



FEDERAL REPUBLIC OF SOMALIA

MINISTRY OF EDUCATION, CULTURE AND HIGHER EDUCATION

**SOMALIA EDUCATION FOR HUMAN CAPITAL DEVELOPMENT
PROJECT (P172434)**

**ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK
(ESMF)**

25TH FEBRUARY, 2021

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ACRONYMS AND ABBREVIATIONS

ABE	Alternative to Basic Education
BRA	Benadir Regional Administration
CBO	Community-based organization
CEC	Community Education Committee
CoC	Code of Conduct
CPF	Country Partnership Framework
CSO	Civil society organization
DG	Director General
DoECC	Directorate of Environment and Climate Change
EA	Environmental Audit
ECCE	Early Childhood Care and Education
EHSGs	Environmental Health and Safety Guidelines
EiE	Education in Emergency
ESC	Education Sectoral Committee
ESCP	Environment and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
FCV	Fragility, Conflict & Violence
FGM/C	Female genital mutilation/circumcision
FGS	Federal Government of Somalia
FRS	Federal Republic of Somalia
GBV/SEAH	Gender-based Violence/Sexual Exploitation, Abuse and Harassment
GCF	Green Climate Fund
GDP	Gross Domestic Product
GEF	Global Environment Facility
GHG	Greenhouse Gas
GIS	Geographic Information System
GNI	Gross National Income
GRM	Grievance Redress Mechanism
HADMA	Humanitarian Affairs and Disaster Management Agency
IA	Implementing Agency
ICR	Implementation Completion Report
IDA	International Development Association
IP	Implementing Partner
IPF	Investment Project Financing
IPV	Intimate partner violence
IVAs	Independent Verification Agents
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation

MDAs	Ministries, Departments and Agencies
MIS	Management Information System
MOEACC	Ministry of Environment, Agriculture and Climate Change
MoECHE	Ministry of Education, Culture, and Higher Education
MoET	Ministry of Energy and Transport
MoPIC	Ministry of Planning and International Corporation
NGO	Non-governmental Organization
OHS	Occupation health and safety
OP	Operational Policy
OPM	Office of the Prime Minister
PCU	Project Coordination Unit
PDO	Project Development Objective
PIU	Project Implementation Unit
PMU	Project Management Unit
PWDs	People with disabilities
RP	Resettlement Plan
RCRF	Recurrent Cost and Reform Financing
RPF	Resettlement Planning Framework
RVA	Rift Valley Institute
SCD	Systematic Country Diagnostic
SDG	Sustainable Development Goal
SEA	Sexual Exploitation and Abuse
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SOPs	Standard Operating Procedures
SPVA	Somali Poverty and Vulnerability Assessment
TA	Technical Assistance
ToR	Terms of Reference
TTL	Task Team Leader
TVET	Technical and Vocational Education and Training
UNDP	United Nations Development Program
UNHCR	United Nations High Commissioner for Refugees
WBG	World Bank Group

EXECUTIVE SUMMARY

1. **Introduction:** More than three million children, aged between 6 and 13 years, are reportedly out of school in Somalia.¹ Due to the absence of an enabling environment (including schooling infrastructure), only few children have the opportunity to attend school in Somalia, with a 30 percent average primary school enrolment rate that dips to 18 percent in hard-to-reach, less secure southern regions.² Somalia has the sixth highest poverty rate in sub-Saharan Africa³ mainly due to this dire economic situation, high levels of civil unrest and insurgencies, especially in the south, and the prevailing pastoralist and nomadic culture, which makes sending children to formal schools impractical and impossible for many families.

2. According to the Somali Poverty and Vulnerability Assessment (SPVA), nearly 90 percent of Somali households are deprived of at least one fundamental dimension: access to income; electricity; education; or water and sanitation.⁴ The Somali civil war and the associated violence and collapse of state institutions has resulted in two generations of Somali children largely missing school. In general, according to the World Bank, just 55 percent of Somalis can read and write, while only 16 percent of Somalis have completed primary school (compared to 34 percent in low-income Sub-Saharan African countries). Only 7 percent have finished secondary school (compared to 19 percent in Somalia's regional peers).⁵

3. **The imperative for improving education sector in Somalia.** There is a direct correlation between improving numeracy and literacy of children and enhancing not only lives and livelihoods but also the country's security outlook and future prospects for stability. A recent study by Mercy Corps shows that children at school in Somalia are less likely to support armed groups than those missing out on education.⁶ The study concludes that improving access to quality education, combined with civic engagement opportunities, pulled Somali youths away from supporting violent groups. This is attributed to the youths being more optimistic about their future job prospects, as well as systemic core outcomes of a well-structured education system, which imbues more confidence among youths (and children) in the use of nonviolent means to achieve change in their communities. In addition, new educational opportunities should seek to address the vast gender disparity that also plagues the education system, where only 25 percent of women aged between 15 and 24 are literate, compared to 38 percent for men (The Borgen Project, 2020).

4. **The Somalia Education for Human Capital Development Project.** The proposed project, to be funded by the World Bank, will focus on increasing access to basic education, with an emphasis on girls, and improving teacher quality. The proposed interventions aim to create schooling opportunities in Somalia at the lower primary education level. The project will support activities that promote literacy and numeracy in the country with the aim of ensuring that schooling leads to learning and that girls participate equally in schooling. The project is in line with the government of Somalia's Education Sector Strategic

¹ See <https://www.unicef.org/somalia/education>.

² See <https://borgenproject.org/facts-about-education-in-somalia/>

³ World Bank, 2019. Somalia Poverty and Vulnerability Assessment: Findings from Wave 2 of the Somali High Frequency Survey. Accessed on March 15, 2020, at <https://openknowledge.worldbank.org/handle/10986/32323>

⁴ See <http://documents.worldbank.org/curated/en/464241565765065128/Findings-from-Wave-2-of-the-Somali-High-Frequency-Survey>

⁵ World Bank, 2020. Project Concept Note – Somalia Education for Human Capital Development Project.

⁶ Mercy Corps and University of San Diego, 2018. If Youths are Given the Chance: Effects of Education and Civic Engagement on Somali Youth Support of Political Violence. Accessed on March 15, 2020, at https://www.mercycorps.org/sites/default/files/2019-11/If%20Youth%20Are%20Given%20the%20Chance_LR_FINAL.pdf

Plan (ESSP). The project will specifically support in directly meeting four of the country's priorities under ESSP:⁷

- Strengthen management capacities and systems at federal and state levels, including improving fiduciary mechanisms and increasing budget allocations to the education sector;
- Support learners and strengthen societal resilience among communities affected by natural disasters and conflict;
- Continue expanding access to education for children, adolescents and youth, especially those from disadvantaged groups such as minority groups, nomadic pastoralists, internally displaced persons (IDPs), orphans, children from single headed households and people with disabilities; and
- Improve the quality of learning outcomes, especially at early grade levels, and to ensure the market relevance of learning opportunities.

5. In the long-term, the project will also help in the achievement of peace and stability, as the interventions will help develop cohorts of school children whose education can contribute to "peacebuilding and state building processes."

6. **Development objectives.** The Project Development Objective (PDO) of the project is: "In unserved areas, increase access to primary education with a focus on girls and improve quality of instruction." The project aims to create schooling opportunities in Somalia at the primary education level and to promote literacy and numeracy in the country. It seeks to ensure that the schooling leads to learning and that girls participate equally in schooling. Expected project outcomes are: (i) increased number of children enrolled in primary school; (ii) increased gender parity in the targeted districts; and (iii) improvements in teacher quality.⁸ The project will have four components as described below.

Component 1: "Systems building" will focus on the establishment and strengthening of capacity and institutional systems at the ministries of educations at the Federal and Member State levels of government, to establish an effective education system with a strong stewardship role for the Federal Government. This sub-component will be achieved through implementation of activities in three sub-components: (1) Subcomponent 1.1: "strengthening government's stewardship role," (2) Subcomponent 1.2: "establishment of a national student learning assessment system," and (3) Subcomponent 1.3: "strengthening monitoring and evaluation."

Component 2: "Expansion of access to quality schooling for the disadvantaged" will focus on supply-side constraints faced by school going-age children who do not have access to education due to a dearth of schools or who are inhibited from enrolling in local non-state schools due to their inability to pay school fees. The component will provide out-of-school children from disadvantaged backgrounds in the targeted 14 districts with access to good quality schools by (i) incentivizing nonstate providers to enroll children free of cost; and (ii) building new schools that provide a minimum package of support that includes teachers, classrooms and school grants to meet recurrent expenditures of these new schools.

Component 3: "Enhanced instruction quality" proposes to support the development of a 2-year Teachers Professional Development Program (TPDP). This program will be delivered using a

⁷ Further details of the ESSP can be obtained at:

https://www.globalpartnership.org/sites/default/files/federal_government_of_somalia_essp.pdf

⁸Details on the project components can be found in the Project Appraisal Document (PAD).

blended learning approach and build the capacity of 6,000 teachers. Activities in the TPDP include defining learning outcomes and associated course structures, creating individual course frameworks and identifying the content to be covered in each course, developing and refining course content and materials, and creating a contextually suitable student support system.

Component 4: “Project management” will finance key project staff at the FGS level including a project director for overall management, project coordinator to work closely with the various implementing entities, M&E, fiduciary and safeguards staff. Funds will also be provided for office equipment and furniture to adequately resource project staff to manage implementation. Project staff will also be hired at the FMS level to manage activities at that level and regularly supervise project activities.

7. ***Environment and social Management Framework (ESMF)***. The objective of this document is to guide environmental and social screening and assessment of the potential impacts from the project investments and propose broad mitigation measures. This ESMF ensures that the project activities scheduled for implementation are compliant with the relevant requirements of national⁹ and state-level¹⁰ policies, regulations and legislations (including any existing school construction and operation standards) as well as the World Bank Environment and Social Standards (ESSs).

8. This ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social impacts of interventions to be funded by the project. Therefore, it directly applies to those activities that will be financed by the project or which are associated or implemented as a result of project interventions. This ESMF also highlights the appropriate World Bank’s ESS and relevant existing Somalia environmental and social regulations and policies which sub-projects and activities financed or related to this project have to conform to.

9. The ESMF also contains an overview of the baseline environmental and social conditions in the states identified for support under the Somalia education project, identifies and characterizes potential environmental and social risks and impacts that might arise out of the implementation of the project’s activities (“sub-projects”) and proposes mitigation and enhancement measures. This ESMF will, therefore, be the basis for the preparation of the site-specific Environment and Social Management Plans (ESMPs) including contractor ESMPs, as required during project implementation.

10. ***Project Environmental and Social Baseline***. The project will support the construction of 180 schools, however, at the time of developing this ESMF the details of the physical infrastructure investments that will be supported is not yet defined. However, investments are likely to include:

- School construction;
- Construction of staff rooms for use by teachers;
- Construction of storage facilities; and
- Construction of ablution facilities for school-going children and teachers.

11. ***Environmental Policy, Legal and Institutional Frameworks***. The key legal instrument for managing the environmental affairs in Somalia is the Constitution, specifically Article 25 (“Environment”),

⁹ Federal Republic of Somalia

¹⁰ The respective policies of the federal states that are to be included for support in the project

Article 43 (“Land”), Article 44 (“Natural Resources”) and Article 45 (“Environment”). In addition, the Cabinet of the FGS has recently approved the National Environment Policy of Somalia.¹¹

12. Article 25 of the Constitution states that “[every Somali] has the right to an environment that is not harmful to their health and well-being, and to be protected from pollution and harmful materials.” The article proceeds to declare that “[every Somali] has the right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of these natural resources.”

13. Article 45 (in Chapter 3 – Land, Property and Environment) exhorts “all people in ... Somalia” to “...participate in the development, execution, management, conservation and protection of the natural resources and environment...” Article 43, on its part, provides guidelines on environmental and social safeguards that can be observed. However, there are no standing environmental and/or social safeguards in terms of legislated and/or drafted regulations.

14. **Environmental Risks and Risk Rating.** Currently, the environmental risk rating is ‘**Moderate**’ due to the p school construction activities. The rating may be amended as more details become available. The schools to be supported in the project, including any new constructions, will be modelled along the Safe Schools standards as promoted by UNICEF and which are also related to the EHS standards and the school environment, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. These Standards focus on school designs for the protection of children and their educational prospects and are relevant for areas prone to armed conflicts. By following these Standards, the Somali government will ensure that it will provide access to water and sanitation in school facilities, ensure that the indoor air quality (IAQ) is in compliance with WHO guidelines, eliminate smoking in schools and ensure that children can safely walk to schools. This will also meet the recommendations established in the World Bank’s EHS Guidelines.

15. The envisaged environmental risks and impacts include: loss of vegetation, soil erosion, land clearing, changes of land uses, risk from vehicular traffic, generation of liquid waste, and hazardous wastes (e.g., use oil, empty paint cans, etc.); risks associated with source of primary supply materials (materials for school construction, etc.); worker occupational health and safety; construction risks during COVID-19 pandemic. Other risks include solid waste generation and disposal issues; air and noise pollution; fire hazards; spread of communicable diseases among children; outbreak of pests and vermin; possible generation of e-waste, especially since the project will support digital delivery of educational materials; and open pits/quarries following extraction of construction materials. The physical components of the project are small-scale civil works that are linked to the construction schools and associated infrastructure. The impact of the civil works is expected to be small-scale, localized and reversible. Therefore, no significant or irreversible adverse environmental issues anticipated from the activities to be financed under this project. However, the project will explore the use of safety audits for the education sector, as is currently done among humanitarian and development partners in the country, to ensure project activities take into consideration key structural safety considerations in design and implementation.

16. **Social Policy, Legal and Institutional Framework:** Article 11 (3) of the Constitution states that: “The State must not discriminate against any person on the basis of age, race, colour, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth”. The

¹¹ See https://twitter.com/DECC_Somalia/status/1228003267059253248, a proclamation by the Directorate of the Environment and Climate Change (DOECC) in the Office of the Prime Minister, issued on February 13, 2020

Constitution provides for the protection of women¹², including the outlawing of female circumcision (Article 15) and protection from sexual abuse (Article 24(5)). Art. 11 provides that all citizens have equal rights regardless of sex, and that the State must not discriminate against any person on the basis of gender. Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labour for any purpose, while Article 24 prohibits sexual abuse in the workplace. The Puntland Sexual Offences Act 2016 prohibits sexual harassment. Article 24.5 stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the workplace. Every labour law and practice shall comply with gender equality in the work-place.

17. The Labour Code of 1972¹³ stipulates that all contracts of employment must include: a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and c) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labour inspector for pre-approval. In regards to occupational health and safety standards (OHS), the employer is obligated to provide adequate measures for health and safety, protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.

18. The Labour Code further forbids work for children below the age of 12, but allows employment of children between the age of 12-15 years, however the employment has to be compatible with proper protection, health and the morals of children. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade unions. The Labour Code stipulates the right to equal pay for the same work. Women are entitled to 14 weeks of maternity leave at half pay.

19. The Somali Penal Code of 1962 criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust committed with violence' are punishable with 5-15 years and 1-5 years of imprisonment, respectively. Abduction for the purpose of lust or marriage is prohibited under Art 401. The Family Code of 1975 sets the minimum age for marriage at 18 for males and females. Females between the age of 16 and 18 can marry with their guardian's consent. Marriage is based on equal rights and duties.

20. Somalia National Gender Policy (2016) includes strategies to eradicate harmful traditional practices such as female genital mutilation/cutting (FGM/C) and child marriage and to improve services for the management of GBV/SEAH cases.

21. **Social Risks and Risk Rating.** The social risk rating is adjudged as '**High**'. The project is designed to have a positive social impact, purposely targeting poor and disadvantaged populations including IDPs, minority groups, rural and pastoralist/nomadic communities. A preliminary assessment of potential social risks and impacts establishes that there are direct risks from project activities related to civil works from construction of schools, which could lead to land acquisition, restrictions on land use, resettlement and labour influx. In addition, the use of local labour and the reliance on community partnerships and management could lead to cases of child labour and forced labour.

¹² LOGICA, Gender and Conflict Note Somalia, March 2013, p. 2, accessed at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/03/31/000333037_20140331154002/Rendered/PDF/862980BRI0Box30gica0DissNoteSomalia.pdf

¹³ The Code has recently been revised, but the revisions have not yet been passed and signed into law.

22. The risks of gender-based violence (GBV/SEAH), including sexual exploitation and abuse (SEA) and sexual harassment (SH), is currently assessed as **'High'** based on the existing high rates of GBV/SEAH in the country, extending from conflict and shocks such as droughts, floods and other climate-related challenges, and social norms that entrench gender inequalities in the country. In addition, because the project's scope and focus will be on predominantly rural sites, the proposed scope of works, and the absence of appropriate institutional structures to manage risks and weak mitigation systems and lower absorption capacity, has raised the risk rating.

23. The project will be implemented in areas of fragility due to endemic poverty, acute drought, floods and protracted conflict and insecurity which may make direct access to beneficiaries challenging and amplify risks related to lack of effective stakeholder engagement, community participation, grievance redress and application of other risk mitigation protocols. Other cumulative risks include systemic weaknesses related to MoECHE's capacity for preventing adverse social impacts on the project and mitigating and offsetting impacts of social harm whenever they occur.

24. **Overall Risk Rating.** The engineering capacity of the client is nascent, but growing in regards to construction of small-scale civil works. However, the client's ability to apply World Bank Environmental and Social Standard (ESS) is limited, due to a dearth of appropriate technical capacity for safeguards at the MoE and lack of experience managing environmental and social safeguards. In addition, the country risks are extensive due to political and security considerations; the limited ability for the World Bank to supervise environmental and social risk management and lack of standards and institutions in Somalia for managing environmental and social risk. Therefore, the overall environmental and social risk rating is **"High"** under World Bank's Environmental and Social Risk Classification system (ESRC).

25. **Applicable Environmental and Social Standards (ESSs).** Due to limited environmental and social laws and regulations at both national and state levels in Somalia, the project will apply the World Bank Environment and Social Framework (ESF)¹⁴. Eight ESSs are considered relevant to the activities implemented under the project:

- ESS 1: "Assessment and Management of Environmental and Social Risks and Impacts"
- ESS 2: "Labour and Working Conditions"
- ESS 3: "Resource Efficiency and Pollution Prevention and Management"
- ESS 4: "Community Health and Safety"
- ESS 5: "Land Acquisition, Restrictions on Land Use and Involuntary Resettlement"
- ESS 6: "Biodiversity and Sustainable Management of Living Natural Resources"
- ESS 8: "Cultural Heritage"
- ESS 10: "Stakeholder Engagement and Information Disclosure"

26. Where potential environmental and social risks and impacts are anticipated, the project in priority order: take measures to avoid, minimize, mitigate, manage or compensate adverse impacts. In addition, the project will enhance positive impacts in project selection, location, planning, design, implementation and management.

27. **Potential Environmental and Social Benefits of the Project.** The anticipated social benefits of the project include:

¹⁴ For better understanding of the World Bank's ESF, please visit <https://projects.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

- inclusion of out-of-school children in schooling and improvements in learning will lead to a larger number of students completing lower primary education;
- availability of larger number of cohorts transitioning into secondary schooling;
- improving girls' participation in schooling by introducing incentives for increasing and maintaining girls' enrolment in school will improve the gender situation in Somalia;
- encouraging the recruitment of female teachers and prioritizing support for female teachers will ensure more women participation in the education sector in Somalia, with positive downstream outcomes;
- inclusion of training modules in promoting girls' education and creating safe, inclusive school environments with specific attention to identifying and addressing violence, including GBV/SEAH in schools, will ensure safer environments for children at school;
- employment opportunities for the community members through construction, rehabilitation and maintenance of the school infrastructure; and
- in the long term, the project will contribute towards development of social cohesion and national stability.

28. The project will have environmental benefits, including the following:

- provision of improved, quality school infrastructure including WASH facilities will lead to improved hygiene standards, less exposure of school-going children to communicable diseases; and
- the formalised schooling environment will provide a basis for incorporating environmental education and stewardship into the school curriculum and activities, resulting in higher levels of environmental stewardship.

29. **Mitigation Measures and Monitoring.** In order to address potential adverse environmental and social risks and impacts, an environmental and social screening process has been proposed under this ESMF. This will be applied in such a way as to ensure that potential negative risks and impacts of the project are prevented or mitigated appropriately, while enhancing positive impacts. This will be the responsibility of the FGS and FMS social and environmental specialists as well as implementing partners and contractors. The community education committees (CECs) and the social accountability committees will play a key role in ensuring that the proposed mitigation measures are implemented.

30. To facilitate the mitigation of risks several key ESF instruments including this ESMF will be prepared and activated in the life of the project, as summarized in Table 1.

Table 1: Key project ESF instruments

#	Document	Purpose
1.	Stakeholder Engagement Plan (SEP)	Sets out inclusive and effective mechanisms for engagement of stakeholders at all levels including feedback and complaints mechanism and transparency. The SEP include a project side Grievance Redress Mechanism (GRM), Inclusion Plan and an Information Disclosure Plan.
2.	Labour Management Procedures	Guides how direct and indirect workers will be sourced and managed fairly and humanely and in a manner that reduces harm on other workers, students and the community.
3.	GBV Action Plan	Articulates the key risks and key mitigation measures for workers, students and the community, as well as the identification of GBV/SEAH Service Providers and reporting and referral protocols in the event of cases. It outlines communication and training requirements for communities and all project related staff, including

		project workers, teachers, and school administrators. An Accountability and Response Framework will elaborate the adoption of mitigation measures, including awareness raising, training and use of code of conducts (CoC), and collaboration with local communities and GBV/SEAH-related service providers
4.	Security Management Plan	Outlines measures to minimize security risks in the project including the protection of schools, students, workers and communities and to ensure that security personnel employed as part of the project do not use undue force or impact negatively on communities.
5.	Resettlement Planning Framework (RPF)	Outlines how land acquisition and/or restriction on land use, which might result in involuntary physical and/or economic displacement will be managed and guidance on the preparation of Resettlement Plans (RPs), as needed. It will also provide the protocols for voluntary land donations and agreements.

31. **Stakeholder engagement plan (SEP):** Engagement and consultations on the project design and the planned activities and implementation arrangements have been held with key institutional stakeholders including the relevant Government agencies, development partners and other cooperating agencies and community representatives. The SEP will be updated and refined during project implementation as needed. The SEP outlines information disclosure requirement, the project Grievance Redress Mechanism (GRM), and a plan for inclusion of disadvantaged groups.

32. **Grievance Redress Mechanism.** The MoECHE will set up a project-specific GRM for people to report concerns or complaints, if they feel unfairly treated or are affected by any of the subprojects. The mechanism will amongst other things: provide information about project implementation; provide a forum for resolving grievances and disputes at the lowest level; resolve disputes relatively quickly before they escalate to an unmanageable level; facilitate effective communication between the project and affected persons; and win the trust and confidence of project beneficiaries and stakeholders and create productive relationships between the parties.

33. The GRM will be implemented at the different levels of the project, including community, district, FMS and FGS. It will ensure that trusted and accessible mechanisms are available to all stakeholders including VMGs, and that all complaints are logged and followed up. More details of the GRM can be found in the SEP.

34. **Project Implementation Arrangements.** The proposed project will be implemented by the Ministry of Education, FGS in coordination with FMS. A Project Steering Committee (PSC) will be established to provide oversight and policy direction while a Project Management Unit (PMU) will be set at the FGS level to manage the activities. There will be Implementation Units (PIUs) established at the State level to oversee implementation in the respective districts. The PMU will include a Project Coordinator, separate Environment and Social Safeguard Specialists and GBV/SEAH specialist, Communication Specialist and Monitoring and Evaluation (M&E) Specialists. The FMS PIUs will include Project Managers, a full time Social Safeguard/GBV/SEAH Specialist and a part time Environmental Specialist. All the positions will be competitively recruited and diversity will be encouraged. These staff members will be provided with capacity building support in environmental and social safeguards. MoECHE will work closely with the FMS MoEs and other ministries and departments including World Bank funded projects and development partners. The school management and community education committees will lead the project at community level, with the social accountability committees providing an independent structure to ensure transparency, promote inclusivity and collecting and raising grievances at the community level.

35. Technical capacities in the MoECHE are limited, as such, an external third party (an NGO or agency with requisite skills as will be spelt out in the terms of reference) may be appointed to support the ministry to carry out training or capacity building on environmental or social aspects of the project. Measures need to be taken to enhance the safeguards capacity to improve environmental and social performance during project implementation. This may include safeguards training for staff or communities or CECs or social accountability committees.

1. INTRODUCTION AND PROJECT CONTEXT

1.1 Project Context

1. Situated in the Horn of Africa, Somalia is bordered by Ethiopia to the west, Djibouti to the northwest, the Gulf of Aden to the north, the Guardafui Channel and Somali Sea to the east, and Kenya to the southwest. With a total land area of 637,657 km² and situated between 2°S and 12°N latitudes and 41° and 52°E longitudes, Somalia has the longest coastline on Africa's mainland. The country's terrain consists mainly of plateaus, plains and highlands. Climatically, hot conditions prevail year-round, with periodic monsoon winds and irregular rainfall.

2. Somalia is faced with two critical challenges: (i) creating sustainable internal peace; and (ii) constructing a path for shared economic growth and prosperity. Among the most critical sectors for the emerging state is the education sector. However, as the country emerges from nearly three decades of civil strife, the education sector is in poor shape. Years of internal conflict virtually wrecked the education system, resulting in a sector "characterized by poor-quality education, insufficient numbers of qualified teachers and inadequate resources," according to the United States Agency for International Development (USAID, 2020). Country-wide, more than three million children, aged between 6 and 13 years, are reportedly out of school. Due to the absence of an enabling environment (including schooling infrastructure), only few children have the opportunity to attend school in Somalia, with a 30 percent average primary school enrolment rate that dips to 18 percent in hard-to-reach, less secure southern regions.



Figure 1: Map of Somalia, showing the capitals of the FMS targeted under the Somalia education project

3. Somalia has the sixth highest poverty rate in sub-Saharan Africa (World Bank, 2019). The quality of life in the country is also among the lowest in the world. An analysis of the Human Development Index (HDI), used to rank countries into four tiers of human development (very high, high, medium and low), shows that Somalia is in the lowest tier, scoring 160 out of 164 countries. Due to this dire economic situation, high levels of civil unrest and insurgencies, especially in the south, and the prevailing nomadic culture, sending children to formal schools is impractical and impossible for many families.

4. According to the Somali Poverty and Vulnerability Assessment (SPVA), nearly 90 percent of Somali households are deprived of at least one fundamental dimension: access to income; electricity; education; or water and sanitation. The Somali civil war and the associated violence and collapse of state institutions has resulted in two generations of Somali children largely missing school. In general, according to the World Bank (2019), just 55 percent of Somalis can read and write, while only 16 percent of Somalis have completed primary school (compared to 34 percent in low-income Sub-Saharan countries) and only 7 percent have finished secondary school (compared to 19 percent in Somalia's regional peers).

5. Somalia's Education Sector Strategic Plan (2018-2020) calls for prominence to be given to three sectoral priorities: (i) sustenance of education services in emergency context; (ii) strengthening resilience by overcoming educational inequities; and (iii) implementation of Safe Schools Declaration to protect education from attack. The proposed project's interventions will have implications for each of the three priorities.

1.2 The Somalia Education for Human Capital Development Project

6. The Somalia education project has a tentative project budget of US\$40 million, which will be spent on four components over a period of 5 years. The proposed project aims to create schooling opportunities in Somalia at the lower primary education level and thereby promote literacy and numeracy in the country. It will ensure that the schooling leads to learning and that girls participate equally in schooling. Over the project's life, dependent on the dedication of adequate investments by government and its development partners, the proposed project is expected to increase the number of children enrolled in lower primary school, increase gender parity at the targeted level and increase the share of students attaining grade level competency in key subjects.

7. The theory of change in education holds that short-term but high-potential interventions can rapidly increase schooling opportunities, with a deliberate focus on the most disadvantaged communities in Somalia, specifically those residing in rural areas and girls. The project proposes to leverage Somalia's strengths, specifically its high mobile penetration and relatively advanced internet telephony system to test innovative approaches to enhancing teacher quality and provide effective teaching and learning materials to students using digital technology. The project will also support the development of a robust system for regularly and reliably collecting data on sector outcomes. In addition, the project will focus specifically on building systems to systematically and regularly collect information on student learning achievements.

1.3 Project Development Objective and Components

8. **Project Development Objective.** The Project Development Objective (PDO) of the Somalia education project is: "In unserved areas, increase access to primary education with a focus on girls and improve quality of instruction."

9. The project will have four components as described below.

Component 1: "Systems building" will focus on the establishment and strengthening of capacity and institutional systems at the ministries of educations at the Federal and Member State levels of government, to establish an effective education system with a strong stewardship role for the Federal Republic. This sub-component will be achieved through implementation of activities in three sub-components: (1) Subcomponent 1.1: "strengthening government's stewardship role," (2) Subcomponent 1.2: "establishment of a national student learning assessment system," and (3) Subcomponent 1.3: "strengthening monitoring and evaluation."

Component 2: "Expansion of access to quality schooling for the disadvantaged" will focus on supply-side constraints faced by school going-age children who do not have access to education due to a dearth of schools or who are inhibited from enrolling in local non-state schools due to their inability to pay school fees. The component will provide out-of-school children from disadvantaged backgrounds in the targeted 14 districts with access to good quality schools by (i) incentivizing nonstate providers to enroll children free of cost; and (ii) building new schools that

provide a minimum package of support that includes teachers, classrooms and school grants to meet recurrent expenditures of these new schools. Approximately 180 new schools are planned to be built, which will likely result in 820 new classrooms. All schools will be designed with functioning WASH facilities. About 820 qualified teachers will be hired to provide instruction to the 100,000 pupils that will be enrolled in the new schools, 50 percent of whom will be girls.

For the new school construction:

- *School location planning.* School sites will be selected based on the findings of a needs assessment survey. Communities that have large numbers of primary-aged girls and boys that do not have a school (public or non-state) within a 30-minute walk will be prioritized. This survey will assess land tenure, social issues such as conflict over land, and presence of VMGs, environmental factors and community support for new schools and will determine the size of the school to be built (number of classrooms). During survey administration, community-based organizations will be consulted for advice on school location planning and demand for schooling.
- *Community mobilization.* Communities will be mobilized through Village Development Committees (VDC) in places where there is no CEC to play a key role in selecting the CEC as per the government CEC policy. The CEC which will be responsible for (i) placement, construction and management of the new schools (ii) responsible for day-to-day supervision of the school, including of decision-making on school management related issues and monitoring teacher attendance in line with government’s policy on CECs; (iii) enrolling students including meeting minimum targets for girls enrolment and following up on steps to reduce drop-outs; (iv) identifying potential teachers from their communities, with preference for female teachers; (v) locating and arranging sites for schools and maintenance of school facilities; and (vi) submitting periodic reports, including via a mobile app when possible, to District Education Officers on student, teacher, and school matters.
- *School construction.* New schools with a proportional allocation of gender-separated washrooms and water delivery points for each school will be constructed. Construction specifications for the new classrooms and schools¹⁵ will conform to the government’s school prototypes, align with agreed standards (safe, disability-inclusive, resilient, and climate-smart), and incorporate a modular approach as appropriate to suit local needs so as to ensure optimal coverage and minimal distances for children to travel. The MoECHE, with the support of its construction supervision contractor, will establish guidelines for phasing in the construction and opening of the schools over 4 years. All new schools will be provided with furniture for students, teachers, and administrators, as well as a core set of equipment for teaching and learning, such as white boards or instructional technology for the larger schools.

