakeholder engagement plan and the Resettlement Planning Framework (RPF) to the stakeholders.</p> <p>Some of the key frameworks, issues, policies and tools discussed in detail include;</p> <ul style="list-style-type: none"> - The overall objectives and rationale of the Environmental and Social Management Framework (ESMF); - An in-depth presentation of the relevant World Bank standards, Somaliland legislative and policy frameworks available and gaps with respect to environmental and social safeguards; - Providing an overview of the World Bank’s Environmental and Social Safeguards for the stakeholders understanding and know-how to relate with the project. - The potential social and environmental risks of the project were presented in detail to the participants of the Stakeholder meeting. The risk identification, planning for the mitigation measures and communication with the relevant stakeholders were well articulated by the GW4R Environment specialist. The continuous engagement of the stakeholders of the project was also communicated. - Potential environmental risks such as oil & chemical spillage, loss of vegetation and soil erosion due to un managed vehicle & heavy equipment movement were discussed. The participants showed their commitment to protect environment from any damage. Also, they shared their experience on how to minimize these negative impacts by enforcing the existing laws and engaging the local authorities to safeguard the natural habitat. - The participant on their side actively participated and suggested mitigation measure for both Social and environmental risks discussed. Participants gave much emphasis on water resource sharing, site selection process, and landownership right registration to avoid potential conflict between the community and government after completion of the project. - The GBV related risks were discussed and participant suggest grievance mechanism specific to the project in village level other than VDC that is already in place.
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	<ul style="list-style-type: none"> - Also, the Grievance Redress Mechanism (GRM) and ways of raising / redressing and resolving were presented and discussed. This includes confidential treatment of sensitive matters, including GBV. - Participant from Hargeisa Group Hospital shared their experience on GBV cases handling and how they provide the emergency medical and psych social care to GBV survivors. - The overview of land dispute challenges, mitigation measures for managing resettlement and compensation, prevention of any negative project effects, and transparent involvement of relevant stakeholders were all thoroughly discussed. - In addition, the participant emphasized the importance of raising awareness among the communities in the project area about social and environmental risks, as well as the procedures to follow if they have a complaint about these issues. 														
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Issues Raised</th> <th>How will it be addressed in the project</th> </tr> </thead> <tbody> <tr> <td>1. Selection of implementation sites, water points site selection.</td> <td> <p>Conduct an assessment of the site residents and land ownership.</p> <p>Map out the different groups of the community including the disadvantaged people.</p> <p>Community consultations meetings and sign a land agreement.</p> <p>Provide a compensation for the land lost and resettlement plan to prevent from involuntary displacement.</p> <p>Community land identification to prevent from land conflict.</p> </td> </tr> <tr> <td>2. Inclusivity and ensuring that all community benefit from the project</td> <td>The project ensures equitable access and resource sustainability. Throughout the project implementation process, the project PIU team will ensure that the community and all relevant stakeholders are engaged in accordance with the World Bank ESS and Somaliland government policies and legal frameworks.</td> </tr> <tr> <td>3. Project intervention</td> <td>The project will benefit from regional cooperation and is designed to initially focus on borderland needs for improved water supply and transboundary cooperation, before addressing the numerous urgent needs that exist for improved water supply in inland areas, as identified by the MoWRD and project management. Investments in borderland areas, which a potential transboundary effect on deep GWs, requires careful discussions and cooperation across borders.</td> </tr> <tr> <td>4. Water sharing between animal livestock herders and women, children</td> <td>The water points and animal water through will be designed to separate the animal and public water tabs.</td> </tr> <tr> <td>5. Land ownership registration before commencing developing any water source.</td> <td>After identifying the potential site the project team will follow the required procedure for land deed/entitlement registration. As per the World Bank ESSs and Somaliland</td> </tr> <tr> <td>6. How is the project to implement activities?</td> <td>All project activities implementation will be led by Somaliland's Ministry of Water Resource Development (MoWRD), and overall coordination, tracking and reporting of project progress will happen at the national MoWRD PIU level.</td> </tr> </tbody> </table>	Issues Raised	How will it be addressed in the project	1. Selection of implementation sites, water points site selection.	<p>Conduct an assessment of the site residents and land ownership.</p> <p>Map out the different groups of the community including the disadvantaged people.</p> <p>Community consultations meetings and sign a land agreement.</p> <p>Provide a compensation for the land lost and resettlement plan to prevent from involuntary displacement.</p> <p>Community land identification to prevent from land conflict.</p>	2. Inclusivity and ensuring that all community benefit from the project	The project ensures equitable access and resource sustainability. Throughout the project implementation process, the project PIU team will ensure that the community and all relevant stakeholders are engaged in accordance with the World Bank ESS and Somaliland government policies and legal frameworks.	3. Project intervention	The project will benefit from regional cooperation and is designed to initially focus on borderland needs for improved water supply and transboundary cooperation, before addressing the numerous urgent needs that exist for improved water supply in inland areas, as identified by the MoWRD and project management. Investments in borderland areas, which a potential transboundary effect on deep GWs, requires careful discussions and cooperation across borders.	4. Water sharing between animal livestock herders and women, children	The water points and animal water through will be designed to separate the animal and public water tabs.	5. Land ownership registration before commencing developing any water source.	After identifying the potential site the project team will follow the required procedure for land deed/entitlement registration. As per the World Bank ESSs and Somaliland	6. How is the project to implement activities?	All project activities implementation will be led by Somaliland's Ministry of Water Resource Development (MoWRD), and overall coordination, tracking and reporting of project progress will happen at the national MoWRD PIU level.
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1. Selection of implementation sites, water points site selection.	<p>Conduct an assessment of the site residents and land ownership.</p> <p>Map out the different groups of the community including the disadvantaged people.</p> <p>Community consultations meetings and sign a land agreement.</p> <p>Provide a compensation for the land lost and resettlement plan to prevent from involuntary displacement.</p> <p>Community land identification to prevent from land conflict.</p>														
2. Inclusivity and ensuring that all community benefit from the project	The project ensures equitable access and resource sustainability. Throughout the project implementation process, the project PIU team will ensure that the community and all relevant stakeholders are engaged in accordance with the World Bank ESS and Somaliland government policies and legal frameworks.														
3. Project intervention	The project will benefit from regional cooperation and is designed to initially focus on borderland needs for improved water supply and transboundary cooperation, before addressing the numerous urgent needs that exist for improved water supply in inland areas, as identified by the MoWRD and project management. Investments in borderland areas, which a potential transboundary effect on deep GWs, requires careful discussions and cooperation across borders.														
4. Water sharing between animal livestock herders and women, children	The water points and animal water through will be designed to separate the animal and public water tabs.														
5. Land ownership registration before commencing developing any water source.	After identifying the potential site the project team will follow the required procedure for land deed/entitlement registration. As per the World Bank ESSs and Somaliland														
6. How is the project to implement activities?	All project activities implementation will be led by Somaliland's Ministry of Water Resource Development (MoWRD), and overall coordination, tracking and reporting of project progress will happen at the national MoWRD PIU level.														