Component 3: “Enhanced instruction quality” proposes to support the development of a 2-year Teachers Professional Development Program (TPDP). This program will be delivered using a blended learning approach and build the capacity of 6,000 teachers. Activities in the TPDP include defining learning outcomes and associated course structures, creating individual course frameworks and identifying the content to be covered in each course, developing and refining course content and materials, and creating a contextually suitable student support system.

¹⁵Approximately 180 new primary schools, providing altogether 820 classrooms.

Component 4: “Project management” will finance key project staff at the FGS level including a project director for overall management, project coordinator to work closely with the various implementing entities, M&E, fiduciary and safeguards staff. Funds will also be provided for office equipment and furniture to adequately resource project staff to manage implementation. Project staff will also be hired at the FMS level to manage activities at that level and regularly supervise project activities.

1.4 Project Beneficiaries

10. While the project supports country-wide policy and system development, such as the platforms for teacher development and content delivery to student and Early Grade Reading Assessment (EGRA), the focus will be on the educationally most disadvantaged parts of the country through Component 2 of the project to create supply of schooling opportunities with quality. Under the project, priority will be given to districts in which children do not attend school because of either an inadequate supply of school places or because they experience social hardships that inhibit their demand for schooling. Districts will be selected based on current education access rates; those with Gross Enrolment Rates (GER) below 10% would be considered eligible, with priority given to districts that engage directly in social safety net support programs, thereby ensuring demand-side support that enables children to attend school. Districts that are not accessible due to security reasons for adequate supervision by the World Bank will be excluded at this stage.

11. It is anticipated that two districts each from Banadir, Galmudug, Hirshabelle, Jubaland, Puntland, Southwest and possibly Somaliland will be selected. Once districts selection has been confirmed, an assessment of schools will be carried out to prioritize school sites for construction. These new schools will be in areas where there are no existing schools in a 30 min radius thus they are expected to be in rural areas. This assessment will likely be carried out by a consortium of organizations working in the different districts using a participatory methodology. The assessment will screen out areas where there is contested land or multiple claims on land. Consultations with all residents, users and residents on the siting of the school and agreements on land will be an important aspect of site selection. Consideration will be made of geographical spread, and inclusivity ensuring that in any particular district all schools are not selected in one clan’s area. The assessment will also explain the objectives and criteria of the project and provide information about stakeholder engagement plans and GRM focal points. The assessment will also help identify the existence and capacity of potential construction companies and their capacity to comply with E&S requirements as well as measures to prevent elite capture by involving CECs and where not available the village development committee (VDC) and other representative community structures.

12. The project will benefit approximately 100,000 primary school-aged students, at least 50% percent of whom will be girls, in the selected 14 target districts. Benefits will accrue through improved access to new schools in close proximity to communities enabling children to attend school. The project targets the areas with the lowest access rates to maximize coverage from investments. Component 2 will directly benefit these students through the establishment of new schools, provision of teachers and school grants for teaching and learning materials and support for poor households to send their children to non-state schools free of charge.

13. Students, teachers and communities country-wide will benefit from improved system performance and a greater focus on learning outcomes. In particular, interventions under component 3 will benefit students throughout the country through the availability of digital content and improved instruction and teacher quality. In addition, a total of 6,000 teachers are expected to benefit from

professional development through a blended training program. The indirect beneficiaries include traders, salesmen, IT companies, contractors and primary suppliers.

14. The FGS will be responsible for sustaining the investments in the education sector beyond the project financing period. This would be done by absorbing the established schools and the teachers into the Federal and State Education structures. The ongoing restructuring and strengthening of the education sector will take into account the structures being established through this and other education projects.

15. The project envisages both direct and indirect beneficiaries. The direct beneficiaries will include school-going children, teachers, parents, communities targeted for support, MoECHE and FMS MoEs.

2. SCOPE AND METHODOLOGY OF THE ESMF

2.1 Purpose and Scope of the ESMF

16. This ESMF has been developed due to the fact that specific subprojects, that is the actual schools to be constructed using project funds, will only be identified during implementation of the project. The purpose of the ESMF is to ensure that the sub-projects executed under the project address and identify measures to avoid and minimize negative environmental and social impacts, as much as possible. Where these cannot be avoided, the impacts are adequately identified, assessed and necessary mitigation measures designed and implemented following relevant, existing Somalia environmental and social legislation (where available) and the World Bank's ESS.

2.2 ESMF Justification

17. The ESMF clarifies appropriate ESS, processes, and mitigation principles, organizational arrangements and design criteria to be applied to subprojects (see Annex 1 on the list of ESS). These standards, principles, instruments and other documents are to be prepared during project implementation by the Project Management Unit (PMU), MoECHE, Project Implementation Units (PIUs) at the State level in the project-supported localities in Somalia and private sector companies (such as construction companies and suppliers) participating in the project.

18. The FGS PMU and FMS PIUs will use and refer to this ESMF during project implementation. Where appropriate, site specific Environmental and Social Management Plans (ESMPs) will detail how voluntary land donation, inclusion and consultation requirements have been met will be prepared during project implementation following the guidelines provided in this ESMF (see Annex 4). It remains the responsibility of the E&S safeguards officers within the PMUs to ensure that the necessary mitigation plans are developed and adhered to by the various implementing agencies.

19. The specific objectives of this ESMF are to:

- Ensure that the implementation of the project, for which the exact locations of the sub-project sites are not definitively identified at this stage, will be carried out in an environmentally and socially sustainable manner;
- Provide information about scope of adverse environmental and social risks and impacts expected during sub-project planning, construction and operation, describe the approach to mitigation and monitoring actions to be taken' and cost implications;
- Clarify the roles and responsibilities for the project: FGS PMU, FMS PIU, district education staff, , community education committees (CECs), social accountability committees and rother representative community structures, contractors, and operators, and other stakeholders with regard to environmental and social due diligence, management of risks and impacts, and monitoring; and
- Provide the project implementers with an E&S screening process and risk management procedures that will enable them to identify, assess and mitigate potential environmental and social impacts of subproject activities, including through the preparation of site-specific ESMPs, where applicable (the screening checklist is presented in Annex 2).

2.3 ESMF Principle

20. This ESMF will guide the PMU and PIUs in implementing the project in line with World Bank ESF and Somalia government E&S management standards.

2.4 Methods

21. The ESMF was prepared through literature review and stakeholder discussions. The MoECHE-based project preparation team in Mogadishu, with close coordination with the World Bank, undertook a review of relevant national legislation, policies, and guidelines, including the World Bank ESS related to this Project. Key informant interviews were carried out and stakeholder consultations workshops were conducted in December 2020 and February 2021.

3. POLICY, LEGISLATIVE AND INSTITUTIONAL FRAMEWORKS

3.1 Overview

22. This section describes the existing policy, legislative and institutional framework that will be important for consideration in the design, implementation, monitoring and evaluation of the project. This section begins with the existing framework in the FGS, before focusing on the respective systems in Puntland, South-West State, Galmudug, Jubaland states and the Benadir Regional Administration.

23. It is important to note that at the time of the development of this ESMF, South-West State and Jubaland did not have any significant legislative frameworks governing the management of the environment and natural resources sector. It was therefore difficult to include the respective policy, legislative and institutional frameworks for these states in this ESMF. The World Bank has undertaken a systemic study in South-West State and Jubaland that has identified existing gaps in environmental regulations, policies and legislation, with a view of capacity enhancement for the two states.

3.2 Somalia National Laws, Policies and Legislations

3.2.1 Provisional Constitution of the Federal Republic of Somalia

24. The key legal instrument for the management of environmental affairs in Somalia is the provisional Constitution, especially Article 25 (“Environment”), Article 43 (“Land”), Article 44 (“Natural Resources”) and Article 45 (“Environment”). Article 25 of the Constitution states that “[every Somali] has the right to an environment that is not harmful to their health and well-being, and to be protected from pollution and harmful materials.” The article proceeds to declare that “[every Somali] has the right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of these natural resources.”

25. Article 45 (in Chapter 3 – “Land, Property and Environment”) exhorts “all people in ... Somalia” to “participate in the development, execution, management, conservation and protection of the natural resources and environment.” Article 43, on its part, provides guidelines on environmental and social safeguards that can be observed. However, there are no standing environmental and/or social safeguards in terms of legislated and or drafted regulations. The Article also affirms that the FGS shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem.

26. Article 12 of the Constitution addresses issues of application of fundamental rights. Further, the Provisional Constitution has made commitments on women’s empowerment and gender mainstreaming. Article 15 (1,2,4) together with Article 24(5) of the Constitution provides for the protection of women¹⁶ against all forms of violence and provides for protection from sexual abuse, segregation and discrimination. Article 11 (1) together with sub article (3) respectively provides that all citizens have equal rights regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall have equal rights and duties before the law, and that the State must not discriminate against any person on the basis of age, race, colour, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth. Article 14 stipulates that a person may not be

¹⁶ LOGICA, Gender and Conflict Note Somalia, March 2013, p. 2, accessed at: http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2014/03/31/000333037_20140331154002/Rendered/PDF/862980BRI0Box30gica0DissNoteSomalia.pdf

subjected to slavery, servitude, trafficking, or forced labour for any purpose, while Article 24 (5) prohibits sexual abuse in the workplace. The Puntland Sexual Offences Act 2016 prohibits sexual harassment.

27. On human trafficking, the Constitution states that a person may not be subjected to slavery, servitude, trafficking or forced labour offences. Every labour law shall comply with gender equality. Article 24(5) stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. Every labour law and practice shall comply with gender equality in the work place.

3.2.2 The Labour Code of 1972¹⁷

28. It stipulates that all employment contracts must include: a) the nature and duration of the contract; b) the hours and place of work; c) the remuneration payable to the worker; and d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labour inspector for pre-approval.

29. In regards to occupational health and safety (OHS) standards, the employer is obligated to provide adequate measures for health and safety, protecting staff against related risks, including the provisions of a safe and clean work environment and of well-equipped, constructed and managed workplaces that provide sanitary facilities, water and other basic tools and appliances ensuring workers' health and safety.

30. The Code further stipulates that workers have the right to submit complaints and the employer must give the complaints due consideration. Remuneration must be adequate in view of the quality and quantity of the work delivered, and must be non-discriminatory in regards to age, gender and other aspects. Maximum number of working hours per week are 8 hours per day and 6 days per week. Some work is considered dangerous and unhealthy and forbidden for women and youth (defined as 15-18 years of age). This includes the carrying of heavy weight or work at night.

31. The Labour Code further forbids work for children below the age of 12, but allows employment of children between the ages of 12-15, but employment has to be compatible with proper protection, health and the moral of children. The Code also recognizes freedom of association. Employers are prohibited from engaging in any kind of discrimination or restriction of the right of freedom of association. Workers are allowed to join trade unions. Further, the Labour Code stipulates the right to equal pay for the same work and women are entitled to 14 weeks of maternity leave at half pay.

3.2.3 The Somali Penal Code of 1962

32. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that 'carnal intercourse' and 'acts of lust committed with violence' are punishable with 5-15 years and 1-5 years of imprisonment, respectively. Abduction for the purpose of lust or marriage is prohibited under Art 401.

3.2.4 The Agricultural Land Law (1975)

33. The law abolished private ownership of land and converted the land tenure to leasehold, where families were forced to seek leasehold from the government. Individuals desiring land were to register their holdings within a 6-month period (upon the enactment of that law). The law does not recognize customary land holdings.

¹⁷ The Code has recently been revised, but the revisions have not yet been passed and signed into law.

3.2.5 Family Code of 1975

34. Minimum age for marriage is 18 for males and females. Females between the age of 16 and 18 can marry with their guardian's consent. Marriage is based on equal rights and duties. A husband can divorce by repudiation (*talaq*). The mother retains custody of the children after separation but she loses custody if she remarries.

3.2.6 Somalia National Gender Policy (2016)

35. The Gender policy includes strategies to eradicate harmful traditional practices such as FGM/C and child marriage and to improve services for the management of GBV/SEAH cases.

3.2.7 Somalia National Environment Policy

36. The Somali Cabinet, on February 13, 2020, approved the National Environmental Policy. The stated goal of environmental policy is to improve the health and quality of life of the Somali people. The development of this policy was backstopped by the Global Environment Facility (GEF) and the United Nations Development Program (UNDP). This is the first time that an environmental policy has been developed and taken to Cabinet for approval since the collapse of the previous central administration in 1991.

3.2.8 Somalia National Education Policy

37. The government of Somalia has prepared the Education Sector Strategic Plan (2018-2020).¹⁸ This Plan calls for investment by Somalia's development partners in the following strategic areas:

- Resilience and education in emergency (EiE);
- Early childhood care and education (ECCE);
- Primary education;
- Secondary education;
- Alternative to basic education (ABE); and
- Technical and vocational education and training (TVET).

38. The project will contribute to the achievement of priority pillars in a number of these strategic areas, including "resilience and EiE", "ECCE," and "primary education."

3.2.9 Somalia National Construction Standards

39. The Ministry of Public Works and Reconstruction has published national construction standards. A policy has been announced which established standards for new public construction or renovation projects funded by, or on behalf of, the Government of Somalia. The policy goal is to provide access to public buildings by people with disabilities (PWDs). The project will ensure that children with disabilities are included in the Project.

40. The national standards emphasize and promote "universal design," meaning that the design of structures, environments, and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized designs. Under these national standards, normal maintenance, re-roofing, painting or wallpapering, or changes to mechanical or electrical systems are not alterations and, therefore, the standards do not apply unless they affect the accessibility of the building or facility. This standard is important for the project.

¹⁸ See https://www.globalpartnership.org/sites/default/files/federal_government_of_somalia_essp.pdf

3.2.10 The Office of the Ombudsman (Established in Article 111J)

41. It is stipulated that the office shall (however, it is unclear with the Office of the Ombudsman is functional at FGS or FMS level):

- Investigate complaints regarding allegations or outright violations against basic rights and freedoms, abuse of power, unfair behaviour, mercilessness, lack of clemency, indiscipline or disrespect towards a person that lives in Somalia by an officer who works at the various levels of government, an apparently unfair behaviour, or act in a corrupt manner, or a behaviour by an officer deemed as illegal by a democratic society or regarded as mischief or injustice.
- Investigate complaints in relation to the activities of the Public Service Commission of the government, administrative institutions of the government, and the defence and police forces whoever such complaints relate to, failure to equally align those services or fair recruitment among all people in those services or to administer those services fairly.
- Take appropriate steps that the public calls for, to rectify or change items mentioned in
 - earlier clauses through a fair, and appropriate process, which include, but are not limited to:
 - Consultations and sacrifices among the people concerned;
 - Reporting on the complaints and matters presented to the Ombudsman, and submit to the head of the offender;
 - To forward the matter to the Attorney General;
 - To bring the matter before a court that forbids improper conduct by an officer.

3.3 The National Security Commission

42. A National Security Commission shall be established by federal law (Article 111H). The National Security Commission is an independent entity that comprises security experts from all sectors. The mandates of the National Security Commission include:

- i. Study and develop an integrated security framework to address the present and future needs of Somalia for review and adoption by the Federal Parliament;
- ii. Present proposals to ensure that human security is prioritized and incorporated into the national security framework;
- iii. Develop a framework through which the public may provide oversight and monitor security related expenditure; and
- iv. Seek redress from abuses by security personnel.

3.4 Laws and Regulations in Federal Member States of Somalia

43. **Puntland.** The National Environmental Policy (2015) provides the overall guiding policies relating to the management of the environment and natural resources. This policy allows a rationalisation of administrative regulations and policies to eliminate deficiencies or inconsistencies with other previous policies. The policy promotes the use of appropriate environmental assessment instruments such as the Environmental Impact Assessment (EIA) and Strategic Environmental Assessment.

44. The legislative and policy environment in Puntland is still weak, although there has been good progress compared to the FGS. Puntland's Constitution envisages, in Article 96, the importance and protection of the environment. Among the key features include combating deforestation, soil erosion and pollution. The Constitution forbids charcoal trading in endangered plant and animal species. Prohibition has been placed too on creating of unsustainable urban-like sprawls in rural settings.

45. The existing policies, laws and regulations in Puntland relevant to the Somalia education project implementation; include:

- Environmental Policy (2014) approved by the Cabinet and Parliament;
- Environmental Management Act (2016) approved by the Cabinet;
- Puntland Rangeland Management Policy, 2nd Edition (2016-2025);
- Puntland Waste Management Policy (2016);
- EIA Act and Regulation (2016) approved by Cabinet and Parliament;
- Puntland Climate Change Strategy (2016); and
- Ministry of Environment and Climate Change Strategic Plan (2016-2020).
- Puntland Sexual Offences Act 2016

46. The environmental licensing process in Puntland is relatively straightforward. Ministries control the licensing procedures, thus:

- The Ministry of Environment and Climate Change (Puntland) has the powers to grant any of the licenses sought;
- Every license shall be subject to such conditions as may be specified therein during the issuance stage;
- The Minister (or any person authorized by him or her) may at any time cancel or suspend any license granted by or on behalf of the minister;
- Grounds for cancellation include suspicions of infringement of any of the conditions upon which said license has been granted;
- The minister may, at any time, also vary the conditions of any such license; and
- Any person aggrieved by any order under this clause may appeal to the minister, whose decision shall be final.
- However, it is unclear if school construction work in Puntland would have to be undertaken subject to the licensing requirements of the state's Environmental Impact Assessment Act. Schedule 1 of the Act¹⁹ classifies projects based on likely scale of adverse environmental impacts on the environment. In this Schedule, small-scale civil works of the nature envisaged in this project are not included.

3.5 Institutional Capacity for Environmental Management

47. **Federal Republic of Somalia.** The Somali government has introduced changes in the institutional set-up dealing with environmental issues in the country. A Directorate of the Environment and Climate Change ("DoECC") has been formed within the Office of the Prime Minister. The Directorate is mandated to draft the national environmental policies, regulations and legislations including establishing of the Environmental Quality Standards, Sectoral Environmental Assessments (SEAs), Environment Impact Assessments (EIAs) and Environmental Audits (EAs), among others. However, necessary laws or legislations have not yet been formulated, and no commissions or authorities have been established as of July 2019.

48. The DoE, part of the Office of the Prime Minister (OPM), takes the lead in the formulation of environmental policies and laws, coordinates stakeholder consultation and partnerships with state agencies, local councils, civil society and private sector entities (Somalia State of the Environment Report, 2019). The Directorate is also the operational focal point for multilateral environmental agreements and funds, such as the Global Environment Facility (GEF), Green Climate Fund (GCF) etc. It is also tasked with conducting Sectoral Environmental Assessments, EIAs and Environmental Audits (EAs).

¹⁹ See <https://www.eia.nl/documenten/00000440.pdf>

49. In November 2020, an environmental impact assessment bill was approved by the Somali cabinet and sent to the parliament for ratification. The Directorate is also the operational focal point for multilateral environmental agreements and funds, such as the Global Environment Facility (GEF), Green Climate Fund (GCF), etc. It is also tasked with conducting Sectoral Environmental Assessments, EIAs and EAs, although at present there are no enabling legislation or regulations in place, other than the aforementioned impact assessment bill. The Bank is offering technical assistance to the Directorate on matters of environmental governance.

50. **Jubaland and South-West State.** Jubaland and South-West states have Ministries of Environment and Tourism (MoE&T), which manage environmental related issues within the respective states. The MoE&T has developed and passed environmental and social impact assessment (ESIA) regulations, which are meant to govern environmental matters, including licensing of public buildings, such as schools.

51. State ministries in charge of environment and tourism are the principal institutions to be consulted before, during and after the implementation of all interventions under the Somalia education project, in so far as they relate to possible environmental and social risks and impact. These ministries are mandated to supervise and co-ordinate all matters relating to the environment. They will likely want to review and approve the safeguards documents such as ESMPs and Resettlement Plans (RPs) during minor civil works implementation in the FMS.

52. **Puntland.** The Ministry of Environment, Agriculture and Climate Change (MoEACC) deals with management of environment and natural resources in Puntland. The ministry collaborates with the Humanitarian Affairs and Disaster Management Agency (HADMA) in the development of climate change, early warning and drought resilience strategies. It also collaborates in the identification and mapping of Puntland disaster prone zones.

53. The MoEACC has responsibility for climate change mitigation and adaptation strategies, and has a five-year plan (2017-2021). Puntland's disaster management authority, HADMA, is not directly involved in environment-related activities, but has a key role in disaster preparedness, management and mitigation. The municipal council of Garowe has overall responsibility for social services, including education management, within its administrative jurisdiction.

54. The Ministry of Planning and International Cooperation (MoPIC) has a three-year development plan (2017-2019) covering livestock, agriculture, social services and the environment. The plan was approved in 2016 by the Puntland Cabinet and is being supported by the UNDP Somali Project Watch Brief.

55. **Benadir Regional Administration (BRA).** BRA is a local government entity, established in law and enshrined in clause 1(b) of article 48 of the Constitution of the Federal Republic of Somalia, which relates to the structure of the state. Benadir is one of the 18 administrative divisions of Somalia established at independence in 1960. Benadir itself is comprised of 17 administrative districts that make up the city of Mogadishu, which is also capital of the Federal Republic. The BRA bears the dual responsibility of managing the affairs of the region as well as the municipality of Mogadishu. Thus, its administrative head is also the governor of the region as well as mayor of the city. Law Number 6 relates to local government and its older version, Law 19, clearly defines the mandates to provide basic services to the city of Mogadishu, including education services.

3.6 International Conventions and Agreements Signed or Ratified by Somalia

56. There are a number of international treaties, agreements and conventions that have been signed or ratified by Somalia. These conventions and agreements are aimed at halting environmental degradation and improving the sustainable use of natural resources, and are relevant for the Somalia education project in various ways. Among the important international conventions related to natural resource use and management that Somalia is a signatory to, include:

- Convention on International Trade in Endangered Species of Wild Fauna and Flora;
- Convention on the Conservation of Migratory Species of Wild Animals;
- Regional Convention for the Conservation of the Red Sea and the Gulf of Aden Environment;
- Protocol concerning Regional cooperation in Combating Pollution by Oil and other Harmful Substances in Cases of Emergency;
- UN Convention on the Law of the Sea;
- Protocol concerning Co-operation on Combating Marine Pollution in cases of Emergency in the Eastern African region;
- Convention for the protection, Management and Development of the Marine and Coastal Environment of the Eastern African Region (Nairobi Convention); and
- Six ILO fundamental conventions (See the LMP for more details).

57. Somalia has 19 International Labour Organisation conventions – including three abrogated conventions. These include the following:

- i. Forced Labour Convention, 1930 (No. 29)
- ii. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- iii. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- iv. Abolition of Forced Labour Convention, 1957 (No. 105)
- v. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- vi. Worst Forms of Child Labour Convention, 1999 (No. 182)
- vii. Medical Examination of Young Persons (Sea) Convention, 1921 (No. 16)
- viii. Workmen's Compensation (Accidents) Convention, 1925 (No. 17)
- ix. Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)
- x. Seamen's Articles of Agreement Convention, 1926 (No. 22)
- xi. Repatriation of Seamen Convention, 1926 (No. 23)
- xii. Underground Work (Women) Convention, 1935 (No. 45)
- xiii. Right of Association (Non-Metropolitan Territories) Convention, 1947 (No. 84)
- xiv. Labour Inspectorates (Non-Metropolitan Territories) Convention, 1947 (No. 85)
- xv. Labour Clauses (Public Contracts) Convention, 1949 (No. 94)
- xvi. Protection of Wages Convention, 1949 (No. 95)
- xvii. Recruiting of Indigenous Workers Convention, 1936 (No. 50)²⁰
- xviii. Contracts of Employment (Indigenous Workers) Convention, 1939 (No. 64)²¹
- xix. Penal Sanctions (Indigenous Workers) Convention, 1939 (No. 65)²²

²⁰ Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

²¹ Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

²² Abrogated Convention - By decision of the International Labour Conference at its 107th Session (2018)

3.7 World Bank ESS

58. **Relevant ESSs.** The World Bank's ESSs seek to avoid, minimize or mitigate the adverse effects of development projects it is financing through the Investment Project Financing (IPF) modality. The compliance with these Standards is required among others, to assure that the project is eligible for World Bank support. Due to the limitation of applicable national and FMS environmental and social laws and regulations, the project will apply the World Bank ESF and the attendant standards. Eight ESSs will be relevant to the project activities are:

- ESS 1: "Assessment and Management of Environmental and Social Risks and Impacts"
- ESS 2: "Labour and Working Conditions"
- ESS 3: "Resource Efficiency and Pollution Prevention and Management"
- ESS 4: "Community Health and Safety"
- ESS 5: "Land Acquisition, Restrictions on Land Use and Involuntary Resettlement"
- ESS 6: "Biodiversity and Sustainable Management of Living Natural Resources"
- ESS 8: "Cultural Heritage"
- ESS 10: "Stakeholder Engagement and Information Disclosure"

59. More details on the ESSs and how they apply to the Somalia education project are enumerated in Table 2.

Table 2: Summary of applicable World Bank E&S Standards (ESSs)²³

Standard	Relevant?	Explanation on application
ESS 1 Assessment and Management of Environmental and Social Risks and Impacts	Yes	<p>This Standard sets out the MOECHE’s responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of Somalia education project in order to achieve environmental and social outcomes consistent with the ESSs.</p> <p>As a result, this ESMF has been prepared, in conjunction with other, appropriate safeguards documentation, including:</p> <ul style="list-style-type: none"> • Resettlement Planning Framework (RPF) • Labour Management Procedures (LMP) • Stakeholder Engagement Framework (SEF), which includes an Inclusion Plan and a Grievance Redress Mechanism (GRM) • GBV Action Plan • Security Management Plan <p>The project will be expected to conduct Environmental Social Impact Assessments (ESIAs) and develop ESMPs for subprojects as determined necessary (see Annexes 3 & 4 on ESIAs and ESMPs, respectively)</p>
ESS2 Labour and Working Conditions	Yes	<p>While the exact labour use (including the number of project workers, their characteristics and timing of workforce mobilization) is to be determined during the implementation of each subproject, the project workers engaged or employed will include:</p> <ul style="list-style-type: none"> • Direct workers (such as consultants hired in the PIU, PMUs, MoECHE, and supervision consultants if required) • Contracted workers (such as skilled permanent staff of the primary contractor (construction company), skilled workers engaged by sub-contractors (such as heavy machine operators), and unskilled community members engaged by the contractor (such as host community members and IDPs including female workers), as well as staff of third-party monitors working with the project) • Primary supply workers (such as workers to produce essential school construction materials such as aggregates and building blocks on an ongoing basis for the project) • Community workers:²⁴ these may include members social accountability committees who will promote transparency and accountability for the project at community level. And will be clarified in the labour management procedures. • Government civil servants such as Federal and State education officers in the ministries and departments, and district police officers. The civil servants will remain subject to the terms and conditions of their existing public sector employment, but comply with OHS requirements including security and GBV/SEAH prevention <p>Potential labour risks and mitigation measures</p>

²³More details at <http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources>

²⁴There will be a need to confirm if the members of these committees will be voluntary or will be considered project workers.

		<ul style="list-style-type: none"> • OHS risks (such as moving equipment and heavy machines, noise, vibration, welding, chemical hazard, working environment temperature, working at height and safety and hygiene in worker camps) • Child labour • Forced labour • Labour influx • Labour disputes over terms and conditions of employment • Discrimination and exclusion of disadvantaged groups (including in payment terms) • Security risks (workers’ exposure to attacks and children’s security while at school) • GBV/SEAH <p>The Labour Management Procedures (LMP) developed for the project, will contain relevant mitigation measures to be incorporated into procurement documents</p>
ESS3 Resource Efficiency and Pollution Prevention and Management	Yes	<ul style="list-style-type: none"> • Because of the nature and relatively moderate scale of the civil works, the risks and impacts related to resource efficiency and pollution will be minor, temporary, and confined to the area immediately surrounding the construction. • The risks related to ESS3 include the normal impacts of civil works (i.e. dust, noise, erosion, surface water sedimentation, pollution from construction wastes and water use), as well as waste from worker campsites, unfilled quarries and burrow pits. • To address these short-term impacts, this ESMF includes standard operating procedures (SOPs) and good construction management practices, including those proposed in WB Environmental and Health Safety Guidelines (EHSs).
ESS4 Community Health and Safety	Yes	<ul style="list-style-type: none"> • Community health and safety impacts will be minor, temporary, and confined to the area immediately surrounding the construction or rehabilitation of schools and classrooms and associated buildings such as ablution facilities and staffrooms. • Anticipated risks and impacts include community health and safety risks associated with construction/rehabilitation work, such as traffic safety, community exposure to diseases (including COVID-19), hazardous materials and emergency preparedness. • Open quarries due to sourcing of materials for construction • To address these short-term impacts, the ESMF includes SOPs and good construction management practices, including those proposed in WB EHSs. • To address potential risks associated with the security personnel to be hired by contractors, the project will develop and implement a Security Management Plan. • Assessment of project related GBV/SEAH/SEA will be conducted during project preparation. • Given the assessment of GBV/SEAH risks for Somalia generally, and considering context of pervasive insecurity, the project will adopt a robust approach to address potential GBV/SEAH/SEA risks. • Relevant mitigation measures to address these risks include integrating Codes of Conduct (CoCs) with GBV/SEAH-related protections, community consultations and mapping activities to identify potential service

		<p>providers, and establishment of GRM with procedures and channels to enable safe, confidential and ethical reporting of GBV/SEAH incidents) are articulated in this ESMF.</p> <ul style="list-style-type: none"> • Additional considerations include the development of a GBV Action Plan and elaboration of provisions for Third Party Monitoring. • The project will also look to include provisions of capacity building and training of relevant stakeholders including contractors, primary suppliers, third party monitors and project workers, in addition to capacity building for the MoECHE. • GBV/SEAH/SEA risks will be monitored throughout project implementation through regular re-assessment with risk screening tool, particularly as new schools and sub-project locations are determined, and through regular monitoring engagement. • Contractors and primary suppliers will be debarred for 2 years if they fail to comply with GBV/SEAH obligations.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Yes	<ul style="list-style-type: none"> • The resettlement impacts of each sub-project are likely to be moderate due to the limited size and nature of the individual physical works. It is notable that schools will be constructed in public land or land donated by the community after an ascertainment that it is not contested and agreed to by representative of residents and users of the land and appropriate government departments • The physical displacement will be minimized and duly compensated. • The economic displacement will largely relate to encroachment on private or community lands or temporary impact during the construction, which will be also minimized. More details are presented in the RPF.
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	Yes	<ul style="list-style-type: none"> • While a few locations in a few municipalities may contain some land with inherent environmental sensitivity relevant to ESS6, the subproject screening process in the ESMF will exclude such sensitive areas. • The ESMF includes specific measures to avoid or minimize negative impact on critical or protected areas if the sub-project screening process does not otherwise exclude these areas.
ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	No	ESS7 is not relevant to the project, as the people in the project area are not considered as Indigenous Peoples as defined under ESS7.
ESS8 Cultural Heritage	Yes	<ul style="list-style-type: none"> • There is the potential for chance find of cultural or archaeological significance during construction or rehabilitation of schools and associated infrastructure, and the existence of some historic buildings in the school neighbourhood that could potentially be impacted from the construction. • The ESMF has been updated to comply with ESS8, and the subproject-specific ESMPs will address these issues through the inclusion of chance find procedures. • More details are available in Annex 5 of this ESMF.
ESS9 Financial Intermediaries	No	Not relevant to this project

<p>ESS10 Stakeholder Engagement and Information Disclosure</p>	<p>Yes</p>	<ul style="list-style-type: none"> • Key stakeholders include beneficiaries, parents, teachers and school committees, including CECs, SAC, other project-affected communities, host communities, federal, state and municipal authorities responsible for education, religious and local leaders, civil society organizations (CSOs), and other development partners. • As discussed in ESS1, the potential disadvantaged groups to be considered for stakeholder engagement include: <ul style="list-style-type: none"> ○ IDPs, refugees and returnees; ○ Poor households (such as female headed, widows, older persons, orphans, persons living with severe illness); ○ Persons with disabilities; ○ Illiterate community members; ○ Nomadic pastoralists; and ○ Minority groups • The project will take differentiated measures to include these groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, discrimination of written materials or graphics or provision of free municipal transport. • More details on the consultation, information disclosure, inclusion plan and the GRM are presented in the SEP.
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60. The project will comply with the ESSs, where potential risks and impacts are anticipated. Where possible, the project will put premium on implementing alternative measures to avoid, minimize, mitigate, manage or compensate adverse environmental impacts. Avoidance measures will be prioritized over mitigatory or compensatory measures consistent with the mitigation hierarchy. Additionally, the project will enhance positive impacts in project selection, location, planning, design, implementation and management.