7.	Natural recourse exploitation and destruction restrictions should be put in place	<p>Range land, and Conservations should be protected in all stages during of project implementation.</p> <p>Restriction on taking or trading stones and minerals in the project area. Furthermore, the biodiversity should not be harmed in any way.</p>
8.	How will the project manage social risks?	<p>Social and Environmental Risks to be identified, mapped and mitigated to minimize adverse effects on the project or the project stakeholders.</p> <p>Project to have dedicated social and environmental expertise to support the implementation of the relevant social instruments.</p> <p>The project will prioritize capacity building and support to implementation agencies and departments.</p> <p>Stakeholder information sharing and mechanism for expressing views and grievances will be established and communicated to the project stakeholders for effective utilization. There will also be confidential handling of sensitive grievances and complaints like GBV.</p> <p>The project will carefully emphasize social risk mitigation.</p>
9.	How to strengthen the GBV/SEAH prevention and response?	<ul style="list-style-type: none"> - Educate women and children on gender based violence and abuses. - Train school teachers and parents on how to detect an abuse or exploitation. - Community awareness on the existing services for GBV survivors and legal justice. - Train project workers and contractors on SEAH and GBV. - Child marriage restriction on the project workers and contractors. - Community training on constitutional rights and violations - Capacity building for the local security actors on GBV/SEAH registration, and reporting mechanisms. - Empower legal services in the selected sites to overcome the barrier of clan based and traditional resolutions. - Service mapping and referral mechanisms - The project workers and contractors should sign and abide to the code of conduct of the project.