3.8 World Bank Group EHS Guidelines

61. WBG has guidelines for Environment, Health and Safety (EHS) that serve as useful references for general issues as well as sector-specific activities. Projects financed by the WBG are expected to comply with these guidelines as required by the policies and the standards. The EHSGs are mainly on OHS, community health and safety as well as on construction and decommissioning. It contains guidelines cross-cutting on environmental (waste management, ambient air quality, noise and water pollution), OHS issues among others, applicable to all the industry sectors.

62. The applicability of the EHS Guidelines should be tailored to the hazards and risks established for each project on the basis of the results of an environmental assessment, which should be carried out as part of the ESMPs before civil works. The EHS Guidelines are available at the World Bank's website.²⁵

3.9 Gap Analysis

63. The activities in the Somalia education project need to comply with both existing Somali laws and regulations and World Bank ESSs. This sub-section compares the national public sector environmental and social management rules, regulations and standards to World Bank's Standards. The main objective of this assessment is to help implement this ESMF more effectively at the Federal and State levels in Somalia through an understanding of existing gaps.

64. Table 3 summarizes a comparison focusing on the World Bank policies relevant to the project and gaps identified in existing Somali laws and regulations.

²⁵ See <http://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

Table 3: GAP analysis for Environmental and Social Standards – August 2020

Scope	Bank Standard	Government of Somalia policies, regulations	Gaps identified	Gap-filling measures
ESS1 (“Assessment and Management of Environmental and Social Risks and Impacts”)				
EIA instruments	Range of instruments to satisfy the Bank include EIAs, regional or sectoral EAs, EMPs, etc.	Instruments for environmental assessment have not been delineated adequately at the FGS level, and are absent in the FMS.	EIAs not incorporated into Federal laws, and are weakly captured at State level in only Puntland (and Somaliland) Missing in all the other FMS.	ESMF to guide the borrower.
Environmental impact screening	Screening procedures developed for projects involving sub-projects, as is likely to be the case in the Somalia education project.	There are no clear procedures for screening under the statutes of Somalia.	Screening procedures are absent in all the FMS save for Puntland and to some extent Somaliland.	ESMF to guide the borrower.
Social impact screening	Screening procedures developed for projects involving sub-projects, as is likely to be the case in the Somalia education project.	There are no clear procedures for screening under the statutes of Somalia.	Screening procedures are absent in all the FMS.	ESMF to guide the borrower.
Public consultations	The Bank requires the Borrower to initiate consultations with project-affected persons and other interested parties including CSOs.	Procedures for public consultations not explicitly stated.	Procedures for public consultations not explicitly stated.	The project SEP to guide the borrower.
Monitoring of environmental and social data	Bank requires regular monitoring of environmental and social safeguards data to evaluate the success of mitigation and to foster corrective measures at the earliest possible juncture.	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental and social data.	There are no procedures provided in regulations in the country on the conduct of monitoring activities in the collection of environmental and social data.	ESMF to guide the borrower.

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Institutional arrangements	Requirement by the Bank for specific description of institutional arrangement and implementation schedule for monitoring and mitigation measures.	<ul style="list-style-type: none"> MoECHE as the project implementing partner. Directorate of the Environment and Climate Change in the Office of the Prime Minister, to be responsible for oversight of environmental matters. 	<ul style="list-style-type: none"> MoECHE has capacity for technical implementation of project interventions but will require Safeguards support. Directorate of the Environment in the Office of the Prime Minister may be responsible for coordinating institutional responses under this ESMF, but the institutional information is not available and its remit is unknown, as is the technical capacities. 	Respective PMUs to work with the respective ministries and agencies responsible for management of environmental and social matters for development projects as the focal points for administration of this ESMF.
ESS2 (“Labour and Working Conditions”)				
Management of different types of project workers	The Bank puts emphasis on the identification and characterization of different types of workers (project workers, direct workers, contracted workers, community workers, primary supply workers) to manage different types of labour risks.	Labour Code of Somalia (Law Number 65, adopted in 1972) is the specific labour law governing all aspects of labour and working conditions, which covers the contract of employment, terms and condition, remuneration, and OHS, trade unions and labour authorities. The provisions of the Labour Code apply to all employers and employees in all project municipalities. The Labour Code is applicable to all project workers of the Somalia education project.	The Labour Code is broadly consistent with the ESS2, while there is a significant gap in the enforcement aspect of the legislation. More details are presented in the LMP.	ESMF and the Labour Management Procedures (LMP) to guide the borrower.
Labour standards	Several provisions made under ESS2 to safeguard the workers, promote safety at work and ensure that they have a viable means of communicating grievances and receiving redress.	<ul style="list-style-type: none"> Article 24(5) stipulates that all workers, particularly women, have a special right of protection from sexual abuse, segregation and discrimination in the work place. The Puntland Sexual Offences Act 2016 prohibits sexual harassment. Article 14 prohibits Human trafficking: A person may not be subjected to slavery, servitude, trafficking or force labour offences. 	<p>The new labour code, amending the code from 1972, has not been passed yet.</p> <p>The implementation of the existing articles in practice may not be very strong.</p>	<p>The Project will not allow any forced and child labour. It will hold all contractors liable to the implementation of the LMP.</p> <p>The PIU will have overall responsibility to monitor the</p>

		<ul style="list-style-type: none"> • Every labour law shall comply with gender equality. • Provisional Constitution of the Federal Republic of Somalia Article 14 stipulates that a person may not be subjected to slavery, servitude, trafficking, or forced labour for any purpose. • The Labour Code of 1972 stipulates that all contracts of employment must include: (a) the nature and duration of the contract; (b) the hours and place of work; (c) the remuneration payable to the worker; and (d) the procedure for suspension or termination of contract. Furthermore, all contracts must be submitted to the competent labour inspector for pre-approval. 		<p>implementation of the LMP.</p> <p>The Project will fully comply with WB ESS 2. This is set out in the LMP (see annex 1).</p>
ESS3 (“Resource Efficiency and Pollution Prevention and Management”)				
Pollution prevention and management	This ESS requires the Borrower to undertake a health and safety risk assessment of any existing pollution which may affect communities, workers and the environment, especially in the school environment which will be the main arena for project implementation.	<ul style="list-style-type: none"> • There are no known national construction standards for schools, however the MoECHE intends to apply the UNICEF Safe Schools Standards and commitments related to school EHS standards. • No known national statutes in support of periodic environmental audits. • No national pollution standards known at the time of developing this ESMF. 	There are no supporting legislative frameworks for pollution prevention and management.	ESMF to guide the borrower on pollution prevention and management.
Management of hazardous wastes	The Bank requires the Borrower to undertake specific measures to manage both hazardous and non-hazardous wastes.	<ul style="list-style-type: none"> • No known national legislation or policies on management of hazardous wastes. 	There are no approved hazardous waste disposal sites in Somalia.	ESMF to guide the borrower on the management of both

	<p>Specific emphasis is given in this ESS with respect to transportation and disposal, obtain chain of custody documentation to the final destination. Approved disposal sites are required for this ESS.</p>	<ul style="list-style-type: none"> Provisional Constitution of the Federal Republic of Somalia - Article 25 of the Constitution states that every Somali has the right to an environment that is not harmful to them, and to be protected from pollution and harmful materials. <ul style="list-style-type: none"> Every Somali has a right to have a share of the natural resources of the country, whilst being protected from excessive and damaging exploitation of natural resources. Article 45 states that the Government shall give priority to the protection, conservation, and preservation of the environment against anything that may cause harm to natural biodiversity and the ecosystem. <ul style="list-style-type: none"> All people have a duty to safeguards and enhance the environment and participate in the development, execution, management, conservation and protection of the natural resources and the environment. 		<p>hazardous and non-hazardous wastes.</p>
<p>ESS4 (“Community Health and Safety”)</p>				
<p>Health of community members</p>	<p>The ESS anticipates that the project will put measures in place to anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life-cycle from both routine and non-routine circumstances. Further, it provides for the avoidance or minimization of</p>	<ul style="list-style-type: none"> The Somali Penal Code of 1962. The Code criminalizes rape and other forms of sexual violence as well as forced prostitution. Articles 398-9 provide that ‘carnal intercourse’ and ‘acts of lust omitted with violence’ are punishable with 5-15 years and 1-5 years of imprisonment. Abduction for the 	<p>The Somali Penal Code of 1962 fails to protect survivors and prosecute perpetrators for GBV/SEAH/SEA crimes.</p> <p>The crimes under Articles 398-9 are too narrowly defined to satisfy international law standards of protection from sexual and GBV/SEAH.</p>	<p>The LMP, SEP and the GBV Action Plan developed for this project will guide the reduction of harm to communities affected by the project.</p>

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	community exposure to project-related traffic and road safety risks, diseases and hazardous materials.	<p>purpose of lust or marriage is prohibited under Art 401.</p> <ul style="list-style-type: none"> Article 39(i) makes abuse of power in the commission of a crime an aggravating circumstance and Article 33 provides that when a superior officer orders the commission of an offence both the perpetrator and his superior will be liable. 	<p>Furthermore, in practice however it has been documented that women complaining about a rape may find themselves trapped by the Article 426 prohibition against adultery that makes no exception for the case of rape.</p> <p>In practice provisions under Art 39(i) offer little more than theoretical protection.</p>	
Security personnel	<p>ESS4 states that when the Borrower retains security personnel to safeguard workers and property, it will assess the risks posed by these security arrangements to those within and outside the project sites.</p> <p>The Borrower will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat.</p>	<p>District police will likely provide security services in the implementation of the Somalia education project. The civil servants in Somalia are governed by Provisional Constitutions and Civil Service Law (Law Number 11).</p> <p>However, there are no security protocols guiding their deployment, and there is possibility of violence meted out on civilians or workers or even the possibility of rent-seeking.</p>	<p>While the security protocols guiding the deployment and use of force are broadly unknown, the project will coordinate with the law enforcement authorities in each municipality to manage associated risks.</p>	<p>The project to be guided by the ESMF and relevant provisions of ESS4 on the deployment of security personnel to construction sites in schools where security risks are deemed 'high'.</p> <p>The project will also develop and implement a Security Management Plan.</p>
ESS5 ("Land Acquisition, Restrictions on Land Use and Involuntary Resettlement")				
Physical and economic displacement	<p>ESS5 covers the involuntary taking of land, resulting in loss of shelter or loss of assets: a hierarchy has been provided that seeks to minimize losses to affected persons. It forbids forced evictions.</p>	<ul style="list-style-type: none"> Provisional Constitution of the Federal Republic of Somalia, Article 26 states that every person has the right to own, use, enjoy, sell and transfer property The Provisional Constitution defines land as public property. The government has created means to transfer some land into private ownership by granting ownership for 	<p>There is a lack of detailed legislation governing land use and ownership. Evictions are reported to be commonplace in Somalia.</p> <p>There are no functional national or state policies guiding involuntary resettlement of persons that may be affected by the project. More details are provided in the RPF.</p>	<p>RPF to guide the borrower.</p>

		<p>urban and agricultural land.²⁶ Formal legal frameworks now exist alongside customary land management.</p> <ul style="list-style-type: none"> • The State may compulsorily acquire property only if doing so is in the public interest. Any person whose property has been acquired in the name of the public interest has the right to just compensation from the State as agreed by the parties or decided by a court. • Compensation is provided only for occupants of temporary structures. Affected persons are to be settled in suitable land and their eviction and settlement costs be paid for by the local government. • Provisional Constitution of Somalia (Article 43) calls for consultation between the Mayor and the Planning Committee prior to the expropriation of private land. 		
ESS6 (“Biodiversity Conservation and Sustainable Management of Living Natural Resources”)				
Biodiversity restoration	In accordance with the mitigation hierarchy provided in ESS1 and with the requirements of this ESS, Borrower is required to ensure that biodiversity expertise is utilized to develop and implement a Biodiversity Management Plan.	<ul style="list-style-type: none"> • Somalia has developed National Biodiversity Strategy and Action Plan (NBSAP), which calls for action to be taken to manage the 40+ identified biodiversity hotspots. 	However, no draft management plan is provided in Somalia’s NBSAP.	The project to be guided by the ESMF and relevant provisions of ESS6 on biodiversity restoration where the project interfaces with biodiversity and other environmentally sensitive areas
ESS8 (“Cultural Heritage”)				

²⁶ IGAD, Somalia. Land Governance Country Profile, Assessment of Land Governance Framework, Training & Research Land Governance Institutions, accessed at: <https://land.igad.int/index.php/countries/39-countries/somalia/40-somalia-profile?showall=1>

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Management of risks on tangible and intangible cultural heritage, including legal protection to cultural heritage sites	This ESS requires the Borrower to manage risks on tangible and intangible cultural heritage, including identification of the presence of all listed legally protected cultural heritage areas affected by the project.	No information is available at hand on how the FGS intends to manage cultural heritage.	There are no explicit laws or regulations known to be delineating sites as places of cultural importance.	ESMF to guide the Borrower.
ESS10 (“Stakeholder engagement and information disclosure”)				
Meaningful engagement of stakeholders in the project activities from planning to implementation levels	The World Bank anticipates that the project will establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. Further, the project will 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. The project affected persons should be provided with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.	Provisional Constitution of the Federal Republic of Somalia: Article 32 stipulated that every person has the right of access to information held by the State. The Federal Parliament shall enact a law to ensure the right of access to information.	The law on the right of access to information currently only exists as a draft	<p>The Project will implement stakeholder consultations throughout the lifetime of the project, as per the SEP.</p> <p>The PIU will ensure that a grievance mechanism for the project is in place, in accordance with ESS10 as early as possible in project development to address concerns from project affected persons.</p>

4. PROJECT BIOPHYSICAL AND SOCIO-ECONOMIC SETTING

65. This section focuses on the existing biophysical and socio-economic environments in the proposed states. Physio-geographically, Somalia is a country of limited contrasts, but for the purposes of the Somalia education project, this ESMF will treat the project sub-regions as three relatively distinct continuities:

- Somaliland, Puntland and Galmudug (arid agroecology);
- Hirshabelle, Jubbaland and South-West State (semiarid agroecology); and
- Mogadishu (coastal marine agroecology).

66. Ecologically-sensitive sub-regions within the regions will be identified where possible.

4.1 Introduction

67. The proposed project will be implemented in a context of ecologically fragile environments, in some places (such as Puntland) characterized by a high number of arid-adapted flora (including the deciduous species of *Acacia* and *Commiphora* in addition to *Euphorbia* and *Aloe* variants forming understory) and fauna (such as the Dorcas gazelle, Beisa oryx, gerenuk, the Somali wild ass - *Equus africanus somaliensis* and the Somali warthog, *Phacochoerus aethiopicus delamarei*) species, many of them endemic. Some of these species used to thrive in the country's national parks and game reserves, which were relatively well protected in the reign of former central government. Following the collapse of the former regime, the parks have all but disappeared, and it was extremely difficult to gather any information on their current state, actual boundaries, management, etc.

68. Many of the species aforementioned are categorized as Critically Endangered (CR), Endangered (EN) or Vulnerable (VU) in international conventions and agreements, such as the World Conservation Union's Red List of Threatened Animals.²⁷ Some of the endangered flora and fauna species, according to the IUCN Red List, include *Aloe eminens*, *Aloe hildebrandtii*, *Aloe grisea*, *Mirafra ashi*, *Mirafra sharpie*, *Aloe ambigens*, *Aloe albovestita*, *Dirachma somalensis*, *Aloe scobinifolia*, *Aloe cremnophila*, *Aloe gracilicaulis*, *Aloe gillettii*, *Aloe bella*, *Cleopatra rugosa*, *Aloe peckii*, *Ceratonia oreothauma* subsp. *somalensis*, *Hildegardia gillettii*, *Elapsoidea chelazzii*, *Linaria johannis*, and *Vigna monantha*. Somalia has ratified the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES), but few if any practical measures are being taken to ensure its implementation. Like for the fisheries, the wildlife is also subject to illegal, unreported and unregulated trapping and trafficking.

69. As a precaution, it will be critically important for the PMUs to engage with communities, contractors, civil society and other government MDAs to ensure that the project does not affect existing biodiversity.

4.2 Climate

70. All the proposed project states share similar characteristics, climate-wise. There is generally warm and arid climate across most parts of Somalia, although precipitation and the wind can be highly variable in places at certain times of the year (on account of proximity to the equator). Typically, the Somali climate is hot and semi-arid to arid, with two annual rainy seasons *Gu'* (which spans from April to June), and *Deyr* (which takes place from October to November). There are variations in spatial distribution of rainfall, with about 500 mm recorded annually in the northern highlands and between 300 and 500 mm in the southern regions. The coastal plains register only between 50 and 150 mm.

²⁷ See <http://www.animalinfo.org/country/somalia.htm>

71. Annual potential evapotranspiration (PET) is high, exceeding 2,000 mm in the northern basins and can be as high as 3,000 mm in the Gulf of Aden. Over the dry period, the vegetation is sustained mainly through the shallow aquifers found along the dry riverbeds (*tog* or *wadis*) across the country. Fertile flood plains and continuous recharge from the Juba and Shabelle Rivers, both originating from Ethiopian highlands, also provide sustained development growth along the riverine areas.

4.3 Ecosystems

72. Somalia's environmental complement, especially the vegetation resources, offers contrasting experiences, and this is due to the spatial and temporal precipitation distribution. There are four main eco-regions in Somalia, whose distribution is determined by the spatial and temporal distribution of the two annual rainfall seasons:

- The dominant xeric grasslands and shrub-lands (accounting for 74 percent of the country's landmass);
- Somali montane xeric woodlands (14 percent);
- East African mangroves (11 percent); and
- Coastal forest mosaic (11 percent).

73. Farms in the south-central region, urban centres and other settlements account for the remaining 1 percent of dry landmass.

4.4 Socio-economic Environment

4.4.1 Geography, Landmass and Population

74. Somalia, with a landmass of about 627,340 km², has a population estimated to be 16,143,406²⁸. Estimates show that, out of the total population, 7,431,038 people were living in urban centres in 2020. This accounts for a relatively highly urbanized society (standing at ~46.8 percent). The population density is estimated at 25 persons per km², one of the lowest in East Africa. The median age in Somalia is estimated to be 16.7 years. The population's livelihoods are connected to either livestock husbandry, smallholder dryland agriculture, itinerant commerce or remittances from diaspora.

75. The United Nations Population Fund (*formerly the United Nations Fund for Population Activities*) estimated that in 2014²⁹ the total population of Somalia was 12.3M which was broken down to 1,830,073 for Puntland, 508,180 for Somaliland and 6,462,580 for the rest of Somalia.

4.4.2 Poverty in Somalia

76. The United Nations classifies Somalia as a least developed country. The socio-economic situation of the country is described as "very poor" in the National Development Plan (2017-2019)³⁰, with approximately 69 percent of Somalis reportedly living below the poverty line. Poverty cuts across sectors, location, group and gender, and its forms and causes vary. An understanding of Somalia's geography, recent trends in its economy and consequences of civil strife is important to determining the nature and extent of its poverty. There is more stability in the northern regions (Somaliland and Puntland), and consequently less poverty. Poverty in Somalia is more pronounced in the IDP camps, where it is estimated to be 88 percent, followed by rural areas with 75 percent and urban areas with 67 percent.

²⁸ These estimates are based on information from <http://www.worldometers.info/world-population/somalia-population/>

²⁹ UNFPA Population Estimates Survey of Somalia 2014

³⁰ See <http://extwprlegs1.fao.org/docs/pdf/som169866.pdf> for a copy of the Plan

77. Somalia's economy is largely consumption-based and dominated by agriculture, while it is also supported by remittances and large aid flows. Remittances and aid flows are estimated at USD 1.4 billion a year, which represented 29 percent of Somalia's GDP in 2018. Agriculture plays a key role by constituting 75 percent of GDP, and 93 percent of total exports. Other sectors driving growth are construction, telecommunications and money transfer services.³¹ Approximately half of Somalia's population depends on pastoralist and agro-pastoralist activities. According to the recent Flood Impact Needs Assessment conducted by the FGS and the World Bank, this means that people remain highly vulnerable to natural disasters.³²

4.4.3 Human Development

78. Somalia scores very low on UNDP's HDI. Although it has not been ranked for a few years, different indicators reveal low scores. For example, life expectancy at birth lies at 57.1 years with a global average of 56 years³³ in low human development countries³⁴; and the mortality rate under the age of 5 is at 127 per 1000 life births³⁵, while the global average is 39³⁶.

4.4.4 Education

79. The school enrolment rates in Somalia are among the lowest in the world. In the education sector, only 16 percent of the Somali population have completed primary school and only 7 percent have finished secondary school.³⁷ Three (3) million children between the age of 6 and 18 do not attend any school. At the primary level, about 60 percent of children do not attend school. At the secondary level 92 percent of children (mainly in the south central parts of the country) do not attend school. The recent flooding has caused additional challenges on the education of children, as it has displaced people, made access more difficult and has caused the exclusion of some.³⁸

80. Literacy in Somalia is 40 percent among the adult population, with male literacy at 8 percentage point higher than female. There are significant differences in the literacy rate between social groupings. For example, urban populations have the highest literacy rate with 64 percent, while nomadic populations have the lowest literacy rate with 12 percent. Among the FMS, Hirshabelle has the lowest literacy rate at 20 percent; South West State has 26 percent and Jubaland 29 percent.³⁹

81. In particular in South Central Somalia, child recruitment, compulsory military training, segregation of boys' and girls' classes and concerns over attacks on education institutions remain key challenges in the provision of education for all children. Furthermore, there are inadequate water and sanitation facilities, limited classrooms and supplies, as well as a shortage of teachers in overcrowded schools.

³¹Government of the Federal Republic of Somalia and The World Bank, Somalia. 2019 Flood Impact and Needs Assessment, February 2020, p. 18.

³² Government of the Federal Republic of Somalia and The World Bank 2020, p. 18.

³³ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

³⁴ UNDP, Human Development Report 2019, p.38.

³⁵ UNDP, Human Development Reports. Somalia, accessed at: <http://hdr.undp.org/en/countries/profiles/SOM>

³⁶WHO, Children. Reducing Mortality, factsheet, accessed at: <https://www.who.int/news-room/factsheets/detail/children-reducing-mortality>

³⁷UNICEF and World Health Organization, Joint Monitoring Program, 2019, accessed at: <https://washdata.org/data#!/som>.

³⁸ Government of the Federal Republic of Somalia and The World Bank, Somalia. 2019 Flood Impact and Needs Assessment, February 2020, p. 58

³⁹ FGS, Ministry of Education, Culture and Higher Education, Education Sector Strategic Plan 2018-2020, p.29

Additional enrolments of IDP children makes the situation even more dire. Absence of school feeding programs in famine and drought prone zones disrupts school attendance as well and drops the nutrition status of children.⁴⁰ Access to education is particularly difficult for nomadic/pastoralist populations, with only 16 percent of nomadic population age 6 and above being enrolled in school.⁴¹

4.4.5 Water and Sanitation Hygiene

82. Access to basic water supply is estimated at 83 percent in urban areas and 28 percent in rural areas. About two-thirds (61 percent) of the population has access to basic sanitation facilities in urban areas and 20 percent in rural areas. According to a UNICEF report, the key challenges are weak water supply management models, high operational management costs and technical limitations. There is further a lack of a harmonized legal and policy framework and policies in place and inconsistency with implementation.⁴²

83. Frequent droughts have had negative impacts on the water sector, while conflicts have weakened the water supply and sanitation services. WASH facilities have been destroyed as a result of conflict, and there is a lack of sufficient WASH facilities for the large number of IDPs. Furthermore, the population pressure causes over pumping of ground water, and the wearing out of equipment.⁴³ Even though various aid programs have supported the development of latrines, UNICEF reports that there is little impact on increased use of latrines or improved sanitation and hygiene more so in the rural areas. There is further a lack of sustainability of latrines and little indication of behavioural change among the population. Widespread displacement and recurrent emergencies contribute to this dire picture. Diseases like cholera are therefore widespread in Somalia, with a total of 164,000 cases reported between 2006 and 2015.⁴⁴

4.4.6 Agriculture, Livestock and Livelihoods

84. Only about 10 percent of Somalia's land can be described as arable and suitable for crop production. Somalia's agricultural sector, which accounts for 65 percent of the GDP and employs 45 percent of the active workforce (Somalia Agriculture Report, 2018), relies on the state of health of the country's natural capital (vegetation and water resources). It is worth noting that the livestock sub-sector alone accounts for between 80 to 90 percent of agricultural GDP and contributes about US\$2.4 billion (or about 40 percent of total GDP) and more than 90 percent of export earnings (*ibid*), and grows 6 percent annually.

85. According to the Somalia Agriculture Report (2018), total agricultural exports have climbed every year since the late 2000s, to a peak in 2015 of \$634 million, more than five times the value before the civil war. The Somalia Supply and Market Outlook Assessment report by FEWSN (2017) identifies the country's four main staple foods as maize, sorghum, rice, and wheat. While maize and sorghum are grown locally, rice and wheat are almost entirely imported.

86. The economy of Somalia mainly depends on livestock production, which has historically and culturally been the mainstay of livelihood for the majority of the people. The livestock production system in Somaliland is predominantly pastoral and agro-pastoral, with the industry providing 29.5 percent of

⁴⁰ Ditto, p. 25-26

⁴¹ Ditto, p. 30

⁴² UNICEF Somalia Country Office, Water, Sanitation & Hygiene (WASH) Profile, February 2020, p.2, accessed at: <https://www.unicef.org/somalia/media/1251/file/Somalia-wash-profile-February-2020.pdf>

⁴³ Ditto, p. 2

⁴⁴ Ditto, p. 3.

GDP in Somaliland and employing 27 percent and 20 percent of the female and male workforce, respectively in Somaliland.

87. Livestock is the source of livelihood for pastoralists, contributes to the Government revenues, and provides employment to a wide range of professionals and other service providers. Somaliland has a long history of live animal export to the Arabian Gulf states through Berbera port on the Red Sea.

88. The movement of these pastoralists is often organized and follows a regular pattern in which clan-based groupings have their traditional grazing areas and/or common watering points and temporary camps. In some parts of the country, pastoralists co-habit with farmers to access crop residues for their animals. In other places, the pastoralists take advantage of heavy rains and floods for agricultural purposes, planting crops in areas cleared for the production of forage or grain.

89. Somalia is prone to flooding. Most of the flooding in 2019 occurred in Middle and Lower Juba, Bay, Lower and Middle Shabelle, and Hiraaan. Weeks of flooding have destroyed physical, productive, and social service delivery infrastructure. Physical infrastructure, such as roads were turned into rivers, and agricultural land was fully destroyed, and livestock lost.

90. According to FAO, since 2016, Somalia has faced climate shocks for eight agricultural seasons. About 2.1 million people currently live in severe acute food insecurity; and 1 million children are acutely malnourished.⁴⁵

4.4.7 Labour and Employment

91. In the labour sector, 47 percent of the population in South Central Somalia is unemployed. The rate is even higher among the youth at 54 percent.⁴⁶ The main employment is in the agricultural sector, where 72 percent of employees worked in 2019; followed by 6 percent in the industrial sector, and 21 percent in the service industry.⁴⁷ In addition, as ILO points out, the legal and judicial systems governing employment are still weak; and there are few private or public insurance institutions; in addition, there are no labour inspection systems. This indicates that workers can be exposed to hazardous work without adequate protection, and child labour is a common practice in Somalia.⁴⁸

92. In view of child labour and trafficking, in Somali culture, girls and boys are expected to take part in household chores from around the age of five years, especially in rural areas. The distribution of such tasks is highly gendered and the burden skewed towards girls. Boys are usually responsible for maintaining income-earning and food-producing animals such as cattle and goats, while girls attend more to cooking, cleaning and resource gathering responsibilities. In situations of extreme poverty, girls may work in domestic roles or engage in survival sex. Poverty-driven child labour is not generally considered to be a violation of children's rights and children are forcibly recruited within Somalia and used as labour in agriculture, livestock herding, construction, sexual servitude, domestic service and sexual exploitation.

⁴⁵ UNFAO, Somalia Humanitarian Response Plan 2020, accessed at: <http://www.fao.org/3/ca7825en/CA7825EN.pdf>

⁴⁶ Federal Republic of Somalia, Ministry of Education, Culture and Higher Education, Education Sector Strategic Plan 2018-2020, p.13

⁴⁷ Statista, Somalia: Distribution of Employment in by economic sector from 2009 – 2019, accessed at: <https://www.statista.com/statistics/863133/employment-by-economic-sector-in-somalia/>

⁴⁸ ILO, Decent Work Programme, Somalia 2011-2015, p. 12.

4.4.8 Land Issues

93. Land conflicts in Somalia have risen to be one of the key factors of instability at the community and inter-community level. This is partly due to a complex situation of land tenure. While the Agricultural Land Law of 1975 abolished private ownership, the current situation is very unclear. Only few local people registered their land at the time, and the civil war further impacted the situation negatively. Customary land tenure has therefore taken the centre stage in ordering land ownership and usage. It is focused on clan relations and on pastoral land use rather than norms of individual ownership. The Provisional Constitution defines land as public property. The government has created means to transfer some land into private ownership by granting ownership for urban and agricultural land.⁴⁹ Formal legal frameworks now exist alongside customary land management.

94. Land disputes and grievances have been identified in the existing literature as a major issue of contestation. A study on land in Mogadishu by the Rift Valley Institute (RVI) even estimated that 80 percent of cases filed at the Supreme Court were connected to land grievances.⁵⁰ Furthermore, ongoing forced evictions are a key challenge for IDPs in Somalia. Due to insecure land tenure arrangements in IDP settlements, it is often difficult for IDPs to secure their rights. According to ReDSS, an annual average of 155,000 individuals have been evicted across Somalia, mainly in Mogadishu and Baidoa. Evictions take place from both public and private infrastructure. Key protection challenges are that IDPs settle on public land or private plots with contested ownership. Women and girls are thereby most vulnerable, as they encounter GBV/SEAH challenges in addition to loss of assets and livelihoods.⁵¹

4.4.9 Cultural Heritage

95. Somalia has rich cultural heritage due to its own cultural goods '*dhaqan*', including the fundamentals of a segmented society and the resulting social fabric. Traditions often originate in the proto-Somali cultural era or originate in the many interactions Somali populations have had with other cultures, including those from the Arabian peninsula, India and sub-Saharan Africa. The protracted conflicts and the civil war in Somalia, however, have had significant impacts on the loss of tangible and intangible cultural heritage. Deliberate efforts have to be made to protect cultural heritage. Unfortunately, the country's legislation around these issues has not yet been developed and does not legally enforce the protection and preservation of cultural artefacts, cultural heritage and distinct sub-national identities. Infrastructure development projects should, therefore, support the protection of places of cultural and religious significance, including graveyards, religious buildings, and historical sites.

4.4.10 Security and Conflict Environment

96. Somalia ranked second on the Fragile State Index of 2019 with a total score of 112.3, only topped by Yemen with a score of 113.5.⁵² Somalia's indicators on factionalized elites, and demographic pressures score the highest.

⁴⁹IGAD, Somalia. Land Governance Country Profile, Assessment of Land Governance Framework, Training & Research Land Governance Institutions, accessed at: <https://land.igad.int/index.php/countries/39-countries/somalia/40-somalia-profile?showall=1>

⁵⁰RVI 2017, p. 67

⁵¹ReDSS, Forced Evictions as an obstacle for durable solutions in Somalia, March 2018, accessed at: <http://regionaldss.org/wp-content/uploads/2018/03/Forced-evictions-as-an-obstacle-to-durable-solutions-210318.pdf>

⁵²Fragile State Index 2019, accessed at: <https://fragilestatesindex.org/data/>

97. Somalia has had a long history of civil war, which followed the Siad Barre regime that ended in 1991. Clan-based militias turned the country into chaos and prevented an effective central government for a long time. A Transitional Federal Republic was formed in the early 2004 and lasted until the 2012 when the country adopted the provisional federal constitution, and a Federal Republic was established with Hassan Sheikh as the president. The FGS came into power following more than two decades of civil war and transitional governance arrangements. With the new President, the federal state building process commenced⁵³ under the framework of the distinct peacebuilding and state building goals of the New Deal/Compact, which was signed in September 2013. However, the last years have been dominated by political infights and clan-related tensions, including in the establishment of the FMS. This has worsened the security situation in the country.

98. There is significant conflict at different levels in Somalia. Some insecurity stems from clan competition, which goes back into historical movements and power distribution. Often it is combined with localized competition over resources, for example over land or water sources. Such insecurity and conflict can be due to continued local tension between different communities, competition over sources of power, such as governmental positions, as well as competition over aid resources brought down to the state or district level.

99. The social impacts and potential aggravation of resource-related conflicts is well documented in a range of pastoralist and agro-pastoralist assessments carried out in the Somali region.⁵⁴ Access to water and pasture is a fundamental source of both conflict and co-operation between clans and civil authorities throughout the Somali region. In terms of conflict, extensive trans-boundary movements of livestock and limited access to the combination of water and pasture is one of the primary drivers of conflict across the Horn of Africa and within Somalia. Following decades of low investment in Somalia, water points with adequate surrounding pasture are especially scarce, claimed by clans, fiercely guarded and intrinsically linked to resource conflict.

100. The Islamist group Al-Shabaab still controls areas in South Central Somalia, providing harsh treatment, forced recruitment vis-à-vis the local populations. It infiltrates other areas and conducts deadly attacks on citizens. Most importantly, Al-Shabaab has introduced a harsh tax system in its areas of control and beyond. It has also started to expand on other administrative functions, such as the provision of justice.⁵⁵ Given the weakness of the formal justice system in the country, people have been turning to Al-Shabaab courts, where swift justice and the execution of judgments is guaranteed. Al-Shabaab remains a key source of violence, attacking government facilities, personnel, security forces, and members of international organizations. In 2019, Somali-led offensives in Lower Shabelle led to the ousting of Al-Shabaab in the area. However, Al-Shabaab has shifted to different areas and has maintained attacks on the newly recovered area.⁵⁶

101. It is notable that different armed groups maintain checkpoints along key entry points of the country to extract fees from travellers. People are thereby associated with their clans, and have difficulties

⁵³Under the FRS, the state level governments are Puntland State of Somalia, Jubaland State of Somalia, and two interim administrations, i.e. Galmudug State and the Interim South West Administration. Somaliland is a self-declared state. State formation is currently ongoing in the Hiraan and Middle Shabelle regions. The formation is complete and all the interim administrations are now functioning Federal Member States.

⁵⁴Lewis 1961; Lewis 1998; DfID 2005; Gomes 2006 Access to water for pastoral resources management

⁵⁵Security Council, S/2019/858, p.3

⁵⁶Security Council, S/2019/884, p. 3/17

moving and working in areas in which their clans are not prominent. Even government checkpoints can be little efficient, as they are subject to corruption.⁵⁷

102. Somalia therefore remains trapped in continued fragility, which is protracted by insecurity, endemic corruption, fledgling government capacity, predatory armed groups and spoiler networks. This poses significant security risks for the population, but also for the planned project activities. These include terrorist attacks, hijackings, abductions, and killings. The state security apparatus is however very weak, and is underpinned by clan dimensions as well. There are sometimes blurred lines between the state security apparatus, local militia or other armed factions.

4.5 Vulnerability and Social Exclusion

103. Internal Displacement: In April 2020, OCHA reported that there were 2.6 million IDPs in Somalia⁵⁸ due to disaster and conflict, among other shocks. Conflict and violence triggered 578,000 new displacements and disasters 547,000.⁵⁹ During the drought in 2017, people dependent on livestock and agriculture had to abandon their rural homes to find new opportunities, migrating predominantly to urban areas. Drought conditions are contributing to already pronounced rates of acute and protracted displacement. More than 278,000 people were displaced in March 2020 alone within Somalia due to the drought, bringing the total number to approximately 585,630 since December 2016⁶⁰.

104. Camps are heavily congested and have also proportionally received the largest number of new arrivals⁶¹. Displaced women and girls are among the most disadvantaged 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 increase exposure to violence.

105. IDPs commonly settle in informal urban settlements, where access to services and conditions is poor, and where they often become victims of forced eviction, sexual harassment, exploitation and forced labour. Conditions of displacement often compound existing conditions of vulnerability and poverty. They are therefore part of the poorest strata in Somalia, and are often in dire need of access to food, water, sanitation, health services, shelter and education.⁶² Generally, the socio-economic and human development indicators for IDPs are worse than those of non-IDPs. While 7 in 10 Somalis are poor, over three in four IDPs live under 1.90 \$ per day.⁶³

⁵⁷J. Sanya and I. Mwenda, Mogadishu. When Checkpoints don't work, Horn International Institute for Strategic Studies, accessed at: <https://horninstitute.org/mogadishu-when-checkpoints-dont-work/>

⁵⁸OCHA, Somalia Situation Report, 5 April 2020.

⁵⁹Internal Displacement Monitoring Center, The Ripple Effect. Economic Impacts of Internal Displacement. Case Studies in Eswatini, Ethiopia, Kenya and Somalia, Thematic Series, January 2020, p. 30.

⁶⁰UNHCR, UN Habitat, IOM, JIRA and Local Ministries of Interior, IOM and The World Bank, 2017

⁶¹JRIA 2016

⁶²Internal Displacement Monitoring Center 2020, p. 30.

⁶³The World Bank, Somali Poverty and Vulnerability Assessment, Findings from the Wave 2 of the Somali High Frequency Survey, April 2019, p.73

106. Minority groups (ethnic minorities such as Bantu, Bajuni, Benadiri,⁶⁴ RerXamar, Bravanese; or occupational groups such as Midgan/Gabooye, Tumul, Yibir, Galgala) that are estimated to represent up to one third of the population in Somalia, 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 violations of their rights, both as women and as members of a minority group. The marginalization and social segregation of disadvantaged groups is one of the key driving forces of the protracted massive displacement of people and the difficulty to find durable solutions for them. Minorities in Somalia can be considered to be those who fall outside the four main clans. There are three main groups of minorities occupational groups, coastal communities and bantu groups:

- i. **Occupational groups** – these communities, including Gabooye, Tumul and Yibir - traditionally fulfilled a particular function that was considered taboo by the main Somali clans. This included leatherworking, pottery, metalworking, hunting and some traditional health practices (including carrying out FGM). These communities are found all over Somalia. 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.
- ii. **Coastal communities** – these communities including Ashraf, Benadiri, Bajuni, Bravanese – often resulted from migrants from the Arabian Peninsula (but also Italians), who settled and inter-married with Somalis. Once living relatively privileged lives, often in larger coastal urban centres, many of these communities were displaced by conflict (both internally and internationally) and their communities were decimated.
- iii. **Bantu groups** – more often found in South Central, these communities may have originally migrated north from the Bantu lands of Central and Eastern Africa. These communities were more likely to earn a living by growing crops – often in the fertile riverine areas of South Central, they coexisted with the major Somali clans who lived more by pastoralism with systems of patronage keeping the Bantu groups in a servile and sometime unpaid labourer positions.

107. These groups are often discriminated against and/or excluded against in services and jobs and typically do not participate effectively in government or other institutions, and therefore have their voices less represented.

4.6 Gender

108. UNDP Somalia reports that the country has one of the highest gender inequalities in the world, at 0.776, which ranks fourth in the world. The country has an extremely high maternal mortality, rape, FGM/C and child marriage rates, while violence and GBV/SEAH/SEA against women and girls is common. The participation and roles of women in politics and decision-making is minimal, which perpetuates limited female roles and inequality. While in Somaliland and Puntland women's rights are ostensibly protected in their respective constitutions, the implementation of these provisions is lagging behind.

109. Women make up 57 percent of the workforce in agriculture and pastoralism (both of which constitute nearly 70 percent of the local economy). The number of women working in government departments and agencies in Somalia is estimated at just 19 percent of the workforce. The situation is

⁶⁴This term is mostly used as a composite name for Rer Xamar and other minority groups residing in Mogadishu. It is sometimes used interchangeably with Rer Xamar to mean the same thing.

also dire in the education sector, where only 36 percent of pupils in the upper primary education are girls. Gender disparity is higher in upper grades due to economic constraints and early marriage.

110. Available economic opportunities, however, are still quite limited for both men and women and female-headed households remain among the most disadvantaged populations. Unemployment rates remain particularly high for women, and especially female IDPs who often remain reliant on charity through social protection mechanisms and contributions from the diaspora in the form of remittances. Women who are engaged in income generating activities are often engaged in the informal sector and further bear the double domestic burden of earning an income and taking care of the home. The consequences of this burden often fall to girls in the family, who are expected to contribute to the maintenance of the home, often at the expense of the girls' education and skills development⁶⁵.

111. While there is lack of statistical data on the situation of women in Somalia, the available evidence shows that Somali women are still far from enjoying equal rights and treatment. The Social Institutions & Gender Index for 2014 places Somalia on the 6th lowest position in the world, with 'very high' discriminatory family codes, 'very high' levels of restricted physical integrity, and a 'very high' level of restricted resources and assets.⁶⁶ The continuation of practices, such as polygyny, early and forced marriages, FGM, and wife inheritance, continues to undermine development towards increased gender equality. Lack of access to services, such as education and health, or lack of access to agricultural production or other livelihoods and employment opportunities has kept most of the female population of Somalia disempowered.

112. Insecurity for women is still the number one issue that prevents gender equality and women's empowerment from being a feasible objective. Somalia has ranked prominently as one of 'the worst countries to be a woman'⁶⁷ and one of the 'worst countries to be a mother'⁶⁸. Women continue to suffer disproportionately from clan-fights and extremist interventions. Formal security forces have proven to be weak in their willingness to protect women, and the justice system has failed survivors of conflict-related GBV/SEAH⁶⁹, as well as the many survivors of domestic violence and FGM. Protracted conflict and fragility have increased fundamentalist religious interpretations, including the acceptance of pharaonic-type FGM/C by the younger generation.⁷⁰

113. The ongoing fragility, conflict and natural disaster like floods are responsible for an increasing number of IDPs within Somalia, including a high proportion of women. They are often subject to poor security arrangements, which leave women and girls particularly vulnerable. In this context, as well as outside IDP camps, GBV/SEAH (particularly rape) is widespread, including as a tool between social units in conflict.⁷¹ The UN has consistently reported that between 75-85% of GBV/SEAH incidents collected

⁶⁵ Interagency Working Group on Disaster Preparedness for East and Central Africa.

⁶⁶OECD Development Center, Social Institutions and Gender Index, 2014, accessed at: http://genderindex.org/ranking?order=field_sigi_value14_value&sort=asc

⁶⁷ See: <http://www.theguardian.com/world/interactive/2011/jun/15/gender-afghanistan>

⁶⁸ Save the Children, 'The Urban Disadvantage. State of the World's Mothers 2015', Fairfield 2015, p.9.

⁶⁹ Implementation of the Beijing Platform for Action. Beijing +20 Review. Somalia Country Report 2014, p. 14

⁷⁰ See, for example, NAFIS Network/MOLSA, Assessment of the Prevalence, Perception and Attitude of Female Genital Mutilation in Somaliland, 2014.

⁷¹See, for example, UNICEF 'Sexual Violence as a Weapon of War, accessed at: <http://www.unicef.org/sowc96pk/sexviol.htm>

through the Gender-Based Violence Information Management System (GBV/SEAHIMS) are perpetrated against IDPs.⁷²

114. Available information indicates that SGBV/SEAH in the country is very high. In particular, sexual violence against women has been used as a tool of war, including *leheyste-galmo*, a form of sexual hostage-taking as well as child marriage, FGM/C (98% of female population in Somalia), rape and intimate domestic violence (IPV) which already existed but were normalized after conflict.⁷³

115. Rape is increasing in prevalence, becoming more violent and taking on a more normalized form. There are reports of an increase of gang rape and “date rape” as a youth phenomenon driven by frustrations associated with lack of opportunity and access to marriage.⁷⁴ Rape case reports indicate that it primarily affects younger women between the ages of 11–25 years as well as children, both girls and boys. In South-Central Somalia and IDP areas, perpetrators are often ‘uniformed’.⁷⁵

116. The UNHCR Protection Return Monitoring Network (PRMN) estimates that floods have displaced 20,308 people in Middle Shabelle; 7,643 in Bay; 3,227 in Middle Juba; 2,923 in Banadir; and, 678 in Bakool region. An initial assessment conducted by UNFPA and its implementing partners in the affected regions identified damages and access challenges to the health facilities and GBV/SEAH one-stop centers which support vulnerable women and girls including pregnant women and survivors of GBV/SEAH. Hence, the need for SRH and GBV/SEAH services to the affected populations. At least 20,340 women and girls are estimated to be at risk of GBV/SEAH as the displacement weakens traditional family and community protection mechanisms. Recurrent floods, drought, protracted conflict and armed attacks in Somalia have resulted in insecurity, major protection challenges, food insecurity and also extremely weakened basic socio-economic services.⁷⁶

117. There are significant barriers with access to justice. Fear of reprisals or punishment deters survivors of GBV/SEAH from reporting incidents. Survivors are often reluctant to pursue cases against the perpetrator due to the social stigma associated with rape and other forms of GBV/SEAH. In south and central Somalia, survivors, lawyers, witnesses, journalists, and family members have been threatened, harassed, and arrested for reporting GBV/SEAH offences. Legal aid providers regularly receive death threats towards their staff. Fear of reprisals to staff, survivors, witnesses, and medical personnel is a particular problem if perpetrators are from the security forces.

118. Most domestic and sexual violence cases are dealt with through the customary and Sharia legal systems. Anecdotal evidence indicates that some customary practices result in double victimization of

⁷²Somalia Humanitarian Country Team, 2019, Humanitarian Needs Overview, accessed at: https://reliefweb.int/sites/reliefweb.int/files/resources/Somalia_2019_HNO.PDF; UNFPA, September 2016, Somalia Gender Based Violence Sub-Cluster Bulletin, accessible at <https://somalia.unfpa.org/en/publications/somalia-gender-based-violence-sub-cluster-bulletin>; UNFPA, December 2016, Somalia: Gender Based Violence Sub-cluster Bulletin, accessed at https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec_GB%20SEAH%20Bulletin%20%283%29.pdf; UNFPA, August 2015, Somalia: Gender Based Violence Sub-cluster Bulletin, accessible at <https://reliefweb.int/report/somalia/somalia-GBV/SEAH-sub-cluster-bulletin-1-january-august-2015>

⁷³Expanding Access to Justice Program, Gender Assessment, 2019.

⁷⁴Ditto.

⁷⁵For example, security and law enforcement officials, AMISOM, gang-members and/or freelance militia

⁷⁶UNFPA Flood Response Situation Report, November 2019.

women and girls, denial of justice for many survivors, and impunity for perpetrators. The customary justice system is focused on clans. Justice is delivered for the clan rather than for the survivor of the sexual violence. Traditional approaches to dealing with rape seek resolution or compensation through negotiation between clan members. Restitution is paid to the clan and not to the survivor. Once restitution is paid, the perpetrator of the sexual violence is free from further punishment and the case is considered finalized. In some cases, the woman or girl is forced to marry the perpetrator of the violence as a form of “restitution” ordered by customary courts. The customary system is widespread, and many families and clans choose it over formal justice systems.⁷⁷

119. In view of inheritance and access to resources, women are exposed to housing, land and property violations, especially land-grabbing and denials of inheritance. The fact that, after marriage,¹¹ women will likely enter a different family limits women’s inheritance. Investing in women is perceived as a misuse of scarce resources in times of poverty and conflict. Therefore, women rarely inherit valuable assets such as land and income-producing animals. Also, women are not considered principals; they are not *diya*-paying members and thus do not usually share in *diya* receipts, even if they relate to a violation against them. This creates important vulnerabilities for women, while a woman must be protected by her clan members by convention, as a *non-diya* paying member and one who cannot contribute to clan security in times of conflict, women will always be less valuable and more dispensable.⁷⁸

120. On the other side of gender, since the war in 1991, the majority of men lack the resources to fulfil their gender specific expectations and responsibilities. Men have become vulnerable and are at risk of revenge killing a war-related phenomenon that affects male mobility and work opportunities which puts pressure on women to act as breadwinners. Men have been forced to leave outside of their clan territory, which makes them leave in constant fear without the protection of the clan.⁷⁹ Interventions for women and children should consider the well-being of the family as a whole. A positive engagement with the issues confronting Somali men should be part of any attempt to address the needs of women and children.

121. The rate of FGM/C in Somalia is estimated at 98 percent. This harmful practice carries serious health consequences and it increases the likelihood of dying during childbirth. Nearly 50 percent of the girls are forced to marry before they turn 18. Being married robs them of their childhood and increases the likelihood of early pregnancy and school dropout. Existing protection services are inadequate, especially in remote and in warring communities: there is widespread failure to promote and protect the rights of children⁸⁰.

⁷⁷UNDP 2018

⁷⁸Expanding Access to Justice in Somalia Program 2019.

⁷⁹J. Garder and J. El-Bushra, The impact of war on Somali men and its effects on the family, women and children.

⁸⁰UNICEF, Child Protection, 2020, accessed at: <https://www.unicef.org/somalia/child-protection>

5. CONSULTATIONS AND PUBLIC DISCLOSURE

5.1 Introduction

122. The World Bank ESS10 “Stakeholder Engagement and Information Disclosure” recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. This Standard requires public consultation with relevant stakeholders (potential project beneficiaries, affected groups and local NGOs) about the project environmental and social impacts, and take their views into account when developing the project.

123. The analytical underpinnings of the Somalia Education Human Development Project (SEHDP) are based largely on the National Development Plan (2020-2024), which has a chapter dedicated to the required improvements in the relevance and efficiency of the human capital development through education in Somalia. The design and priorities of the SEHDP were discussed at the WBG office in Nairobi, Kenya in January 2020 and involved important stakeholders including representatives of the Ministries of Education of the Federal Republic and Member States, line ministries and local education groups. Engagements and consultation on the project design and the planned activities and implementation arrangements have been done with key institutional stakeholders including the relevant Government and implementing agencies as summarized in Table 4.

Table 4: Stakeholder planning meeting

Agenda discussed	Participants	Key points discussed
Ministry of Finance (MoF)	DG	Funding formula for the project, efficient use of the resources and accountability
Ministry of Labour and Social Affairs	DG	Policy direction and guidance on all labour administration
Ministry of Energy and Water Sources	DG	Safety and health of potential workers
Ministry of Public Works and Reconstruction	DG	How the Ministry can support the project in the area of construction standards, land acquisition policies and restrictions on land use
Ministry of Posts, Telecom and Technology	DG	ICT in education, infrastructure building, etc.
National office for Environment	Director	How the Office would provide necessary advice on the area of regulation, forest protection, minimization of air pollution, preservation of bio-diversity etc.

5.2 Brief Summary of Previous Stakeholder Engagement Activities

124. A virtual stakeholder consultation on the SEP was held on 3 December 2020 was attended by 40 participants representing the Federal and State Governments, civil society organizations (CSOs), development partners and the World Bank (about 6 of the participants were women). A stakeholder consultation on the ESMF and RPF was held on February 2021, attended by 55 participants representing the Federal and State Governments, civil society organizations (CSOs), development partners and the World Bank. Tables 7&8 presents a summary of the key issues raised and how they have been incorporated in the instruments. The list of participants is presented in Annex 6.

Table 5: Summary of key issues raised during SEP consultations on 3rd December 2020

#	Concern	Responses
1.	Transparent criteria for selection of schools to be supported by the project	The national poverty index will be used to select the districts and beneficiary schools. The focus will be on the poorest parts of the country with low education enrolment. The criterion is described in Section 1.4 of this ESMF.
2.	Inclusion of the poor and disadvantaged including learners with disability	The selection of the districts and the areas to be supported by the project is aimed at supporting communities that are poor and disadvantaged. The Inclusion Plan, presented in section 5 of this ESMF, outlines how the various disadvantaged groups will be involved in all stages of the project. The grievance redress mechanism (GRM), described in section 6 sets out ways through which the communities will be able to channel their complaints and get redress.
3.	Recruitment and retention of female school teachers in schools	The community education committees will be enlisted to take part in the recruitment process. The selection of female teachers, that are resident in the communities will be key to ensuring that they are kept in the education system. There will also be incentives to attract and retain female teachers
4.	Trusted grievance redress mechanism	The project will establish a GRM as outlined in the SEP. Measures will be put in place to make sure it is trusted and accessible.
5.	Gender based violence (GBV/SEAH) and other crimes	The risk of GBV/SEAH is articulated in Section 6.5 of this ESMF. A standalone GBV Action Plan will be developed before disbursement, to manage GBV/SEAH and sexual exploitation and abuse (SEA).
6.	Coordination and management of the project	There will be a PMU and PIUs will have responsibility to coordinate with other projects, arms of government and non-state actors.
7.	Sustainability of the interventions beyond project funding	The FGS will absorb the costs of managing the investments from the project beyond the project funding. This is indicated in Section 1.4 of this ESMF.

Table 6: Summary of key issues raised during consultations on ESMF and RPF held on 9th February, 9am -12pm

	Issues Raised	Mitigation measures
1.	Min of Environment asked how this Environmental and social guideline will be in line with currently drafted Government guidelines which is ESIA regulations.	The project will be implemented in line with the EIA regulations as per the ESMF
2.	Are there specially trained investigators of SEA. If not, the Ministry should consider as some of the cases may need special attention.	This will be considered in the GBV Action Plan
4	The need for confidentiality in reporting GBV/SEAH issues and protection of victim identity and avoiding stigma	There will be multiple reporting lines including toll lines, messaging and focal persons trained in these issues. And ensure confidentiality in the process.
5	There is a teacher recruitment processes in the Teacher Policy. The onus is on FMS and MoECHE to implement the policy proposals.	To be referred to in the LMP
6	The society knowledge gap on issues of GBV/SEAH	Awareness of the society on the GBV issues.
7	Land ownership and acquisition	To sensitize the community about the project to have community buy inn and to have land agreement drawn from other project experience like the one used in other projects (Byole), to use government land where possible. And use existing schools in urban centers where land is expensive.
8	Security for the teachers and students on issues of GBV	Developing a comprehensive approach and sensitize the community on the issue.
	Ministry of labour mentioned that there is a new labour law ready for submission to the cabinet for approval, and there a	These gaps will be considered in the LMP

	<p>number of HR policies that might need to be updated including issues of child labour and OHS. Suggestion that there should be SOPs that should be followed strictly by all stakeholders. Secondly a simple community/stakeholder feedback mechanism to be developed to allow all project staffs and stakeholders to provide feedbacks/complains to the management.</p>	<p>Annual stakeholder consultation meetings will be held at FGS and FMS level.</p>
	<p>Land disputes are a significant risk for school construction. There is need for thorough investigation. It is important that the land should be Government land to avoid collusion and land being taken away from the public. The participants also mentioned the importance of land donation or acquisition being documented in a proper way, and hardly will that cause an issue especially in rural areas if the community is well informed and issues explained to them. The process differs from one region to the other, like in Puntland the interior ministry declares what is to be public properties and the mayors are also involved. The donation document must be notarized and witnessed by several parties. The participants also mentioned that it is useful to draw from past and current experiences including the Biyole project in matters of land acquisition. The community engagement is important and also all the neighboring parties should be involved, which would reduce or eliminate cases of land contestation. It was mentioned if there is a clear process guiding resettlement.</p>	<p>These issues have been considered in the RPF</p>
	<p>Concern over accessibility for students with physical impairment and if the project intends to support students with special needs, particularly when doing construction.</p>	<p>The schools will be accessible to those with physical disabilities and will follow the guidelines approved by the ministry on the construction standards that include all public utilities to be accessible.</p>
	<p>Concerns that the school ownership would be taken over by private entities</p>	<p>Schools will be owned by the MOECHE and only in cases where land acquisition or donation is not possible like the Banadir region and the GER is low, the government might engage the private schools to accept poor students.</p>

125. MoECHE teams will continue engaging in extensive consultations with all relevant stakeholders including the Federal Member States (FMS), local administrators in the selected project areas, community leaders, education officers and business entrepreneurs. Information gathered through these consultations will be used to update the SEP as necessary.

5.3 The Project SEP

126. The SEP identifies the key stakeholders to be consulted and the means of communication. It also identifies the frequency of engagement. The social specialists assigned to the SEHCDP will be responsible for the implementation of the SEP and the monitoring elements, with assistance from the communication and M&E officers. Key stakeholders identified include learners, parents, school committees, including CECs, Social Accountability Committees other project-affected communities, host communities, federal, state and municipal authorities responsible for education, religious and local leaders, civil society organizations (CSOs), and other development partners. The Project will take differentiated measures to include such groups into stakeholder engagement activities, such as through focus group/individual meetings, mediation by community support groups, accessible consultation venues, simple written materials or use of graphics or provision of free municipal transport.

5.3.1 Inclusion plan

127. An Inclusion Plan is also included in the SEP, aimed at ensuring that all people are involved in project decision making and benefit from the investments. The following disadvantaged groups have been identified by the project:

- i. Minority casts and groups;⁸¹
- 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 pastoralists, adults and children living with mental and/or physical disabilities;
- v. Widows;
- vi. Single heads of households;
- vii. The elderly;
- viii. Persons with chronic illnesses; and
- ix. Orphans.

128. Social accountability committees will have representation of these groups and promote inclusion. Teachers and communities will be trained on inclusion of minority groups, people with mental and physical disabilities etc.

5.3.2 Grievance Redress Mechanism

129. Transparency and accountability will be core elements of the SEHDP. The goal of the GRM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. By increasing transparency and accountability, the GRM 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.

130. Under the new World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project.⁸² One of the key objectives of ESS 10 (Stakeholder Engagement and Information Disclosure) is ‘to provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow borrowers to respond and manage such grievances’.⁸³ This GRM should facilitate the SEHDP to respond to concerns and grievances of the project-affected parties related to the environmental and social performance of the project. The SEHDP will provide mechanisms to receive and facilitate resolutions to such concerns.

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

⁸¹ This shall include all groups falling outside the big four clans and not genealogically associated with them in a specific district or geographical area including the ethnic, occupational groups.

⁸² Under ESS2 (Labour and Working Conditions), a grievance mechanism for all direct or contracted workers is prescribed, which will be laid out in a separate Labour Management Plans (LMPs). The World Bank’s Good Practice Note on ‘Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works’ spells out requirements for a GBV grievance redress mechanisms, which will be defined in a separate GBV/SEA and GBV Action Plan.

⁸³ World Bank, Environmental and Social Framework, 2018, p. 131.

- i. Fairness of contracting;
- ii. Fraud or corruption issues;
- iii. Inclusion;
- iv. Social and environmental impacts;
- v. Payment related complaints;
- vi. Quality of service issues;
- vii. Poor use of funds;
- viii. Workers' rights;
- ix. Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) and sexual harassment;
- x. Forced labour, including human trafficking and use of prison labour;
- xi. Child labour; and
- xii. Threats to personal or communal safety.

132. As per World Bank standards, the GRM will be operated in addition to GBV/SEA and GBV Action Plan, which includes reporting and referral guidelines (there will be a stand-alone GBV Action Plan developed for this project). The GRM will also operate in addition to specific workers' GRMs, which are laid out in the LMP.

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

134. The GRM aims to address project-related concerns in a timely and transparent manner and effectively. Information on the GRM will be readily available to all project-affected parties. The GRM 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 GRM does not prevent recourse to judicial and administrative resolution mechanisms.

135. MoECHE will have the responsibility of overseeing the resolution of all issues related to the project activities in accordance with the laws of FGS 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 FGS and FMS level who will receive grievances by phone, text or email to publicized toll free mobile phone lines and email addresses at both FMS and FGS level. The social specialists will acknowledge, log, forward, follow up grievance resolution and inform the complainant of the outcome. The complainant has the right to remain anonymous, thus their name and contacts will not be logged and whistleblower protection for complaints raised in good faith will be ensured. The FGS social specialist will carry out training of all PMT staff and Ministry of Education staff involved with the project, and contractors on receiving complaints and referral and complaints handling and reporting and will oversee awareness raising on the GRM at national level.

136. A grievance redress committee (GRC) will be established at FMS and FGS levels chaired by the project manager, and the relevant staff will be included as necessary depending on the complaint (procurement, finance, monitoring and evaluation (M&E), GBV advisor and communication). The social specialist 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 MOE/PIU level. Significant complaints will be outlined in the GM manual. For serious or severe complaints involving harm to people or the environment or those which may pose a risk to the project reputation, the FMS social specialist should immediately inform the FGS social specialist or head of the PMU, who will inform the World Bank within 48 hours as per the Environmental and Social Incident Reporting (ESIRT) requirements.

137. Due to limited capacity in the Government system, the States may enlist the support of CBOs working in the project areas to support the GRM activities or NGOs/an independent call center to receive and help process complaints on an as-needed basis. All contractors and suppliers will be expected to sensitize their workers on the Project GRM and have a focal person to receive complaints regarding the construction and their workers and put in place complaints structures specific to the workers (as detailed in the LMP).

138. At community level social accountability committees with strong representation of disadvantaged groups will receive complaints directly from the community, contractors or school and forward to the FMS social specialist to support resolution and follow up. Figure 1 presents the structure to be adopted by the project in managing grievances.