10.	Labor risks with local contractors and how to mitigate them	Paying special attention to the documentation done by the sub-contractor candidates and to creating a good risk response plan. Follow the LMP of the project and enforce the relevant Somaliland policies, laws and legal frames.
11.	How the community will benefit from this project?	The community will be provided with a better water services, they will also be trained to run their water points.
12.	Will the project be implemented in cities and rural areas?	The project will conduct a feasibility study on areas in which the project can be implemented; also the project carry out community engagement
13.	How will the project solve the land dispute issues? Land is a major source of disputes and conflicts in the country, and the scramble for the few water resources and points too.	Residents and users of land will mapped and agreements will be secured from all groups including local government and mayors. Transparency and equity in the selection criteria of water points to be supported.

Comments/Discussion

Participants actively participated in the meeting, sharing their concerns and suggestions. Some participants were concerned about land ownership and how the project would be implemented in a rural areas without inciting tribal conflict. Some of the other issues raised can be summarized as per the following:

- Site selection process
- Inclusivity; Participants advocated for inclusion of all community groups (disadvantaged people, minority, women, IDP's and people with disabilities).
- Land ownership and compensation processes
- Participants also recommend establishing a GRM committee in village specific to deal with the GBV/SEAH cases.
- The meeting participants recommended that the project information should be communicated to the communities on the site selection process before the implementation.
- Consider including the Minister of Employment, Social Affairs, and Family on the list of major partners on how to report, resolve and deal with the grievances related to GBV and SEAH cases.

5. ANNEX 2: Example complaints form

1. Complainant's Details

Full name or Reference number (if confidentiality requested):

Male/Female _____

Mobile _____

Email _____

District _____

Relationship to the project _____

Age (in years): _____

2. Which institution or officer/person are you complaining about? Ministry/department/agency/company/group/person

3. Have you reported this matter to any other public institution/ public official?

Yes No

4. If yes, which one?

5. Has this matter been the subject of court proceedings?

YES NO

6. Please give a brief summary of your complaint and attach all supporting documents [Note to indicate all the particulars of *what* happened, *where* it happened, *when* it happened and by *whom*]

7. What action would you want to be taken?

Signature _____

Date _____

9. ANNEX 5: References

World Bank Environmental and Social Framework

<http://documents.worldbank.org/curated/en/383011492423734099/pdf/114278-WP-REVISED-PUBLIC-Environmental-and-Social-Framework.pdf>

World Bank Guidance note on ESS10: Stakeholder Engagement and Information Disclosure

<http://documents1.worldbank.org/curated/en/476161530217390609/ESF-Guidance-Note-10-Stakeholder-Engagement-and-Information-Disclosure-English.pdf>

World Bank Good Practice Note on Gender: <http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf>

World Bank, Grievance Redress mechanisms, Responsible Agricultural Investment (RAI) accessed on 14th January 2019 at: <http://www.worldbank.org/en/topic/agriculture/publication/responsible-agricultural-investment>

World Bank (n.d.) How to Notes: Feedback Matters: Designing Effective Grievance Redress Mechanisms for Bank-Financed Projects Part 1: the Theory of Grievance Redress

<http://documents.worldbank.org/curated/en/342911468337294460/The-theory-of-grievance-redress>

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<http://documents.worldbank.org/curated/en/658351468316439488/The-practice-of-grievance-redress>