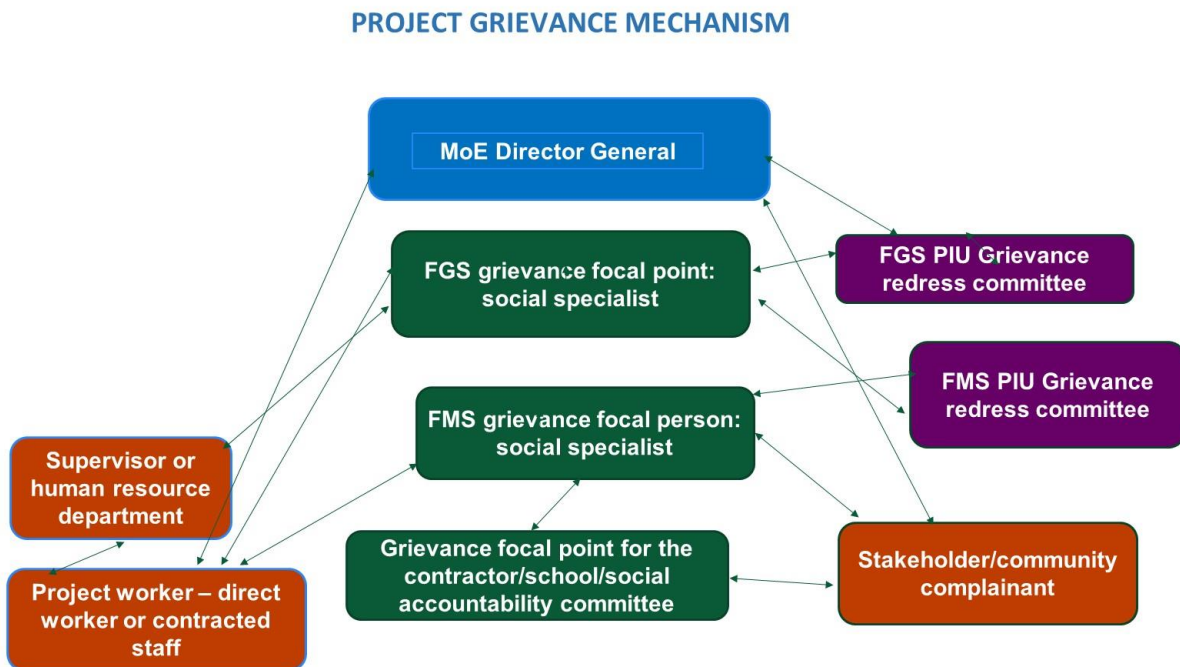


Figure 2: Grievance structure for the project

(i) Receive and register complaints

139. The beneficiaries will have multiple ways of channelling complaints on any aspect of the project. This will be through email, mobile phones, community meetings, and websites. There will also be opportunities for in-person reports at the community level through contractors or project staff, CECs, SACs or community leaders. All complaints will be channelled to the relevant social specialist, who will log them into the Complaints Register (see a template in Annex 2).

(ii) Acknowledge, assess and assign

140. An acknowledgement of receipt will be sent to the complainant within 7 days of receipt of the complaint. The social specialist will assess the complaint in conjunction with the PM and forward it to the relevant level of implementation (e.g. MoE at the State level). If the grievance cannot be easily resolved, the social specialist in conjunction with the project manager will call a meeting of the Grievance Redress Committee (made up of relevant members of the project team) will develop a course of action. The GRC will meet every 2 months to review the functioning of the GRM and the Grievance log. All cases will be treated with utmost confidentiality.

141. Incident reporting. Severe incidents, those that caused an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, e.g., fatality, GBV, forced or child labor, will be reported by the IP to the PMU and the WBG within 24 hours (details on this process are described in the Labour Management Procedures).

142. Where grievances are of sexual nature and can be categorized as GBV/SEA or GBV 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 GBV Action Plan. Dedicated training on how to respond to and manage complaints related to GBV/SEA will be required for all GRM operators and relevant project staff.

143. For all other grievances, the respective PIU will determine whether the grievance can be solved locally, with local authorities, implementers, NGOs, CSOs or contractors, and whether an investigation is required. The first port of call will have in-depth knowledge of communal socio-political structures, hence will be able to address the appropriate individuals, if the case can be solved at the local level.

144. At all times, the PIUs will provide feedback promptly to the aggrieved party, for example through the phone or through the community structures established for addressing GRM. Feedback will also be communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback will be given to the concerned persons bilaterally.

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

(iii) Propose a response

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

(iv) Agreement of a response between the Complainant and the GRM Team

147. 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.

148. After deciding a case, the GRC will provide an appeals mechanism to the aggrieved party, which is constituted through the PMU. This is important in cases in which the aggrieved party is dissatisfied with the solution provided by the GRC. In these instances, the PMU will step in and provide an appeals mechanism. The appeal should be sent to the PMU directly (a phone number will be provided), where it will be reviewed by the PMU GRM Team and will be decided on jointly with the PIU Coordinator. Where aggrieved parties are dissatisfied with the response of the PMU, they can report cases directly to the World Bank or use the available national grievance resolution mechanisms (see below).

(v) Implement the response

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

(vi) Review the Grievances

150. The GRM team will conduct a review of the cases reported on a monthly basis and agree on the next steps on cases that have not been closed out. The GRM focal point will record the actions recommended by the GRM team and file a monthly report to the PIU. Most importantly, all cases filed will need to be logged and monitored by the contractors and primary suppliers. Figure 2 presents the process to be adopted by the project in managing grievances.

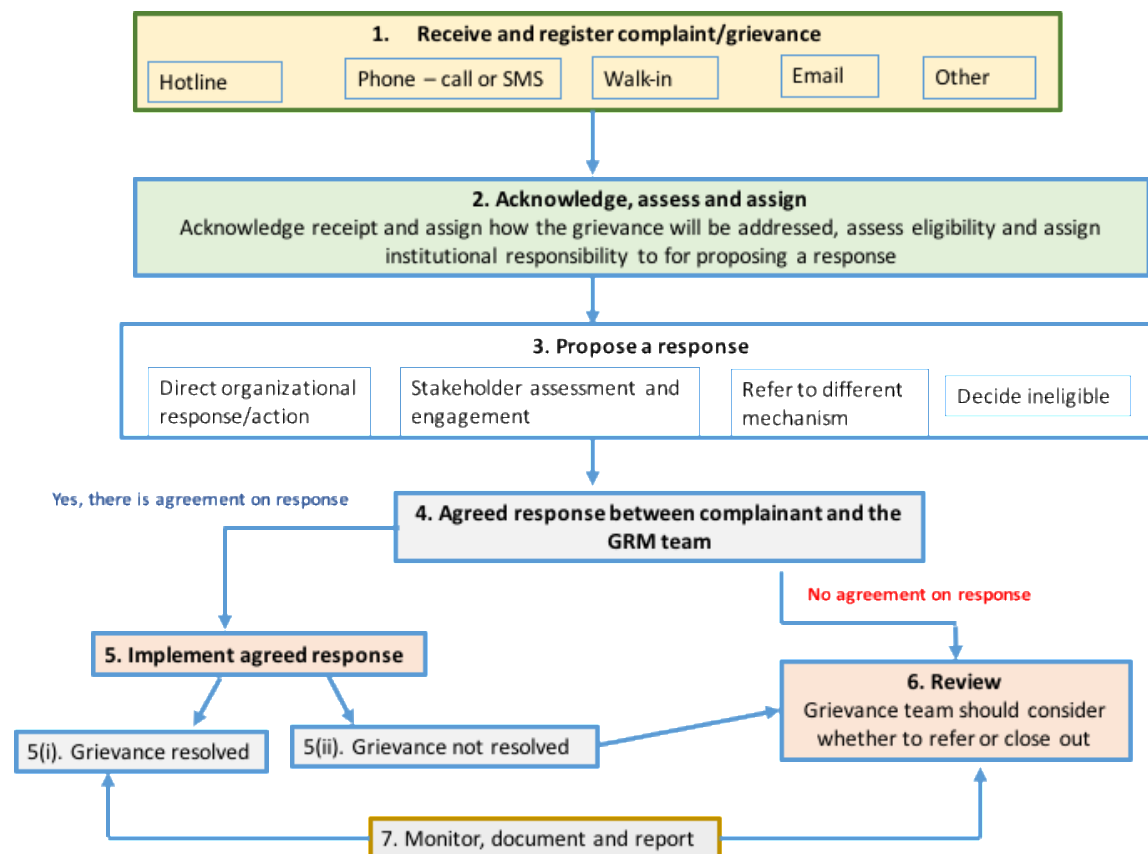


Figure 3: Grievance process for the project

Monitoring and Reporting of GRM

151. The PMU, specifically the Social Specialist, will be responsible for monitoring the access to and implementation of the GRM by all project teams at the national, state levels. The Specialist will include the GRM in his/her supervision and monitoring missions to the field and conduct spot checks on its implementation, or, where access is difficult recruit local teams to do so.

152. The contractors and primary suppliers will provide analytical synthesis reports on a quarterly basis to the PMU, which will include the number, nature and status of grievances. These reports will form the basis of all regular reports from the PMU to the World Bank.

153. The PMU will further provide an excel sheet summary of the feedback and grievances reported, which will be linked to the Project’s Management Information System (MIS) and to the M&E Results Framework. 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 GRM 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 PMU will extract lessons from the GRM and conduct an analysis on the overall grievances, and share the results with all contractors and key project team members.

GBV and SEA

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

155. The GRM proposes the following key features on preventing GBV/SEA: (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 GRM services at the community level to create GBV/SEA awareness and enable project-affected persons to file complaints.

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

157. If a GBV/SEA case is reported through the Project GRM, the GRM Operator will report the case within 24 hours to the PMU, and the PMU is obliged to report this case to the WB within 24 hours. Furthermore, cases of SH will be reported through the workers' GRM, if it concerns a direct worker or a worker from a sub-contractor, NGO partner or even a community worker following a survivor-centered 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/SEA will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-basis, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution.

GRM Appeals and Escalation Mechanisms

158. 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.

WBG's Grievance Redress Service (GRS)

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

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

6. POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS, IMPACTS AND MITIGATION

6.1 Introduction

161. This section highlights the environmental and social risks and impacts along with associated mitigation measures for the expected negative environmental and social risks and impacts linked to the proposed, albeit small-scale civil works, especially during the construction and rehabilitation of classrooms, schools, ablution facilities, staff rooms, storage facilities and another schooling infrastructure. The risks and impacts during the operational phase of the supported schools are also covered. The schools to be supported in the project, including any new constructions, will be modelled along the Safe Schools standards as promoted by UNICEF and its partners, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. The Safe Schools Standards focus on school designs for the protection of children and their educational prospects in areas prone to armed conflicts. The schools to be supported in the project, including any new constructions, will be modelled along the Safe Schools standards as promoted by UNICEF. These UNICEF standards focus on the EHS standards and the school environment, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. These Standards focus on school designs for the protection of children and their educational prospects and are relevant for areas prone to armed conflicts. By following these Standards, the Somali government will ensure that it will provide access to water and sanitation in school facilities, ensure that the indoor air quality (IAQ) is in compliance with WHO guidelines, eliminate smoking in schools and ensure that children can safely walk to schools.

162. Based on stakeholder consultations and on account of the fact that the project length is relatively limited, it is envisaged that the project will have minor deleterious environmental impacts. The potential positive socio-economic benefits that may be registered as a result of this project are also described.

163. An Environmental and Social Commitment Plan (ESCP) has been prepared for the project. The ESCP requires compliance with all provisions of the following environmental and social instruments, which have been prepared and/or are under preparation for this project:

- This ESMP, which has been prepared in accordance with the procedures set in place by the World Bank;
- The Resettlement Policy Framework (RPF), which has been prepared in accordance with ESS5 of the ESF. The Framework will ensure that appropriate measures are in place to address any issues that might arise from potential land acquisition and/or economic displacement under the project;
- The Stakeholder Engagement Plan (SEP) has been developed. The SEP includes stakeholder identification and analysis summary, plans for engagement (e.g., type, regularity, etc.), communication activities and grievance redress mechanisms. The SEP outlines both the initial and ongoing process by which stakeholders will be engaged to ensure the design of the project aligns with stakeholders current and ongoing needs. Consultations have been done on the SEP with a variety of actors in the education sector in Somalia, and a number of comments received and addressed;
- The Labour Management Procedures (LMP) will be developed and cleared prior to disbursement of funds for Component II of the project. The LMP will outline requirements for construction companies and primary suppliers including a mechanism to prevent child and forced labour and reporting requirements on serious incidents;
- GBV/SEAH Action Plan will be developed to address risks related to sexual exploitation abuse and harassment; and

- Security Management Plan will be developed and cleared before disbursement of components 2 and 3.

164. The ESCP also requires compliance with ESIA's and ESMPs, Resettlement and Livelihood Plans (RPs and LPs), sub project specific SEPs and contractor LMPs, which will be prepared for subprojects under the project.

6.2 The ESMF Procedures

165. Step 1: Environmental and Social Screening. Screening is the process of identifying whether a closer, more comprehensive and formal assessment of environmental and social impacts is necessary or not. The procedure is used to determine whether a proposed sub-project activity within the larger Education project is likely to have significant effects on the environment and social systems. The subproject screening process will also exclude sensitive areas, including biodiversity hotspots and seasonal water streams, to ensure that ecological processes are not interfered with.

166. An environmental and social screening checklist is hereby provided for the benefit of the project implementing teams in the seven project districts. The project teams, and especially the environmental and social safeguards, are required to closely go through the screening tool to determine the next steps, including the environmental and social instruments that need to be prepared. Please see Table 6.

Table 6: Environmental and social screening tool for the Somalia Education Project

Impact occurrence		Yes ⁸⁴	No ⁸⁵	Details
<i>Will sub-project activities entail the ...</i>	logging of natural stands of forests?			
	consumptive use of wetlands?			
	use of marine resources?			
	consumptive use of natural grasslands?			
	poaching, removal, alteration or disturbance of any animal species?			
<i>Will project activities, after their implementation, result in the ...</i>	modification of physical features of the terrain, leading to alteration of site hydrology?			
	flow of leachate into the soil?			
	spilling of oil and other petroleum products and the contamination of surface and subsurface soil biota			
	generation of hazardous wastes (solid and liquid)?			
	groundwater contamination or deterioration of water quality?			
	soil erosion?			
	siltation of waterways?			
	flash floods?			
	increased levels of air pollution, including dust, particulate matter, and emissions of noxious fumes?			

⁸⁴ Tick if “yes”

⁸⁵ Tick if “no”

<i>Project procurement</i>	Will the project procure, or does the project intend to procure, products that are in the World Health Organization (WHO) Classes IA and IB, or formulations of products in Class II or pesticides or other chemicals specified as “persistent organic pollutants” under the Stockholm Convention or that are banned in Somalia? <i>Please check the WHO website for more information (http://www.who.int)</i>			
<i>Environmental conventions and treaties</i>	Will sub-project activities contravene major international and regional conventions on environmental issues? <i>Please consult the project’s ESMF listing on page X for a list of these conventions.</i>			
<i>Unexpected environmental impacts</i>	Will there be other unexpected environmental impacts that may occur as a result of implementation of the proposed sub-projects?			
<i>Environmental-related grievances</i>	Is the project likely to receive any environmental and/or social related grievances as a result of the sub-projects?			
Social screening checklist				
Land availability and ownership	Is land available for school construction? Are the community members willing and ready to hand it over for school construction?			
Presence of a CEC at the school level	Does the area have a functional CEC or the readiness to form one?			
Involvement of disadvantaged groups in discussions and decision making	Are there structures in place to engage people considered disadvantaged in decision making (e.g. women, youth, persons with disabilities, IDPs, etc.?)			

167. Step 2: Development of E&S instruments. Based on the findings of the environmental and social screening, the team will proceed to the next step of development of environmental and social instruments

in the event that significant environmental and social impacts are anticipated. The team will therefore prepare the following environmental and social documents:

- a. Site-specific Resettlement Plans (RPs); and
- b. Environmental and Social Management Plans (ESMPs).

168. Step 3: Review and approval. The draft environmental and social instruments prepared will be submitted to the project TTLs, who will review and in turn forward these draft documents to the World Bank ESF team supporting this project. The Bank will internally review the submitted instruments carefully and will likely have suggestions for quality improvement, including enhancing the proposed environmental and social mitigation measures. After Bank clearance, the project team can go ahead and implement the sub-projects, including allowing contractors to move on and commence civil works.

169. Step 4: Implementation, monitoring and reporting. In this instance, the project teams in the various FMS's will ensure that specific requirements on contractor management, including incorporating ESHS requirements, are incorporated into bidding document and contracts. Contractors are duty bound to ensure that they report as accurately as possible on incidents and accident in the course of the construction and operation of the schools supported by the project. The contractor and primary suppliers will be required to ensure that they follow the national guidelines and World Bank requirements, including maintaining an accurate labour registry of all contracted workers, with age verification conducted. Minimum working age under the project is 18 years.

170. Also, under Section 6.1, several E&S instrument, including ESMF, RPF, SEP, LMP, GBV Action Plan and SMP are said have been or being in the process of being prepared. It needs to clearly state the specific timeline for each instrument.

6.3 Environmental and Social Screening

171. Screening is the first step in the ESMP preparation process. All proposed subprojects, that is, new school construction activities grouped into district cohorts, will be subjected to the screening process to determine and assign them an environmental and social risk rating category and further identify potential environmental and social impacts. The process will also identify critical issues that might be triggered and/or exacerbated by the subprojects and would need further detailed investigations during environmental and social assessments. This process will also help in advising what safeguards tools (ESMPs, RPs, LPs etc.) will be required for the various subprojects. Most importantly, it will help in re-aligning, re-designing and where not possible dropping out subprojects that have high risks and the potential to negatively impact on the environment, natural habitat and physical and cultural resources, forests, and the health and wellbeing of the communities.

172. The environmental and social screening will involve:

- reconnaissance of the subproject areas (including the siting of the schools) and their surroundings;
- the absence or existence of any VDC/CEC in the village/district, their capacity, effectiveness as per the CEC policy and the existing gaps;
- identification of the major subproject activities to be implemented;
- preliminary assessment of the impacts of these activities on the ecological, physicochemical and socio-economic environment of the subproject surrounding areas; and
- potential impacts on the individuals, households and communities living in the project area; and
- an understanding of the community including disadvantaged groups as well as the land ownership and management system and community structures including the existence of CECs and VDCs and representativeness.

173. A template form for environmental and social screening for sub-project activities is presented in Annex 2. This will be reviewed and updated as needed during the implementation process. Key environmental and social risks identified as crosscutting for the project include labour and OHS. The project investments will be considered in the environmental and social assessments. Specific environmental and social risks for each project component are mainly linked to processes and capacity of key stakeholders for environmental and social risk management.

6.4 Environmental and Social Risks Rating

174. Assessment of risks for subprojects will be determined according to their environmental and social risk levels. The risk level is to be estimated based on the intrinsic environmental and social risks associated with:

- the type of interventions to be carried out (e.g., during the construction of schools); and
- the specific type of infrastructure proposed.

175. The physical components of the project are civil works related to the construction of schools and upgrading offices to be used for project activities. The impact of the civil works is expected to be small-scale, localized and reversible. There are, therefore, no significant or irreversible adverse environmental issues anticipated from the activities to be financed under the project.

176. The engineering capacity of the client is nascent and growing with regards to construction of small-scale civil works. However, the client's ability to apply World Bank ESS is limited due to lack of appropriate technical capacity for safeguards at the MoECHE. In addition, the country risks are extensive due to political and security considerations; the ability for the World Bank to supervise environmental and social risk management is limited. Construction specifications for the new classrooms and schools will conform to the government's school prototypes, align with agreed standards (safe, inclusive, resilient, and climate-smart), and incorporate a modular approach as appropriate to suit local needs so as to ensure optimal coverage and minimal distances for children to travel. The project will also adhere to the recently published national construction standards by the Ministry of Public Works and Reconstruction which establishes standards for construction or renovation projects funded by, or on behalf of, the government of Somalia. The ministry's building standards put emphasis on ensuring that such buildings are accessible to persons with disabilities (PWDs), i.e., PWD-friendly, through "universal design," which ensures usability by all people, to the greatest extent possible, without the need for adaptation or specialized designs.

177. The overall environmental and social risk rating is "**High**" under World Bank's Environmental and Social Risk Classification system (ESRC).

6.5 Environmental Risks and Impacts Envisaged

178. There are environmental risks and impacts associated with the implementation of the project activities for the proposed initiative. The environmental risk rating is "**Moderate**" at this time due to the potential environmental risks from school construction and IT support. The rating may be amended as more details become available. The new schools will be modelled along the Safe Schools Standards as promoted by UNICEF and its partners, meaning that the schools will be designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. The Safe Schools Standards focus on school designs for the protection of children and their educational prospects in areas prone to armed conflicts. The schools to be supported in the project, including any new constructions, will be modelled along the Safe Schools standards as promoted by UNICEF. The Standards include commitments related to the EHS standards and the school environment, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse

environmental risks and impacts, and which are in agreement with the World Bank's EHS Guidelines. These Standards focus on school designs for the protection of children and their educational prospects and are relevant for areas prone to armed conflicts. By following these Standards, the Somali government will ensure that it will provide access to water and sanitation in school facilities, ensure that the indoor air quality (IAQ) is in compliance with WHO guidelines, eliminate smoking in schools and ensure that children can safely walk to schools.

179.

180. The envisaged environmental risks and impacts during the construction phase are likely to include:

- a. land clearing and loss of vegetation;
- b. soil erosion and sedimentation;
- c. risks from vehicular traffic;
- d. change of land use;
- e. generation of liquid waste, and hazardous wastes (e.g., use oil, empty paint cans, etc.);
- f. risks associated with source of primary supply materials (materials for school construction, etc.);
- g. worker occupational health and safety;
- h. construction risks during COVID-19 pandemic;
- i. solid waste generation and disposal;
- j. air and noise pollution; and
- k. open pits following extraction of construction materials for school construction.

181. The envisaged environmental risks and impacts during the operational phase are likely to include:

- a. potable water supply;
- b. wastewater disposal;
- c. solid water collection and disposal;
- d. indoor air quality;
- e. transportation (including traffic);
- f. outbreak of pests and vermin;
- g. spread of communicable and infectious diseases among children noise pollution;
- h. e-waste (especially since the project will support digital delivery of educational materials); and
- i. other potential hazards beside fire (including droughts, etc.).

182. Although there are no significant or irreversible adverse environmental issues anticipated from the investments, the project will explore the use of safety audits for the education sector, as is currently done among humanitarian and development partners in Somalia, to ensure project activities take into consideration key structural safety considerations in design and implementation.

6.6 Social Risks and Impacts Envisaged

183. The social risk rating is adjudged as **'High'**. While the scale and nature of the civil works are limited, some social risks and impacts may be significant. The project is designed to have positive social impacts by purposely targeting disadvantaged populations including IDPs, rural, and pastoralist/nomadic communities. A preliminary assessment of potential social risks and impacts establishes that there are direct risks from project activities related to civil works from construction of schools, which could lead to land acquisition, restrictions on land use, resettlement and labour influx. In addition, the use of local

labour and the reliance on community partnerships and management could lead to cases of child labour and forced labour.

184. The risks of GBV/SEAH/SEA and sexual harassment, are currently assessed as **“High”** based on the existing high rates of GBV/SEAH in the country, extending from conflict and shocks such as droughts, floods and other climate-related challenges, and social norms that entrench gender inequalities in Somalia. In addition, because the project’s scope and focus will be on predominantly rural sites, the scope of works, and the absence of appropriate institutional structures to manage risks and weak mitigation systems and lower absorption capacity ramps up the risk rating.

185. The project will be implemented in areas of fragility due to endemic poverty, acute drought, floods and protracted conflict and insecurity which may make direct access to beneficiaries challenging and amplify risks related to lack of effective stakeholder engagement, community participation, grievance redress and application of other risk mitigation protocols. Other cumulative risks include systemic weaknesses related to MoECHE’s capacity and the capacity of the FMS MoEs’ for preventing adverse social impacts on the project and mitigating and offsetting impacts of social harm whenever they occur.

186. In order to address the aforementioned potentially adverse environmental and social risks and impacts, an environmental and social screening process has been proposed under this ESMF. This will be applied in such a way as to ensure that potential negative risks and impacts of the project are identified, prevented or mitigated appropriately while enhancing the positive impacts. As an additional mitigation measure, schools will be designed according to the Safe School Standards. Promoted by UNICEF and its partners, Safe School Standards ensure that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. The Safe Schools Standards focus on school designs for the protection of children and their educational prospects in areas prone to armed conflicts. The Standards put emphasis on school crisis and emergency preparedness training for both students and teachers, which encompass environmental crisis prevention/mitigation, early intervention (which is part of ongoing school safety), immediate response/intervention, and long-term recovery. The Standards include commitments related to the EHS standards and the school environment, ensuring that the schools are designed and constructed to secure the children while at the same time having minimal adverse environmental risks and impacts. Taken together, adhering to the Standards and the EHS commitments will help the Somali government ensure that it will provide access to water and sanitation in school facilities, ensure that the indoor air quality (IAQ) is in compliance with WHO guidelines, eliminate smoking in schools and ensure that children can safely walk to schools. This is in tandem with the guiding principles of the World Bank’s ESF.

187. To mitigate these risks during project implementation, key ESF instruments will be prepared and activated in the life of the project. These are as follows:

- The LMP will guide how project related labour will be sourced and managed in a manner that reduces harm on all categories of workers;
- The SEP will set out effective and transparent management of consultation and information disclosure processes. The SEP will include a Grievance Redress Mechanism (GRM) and Inclusion Plan as key components;
- A GBV/SEAH Action Plan, which will articulate the key risks and mitigation measures to address GBV/SEAH/SEA risks, identification of GBV/SEAH Service Providers and reporting and referral protocol in the event cases emerge, and communication and training requirements for communities and all project related staff, including project workers, teachers, and school

administrators. It will also elaborate the adoption of mitigation measures including an Accountability and Response Framework which will define the use of Code of Conduct (CoC) for project workers, collaboration with local communities and GBV/SEAH-related service providers;

- Security Management Plan which will highlighting measures to minimize security risks such as protection of project construction workers, if any;
- An ESCP, which will summarize the Borrower's commitments and obligations to adopt and implement these measures during project implementation; and
- A Resettlement Planning Framework (RPF), which will contain the protocols for voluntary land donations and will be a key guide in terms of the processes and procedures for land acquisition and resettlement, should this be necessary.

6.7 Environmental and Social Benefits

188. The implementation of subprojects under the overall Somalia education project as proposed will have a number of social and environmental benefits. The social benefits include:

- inclusion of out-of-school children in schooling and improvements in learning will lead to a larger number of students completing lower primary education;
- availability of larger number of cohorts of students transitioning into secondary schooling;
- improving girls' participation in schooling by introducing incentives for increasing and maintaining their enrolment in school will improve the gender situation in Somalia;
- encouraging recruitment of female teachers and prioritizing support for female teachers and schools will ensure more women participation in the education sector in Somalia, with positive downstream outcomes;
- inclusion of training modules in promoting girls' education and creating safe, inclusive school environments with specific attention to identifying and addressing violence, including gender-based violence in schools, will ensure safer environments for children at school;
- employment opportunities for the community through construction, rehabilitation and maintenance of the school infrastructure; and
- overall, the project will contribute towards the development of social cohesion and national stability in the longer-term.

189. The project will have the following key environmental benefits:

- provision of improved, quality school infrastructure which will lead to less exposure of school-going children to communicable diseases; and
- the formalized schooling environment will provide a basis for incorporating environmental education and stewardship into the school curriculum, resulting in higher levels of environmental stewardship.

7. ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

7.1 Environment and Social Risks Mitigation

190. Table 5 presents the mitigation measures proposed for negative environmental and social risks and impacts anticipated for the Somalia education project.

191. Before the implementation of activities on the ground, the government of Somalia will oversee the development of two Environmental and Social Management Standards per district. A standard (base) ESMP will be developed with environmental and social mitigation activities for school construction, while a different standard ESMP will be developed to take care of possible environmental and social risks occurring during school operation and maintenance activities. Both ESMPs should be developed at the initiation of the project. Sample TORs for an ESMP are provided in Annex 4.

192. The standard construction ESMP then will then modified/enhanced based upon the subproject screening (and any other additional activity) and be used as a requirement for construction contractors (including a base for their C-ESMP). Similarly, the standard operation phase ESMP will also be modified/enhanced based upon the actual conditions (design, location, services, etc.) of an individual school prior to the end of construction. These standard ESMPs will be presented to the World Bank for review and clearance and will help ensure consistency and adequacy (completeness, details) among individual schools/subprojects.

Table 7: Environmental and social risks and impacts mitigation

Potential negative environmental and social risks and impacts	Proposed mitigation measures
CONSTRUCTION PHASE	
Possible loss of terrestrial biodiversity during land clearing for construction or rehabilitation of classrooms, especially in the southern regions of the country, including loss of natural vegetation (both flora and fauna), soil erosion and sedimentation, change of land use	<ul style="list-style-type: none"> • Avoid environmentally sensitive areas when scouting for gravel extraction and backfill materials for school infrastructure works • Contracts with contractors and suppliers will incorporate EHS requirements • Contractors and PMUs to seek advice and clearance from appropriate government agencies on the location of these sensitive environments • Minimize removal of existing vegetation within the project site, else restore/rehabilitate areas temporarily cleared of its vegetation • Use of appropriate indigenous species (tree/shrub/grass/cover crop) for rehabilitating temporarily disturbed/cleared/denuded areas • Minimization of cleared area to only the land needed for the construction of the facilities • Minimize clearance/cutting of indigenous and rare tree species • Careful site selection avoiding sensitive and/or breeding areas • Vegetative regeneration should be included as a condition in contracts for physical works
Air quality problems, including: (a) increased levels of air pollution caused by the operations of construction vehicles	<ul style="list-style-type: none"> • Ensure that project and contractor vehicles and other equipment undergo scheduled preventive maintenance for proper exhaust emission • Construction truck drivers to observe established speed limits when working in the school set-up • Avoid burning of biomass as much as possible and use fire only in situations where this is least environmental damaging

and heavy equipment in schools and (b) increased greenhouse gases emission due to the operations of construction vehicle and equipment (c) Air quality impacts also during school operations due to poor indoor air quality	
Noise, dust and vibration from construction and maintenance equipment	<ul style="list-style-type: none"> • Dampening school construction sites at least once a day to reduce dust levels • Use of modern, well maintained equipment fitted with noise enclosures • Strict controls of timing of activities (e.g., prohibition on night-time working) • Observance of seasonal sensitivity (breeding and animal migration seasons)
Hazards from vehicular traffic, especially from construction traffic	<ul style="list-style-type: none"> • Signage • Traffic calming measures where possible • Deploying signalmen when constructing for traffic coordination
Poor management of occupational health and safety could lead to accidents, injuries and diseases, especially among causal labourers hired from the community in the area (<i>see also OHS measures proposed in the LMP</i>)	<ul style="list-style-type: none"> • Conform to international standards regulations governing civil works and other infrastructure development⁸⁶ • Rest and recreational facilities and time should be provided for workers • Adherences to comprehensive health and safety and risk management plans and reporting system • Availability of First Aid kits at the working sites and camps (including temporary camps) • Training of construction workers in First Aid, fire prevention and PPE use • Strict regulation of incidents register • Arrange with nearby suitable hospitals or health clinics to treat project staff and workers that are sick or have been victims of accidents in the civil works sites or camps • Contractors to develop an Emergency Response Plan for each school supported in the project • Orient ambulance drivers and emergency response teams on alternative routes, and instruct traffic aides to assist the medical and emergency response teams when necessary • Establish a CoC to be followed by all construction supervisors and workers that will include disciplinary action in case of gross violation of the guidelines
Land acquisition and resettlement issues (including physical and economic displacement)	<ul style="list-style-type: none"> • Comply with the RPF, including the following: • Prepare and implement the land agreements, RPs and LPs subject to WB approval, for each of the sub-projects.. • Ensure all resettlement issues are resolved prior to the start of construction •
Possible loss of cultural heritage during construction works	<ul style="list-style-type: none"> • PMUs to ensure that contractors carefully follow the protocols and procedures to protect tangible and intangible cultural heritage (e.g., protection of community graves or no-disruption to cultural/religious events, and development of cultural heritage mitigation plans as per ESS8)

⁸⁶ See ISO standards for civil works, which are codified here:
<https://www.iso.org/files/live/sites/isoorg/files/store/en/PUB100317.pdf>

<p>Possible social tensions and conflicts as a result of activities such as displacement, marginalization of community groups (see also the LMP on management of labour-related risks)</p>	<ul style="list-style-type: none"> • Comply with the RPF • Prepare and implement a RP for each of the districts • Ensure all resettlement issues are resolved prior to the start of construction • Ensure continual community consultation, and ensure that disadvantaged groups are represented • All public consultation meetings are to be well documented • Ensure establishment of functioning GRM to promptly address community and worker grievances (see Annex 7 on sample GRM) • Proper selection of construction workers, with priority given to hiring of qualified members of project affected households, local residents and IDPs • Holding of orientation to all construction workers on local customs and traditions
<p>Negative social implications attributable to labour influx</p>	<ul style="list-style-type: none"> • Contractor to prepare and enforce a No Sexual Harassment Policy in accordance with national law where applicable • All workers and nearby communities and stakeholders will be educated on preventing and responding to sexual harassment and GBV/SEAH ahead of any project related works • The community within the vicinity of the school where construction will take place will also be educated on GBV/SEAH and sexual offenses such as sexual harassment, rape and defilement in the context of labour influx and the prevention and response measures • Strategies such as male involvement will be employed in preventing and responding to GBV/SEAH/SEA • Partnerships will be established with relevant government agencies and NGOs to ensure survivors of GBV/SEAH and sexual offenses access survivor centred services such as medical care, psychosocial support, legal redress, safety, etc. as and when necessary • Provision of gender disaggregated data, separate bathing, changing, sanitation facilities for men and women • Impose zero tolerance on sexual harassment, all forms of GBV/SEAH and discrimination at all phases of the project • Grievance redress mechanisms including non-retaliation should be set up for the workers
<p>Discrimination against disadvantaged groups Several disadvantaged groups have been identified including minority groups, IDPs, nomadic pastoralists, persons with disabilities, female headed households and orphans or children from single headed households that may not be actively engaged in the project activities and may not benefit equally from the interventions</p>	<ul style="list-style-type: none"> • Implement the Inclusion Plan included in the SEP • Generate a comprehensive list of disadvantaged people and groups in the respective community, and ensure this list is regularly updated • Ensure a continued update disadvantaged groups • Monitor the implementation of the Inclusion Plan and make changes on need-basis • Ensure that social accountability committee is established and its role known to all project stakeholders • Educate the community and the general public on the presence and function of the GRM
<p>GBV/SEAH/SEA</p>	<ul style="list-style-type: none"> • Comply with the provisions of the GBV/SEAH Action Plan (see Annex 8)

<p>There are already high levels of GBV/SEAH that might increase during project implementation since the project seeks to increase the number of female teachers and increase female students to about 50% of the school population There is risk of GBV/SEAH/SEA during the construction phase</p>	<ul style="list-style-type: none"> • Sensitize the school community – learners, teachers, management administrative staff and workers on GBV/SEAH/SEA • Provide training to all Project workers – direct, contract, supplies and community on GBV/SEAH/SEA • Include GBV/SEAH/SEA provisions in the CoCs to be read, understood and signed by each project worker • Sensitize the communities living around the schools on GBV/SEAH/SEA • Monitor and refine GBV/SEAH/SEA activities throughout the project implementation period
<p>Lack of or inadequate public participation This will mainly arise due to the country's fragility and high levels of insecurity</p>	<ul style="list-style-type: none"> • Ensure that measures are put in place to identify and reach the disadvantaged groups and rural populations with project information in a timely manner • Use communication channels that are accessible including the use of community radios • Translate and disseminate information in local languages • Hold meetings with the beneficiary communities to update on the project and respond to any communal concerns • Identify and equip local leaders with information on the project more generally and the GRM for further dissemination in their communities
<p><i>Security threats</i> The project will be implemented in rural and remote areas that are prone to security threats from known and unknown militia</p>	<ul style="list-style-type: none"> • Refer to the Security Management Plan • Coordinate with Ministry for Internal Affairs, which is responsible for security • Monitor the security of project workers and take actions based on the threats
<p>OPERATION PHASE</p>	
<p>Issues with potable water supply</p>	<ul style="list-style-type: none"> • Ensure that school construction designs include the installation of appropriate potable water supply facilities • School operation costs to take into account expenses related to provision of safe and potable water for school children, teachers, and other stakeholders
<p>Poor management of OHS, as well as risks to community health and safety</p>	<ul style="list-style-type: none"> • Establish and maintain continuous liaison with the host communities including sensitization on safety and health issues on construction sites • Install and maintain appropriate safety and warning signage in schools where constructions works are in progress • Use of local language and images for signage shall be encouraged • Ensure that all potentially dangerous work areas have controlled access limited to authorized persons only • Ensure proper and adequate provision of sanitation and waste management facilities at all construction sites • Maintain a system of receiving and responding to any safety concerns by the communities • School CECs to be trained on EHS monitoring during school operations
<p>Inefficient solid, hazardous and liquid</p>	<ul style="list-style-type: none"> • Preparation of waste management plan for each waste stream and implementation of the waste hierarchy, as part of the Operation Phase ESMP

waste and e-waste collection and management during operation and maintenance phases, leading to waste disposal problems, and resulting in polluting soils, surface and shallow groundwater, especially during the rainy seasons	<ul style="list-style-type: none"> • Prepare and implement a simple waste management plan subject to the concurrence of the respective PMUs in the FMS • School CECs to provide garbage receptacles in strategic places within the school compound area, and regularly collect and properly deposit of these wastes in the designated disposal areas • As much as practicable, reuse spoils that meets material specifications • When practicable, compost organic and degradable waste in suitable container, and provide this to interested farmers for their crop production
Outbreaks of diseases and poor indoor air quality	<ul style="list-style-type: none"> • Ensure that school designs adopted provide adequate learning environment free of pests and vermin, with ample ventilation provided • Periodic fumigation activities, to be prescribed in the Operation Phase ESMP • Ensure proper and adequate provision of sanitation and waste management facilities at all schools • Maintain a system of receiving and responding to any safety concerns by the communities
GBV/SEAH/SEA As the project seeks to increase the number of female teachers and increase female students to about 50% of the school population, GBV/SEAH/SEA risks during operation of the schools	<ul style="list-style-type: none"> • Comply with the provisions of the GBV/SEAH Action Plan (see Annex 8) • Sensitize the school community – learners, teachers, management administrative staff and workers on GBV/SEAH/SEA • Provide training to all Project workers – direct, contract, supplies and community on GBV/SEAH/SEA • Include GBV/SEAH/SEA provisions in the CoCs to be read, understood and signed by each project worker • Sensitize the communities living around the schools on GBV/SEAH/SEA
LMP, SEP, SMP and RPF	<ul style="list-style-type: none"> • The need to ensure that the project is complying with the provisions in these instruments • Continue sensitizing the communities on the key provisions • Ensure that the documents are updated based on the monitoring reports and project amendments

7.2 Gender Mainstreaming and GBV/SEAH Action Plan

7.2.1 Gender Mainstreaming

193. The rights of women are protected in the Constitution of Somalia. Women have the right to education, they are allowed to work, own property, hold public office, and receive inheritance. However, there are risks that disparities between men and women may possibly occur during project implementation, in areas such as exclusion from stakeholder engagement activities, priority in recruitment of workers, differentiated pay rates for similar work done, safe working environment, health and sanitary facilities in the work place, and exposure to GBV/SEAH/SEA.

194. To address such risks, the project will take a number of differentiated measures to include female members in stakeholder engagement processes (including consultation events and grievance redress committees); inclusion in the CECs and the social accountability committees, provision of job opportunities in subprojects' civil works; and fair working conditions (including provision of maternity

leave and nursing breaks where relevant, and sufficient and suitable toilet and washing facilities, separate from men and women workers). These measures are also included in the LMP and SEP. Gender mainstreaming can be incorporated into the project with lessons from the Africa Region Gender Action Plan (GAP).⁸⁷ This plan lays out the World Bank Africa Region's strategy for addressing gender inequality. The plan's objective is to advance development for both men and women through operations grounded in robust evidence and informed country dialogue.

7.2.2 Management of GBV/SEAH/SEA Risks

195. Given that GBV/SEAH in Somalia is a significant contextual challenge, a preliminary assessment of project-related GBV/SEAH/SEA has been conducted during project preparation (based on the risk assessment tool). Consequently, the project will adopt a robust approach to address potential GBV/SEAH/SEA risks. Relevant mitigation measures to address these risks will be included in the ESMP as follows:

- The CoC for all categories of project workers will have GBV/SEAH/SEA-related protections;
- Plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and GBV/SEAH/SEA provisions;
- Sensitize the school communities on GBV/SEAH/SEA – learners, teachers, management and administration;
- Mapping and collaboration with GBV/SEAH service providers;
- A Reporting matrix that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centred response;
- An Accountability Response Framework that outlines how the PMUs/contractors/suppliers will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators;
- Establishment of special channel/procedures for safe, confidential reporting of GBV/SEAH incidents that connect to the project GRM and enable training of GRM operators on how to respond to cases that come forward;
- GBV/SEAH requirements to be clarified in bidding documents (including requirements for CoCs, training of workers, and how GBV/SEAH related costs will be covered in the contracts); bid evaluation to include consideration for GBV/SEAH response proposals; and
- Make additional funds available to implement measures to address GBV/SEAH/SEA risks and impacts that may arise during project implementation.

196. The project will also include provisions of capacity building and training of relevant stakeholders, including contractors and project workers, in addition to capacity building for government partners. GBV/SEAH/SEA risks should be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement. Contractors and primary suppliers who do not observe the GBV/SEAH requirements will be debarred for a period of two years. This section is also presented in Annex 8 of this ESMF and relevant provisions have been incorporated into the ESMP of each subproject.

7.3 Resettlement Policy Framework for the Somalia Education Project

197. Resettlement is broadly defined as the process by which those adversely affected are assisted in their efforts to improve, or at least to restore their incomes and living standards. In general, resettlement

⁸⁷ See <http://siteresources.worldbank.org/INTAFRICA/Resources/AFR-Gender-Action-Plan-FY13-17.pdf> for more details

associated with Somalia education project is likely to be mainly associated with the acquisition of land for the construction of schools. This would likely lead to the following impacts:

- i. Loss of land-based livelihoods;
- ii. Loss of access to communal resources and associated loss of livelihood;
- iii. Loss of economic immovable assets;
- iv. Decreased income earning ability;
- v. Food insecurity; and
- vi. Unemployment.

198. Resettlement can also lead to the loss of access to communal resources:

- i. Loss of land for grazing;
- ii. Loss of access to water;
- iii. Loss of medicinal plants; and
- iv. Loss of trees for charcoal production and firewood.

199. These impacts can result in further indirect impacts, including the marginalization of the population concerned, degradation of health standards, loss of access to resources for disadvantaged communities such as pastoralists and minority groups, disturbance to the way of life of affected populations, conflicts with host communities, and potential food shortages. Given the type of investments, however it is not likely that resettlement as a result of the project will be extensive. The requirements of the RPF will, however, still apply, as this does not depend on the scale or complexity of the resettlement required.

200. Whenever and where the implementation of the Somalia education project results in physical and economic displacement of persons and entities, a RP will be prepared and implemented after approval by the PIU and the World Bank.

7.4 Security Management Plan

201. A SMP will be developed to describe the procedures and protocols related to the security for the project, and ensure that the security arrangements of the project are in line with the World Bank ESF. The Plan will also describe the pre-requisite security arrangements (policies, resources and equipment) which will be necessary before the implementation of the project, including those of the contractors and primary suppliers before they are awarded service-delivery contracts. In addition, the Plan will further outline the roles and responsibilities of each project partners - FGS MoCHE, FMS MoEs and other partners - in managing and maintaining the security of the project beneficiaries, materials and equipment throughout the implementation period.

202. Prior to the development of the SMP, wide consultations will be conducted under the leadership of the MoECHE with security teams in the FGS and FMS and World Bank experts with experience in developing SMPs. The SMP will be a stand-alone instrument.

7.5 Environmental and Social Monitoring of Contractors

203. The PIU and supervision consultants, with the support of municipal and district officers, will monitor the contractors' compliance on the following environmental and social issues for their subprojects.⁸⁸

⁸⁸ The following list should be used in a manner proportional to the size, risk and impacts of each sub-projects.

- Safety: hours worked, recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, etc.).
- Environmental incidents and near misses: environmental incidents and high potential near misses and how they have been addressed, what is outstanding, and lessons learned.
- Major works: those undertaken and completed, progress against project schedule, and key work fronts (work areas).
- Environmental and social requirements: non-compliance incidents with permits and national law (legal noncompliance), project commitments, or other environmental and social requirements including the C-ESMP.
- Environmental and social inspections and audits: by contractors, engineers, or others, including authorities - to include date, inspector or auditor's name, sites visited and records reviewed, major findings, and actions taken.
- Workers: number of workers, indication of origin (expatriate, local, non-local nationals, IDPs), gender, age with evidence that no child labour or forced labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- Training on environmental and social issues: including dates, number of trainees, and topics.
- Footprint management: details of any work outside boundaries or major off-site impacts caused by ongoing construction—to include date, location, impacts, and actions taken.
- Details of any security risks: details of risks the contractor/supplier may be exposed to while performing the work - threats may come from third parties external to the project.
- Worker grievances (based on the workers' grievance management system): details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report and time taken to resolve grievances.
- External stakeholder grievances: grievance and date submitted, action(s) taken and date(s), resolution (if any) and date, and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report. Grievance data should be gender-disaggregated.
- Major changes to contractor's environmental and social practices.
- Deficiency and performance management: actions taken in response to previous notices of deficiency or observations regarding E&S performance and/or plans for actions to be taken—these should continue to be reported until municipalities/PMU determines the issue is resolved satisfactorily.
- Incidences of GBV/SEAH/SEA reported and handled through the referral systems, number of perpetrators prosecuted.

7.6 Environmental and Social Liabilities of Contractors

204. Contractors and primary suppliers will be legally and financially accountable for any environmental or social damage or prejudice caused by their staff, and thus are expected to put in place controls and procedures to manage their environmental and social performance. A breakdown for the cost of noncompliance for each mitigation measure will be enclosed in bidding documents (see Annex 9 on environmental stewardship for contractors). These will include:

- Mitigation measures to be included in the contract will be specified in the subproject ESMP;
- Deductions for environmental non-compliance will be added as a clause in the Bill of Quantities (BOQ) section;
- Environmental penalties shall be calculated and deducted in each submitted invoice;
- Any impact that is not properly mitigated will be the object of an environmental/social notice by Somali authorities;

- For minor infringements and social complaints, an incident which causes temporary but reversible damage, the contractor/supplier will be given a notice to remedy the problem and restore the environment;
- If the contractor/supplier fails to remedy the environmental impact during the allotted time, the PIU will stop the work and give the contractor/supplier a notification indicating a financial penalty according to the non-complied mitigation measure that was specified in the bidding document;
- All workers signed CoC;
- All worker's grievances recorded and resolved;
- Through stakeholders' engagement plans ensure that the process of hiring local labour is agreed with all the stakeholders and clearly understood; and
- Human rights are observed for all the workers.

8. ROLES AND RESPONSIBILITIES OF THE IMPLEMENTING ENTITIES

8.1 Introduction

205. The successful implementation of the ESMF for the project depends on the commitment of the different arms of government in Somalia, the education sector and related institutions, and the capacity within the institutions to apply or use the ESMF provisions effectively, and the appropriate and functional institutional arrangements, among others. This section describes the detailed roles and responsibilities of the key institutions involved in the implementation of the ESMF by project components.

8.2 Overall Project Management

206. Overall project implementation and coordination will be led by the FGS MoECHE. The MoECHE will collaborate with all State MoEs to implement the different components of the project.

207. The project will set up a single Project Steering Committee (PSC). The PSC, headed by the FGS MoECHE with representatives from the FMS Ministries of Education including FMS MoE Ministers, one representative from the Education Sectoral Committee (ESC) coordination body and one donor representative. The PSC will provide strategic direction and guidance on high-level risk management and monitoring. It will also facilitate effective relationships across the project. The PSC will meet annually. The FGS MoECHE will have the latitude to make changes in the membership of the PSC and/or its terms of reference (TOR) in consultation with State MoEs.

208. A Program Management Committee (PMC) will be established. The PMC will be headed by the Director General, Federal MoECHE; or his/her designate. The PMC will include FMS Director Generals of Education, Heads of relevant MoECHE departments and the PIU coordinator. Key responsibilities of the PMC will include: (a) establish a platform for collaboration, management and decision making of the project; (b) provide collaborative management of project activities, decision-making around co-design and co-management of activities including the annual work plan and budget; (c) co-monitor project activities; (d) conduct quarterly progress reviews; (e) make joint decisions on issues pertaining to implementation, and (f) ensure open communication and maximum accountability. The PMC will meet once a quarter, but it can be convened by the FGS DG as and when required.

209. A dedicated PMU will be formed at FGS level. The PMU will be headed by a Project coordinator and include a small team of experts: (a) financial management specialist (FMS); (b) procurement specialist; separate environmental and social specialists and a GBV/SEAH specialist (c) M&E specialist; and (d) communication specialist. The project coordinator will coordinate the implementation of day-to-day administration of the project activities and will conduct quarterly reviews and a total of five in-country reviews to ensure the effective and timely implementation of project components and activities. The PMU team will be responsible for developing, updating, validating and disseminating the standardized construction phase and operation phase ESMFs. The PIU coordinator will also work closely with the RCRF Project III PIU team to ensure coordination of the education activities. The management structure is illustrated in Figure 2.

210. The PIU's at FMS level will include a project manager and a full time social/GBV/SEAH specialists and a part time environmental specialist. These staff will be supported by officers at the district level. There will be a social specialist based in the districts where construction is taking place in order to closely work with the contractors and communities in addressing social issues. A communications officer will also be placed at the FMS level to be responsible for all communication activities in close coordination with the officer at the Republic level. The PIUs 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 4 and may be adjusted on need basis.

211. The implementation of this project will be vested with the MoECHE at the Federal level, the MoE at the State level and the communities at the local level. It is notable due to capacity gaps inherent at all implementation levels and the need to synergize with ongoing activities, the PIU will coordinate its activities with other partners such as development partners, NGOs and CBOs in the delivery of some of the interventions. Table 5 presents a synopsis of the responsibilities and partners per component.

Table 8: Leadership of various sub-components and activities

Component	Sub-component	Implementer	Potential partners /collaborators
1. System building: The focus will be on establishing and strengthening systems at the FGS and the FMS level to successfully implement the government's ESSP and enhance sustainability of investments in the sector	1.1: Strengthening government's stewardship role and policy formulation	MoECHE	-FMS MoE -Development partners -NGOs/CBOs
	1.2: Implementation of national sample-based student learning assessment systems	MoECHE	-FMS MoE -Development partners -NGOs/CBOs
	1.3: Strengthening monitoring and evaluation	MoECHE	-FMS MoE -Development partners -NGOs/CBOs
2. Expansion of access to quality schooling for the disadvantaged: The focus will be to provide out-of-school children from disadvantaged backgrounds with access to good quality schools	2.1: Constructing and furnishing new schools	Federal State MoE	-MOECHE -CECs -Development partners -NGOs/CBOs -Ministry of Public works, Infrastructure and Reconstruction -National office for Environment
	2.2 Recruiting and paying the salaries of teachers	Federal State MoE	-MOECHE -CECs -Development partners -NGOs/CBOs -Ministry of Public works, Infrastructure and Reconstruction -Ministry of Energy and Water Services -National Treasury
	2.3 School grants to the newly established schools to meet recurrent expenditures	Federal State MoE	-MoECHE -CECs -Development partners -NGOs/CBOs -National Treasury
	2.4 Incentivizing non-State schools to expand access to the most disadvantaged children	Federal State MoE	-MOECHE -CECs -Development partners -NGOs/CBOs -Ministry of Labour and Social Affairs
3. Enhanced instruction quality: This component will leverage the high levels of connectivity in Somalia to enhance the quality of education services	Development of a 2-year Teachers Professional Development Program (TPDP) - blended teacher training	MoECHE	-Ministry of Posts, Telecom and Technology -FMS MoE -Development partners
4. Project Management	The project will build capacity at all levels of implementation FGS, States and community levels	MoECHE	-FMS -Development partners

8.3 Responsibility for the ESMF

212. The PMU will provide overall responsibility for safeguards' due diligence, and compliance monitoring of the project. With regards to safeguards, the PMU will:

- Employ separate and qualified full-time environmental and social specialists and a GBV/SEAH specialist;
- Ensure compliance with World Bank ESS and other relevant country laws as contained in this ESMF;
- Ensure that E&S requirements are included in all documents and guidelines;
- Ensure that E&S requirements are included in the bidding documents and due diligence and monitoring is carried out with contractors by the safeguards staff at FMS level;
- Undertake effective preparation, review, approval and implementation of GBV/SEAH action plan, security management plan, labour management procedures, sub-project ESMPs, based on the provisions in this ESMF.
- Be responsible for the preparation, updating, validation, and dissemination of standardised ESMPs for the construction and operational phases of schools in the project.

Safeguards Officers

213. The Safeguards officers at the PMU will specifically:

- Provide capacity building and technical oversight for all social specialists at FMS level.
- Provide guidance and templates for all E&S processes, monitoring and reporting;
- Review all ESMPs, reports and documents prepared by PIU specialists to ensure compliance to the World Bank ESS;
- Screen all subprojects for E&S risks and approve checklists and statutory forms for environmental and social screening;
- Ensure that the project design, specifications and budget adequately reflect the recommendations of the ESIA/ESMPs;
- Co-ordinate application, follow up processing and obtain requisite clearances and approvals from the World Bank for the Contractor ESMPs submitted by the individual subprojects;
- Prepare regular monthly/quarterly/semi-annual and annual progress reports on their responsibilities;
- Develop, organize and deliver appropriate E&S safeguards related training courses for the PMU staff, contractors, local government/community representatives and others involved in the project implementation;
- Review and approve the contractors' ESMPs (C-ESMPs) using this ESMF as a guide;
- Liaise with the contractors, the supervision consultants, third party monitors, primary suppliers and the PI/PMUs/MDAs on implementation of the ESMPs;
- Liaise with various Government agencies on environmental, resettlement and other regulatory matters;
- Continuously interact with relevant NGOs/CBOs and community groups;
- Establish dialogue with the affected communities and ensure that the environmental and social concerns and suggestions are incorporated and implemented in the project;
- Ensure the implementation of all plans developed for the project including the LMP, SEP (that contains the Inclusion Plan and the GRM), ESMPs, GBV/SEAH Action Plan, and SMP;
- Review the performance of the project in terms of the progress in E&S safeguards, through an assessment of the periodic internal monthly and quarterly environmental and social monitoring reports; provide summaries of the same and initiate necessary follow-up actions; and

- Provide support and assistance to the Government MDAs and the World Bank during Project Review Missions.

214. The FMS PIU's will oversee safeguards' due diligence, and compliance monitoring of the project at FMS level. With regards to Safeguards, the PIU will:

- Employ one social specialists/GBV officer and one part time environmental officer at FMS level;
- Screen all subprojects for E&S risks and approve checklists and statutory forms for environmental and social screening;
- Ensure that the project design, specifications and budget adequately reflect the recommendations of the ESIA/ESMPs;
- Co-ordinate application, follow up processing and obtain requisite clearances and approvals from the World Bank for the Contractor ESMPs submitted by the individual subprojects;
- Prepare regular monthly/quarterly/semi-annual and annual progress reports on their responsibilities;
- Develop, organize and deliver appropriate E&S safeguards related training courses for the PMU staff, contractors, local government/community representatives and others involved in the project implementation;
- Review and approve the contractors' ESMPs (C-ESMPs) using this ESMF as a guide;
- Liaise with the contractors, the supervision consultants, third party monitors, primary suppliers and the PI/PMUs/MDAs on implementation of the ESMPs;
- Liaise with various Government agencies on environmental, resettlement and other regulatory matters;
- Continuously interact with relevant NGOs/CBOs and community groups;
- Establish dialogue with the affected communities and ensure that the environmental and social concerns and suggestions are incorporated and implemented in the project;
- Ensure the implementation of all plans developed for the project including the LMP, SEP (that contains the Inclusion Plan and the GRM), ESMPs, GBV/SEAH Action Plan, and SMP;
- Review the performance of the project in terms of the progress in E&S safeguards, through an assessment of the periodic internal monthly and quarterly environmental and social monitoring reports; provide summaries of the same and initiate necessary follow-up actions; and
- Provide support and assistance to the Government MDAs and the World Bank during Project Review Missions.
- Provide monthly reports on E&S compliance to the PMU safeguards specialists.

Safeguards Officers

215. The Safeguards officers at the PIU will specifically:

- Screen all subprojects for E&S risks;
- Review all ESMPs, reports and documents prepared by environmental and social consultants to ensure compliance to the World Bank ESS;
- Ensure that the project design, specifications and budget adequately reflect the recommendations of the ESIA/ESMPs;
- Co-ordinate application, follow up processing and obtain requisite clearances and approvals from the World Bank for the Contractor ESMPs submitted by the individual subprojects;
- Prepare regular monthly/quarterly/semi-annual and annual progress reports with statutory requirements;

- Develop, organize and deliver appropriate E&S safeguards related training courses for the PMU staff, contractors, local government/community representatives and others involved in the project implementation;
- Review and approve the Contractors' ESMPs using thus ESMF as a guide;
- Liaise with the Contractors, primary suppliers and the PI/PMUs/MDAs on implementation of the ESMPs;
- Liaise with various Government agencies on environmental, resettlement and other regulatory matters;
- Continuously interact with relevant NGOs/CBOs and community groups;
- Establish dialogue with the affected communities and ensure that the environmental and social concerns and suggestions are incorporated and implemented in the project;
- Ensure the implementation of all plans developed for the project including the LMP, SEP (that contains the Inclusion Plan and the GRM), ESMPs, GBV/SEAH Action Plan, and SMP;
- Review the performance of the project in terms of the progress in E&S safeguards, through an assessment of the periodic internal monthly and quarterly environmental and social monitoring reports; provide summaries of the same and initiate necessary follow-up actions; and
- Provide support and assistance to the Government MDAs and the World Bank during Project Review Missions.

8.4 Roles and Responsibilities of the MOECHE

216. The MoECHE is the lead implementing agency of the project. Its roles and responsibilities are as enumerated below:

- Take the lead in reviewing of draft ESMPs for the government, receiving comments from stakeholders during public hearing of the project,
- Provide overall leadership during public consultations with critical education sector stakeholders, in order to gain their support/cooperation/consensus in established policy direction; and
- Ensure that the Somalia education project implementers comply with all relevant environmental laws and policies.

8.5 World Bank Roles and Responsibilities

217. The World Bank will:

- Provide guidance on the compliance to Bank's ESS;
- Perform compliance monitoring of the project to ensure that the ESS are complied with and conduct regular project review missions;
- Maintain an oversight role, review and approve the project's ESMF, and environmental and social assessment instruments such as any ESIA or ESMPs of sub-projects, if any;
- Conduct regular supervision missions to check on the performance of the project and assess its compliance to agreed grant covenants;
- Recommend measures for improving the performance of the project PMUs; and
- Recommend the holding of appropriate training activities intended to improve the capacity of PCU and PIU as necessary.

8.6 Updating the ESMF

218. This ESMF will be used for screening of sub-projects and as a guide for the preparation, review and approval of environmental assessment instruments (ESIA and ESMP). It will also be a reference in the implementation of the subprojects and their respective ESMPs. Since there may be new developments, guidelines or national legislations issued after its (ESMF) approval and posting on the World Bank website, the ESMF may need to undergo updating from time to time.

8.7 Disclosure of Safeguards Instruments

219. This ESMF has been prepared in consultation with the relevant stakeholders in Somalia. Copies of this ESMF and other safeguard instruments developed later (including GBV/SEAH Action Plan, RPF and ESMPs), prepared for the subprojects to be financed under the project, should be consulted upon disclosed in compliance with relevant country regulations and the World Bank ESSs. A summary of the safeguards instruments will be translated into Somali language and disclosed in all project sites. It will also be disclosed in two daily newspapers for 21 days, or as required by country laws, while the World Bank will post the approved document on its InfoShop.

9. SAFEGUARDS CAPACITY NEEDS ASSESSMENT AND TRAINING PLAN

220. Once the FGS and FMS safeguards specialists are on board, a capacity assessment and implementing plan will be developed, possibly by an independent consultant. Given there are very few experienced safeguards specialists in Somalia particularly at FMS level, it is likely that capacity will have to be developed from scratch.

221. The training and capacity building plan (summarized in Table 9) will include general ESF training and project implementation facilitated by World Bank consultants and the RCRF senior social specialist and other government specialists and consultants. Specialist training and capacity building support may also need to be carried out by independent capacity building specialists and agencies including for contractors and social accountability committees and GRM.

Table 9: Planned capacity building activities

Session	Timeframe	For whom
E&S requirements for contractors	Once requests for proposals are issued	Potential implementing partners.
E&S requirements for MoE and action planning	Once FGS and FMS staff are in place.	PCIU and FMS PMT staff including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
GRM	Month 1	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
GBV/SEAH	Month 2	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
LMP and code of conduct	Month 3	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
OHS requirements	Month 4	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
Inclusion plan	Month 5	All direct workers including social and environmental specialists, GBV/SEAH specialist, M&E specialist, communication specialists
E&S reporting	Month 6	Social and environmental specialists
Monitoring of E&S requirements	Month 7	Social and environmental specialists, M&E specialists
Virtual tools for E&S monitoring	Month 8	Social and environmental specialists, M&E specialists
Other sessions as required		

10. MONITORING PLAN

10.1 Regular Monitoring and Inspection for Compliance

222. The goals of monitoring are to measure the success rate of the activities, determine whether activities have managed negative impacts, and whether further interventions are required or if monitoring is to be extended in some areas. The goal of inspection activities is to ensure that subproject activities comply with the plans and procedures laid out in the ESMF and in activity-specific instruments.

223. Both the PMU and PIUs will have responsibilities for project-related environmental and social monitoring and implementation as laid out in this ESMF, as well as the SEP, LMP, RPF, GBV/SEAH Action Plan and SMP. The Project Coordinator of the PMU will bear the overall responsibility for the implementation of the environmental and social mitigation measures, as well as for monitoring and inspections for compliance. The Environmental and the Social Specialists in the PMU will address the day-to-day tasks in regard to the implementation of the ESMF and associated instruments. The PIU managers and PIU safeguards staff have responsibility for day to day monitoring and capacity building of contractors E&S requirements. The supervision consultant will be responsible for monitoring the contractors ESMP implementation. GIS tagged tools e.g. kobotoolbox will be used to monitor construction and E&S measures on a day to day basis so that pictures of the sites, construction and log books can be sent to the FMS and FGS at regular intervals. Independent Verification Agents (IVA) will also include environmental and social risk mitigation measures in their project monitoring activities.

224. The ESMF is the overall document that guides the development of site specific ESMPs. All implementers will be responsible for their own site/activity specific screening, impact assessments, development of site/activity-specific ESMPs, monitoring of impacts, and administration of mitigation measures in regards to their respective sub-component activities. They further commit to integrate stakeholder inputs into their regular monitoring and reporting activities. All implementers are committed to report all screening results (see reporting format in 2), results of ESIA, site/activity-specific ESMPs, to the PIU.

225. The PMU Environmental and Social Specialists will assess the compliance of all implementers' activities against the ESMF and their subsequent ESMPs, and will report possible non-compliance to the Project Coordinator of the PMU. Indicators are identified in both documents, and used as a baseline for assessing progress on implementation. The PIU will also independently conduct its own monitoring, verification and inspection of the activities of all implementers to ensure they are in compliance with this ESMF. Monitoring indicators will depend on specific activity contexts. Performance will be integrated into quarterly reports to the WBG (see Annex 10).

226. The World Bank will supervise and assess the environmental and social performance through review of the biannual monitoring reports and through site visits where possible.⁸⁹ A summary of the key E&S aspects to be covered during project reporting is provided in Annex 10.

227. The GRM will further help track complaints and effectiveness of interventions, including those with environmental and social impacts. Furthermore, Independent Verification Agents (IVAs) will be deployed to monitor overall project implementation, including the implementation of environmental and

⁸⁹ Frequency will be determined by the need but expected to be more frequent at early stages of project implementation

social risk mitigation measures. The IVAs will report non-compliance to the PMU and directly to the World Bank.

228. Upon completion of the Project, the PMU shall undertake an assessment of the success of the ESMF and include relevant information in the Implementation Completion Report (ICR). This ICR will be followed by the Bank’s own ICR. If either of these assessments reveals that any key objectives of the ESMF were not achieved, follow-up measures shall be developed to remedy the situation. This is also applicable for site-specific ESMPs.

229. Implementation (work plan) progress shall be reported by the contractors to the FMS PIU, and verified by the PIU through regular project site visits. The PIU in turn will keep the PMU and the WB properly updated on implementation progress. It is also expected that there will be a supervision consultant to supervise activities in the implementation of E&S instruments.

9.2 Incident and Accident Reporting

230. Incident reporting will follow the process indicated in Figure 3.

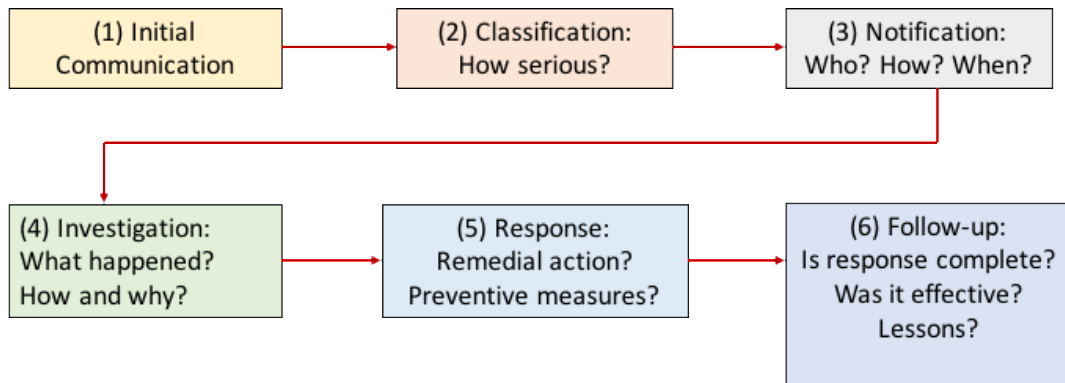


Figure 4: Incident reporting process

231. Incidents should be categorized into ‘indicative’, ‘serious’ and ‘severe’. Indicative incidents are minor, small or localized that negatively impact a small geographical area or a small number of people and do not result in irreparable harm to people or the environment. A ‘significant’ incident is one that causes significant harm to the environment, workers, communities, or natural resources and is complex or costly to reverse (see Annex 11 for World Bank incident classification guide). A ‘severe’ incident causes great harm to individuals, or the environment, or presents significant reputational risks to the World Bank.

232. Severe incidents (an incident *that caused significant adverse effect on the environment which affected communities, the public or workers, e.g. fatality, GBV/SEAH, forced or child labour*) will be reported within 24 hours to the PIU and the World Bank. Further guidance on reporting of serious and indicative incidents is provided in Annex 11.

233. Where grievances are of sexual nature and can be categorized as GBV/SEAH or child protection risk, the implementer has to handle the case appropriately, and refer the case to the GBV/SEAH referral system, defined in the GBV/SEAH Action Plan. Contractors and primary suppliers who do not adhere to the GBV/SEAH provisions will be debarred for 2 years.

11. ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN AND BUDGET

234. This section describes the specific E&S due diligence provisions necessary to avoid, minimize, or mitigate project activities with potential risks, and monitor their outcomes. This process also includes identification of institutional responsibilities (implementation, supervision, monitoring and evaluation, and reporting) along the lifetime of the interventions, timing of actions, how these provisions will be monitored and reported on, and identification of budget requirements. The objectives of the ESMP are:

- i. To identify measures and plans to prevent, reduce, mitigate and/or compensate adverse impacts and enhance positive impacts; including the environmental, health and safety aspects of the project's interventions/activities, risks and negative impacts of the project;
- ii. To provide an estimation of the budgetary costs for implementing the mitigation measures alongside the implementing agencies responsible for addressing project impacts;
- iii. Develop environmental and social monitoring plan, corresponding to measures proposed in the mitigation plan, for project activities/sub-projects and the implementation of mitigation measures with estimated cost. The monitoring plan has included the parameters to be monitored, methods to be used, frequency of measurements, responsibility and budget;
- iv. To identify the responsibilities and capacity assessment for each of the participating implementing agencies responsible for addressing project impacts; description of institutional arrangements and reporting procedures; and
- v. To prepare clear ESMP in such a manner that environmental and social requirements e.g. mitigation measures and monitoring plan related to project activities (sub-projects) could be incorporated in the bidding/contract documents.

235. This section describes the specific E&S risk management due diligence provisions necessary to avoid, minimize, or mitigate project activities with potential risks, and monitor their outcomes. This process also includes identification of institutional responsibilities (implementation, supervision, monitoring and evaluation, and reporting) along the lifetime of the interventions, timing of actions, how these provisions will be monitored and reported on, and identification of budget requirements. The objectives of the ESMP are:

- i. To identify measures and plans to prevent, reduce, mitigate and/or compensate adverse impacts and enhance positive impacts; including the environmental, health and safety aspects of the project's interventions/activities, risks and negative impacts of the project;
- ii. To provide an estimation of the budgetary costs for implementing the mitigation measures alongside the implementing agencies responsible for addressing project impacts;
- iii. Develop environmental and social monitoring plan, corresponding to measures proposed in the mitigation plan, for project activities/sub-projects and the implementation of mitigation measures with estimated cost. The monitoring plan has included the parameters to be monitored, methods to be used, frequency of measurements, responsibility and budget;
- iv. To identify the responsibilities and capacity assessment for each of the participating implementing agencies responsible for addressing project impacts; description of institutional arrangements and reporting procedures; and
- v. To prepare clear ESMP in such a manner that environmental and social requirements e.g. mitigation measures and monitoring plan related to project activities (sub-projects) could be incorporated in the bidding/contract documents.

Table 10: ESMP and Indicative Budget – Somalia Education Project

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
Project Planning, construction and equipping of schools							
Construction of schools	Inadequate consultations with local communities and other stakeholders	<ul style="list-style-type: none"> Identify disadvantage groups in each of the participating districts. Establish and maintain continuous liaison with the communities including disadvantaged groups to sensitize them on the project objectives and design. Use innovative communication means to reach the communities with information on the project. Establish GRM structures in the communities that would sensitize the communities on the project GRM. Maintain a system of receiving and responding to any project concerns by the communities 	# of disadvantaged groups per districts # of meetings held # of participants structured along vulnerability	#Meeting reports -Site visits	Continuou s	Social specialist	USD 180,000
Construction of schools	Land and resettlement issues	Comply with the RPF, including the following: <ul style="list-style-type: none"> Ascertaining land ownership and claims before commitments to construct a school Get agreement from residents and users of the land and relevant departments on the use of land for the new schools. Preparation and implementation of RPs subject to WB approval, for each of the sub-projects with resettlement requirements Ensure all resettlement issues are resolved prior to the start of construction Require contractors to give preferential hiring to qualified members of project affected households 	-Land donation/endo wment agreements -RPs for each subproject -List of people displaced and resettled # of land related complaints captured through the GRM	-Site visits -Project documents	Monthly	Social specialist	USD 100,000
Construction of schools	Localized noise and vibration	<ul style="list-style-type: none"> Selecting equipment with lower sound power levels e.g. the use of hand drilling machines 	Recorded cases of complaints by the project	-Site visits -Document review	Monthly	Environm ent Expert	This will be part of the

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> • Installing suitable mufflers on engine exhausts and compressor components in cases where the service provider uses generators • Post safety signage including “men/women at work” signs, prominently displayed • Provide fit to work PPEs (ear plug/earmuffs) for all workers involved in the areas with elevated noise levels • Coordinate with the office users/staff as to determining timing and more importantly what specific noise controls and mitigations may be needed at the site • Installing acoustic enclosures (sound nets) for equipment casing radiating noise i.e. generator • The contractor should use equipment that is/are in good working condition and are periodically serviced • Dampening the soil where possible to reduce dust vortexes and soil erosion 	workers and community members				contracts for construction
Construction of schools	Fire hazards	<ul style="list-style-type: none"> • Provide fire hazard training to construction workers • Install fire hydrants • Provide fire extinguishers • Designate areas as “assembly points” • Establish, where possible, live fire breaks in form of appropriate vegetation 	<ul style="list-style-type: none"> - # of fire extinguishers installed - # of fire hydrants installed - # of assembly points designated 	<ul style="list-style-type: none"> - Site visits - PIU reports - Third-party monitor reports 	Continuou s during construction	Environment Expert	Part of contracts for construction – costs will be included in the contracts

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
Construction of schools	Dust Emission	<ul style="list-style-type: none"> • Suppress dust during construction by water spraying and dampening where necessary • Practice good general housekeeping at the work site; sweep off the drilled-out materials • Post safety signage including “men/women at work” (or “work in progress”) signs • Provide fit to work PPEs for all workers involved in the renovation and installation activities 	# of complaints on dust emissions	-Site visits -Document review - Photography	Monthly	Environment Expert	Part of contracts for construction – costs will be included in the contracts
Construction of schools	Open pits following extraction of construction materials for school construction can result in injuries, especially for children The pits can also become breeding grounds for mosquitoes and other vermin	<ul style="list-style-type: none"> • Ensure that all quarries are registered • Contractors should commit to backfilling the open pits before handing over the sites 	-Quarry certificates -Agreements with contractors # of complaints on open quarries	-Site visits -Document review - Photography	Monthly	Environmental Expert	Part of contracts for construction – costs will be included in the contracts
Construction of schools	Outbreak of pests and vermin	<ul style="list-style-type: none"> • Spacing out school-going children • Periodic fumigation of school infrastructure 	# no of fumigation events conducts	- Site visits - Inspection reports - Third-party monitor reports	Twice a year	MoECHE	Fumigation will be included in school activities supported by school grants

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
Construction of schools	Generation of solid waste	<ul style="list-style-type: none"> The contractor shall ensure provision of waste bin at the site to handle waste generated Efficient use of materials to as much as possible avoid and minimize waste production Ensure waste are recycled/reused before opting to dispose Use of durable, long-lasting materials that shall not need to be replaced often Ensure waste is collected and disposed in accordance to Somali Government Regulations 	# of waste bin at the site	Site Visit Project progress reports review	Monthly	Environment Expert	Part of contracts for construction – costs will be included in the contracts
Construction of schools	Occupational health and safety: slip/fall, elevated noise, dust and electrocution	<ul style="list-style-type: none"> The contractor shall provide the workers with the required PPE and enforce on use at all times while at the work sites The equipment used in the works should be routinely serviced to ensure proper and safe equipment functionality Carry out Job Risk Assessment (analysis of hazards likely to occur and precautions need to be undertaken) before executing the construction Use of safety signage “MEN/WOMEN AT WORK” to warn contractor workers and visitors to worksites Provision of adequate signage and communication of risk to workers and communities Training and use of temporary fall prevention devices, such as rails, full body harnesses and energy absorbing lanyards Electrical works should be performed by trained and qualified experts Ensure that electrical equipment is properly connected before switching on sockets 	-Accident logs -First Aid Kits -Fire extinguishers	-Site visit -Document reviews - photography	Monthly	Environment & Social Expert	Part of contracts for construction – costs will be included in the contracts

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> In case on any spillage at working areas, this should be cleaned off immediately, anti-slip hazard warning when mopping floors should be provided to reduce on chances on slip and falls 					
	Spread of infectious diseases - in particular COVID-19	<ul style="list-style-type: none"> Train all staff on the signs and symptoms of COVID-19, how it spreads, how to protect themselves and the need to be tested if they have symptoms Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing All workers and visitors accessing work sites every day or attending meetings shall be subjected to rapid Covid-19 screening which may include temperature check and/or other vital signs Mandatory provision and use of appropriate PPE such as masks shall be required for all project personnel including workers and visitors Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the project site and during breaks Avoid congregation of more than 15 workers at one location. Where more than one persons are gathered, maintain social distancing of at least 2 meters Restriction of the number of people accessing the work areas Fumigation of offices and work areas Train all workers in respiratory hygiene, cough etiquette and hand hygiene 	# of reported cases at site # availability of IPC strategies for hand and water hygiene, use of PPE -Training reports	Site Visits Document review Grievance/ incident log	Monthly	Social specialist, CPHO	In component 4 budget and SEP – USD 100,000

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoE offices 					
	Spread of infectious diseases - in particular HIV/AIDS	<ul style="list-style-type: none"> Sensitize workers and communities on HIV/AIDS prevention and management Place signage at the work sites/schools on HIV/AIDS prevention For site camps: provide signage for workers on HIV/AIDS at all the camps Provide HIV testing facilities at worksites those with many workers 	# of sites with communication posters/information on HIV/AIDS # of communities reached with information on HIV/AIDS # of people who know about where to get HIV/AIDS services	Site Visits Document review	Monthly	Environment & Social Expert	Comp 4 – USD 50,000
	Labour disputes	<ul style="list-style-type: none"> Fair terms and conditions shall be applied for workers (guided by relevant laws and WB ESS2) The project shall facilitate the development and operationalization of GRMs for project workers (direct workers and contracted workers) to promptly address their workplace grievance (as provided for in the LMP) The project shall respect the workers’ rights of labour unions and freedom of association 	# of reported cases of disputes by workers	-Site visits -Workers’ GRM -Document review	Monthly Reports	Social Expert	Comp 4 – social specialists
	Insecurity – construction sites	<ul style="list-style-type: none"> All work sites and camps shall be protected by security personnel All visitors to construction and camp sites (as appropriate) will be required to fill a visitors’ form providing all personal details and purpose of the visit 	# of reported insecurity incidents, # of training offered project workers	Site visits SMP reports Project documents	Quarterly	E&S Expert, Security personnel involved in the	Comp 4 – E&S specialists

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> A data file with information regarding the visitor will be recorded and kept by the MoECHE Security induction must be done to all project workers The SMP, developed for this project, will be implemented by all parties involved in the project implementation 	# of workers trained			project activities	
	Traffic Hazards	<ul style="list-style-type: none"> Use of competent drivers with defensive driving techniques MoECHE and MoEs' at the district level shall regularly inspect vehicle safety and maintenance All fleet handling deliveries shall observe speeds limits to a maximum of 80km/h out of major towns but 30kms in towns All drivers and loaders should sign the CoC Drivers (especially going to high insecurity areas) should follow guidance on safe emergency driving 	# of accidents recorded, #Vehicle inspection reports -Trip Management Plans	-Field visits -Document review	Quarterly	-E&S Experts -SMPC -Contractors -Drivers	Comp 2 and 4
Operational Phase of the Project							
School operation and maintenance	Security threats	<ul style="list-style-type: none"> The security personal shall be oriented on good conduct and required to sign a code of conduct as per the SMP All students and workers shall be oriented on security matters The SMP shall be shared with the key project teams (school managers and MoE officers) on a need-to-know basis All visitors to school be required to fill a visitor form providing all personal details and purpose of the visit Every school administrator shall keep a record of all his employees and workers and their personal details including phone numbers and address. 	# of reported cases at site, -Types of work site and camp protocols Trainings offered to staff	-Field visits -Document review - photography	Quarterly	E&S Experts, Security Personnel	Comp 4 – E&S specialists

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# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> Regular security induction and drills must be done for all staff and students A search of personal luggage shall be performed by the guards at the access control point to ensure no access of all the prohibited items into the project site 					
	Potable water supply problems	<ul style="list-style-type: none"> Ensure that school construction designs include the installation of appropriate potable water supply facilities School operation costs to take into account expenses related to provision of safe and potable water for school children, teachers, and other stakeholders 	% of school children with access to safe potable water	Field visit TPM reports Safeguards monitoring reports	Quarterly	Env. Specialist	Comp 2 – part of construction contracts and maintenance will be covered by school grants
	Poor management of ESHS risks, as well as risks to community health and safety	<ul style="list-style-type: none"> Establish and maintain continuous liaison with the host communities including sensitization on ESHS risks and mitigation measures Use of local language and images for ESHS signage shall be encouraged Ensure proper and adequate provision of sanitation and waste management facilities at all schools Maintain a system of receiving and responding to any safety concerns in the schools by the communities School CECs to be trained on EHS monitoring during school operations 	# of ESHS incidents occurring	Field reports	Half yearly	CECs	Comp 2 and 4 – USD 180,000
	Inefficient solid, hazardous and liquid waste and e-	<ul style="list-style-type: none"> Preparation of waste management plan for each waste stream and implementation of the waste hierarchy, as part of the Operation Phase ESMP 	# of waste management plans	Field reports TPM reports	Half yearly	PMU	Comp 2 –

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
	waste collection and management during operation and maintenance phases, leading to waste disposal problems, and resulting in polluting soils, surface and shallow groundwater, especially during the rainy seasons	<ul style="list-style-type: none"> Prepare and implement a simple waste management plan subject to the concurrence of the respective PMUs in the FMS School CECs to provide garbage receptacles in strategic places within the school compound area, and regularly collect and properly deposit of these wastes in the designated disposal areas As much as practicable, reuse spoils that meets material specifications When practicable, compost organic and degradable waste in suitable container, and provide this to interested farmers for their crop production 	<p>Volume of total waste generated</p> <p>% of waste collected</p>				Part of construction contracts
	Outbreaks of diseases and poor indoor air quality	<ul style="list-style-type: none"> Ensure that school designs adopted provide adequate learning environment free of pests and vermin, with ample ventilation provided Periodic fumigation activities, to be prescribed in the Operation Phase ESMP Ensure proper and adequate provision of sanitation and waste management facilities at all schools Maintain a system of receiving and responding to any safety concerns by the communities 	# fumigation events conducted	Safeguard reports School progress reports	Half yearly	MoECHE PMU	Comp 2
Project beneficiaries – pupils	Discrimination and exclusion of disadvantaged groups	<ul style="list-style-type: none"> The project will implement the inclusion plan contained in the SEP The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship 	#Procedure of project targeting	Field visits Document review	Quarterly	Social Expert	Comp 4 - E&S specialists

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> • Hold sensitization meetings on resources planning and conflict resolution mechanisms • Institutionalization of inclusion of all categories in processes and decision making • There will also be enough and suitable toilet and washing facilities, separate from men and women workers, boy youths and girl youths as the community cultures demand • The contracts with third parties will include non-exclusion requirements which will also be part of the monitoring system • All stakeholders will be informed and sensitized on the GRM and available channel for redress. 					
Project beneficiaries	Sexual Exploitation and Abuse (SEA)	<ul style="list-style-type: none"> • Sensitization of project workers and the MoE staff and benefiting communities; • Instituting separate Grievance Redress Committee to handle cases among others sexual abuses, • Involving local authorities and police where appropriate in handling sexual abuses; and • All project staff should be trained against SEA awareness programs for workers and the beneficiary community. 	# of reported cases # of cases handled to conclusion Existence of SEA Plan	Field Visit Document review	Quarterly	Social Expert	Comp 4 - E&S specialists
	Spread of HIV/AIDS and STIs	<ul style="list-style-type: none"> • Carry out periodic HIV/AIDS awareness for workers and staff, • Carry out voluntary HIV/AIDS testing for workers; and • Workers should sign the CoC and abide by its provisions for HIV/AIDS awareness and prevention. 	# HIV/ AIDS campaign done #Training record available	Field visits Document review	Quarterly	Social Expert, CBO	Comp 4 - E&S specialists
Selection of female teachers to be recruited, trained and	Compromised selection process	<ul style="list-style-type: none"> • Generate criteria for selection of female teachers to be engaged by the project 	-Template for selecting the female teachers	Field visits Project reports	Quarterly	Social Expert	Comp 4 - E&S specialists

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# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
deployed to schools		<ul style="list-style-type: none"> • Disclose up to the community level the selection criteria • Disseminate the GRM process to the lowest level to ensure that community members know where to channel to and how to channel their grievances 	-GRM template distribution -Site visits -Project documents #Grievances on teacher selection				
	Forced recruitment of female teachers	<ul style="list-style-type: none"> • Provide a form for recruited female teachers to indicate their consent • Disseminate the GRM process to the lowest level to ensure that community members know where to channel to and how to channel their grievances • Monitor the process and identify any challenges among the female teachers 	#Completed consent forms #Grievances related to the recruitment process -Teachers' performance	Field visits Project reports GRM reports	Quarterly	Social Expert	Comp 4-E&S specialists
Training of 6000 teachers (blended training)	Compromised selection process	<ul style="list-style-type: none"> • Ensure the development of a criteria for selection of teachers to benefit from the training • Disclose, at the county level, information on those selected for training 	-Selection criteria -No. of teachers trained	Training procedures	Quarterly	E&S Experts,	Comp 4-E&S specialists
	GBV/SEAH/SEA/S H	<ul style="list-style-type: none"> • Monitor and report on the behaviour of project workers at all levels; • Ensure the people engaged in project activities understand the GBV/SEAH referral pathway; • Ensure all learners and community members have access to the GRM contacts; and • All workers should sign the CoC (see the LMP). 	# of reported cases # of cases handled to conclusion # Existence of GBV/SEAH/SEA Plan	Field Visit Document review	Quarterly	Social Expert	Comp 4-E&S specialists
Selection of project beneficiaries	Lack of or inadequate public participation and consultation	<ul style="list-style-type: none"> • Ensure that measures are put in place to identify and reach the HUTLCs and rural populations with project information; 	-Record of Public participation -Meetings minutes	-Field visits -Document review	Quarterly	Social Expert	Comp 4-E&S specialists

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# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> Use communication channels that are accessible to marginal populations including use of community radios, translating information in local languages; and Identify and equip local leaders with information on the project more generally and the GRM for further dissemination in their communities. 	# of complains recorded				
Project implementation	Inadequate capacity <ul style="list-style-type: none"> Environment Social GBV/SEAH Communication Monitoring and evaluation 	<ul style="list-style-type: none"> Undertake a training needs assessment for the MoECHE, MoE and implementing partners Identify suitable and tailor-made courses for the technical teams Facilitate capacity building efforts for the team Monitor the performance and provide continuous technical support to the PIU 	-Training needs assessment report -Training protocols -List of staff trained	-Field visits -Review of project reports	Quarterly	Project Coordinator	USD 50,000
Project Implementation	Inadequate and/or inefficient management of logistics	<ul style="list-style-type: none"> Standardization of inventory management tools and mechanisms Checking needs for support in all schools more so those in remote areas Empowering implementing partners to take over the supply of inputs for the activities for which they are responsible Independent responsibility of each partner for its activities (logistical support: accommodation, means of communication and IT, transport, etc.) Strengthening the package of shared logistics services for efficient response 	Clear procedure for opening bid, Adherence to the Implementation manual	Field Visit Document review	Quarterly	Project Coordinator Social specialist	Comp 4- E&S specialists
	Spread of Infectious Disease – COVID-19	<ul style="list-style-type: none"> Train all school staff and school-going children on the signs and symptoms of COVID-19, how it 	# of reported cases at site,	Field Visit	Quarterly	Environment	Comp 4- E&S specialists

# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<p>spreads, how to protect themselves and the need to be tested if they have symptoms</p> <ul style="list-style-type: none"> • Ensure that the schooling infrastructure (including chairs and desks) are well spaced apart, and are frequently sanitised • Use existing grievance procedures to encourage reporting of co-workers if they show outward symptoms, such as ongoing and severe coughing with fever, and do not voluntarily submit to testing; • Mandatory provision and use of appropriate Personal Protective Equipment (PPE) such as masks shall be required for all project personnel including suppliers, workers and visitors; • Provide hand wash facilities, water and soap, alcohol-based hand sanitizer and mandate their use on entry and exit of the schools and during breaks; • Avoid concentration of more than 15 persons at • Fumigation of offices, work areas, store and project vehicles delivering food to the schools; • Train all workers in respiratory hygiene, cough etiquette and hand hygiene; and • Train cleaning staff in effective use of PPE, cleaning arrangement and procedures and disposal of waste generated from the MoE offices /schools. 	# availability of IPC strategies for hand and water hygiene, use of PPE	Document review, and photography		and Social Expert, CPHO	
Operation & Management of ICT Equipment	Generation of E-Waste with associated toxic chemicals leading to Air Pollution, pollution of ground water	<ul style="list-style-type: none"> • Procure electronic devices from credible manufactures to avoid purchasing second hand, refurbished or obsolete devices with a short shelf life or already categorized as E-Waste; • Recycle all E-waste through the licensed e-waste recycling companies; • Return Obsolete devices to the supplier depending on warranty period/agreement; 	<p>-Clearly labelled E-waste bins / receptacles</p> <p>-Warrant for the ICT Equipment</p> <p>-Temporary E-waste collecting facility at</p>	Field Visit Document review, Photography	Annually	Project Coordinator Environment expert at PIU	USD 80,000

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# Key Activities	Potential E&S Risks and Impacts	Proposed Mitigation Measures	Indicators for monitoring	Means for Monitoring	Frequency of Monitoring	Responsibility	Cost (USD)
		<ul style="list-style-type: none"> Establish an E-Waste Temporal Collection Centre at MoE; including collection bins/receptacles; Contract the services of NEMA Licensed E-Waste Firm to collect E-wastes from MoE and dispose of in an environmentally sound manner Conduct awareness and sensitization targeting the users of the electronic devices to ensure that they engage in best practice for E-waste management; and The contractor for the installation of the ICT equipment shall adhere to the provisions in the E-Waste Management Plan (Annex I). 	MoECHE and other offices -Training records for E-Waste handling, -E-Waste disposal Certificates -Waste License for contracted Firm				
TOTAL COST							USD 740,000

ANNEXES

ANNEX 1: WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS

ESS1: Assessment and Management of Environmental and Social Risks and Impacts⁹⁰

This Standard sets out the Borrower's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of a project supported by the Bank through Investment Project Financing (IPF), in order to achieve environmental and social outcomes consistent with the Environmental and Social Standards (ESSs).

ESS2: Labour and Working Conditions*

This Standard recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions.

ESS3: Resource Efficiency and Pollution Prevention and Management*

This Standard recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services and the environment at the local, regional, and global levels. This ESS sets out the requirements to address resource efficiency and pollution prevention and management throughout the project life-cycle.

ESS4: Community Health and Safety*

This Standard addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.

ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement*

Involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.

ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources*

This Standard recognizes that protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development and it recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support. ESS6 also addresses sustainable management of primary production and harvesting of living natural resources, and recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples, whose access to, or use of, biodiversity or living natural resources may be affected by a project.

ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This Standard ensures that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. ESS7 is also meant to avoid adverse impacts

⁹⁰ The asterisk sign (*) denotes that this Standard is applicable in the Somalia education project

of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.

ESS8: Cultural Heritage*

This Standard recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present and future. ESS8 sets out measures designed to protect cultural heritage throughout the project life-cycle.

ESS9: Financial Intermediaries (FIs)

This Standard recognizes that strong domestic capital and financial markets and access to finance are important for economic development, growth and poverty reduction. FIs are required to monitor and manage the environmental and social risks and impacts of their portfolio and FI subprojects, and monitor portfolio risk, as appropriate to the nature of intermediated financing. The way in which the FI will manage its portfolio will take various forms, depending on a number of considerations, including the capacity of the FI and the nature and scope of the funding to be provided by the FI.

ESS10: Stakeholder Engagement and Information Disclosure*

This Standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

More information on these Standards is available at

<http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf#page=53&zoom=80>

ANNEX 2: INDICATIVE SCREENING CHECKLIST

No	ITEM	DETAILS		
INTRODUCTION				
1	Project Name	Somalia Education for Human Capital Development Project		
2	Project Location			
3	Project Description (brief) including risk classification and recommendations about additional ES studies/assessments			
4	Does the Project require any:	Yes	no	If yes, extent in ha.
	Reclamation of land, wetlands			
	Clearing of grazing lands			
	Felling of trees			
5	Minimum land area required for the proposed development (ha)			
6	Available total land area within the identified location (ha)			
7	Expected construction period			
8	Responsible contact person, contact information			
9	Present land ownership	State:	Private:	Other:
10	Are there Multiple land claims or conflict over land			
11	Lack of community support	YES	No	
15	Is there a Village Development Committee or Community Education Committee or other representative community structure?	Yes	No	
16	How effective and representative is the CEC/VDC etc?			
17	How are they selected and/or appointed?			
18	Are there minority clans in the area?			
19	Are there IDPs in the area? If Yes, how do you describe the how the host community treat them?			

20	What survivor centric health, psychosocial, and legal services exist in the area?					
21	Are there any cases of forced or child labour for constructions?					
ENVIRONMENTAL IMPACT AND MITIGATION/ENHANCEMENT DURING CONSTRUCTION PERIOD						
	Impacts	H ⁹¹	M ⁹²	L ⁹³	N/A	Mitigation/Enhancement
15	Soil erosion, soil subsidence, and sedimentation					
16	Water pollution					
17	Potable water supply issues					
18	Noise pollution					
19	Solid waste generation					
20	Liquid or e-waste waste generation					
21	Traffic hazards					
22	Loss of vegetation cover					
23	Habitat loss or fragmentation					
24	General disturbance to animal behaviour					
25	Interference with normal movement of animals					
26	Irreversible/irreparable environmental change					
27	Air pollution					
28	Existing environmental liabilities (e.g., waste materials disposed on site, soil contamination)					
ENVIRONMENTAL IMPACT AND MITIGATION/ENHANCEMENT DURING OPERATIONAL PERIOD						
29	Potable water supply issues					
30	Waste disposal issues					
31	Indoor air quality					
32	Traffic hazards (transportation)					
33	Outbreaks of pests and diseases					
34	Outbreaks of communicable diseases					
35	Other potential hazards (including fire, droughts, etc.)					
36	Consider adjoining land uses and activities (i.e., what is immediately next to the school site, and whether there are any sensitive					

⁹¹ High

⁹² Medium

⁹³ Low

	receptors (homes, health clinics, religious facility) nearby					
COMMUNITY ENGAGEMENT						
24	Number and nature of public consultation meetings conducted so far	Type of Meeting	Number of Meetings	of	Nature of Participants	Participants
						Male
						Female
CONTACT DETAILS OF OFFICIALS AND RECOMMENDATIONS						
	Name of the person completing form					
	Designation and contact information					
	List of team members					
	Signature and date					
	Name of officer who checked this form					
	Designation and contact information					
	Remarks					
	Signature and Date					

ANNEX 3: GENERIC CONTENTS FOR SITE-SPECIFIC SUB-PROJECT ESMP

INTRODUCTION

Purpose of the ESMP

There is need to carry out an environmental and social impact assessment which will have to comply with the environmental procedures ofand with the environmental guidelines of the financing institutions, World Bank. The main objective of this study is to develop an Environmental and Social Management Plan (ESMP) for planned project activities within the that will provide the decision makers in the Ministry of Education, Federal Republic of Somalia, with sufficient information to justify acceptance, modification or rejection of the proposed sub-projects (“schools”) for financing and implementation.

The purpose of the Environmental and Social Management Plan (ESMP) is to define and reach an agreement with the World Bank concerning mitigation/enhancement, monitoring, consultative and institutional strengthening measures to be undertaken during sub-project implementation and operations. The ESMP format shall be flexible to ensure the integration of project specific mitigating, enhancing and monitoring requirements. For instance, the ESMP shall integrate or at least refer to any initiatives, such as resettlement plans, that contribute to enhance the project environmental or social performance.

In addition, the ESMP format shall permit adjustments and revisions to reflect new developments and findings along project implementation and operations. The ESMP's scope and level of details shall be proportional to the number and complexity of the measures required to ensure the project's environmental and social sustainability. The following components constitute the minimal contents of an ESMP.

- ☐ General Information
- ☐ Estimated Starting date of implementation
- ☐ Project completion date
- ☐ Date of operation
- ☐ Period covered by the plan

Objectives of the ESMP

This section shall specify that the ESMP aims to bring the project into compliance with applicable Somalia national environmental and social legal requirements and the World Bank’s Environmental and Social Framework. Other objective of the ESMP is to outline the mitigating/enhancing, monitoring, consultative and institutional measures required to prevent, minimize, mitigate or compensate for adverse environmental and social impacts, or to enhance the sub-project beneficial impacts. It shall also address capacity building requirements to strengthen environmental and social capacities if necessary.

Project context

The ESMP shall briefly describe project activities and major environmental and social components that will likely be affected positively or negatively by the project. The information provided shall be concise as the project’s ESMF covers in detail this topic. In fact, for this section, cross-references to the ESMF are recommended. Moreover, the context section shall outline existing interrelations between ecological and social processes. These interrelations among components shall be mentioned to be taken into account in the impact assessment and the development of mitigation/enhancement measures.

Beneficial and Adverse Impacts

This section shall focus on beneficial impacts that can be enhanced to improve the project's environmental and social performance as well as on adverse impacts that require mitigation measures to be minimized or compensated. The impact description in the ESMP shall be brief and refer to the project's ESMF for further details.

Enhancement and Mitigation Program

This section shall propose feasible and cost-effective measures to address the impacts previously defined, in order to accrue project benefits (enhancement measures) or to reduce potentially adverse environmental and social impacts to acceptable levels (mitigation measures). Each measure shall be described in detail, providing all technical information required for its implementation (design, equipment description and operating procedures, as appropriate).

Monitoring Program

A monitoring program aims to ensure that mitigation and enhancement measures are implemented, that they generate intended results and that they are modified, ceased or replaced when inappropriate. Moreover, it allows to assess compliance with national environmental and social policies and standards as well as with the international policies and guidelines. A monitoring program shall include two parts: surveillance and monitoring activities.

Surveillance activities: The surveillance aims to ensure that the proposed mitigation and enhancement measures are effectively implemented during the construction and operational phases.

Monitoring activities: These activities consist in measuring and evaluating the project impacts on some environmental and social components of concern and to implement remedial measures, if necessary. The program shall define as clearly as possible the indicators to be used to monitor the mitigation and enhancement measures that need to be assessed during project implementation and/or operation. The monitoring program shall also provide technical details on monitoring activities such as methods to be used, sampling of schools, frequency of measurements, detection limits, and definition of thresholds that will signal the need for corrective actions.

Where it is required, monitoring should address both emission and ambient levels of pollutants and solid waste generated by the support schools, where these may be detrimental to human health. World Bank guidelines presents general ambient quality standards, the figures presented are ambient guidelines only. As Somalia has no national ambient air quality standards, the Bank's standards can be used to substitute for the country's non-existent quality standards.

Consultations

The implementation and monitoring of some mitigation or enhancement measures may require that consultative mechanisms be used. In such cases, the ESMP shall first identify for which measures consultations will be undertaken as well as the goals and expected outcomes of these consultations. Then the ESMP shall specify the target groups, appropriate consultative processes, consultation frequency, reporting methods and result disclosure procedures.

Complementary initiatives

The ESMP shall integrate or at least refer to all initiatives that are proposed to improve the project environmental or social performance. As the project's ESMF includes such initiatives, these shall be briefly presented in this section. Moreover, these complementary initiatives shall be taken into account in determining the responsibilities, institutional arrangements, cost estimates and implementation schedule.

Responsibilities and Institutional Arrangements

The implementation of enhancement and mitigation measures as well as the completion of the monitoring program require to clearly establish responsibilities among the project implementation team at FGS and FMS levels. Ultimately the Ministry of Education at the FGS level is responsible for monitoring and reporting on achieved results, but it may need to be assisted in the implementation of the ESMP by the FMS project team and external consultants. Consequently, the ESMP shall identify the responsibilities of the World Bank, the implementing ministry and other stakeholders in applying the ESMP, particularly the monitoring program. In addition, the ESMP shall propose support to the implementing unit if it has insufficient capacities to fulfil its obligations. This support could be provided through various means including technical assistance, training and/or procurement.

Estimated Cost

This section estimates the capital and recurrent cost associated with the various proposed measures (enhancement and mitigation), the monitoring program, consultations, complementary initiatives and institutional arrangements. The financing for implementing the ESMP shall be part of project financing.

Implementation Schedule and Reporting

The ESMP shall include an implementation schedule taking into account all activities related to the proposed measures (enhancement and mitigation), the monitoring program, consultations, complementary initiatives and institutional arrangements. Moreover, the implementation schedule shall be developed by phases and in co-ordination with the overall project implementation plan. To ensure early detection of critical environmental and social conditions and to provide information on the mitigation progress and results, reporting deadlines shall be specified in the implementation schedule and reporting procedures shall be presented in this section.

ANNEX 4: PROTECTION OF CULTURAL PROPERTY

Cultural property includes monuments, structures, works of art, or sites of significance points of view, and are defined as sites and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This includes cemeteries, graveyards and graves. Under ESS 8, there will be aspects of important, intangible cultural heritage, which need consideration, especially in the ancient city of Mogadishu. Under Somalia education project, for example, the construction should not disturb events or ceremonials in nearby mosques or Islamic schools.

The initial phase of the proposed Somalia education project interventions pose limited risks of damaging cultural property since projects will largely consist of small investments in school infrastructure and other relatively minor public works. Nevertheless, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents.

Chance Find Procedures

Chance find procedures will be used as follows:

- Stop the construction activities in the area of the chance find;
- Delineate the discovered site or area;
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums take over; and
- Notify the supervisory Engineer who in turn will notify the responsible local authorities and the Ministry of Culture immediately (within 24 hours or less);

Responsible local authorities and the Ministry in charge of Department of Archaeology and Museums would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists of the Department of Archaeology and Museums (within 72 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values.

Decisions on how to handle the finding shall be taken by the responsible authorities and the Ministry in charge of Department of Archaeology and Museums. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage.

Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Ministry in charge of Department of Archaeology and Museums.

Construction work could resume only after permission is given from the responsible local authorities and the Ministry in charge of Department of Archaeology and Museums concerning safeguard of the heritage

These procedures must be referred to as standard provisions in construction contracts, when applicable. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered are observed.

Relevant findings will be recorded in World Bank Project Supervision Reports and Implementation Completion Reports will assess the overall effectiveness of the project's cultural property mitigation, management, and activities, as appropriate.

ANNEX 5: SUGGESTED TEMPLATE FOR SCHOOL CONSTRUCTION ESMP (IN ADDITION TO CONTRACTOR C-ESMP)

Please annex CESMP, voluntary land donation/agreement documentation, screening form, community meeting minutes

Proposed sub-project: _____ Village/district/state: _____

Overview of the school site location and key features within 200m of works (to understand impacts) _____

Population resident on or regularly using the land/sub-project or claimants of the land:

Village/ (facility users can be by people resident more than one location)	No of individuals resident or regularly using the project area for their livelihood	No. of direct users of the sub-project area (individuals)	Number of people from that village/consulted on the sub-project (design, siting, social and environmental impacts)

Has there been any conflict over this land? If so please describe, what measures the project will take to ensure that it does not exacerbate conflict.

1. Consultations with the community on the site selection (to ensure broad agreement, ownership and risk identification and mitigation)

	Date	Village	Total number of people involved	No. of women	No. of youth	No. of minority group or IDP representatives (please specify group/s)	Main concerns raised and how they will be addressed	Challenges in consulting with people e.g. migration, conflicting event, insecurity
Initial discussions								
Safeguards screening meeting								

Other – meetings (specify)								
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2. Environmental and social impacts and mitigation measures identified by the community (only put those not captured in the ESMP)

Social and environmental impacts of sub-project	Mitigation measures	Costing	Time frame	Responsible agency

3. Has a safeguards field visit been undertaken to the site? Y/N Date of visit: _____ Title of visiting officer: _____

4. Is the contract signed by the contract explicitly binds the contractor to incorporate the CESMP in his operations?

5. Has the ESMP been incorporated into the collective and individual contract for the works; and is a safeguards compliance report required before payment?

–

6. Type of land required for sub-investment and documentation:

a. Government land	Title deed/confirmation document attached?	YES/NO/EXPLANATION
b. Community land	Voluntary land donation form and community minutes attached?	YES/NO/EXPLANATION
c. Private land	Voluntary land donation form and conversion document attached?	YES/NO/EXPLANATION

7. Voluntary land donation:

- a) How many people either live on or regularly use the land where the project will be implemented (including those who might use it as a drought fall back area) by location and how many and who agreed to the voluntary donation of this land for this public facility? _____
- b) Explain how the requirements for voluntary land donation have been met (and attach minutes, VLD form and signed participants list):

Requirements for voluntary land donation	Explanation and evidence
1. The land required to meet technical project criteria must be identified in conjunction with the affected community?	
2. What are the likely impacts of proposed activities on donated land and how were these explained to the community?	
3. Area of land compared to area owned (no more than 10 percent of the area of any holding can be donated). %	
4. How will the users and occupiers of the land benefit from this sub-project?	
5. What are the conditions of benefiting from this sub-project – connection fees, service charges etc.	
6. How was the community made aware that refusal was an option and confirmed in writing that they are willing to proceed with the donation? (e.g. at the consultation and in the voluntary land donation document)	
7. What evidence is there that the act of donation was undertaken without coercion, manipulation, or any form of pressure on the part of public or traditional authorities (e.g. photos/videos of community consultation etc.)?	
8. Do all the users and occupants of this land understand that by donating this land it may be gazetted as public land	
9. How was it explained that they have a right to compensation for land and the available compensation options (in-kind compensation, land for land compensation or cash compensation, and the implications of cash compensation)?	
10. Were monetary or non-monetary benefits or incentives requested as a condition for the donation and were these provided?	
11. How do you know that the land being donated will not reduce the remaining land area to a level below that required to maintain the donor’s livelihood at current levels and will not required the relocation of any household?	
12. Will any structures be moved or any access to land be limited as a result of the sub-project (describe structures and locations)?	
13. If so, how will they be compensated/facilitated and/or their livelihoods restored?	
14. How was consent provided by all individuals occupying or regularly using the land?	
15. Was there anyone who did not give agreement and why?	
16. How was it established that the land to be donated was free of encumbrances or encroachment and was it registered in an official land registry?	

17. All users and occupants of the land have genuinely understood (in local language with sufficient time) and agreed that all conditions for voluntary land donations have been met (refer to consultations above and attach minutes)	
--	--

8. **GRM: Has the GRM process and contact information for focal points been disseminated to the community? If so, how and to whom (numbers and groups). If Not, when will this be done?**

9. **Have the SAC members been introduced to the community and their functions explained to the locals?**

10. **GBV/SEAH: Has awareness been carried out on GBV/SEAH, service providers and confidential survivor centric GBV/SEAH complaints mechanism? If so, how and to whom (numbers and groups). If not, when will this be done?**_____

11. **Describe the involvement and inclusion of women and minority groups or nomadic pastoralist representative in management?**_____

ANNEX 6: CONSULTATION MEETINGS HELD WITH KEY STAKEHOLDERS**CONSULTATION MEETING ON SEP: Date 3/12/2020 Time: 10 am – 12 pm****List of participants for the IDA project stakeholder meeting Meeting Mode: Zoom**

No	Name	Institution
1.	Shweta Sandilya	UNICEF
2.	Mengistu Koricha	Save the Children
3.	R. Drake Warrick	Creative Associates
4.	William Babumba	DRC
5.	Suleiman Ahmed	DRC
6.	Ahmed Dirshe	Concern WW
7.	Dr. Mohamed Hassan Nur	Mogadishu University
8.	Dahir Hassan	SIMAD University
9.	Dr. Salad	Jazeera University
10.	Abdirashid Mohamed	SCC
11.	Dahir Shire	DAN
12.	Abdikadir Isse Farah	FENPS
13.	Abdifitah Aden Abdi	WARDI
14.	Abdisahal Mohamed	Himilo Foundation
15.	Aweis Haji Hassan	Ayuub NGO
16.	Beryl Auma	World Vision
17.	Adan Mohamed	EFASOM
18.	Mohamed Idle	AET
19.	Mohamud Ahmed Rage	MOECHE
20.	Abdi Gashan Egal	MOECHE
21.	Suaad Abdulle	MOECHE
22.	Abdinur Jama	MOECHE
23.	Abdifitah Mohamed	ESC Coordinator
24.	Shueyb Youb	ARC
25.	Mohamed Abdulkadir Nur	MOECHE
26.	Abdirizak Mohamed	MOECHE
27.	Ousman Abdullahi	World Bank
28.	Abdirahman Zeila	World Bank
29.	Huma Ali Waheed	World Bank
30.	Farhiya Farah	World Bank
31.	Mahdi Mohamud Abdi	EFASOM
32.	Ahmed Hassan Mohamed	Himilo Foundation
33.	Ismail Mohamed Ali	GPE Coordinator
34.	Ahmed Hassan Yusuf	DG-MOECHE
35.	Raymond S. Kirwa	World Bank
36.	Mary Amuyunzu-Nyamongo	World Bank
37.	Ahmed Kormeere	MOECHE
38.	Ismail Abdi	MOECHE

CONSULTATION MEETING ON ESMF AND RPF: Date 9th February 2021, 9am -12pm

List of participants for the IDA project stakeholder meeting Meeting Mode: Zoom

No.	Name	Title & Institution
1.	Salad Abdulle	MoLSA – Director of Planning
2.	Mohamud Rageh	MOECHE- Director of Planning
3.	Abdifitah Abdi Mohamed	Education Sector Coordinator
4.	Vanessa Tilstone	Social specialist, World Bank
5.	Shweta Sandilya	UNICEF
6.	Haile Gashaw	UNICEF – WASH
7.	Huma Waheed	World Bank -TTL
8.	Khalif Hassan Dalmar	Director of Environment & Climate Change – OPM
9.	Jose M. Bendito	Chief of Social Policy, UNICEF Somalia.
10.	Mohamed Dhugad	Alight (formerly ARC) Area Rep
11.	Ahmed Yusuf	Director General of Environment, Office of the Prime Minister.
12.	Dahir Shire	Head of operations and Programs- DAN
13.	Fouzia Warsame	DCOP of USAID Bar Ama Baro
14.	Peter Quamo	UNICEF Education
15.	Musa.I Dugow	SOS Children's Village Somalia
16.	Mohamud Sheikh Abdi	INISKOY Program Manager Baidoa Base
17.	Abdihakim Abdullahi Jama	FENPS
18.	Joy Khangáti	CARE
19.	Mahad KAARSHE	WFP
20.	Farhia Mohamud	Somali Public Agenda
21.	Oscar Boije	UNICEF
22.	Ismail Abdi	MoECHE- TA Teacher Development
23.	Lugard Ogaro	Mercy Corps, Director of Programs
24.	Mohamed Dahir Moalim	Social Safeguard Specialist, RCRF, South West State
25.	Mohamed Moge Mohamed	Social Specialist, RCRF, Jubaland
26.	Mandeq Abukar	Concern Worldwide
27.	Abdinasir Abdullahi	DG. Ministry of Energy and Water Resources, Galmudug
28.	Hussein Hassan	RCRF Project Manager SWSS
29.	Christophe Hodder	UN Environmental Advisor
30.	Mohamed-Abdullahi	MARDO
31.	Mohamed Hared	Juba Foundation
32.	Dr. Abdiwali Ahmed	DG Galmudug MoH
33.	Yarow Mohamed Abdi	Juba Foundation
34.	Siyad Abdirahman	Rural education and agriculture development organization READO
35.	Christophe Hodder	IO/UNEP, Environment Advisor
36.	Naima Nor Abdi	FENPS
37.	All Aweys	Ayuub NGO
38.	Shair Luli	GBV consultant World Bank Somalia
39.	Paul Owora	World Vision Somalia
40.	Adam Mohamed	National Coordinator of EFASOM
41.	Mahdi Mohamud	MoECHE
42.	Abdishakur Isse Hashi	Social specialist RCRF Galmudug State
43.	Ahmed Hussein Iman	Project Coordinator, SOMALI NON-STATE ACTORS (SONSA)
44.	Mohamed Abulkadir Nur	MOECHE
45.	Abdirahman Zeila	Environment Specialist, World Bank
46.	Jaafar Muhammed	Social Specialist, World Bank
47.	Mohamed Mohamud	Directorate of Environment and Climate Change, Office of the PM
48.	Peggy Ayako Kwendo	World Bank
49.	Abdinur Ahmed Jama	MOECHE
50.	Amin Mukhar Ahmed	DG- Hirshabelle Ministry of Education

51.	Ahmed Nur	DG- Galmudug Ministry of Education
52.	Abdi Ibrahim	TIDES NGO – Executive Director, Garowe, Puntland
53.	Abdiaziz Nur Mohamed	MOECHE – TVET & Non-formal Director
54.	Mohamed Mohamud	(DECC-OPM)
55.	Mohamed	Civil Society Platform

ANNEX 7: GENDER MAINSTREAMING AND GBV/SEAH ACTION PLAN

Gender mainstreaming

The rights of women are protected in the Constitution of Somalia (including in the particular constitution of Somalia and that of Puntland). Women are given the right to education, allowed to work, own properties, hold public office, and receive inheritance. However, there are risks that disparity between men and women may possibly occur in the Somalia education project in the course of its implementation, in areas such as exclusion from stakeholder engagement activities, priority in hiring, pay rates for similar work done, safe working environment, health and sanitary facilities in the work place and office and others.

To address such risks, the project will take a number of differentiated measures to include female members in stakeholder engagement processes (including consultation events and grievance redress committees); provision of job opportunities in subprojects' civil works; equal pay and fair working conditions (including provision of maternity leave and nursing breaks where relevant, and sufficient and suitable toilet and washing facilities, separate from men and women workers). These measures are also included in the LMP and SEF.

Gender mainstreaming can be incorporated into the project with lessons from the Africa Region Gender Action Plan (GAP).⁹⁴ This plan lays out the World Bank Africa Region's strategy for addressing gender inequality. The plan's objective is to advance development for both men and women through operations grounded in robust evidence and informed country dialogue.

Management of GBV/SEAH risks

While incidence of GBV/SEAH in Somalia is a significant contextual challenge, preliminary assessment of project-related Sexual Exploitation and Abuse (SEA)/GBV/SEAH (based on the risk assessment tool) has been conducted during project preparation. Given the significant GBV/SEAH risks the context of pervasive insecurity, the project will adopt a robust approach to address potential GBV/SEAH risks. Relevant mitigation measures to address these risks will be included in the ESMP as follows:

- 1) Code of conduct (CoC) for project workers with SEA/GBV/SEAH-related protections;
- 2) Plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and SEA provisions;
- 3) Mapping and collaboration with GBV/SEAH service providers;
- 4) A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response;
- 5) An Accountability Framework that outlines how the PMU/PIU/contractor/primary suppliers will handle allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators;
- 6) Establishment of special channel/procedures for safe, confidential reporting of GBV/SEAH incidence that connect to the project GRM, and enable training of GRM operators on how to respond to cases that come forward;
- 7) GBV/SEAH requirements to be clarified in bidding documents (including requirements for CoCs, training of workers, and how GBV/SEAH related costs will be covered in the contract); bid evaluation to include consideration for GBV/SEAH response proposal; and
- 8) Make additional funds available to implement measures to address GBV/SEAH and SEA risks and impacts that may arise during Project implementation.

The project will also include provision of capacity building and training of relevant stakeholders, including contractors and project workers, in addition to capacity building for government partners. GBV/SEAH risks should be monitored throughout project implementation through regular re-assessment with the risk screening tool, particularly as new project locations are determined, and through regular monitoring engagement.

⁹⁴ See <http://siteresources.worldbank.org/INTAFRICA/Resources/AFR-Gender-Action-Plan-FY13-17.pdf> for more details

ANNEX 8: INDICATIVE ENVIRONMENTAL STEWARDSHIP FRAMEWORK FOR CONTRACTORS

ENVIRONMENTAL STEWARDSHIP FOR SCHOOL INFRASTRUCTURE DEVELOPMENT FOR SOMALIA EDUCATION PROJECT

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
Pre-construction/Construction Phase			
1	Land Use	<p>Passage of contractor’s vehicles through grazing reserves or cultivated and forested land resulting in a permanent loss of the resources.</p> <p>The environmental effects can amplify if proper operation and maintenance schedules are not followed.</p>	<p>Plan and file Vehicular Traffic Movements (VTMs) so as to as much as possible avoid trekking through grazing reserves or cultivated, thus minimizing loss of resources</p>
2	Material Use	<p>Excess extraction of local resources, such as wood, sand, soil, boulders, etc.</p> <p>Degradation of forests, erosion and landslide at steep locales due to boulder, stone extraction.</p> <p>Change in river and stream ecosystem due to unchecked sand extraction</p>	<p>Extract materials only on need basis</p> <p>Avoid sensitive areas, such as steep slopes</p> <p>Follow engineer’s directions at all times</p>
3	Slope Stability	<p>Extraction of forest products and cutting of trees in the steep slopes increases soil erosion and landslide due to loss of soil binding materials</p> <p>Wrong alignment can trigger slope failure</p> <p>Haphazard disposal of construction waste can disturb slopes</p> <p>Improper drainage facilities can result in erosion and landslides</p>	<p>Extract carefully and secure the top soil within 25 cm from the surface</p> <p>Limit down grading of the infrastructure such as temporary road to 50</p> <p>If down grading exceeds 70, construction of side drainage is necessary</p> <p>Keep optimum balance in extraction and filling of soil works, geo-hazardous assessment and mapping</p> <p>Use designated disposal site and avoid side-casting of spoil</p> <p>Provide proper drainage</p> <p>Use bio-engineering on exposed slopes</p>

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
4	Wildlife	<p>Wildlife habitats at forests, shrub-lands along water infrastructure corridor are affected by the infrastructure construction activities</p> <p>Wildlife and human conflicts increase as wildlife might destroy the crops or attack the construction workers</p>	<p>Avoid as much as possible areas with high biodiversity</p> <p>Efficient movement of machinery and other traffic</p> <p>Control poaching activities and regulate movement of labour force and their dependents into the forest area</p> <p>District Forest or Range Office and its subsidiary body should be involved in monitoring the activities of the construction workers and officials to minimize wildlife harassing, trapping and poaching</p>
5	Drainage	<p>Higher flow rate of surface water and water logging induce landslides, erosion</p> <p>Hard-pan setting in school environment to contribute to enhanced surface runoff</p>	<p>It is strongly recommended that the cross-drainage outlets must be channeled to the confirmed natural drains</p> <p>If horizontal slope exceeds 5%, construction of flow control device necessary every 20 m</p> <p>Construction of walkways for use by children and teachers in the schools</p>
6	Protection of Vegetation	<p>Protected areas and highly forested areas</p> <p>Degradation of forest areas</p> <p>Degradation of agricultural land</p>	<p>Use minimum and efficient use of wood products for construction</p> <p>Initiate plantation at damaged and damage prone areas</p> <p>Increase liability of local forest user groups</p> <p>Avoid protected areas or densely forested areas</p>
7	Disposal of Construction Wastes	<p>Dumping of wastes along the infrastructure such as roads or elsewhere</p>	<p>Selected spoil dumping sites should be used</p> <p>After disposal, the area should be levelled and compacted</p> <p>It is recommended to conserve the soil by planting indigenous plants including grasses</p> <p>Wastes could also be used as levelling materials along the infrastructure</p>

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
8	Disposal of Sanitary Wastes	Unmanaged sanitary waste disposal creating health problems and public nuisance	Proper sanitation area needs to be demarcated Check for hygiene of work force
9	Impacts on amenities	Infrastructure such as road crossings at water supply, irrigation lines may be disturbed or damaged	Avoid as much as possible the crossing over such amenities
10	Pollution	Dust generation from construction activities, construction vehicular movement increases air pollution Noise pollution likely from construction machinery operation and vehicular movement Sanitary problems likely at the construction and workforce quarters.	Possibly construction period should be during any of the two rainy seasons when soil moisture content is highest in Somalia (March-May or October-December) Enforce speed limit of vehicles and construct the infrastructure such as road according to volume and size of traffic movement
Operation Phase			
1	Encroachment	Unmanaged settlement, constructions near the new schools	Community zoning recommended, with enforcement
3	Pollution/Vehicle Emission	Dust generation from vehicular movement increases air pollution Noise pollution likely from vehicular movement and enhanced student numbers	Enforce speed limit of vehicles Maintain traffic size movement Discourage use of horns
4	Aesthetics	Infrastructure such as water construction is likely to increase landscape scars In addition, if the construction spoils are disposed of improperly, the ground vegetation would be destroyed which will be visible from a distance	Such damage cannot be avoided but can be minimized through re-plantation of indigenous species and greenery development
5	Issues with potable water supply and sanitation problems	Water supply and availability problems arising from the huge numbers of school-going children	<ul style="list-style-type: none"> Ensure that school construction designs include the installation of appropriate potable water supply facilities School operation costs to take into account expenses related to provision of safe and potable water for school children, teachers, and other stakeholders
6	Poor management of ESHS, as well as risks to community health and safety	Critical ESHS issues arising from the increased student numbers	<ul style="list-style-type: none"> Establish and maintain continuous liaison with the host communities including sensitization on safety and health issues on construction sites Install and maintain appropriate safety and warning signage in schools where constructions works are in progress

SN	ENVIRONMENTAL ISSUE	POTENTIAL IMPACT	CODE OF CONDUCT REQUIREMENT
			<ul style="list-style-type: none"> • Use of local language and images for signage shall be encouraged • Ensure that all potentially dangerous work areas have controlled access limited to authorized persons only • Ensure proper and adequate provision of sanitation and waste management facilities at all construction sites • Maintain a system of receiving and responding to any safety concerns by the communities • School CECs to be trained on EHS monitoring during school operations
7	Waste management problems at schools	Inefficient solid, hazardous and liquid waste and e-waste collection and management during operation and maintenance phases, leading to waste disposal problems, and resulting in polluting soils, surface and shallow groundwater, especially during the rainy seasons	<ul style="list-style-type: none"> • Preparation of waste management plan for each waste stream and implementation of the waste hierarchy, as part of the Operation Phase ESMP • Prepare and implement a simple waste management plan subject to the concurrence of the respective PMUs in the FMS • School CECs to provide garbage receptacles in strategic places within the school compound area, and regularly collect and properly deposit of these wastes in the designated disposal areas • As much as practicable, reuse spoils that meets material specifications • When practicable, compost organic and degradable waste in suitable container, and provide this to interested farmers for their crop production
8	Outbreaks of diseases and poor indoor air quality	Increased prevalence of communicable diseases Outbreaks of pest and vermin infestation General lack of cleanliness	<ul style="list-style-type: none"> • Ensure that school designs adopted provide adequate learning environment free of pests and vermin, with ample ventilation provided • Periodic fumigation activities, to be prescribed in the Operation Phase ESMP • Ensure proper and adequate provision of sanitation and waste management facilities at all schools • Maintain a system of receiving and responding to any safety concerns by the communities

ANNEX 9: SUMMARY OF KEY E&S ASPECTS DURING THE REPORTING PERIOD

PROJECT STATUS, E&S INCIDENTS, E&S CHANGES, E&S INITIATIVES

PROJECT STATUS

PROVIDE A BRIEF DESCRIPTION OF ANY NEW DEVELOPMENTS IN RELATION TO OPERATIONS AND FACILITIES OVER THE REPORTING PERIOD.

E&S INCIDENTS

PLEASE PROVIDE A SUMMARY OF ALL THE NOTIFIABLE E&S INCIDENTS, PER CTA DEFINITIONS.
PLEASE EXPAND OR COLLAPSE THE TABLE WHERE NEEDED.

DATE	INCIDENT DESCRIPTION	CLASS	REPORTS SENT TO LENDERS	CORRECTIVE ACTIONS / REMEDIAL PLAN

E&S CHANGES

PLEASE PROVIDE A SUMMARY OF ALL THE NOTIFIABLE E&S CHANGES.
PLEASE EXPAND OR COLLAPSE THE TABLE WHERE NEEDED.

DATE	CHANGE DESCRIPTION	REPORTS SENT TO LENDERS	IMPLEMENTATION STATUS

IMPROVEMENTS/INITIATIVES REGARDING E&S PERFORMANCE

BRIEFLY DESCRIBE IMPROVEMENTS/INITIATIVES IMPLEMENTED DURING THE REPORTING PERIOD ON MANAGEMENT OF E&S ASPECTS (E.G. ENERGY/WATER SAVINGS, SUSTAINABILITY REPORTS, WASTE MINIMIZATION, ETC.)

ESS1: Assessment and Management of Environmental and Social Risks and Impacts

E&S IMPACT / RISK ASSESSMENT

HAVE ANY SUPPLEMENTAL ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY IMPACT/RISK STUDIES BEEN CONDUCTED DURING THE REPORTING PERIOD? (PLEASE PROVIDE COPIES)

Compliance with Environmental and Social Management Plans

The status of the ESMP implementation should be described and any issues that remain outstanding should be detailed.

ESS2. Labor and Working Conditions

HUMAN RESOURCES MANAGEMENT

HAVE ALL DIRECT WORKERS SIGNED COCS AND RECEIVED ORIENTATION?

YES

NO

PLEASE PROVIDE DETAILS.

	# community workers	# direct workers	# Female direct workers	Turnover	# Contracted workers ⁹⁵
Previous period					
Reporting period					

PROVIDE THE FOLLOWING INFORMATION REGARDING THE WORKFORCE:

IS THERE A FUNCTIONING AND ACCESSIBLE WORKER GRM

LIST THE WORKER-RELATED GRIEVANCES AND THEIR STATUS

OCCUPATIONAL HEALTH AND SAFETY

DESCRIBE THE MAIN CHANGES IMPLEMENTED IN TERMS OF OCCUPATIONAL HEALTH AND SAFETY (OHS) DURING THE REPORTING PERIOD, E.G. REVISION OF THE OHS MANAGEMENT PROCEDURES, ACTION PLANS FOR TECHNICAL IMPROVEMENTS, LEADING/LAGGING INDICATORS USED/INTRODUCED, IDENTIFICATION OF HAZARDS, NEW CONTROLS, ETC.

PLEASE ATTACH HEALTH & SAFETY AUDIT REPORTS AVAILABLE FOR THE REPORTING PERIOD.

COPIES ATTACHED WITH THIS REPORT

COPIES AVAILABLE UPON REQUEST

NOT AVAILABLE

ACCIDENT STATISTICS MONITORING

Report TOTAL numbers for each parameter	This reporting period			Last reporting period (not cumulative) ⁹⁶		
	COMMUNITY WORKERS	DIRECT WORKERS	CONTRACTED WORKERS	COMMUNITY WORKERS	DIRECT WORKERS	CONTRACTED WORKERS
Total number of workers						
Total man-hours worked – annual						
Total number of lost time occupational injuries ⁹⁷						
Total number of lost workdays ⁹⁸ due to injuries						

⁹⁵ See ESS2 definitions.

⁹⁶ To be provided after the project has been operational for at least two consecutive years.

⁹⁷ A *lost-time injury* (LTIs) is the incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

⁹⁸ *Lost workdays* are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

Lost time injury frequency ⁹⁹						
Fatalities						
Vehicle collisions ¹⁰⁰						

PROVIDE DETAILS FOR THE NON-FATAL LOST TIME INJURIES DURING THIS REPORTING PERIOD.

UNOPS/IOM / contractor/ Subcontractor employees?	Total workdays lost	Description of injury	Cause of accident	Corrective measures to prevent reoccurrence

PROVIDE DETAILS FOR FATAL ACCIDENTS DURING THIS REPORTING PERIOD, IF ANY, (AND PROVIDE COPIES OF ACCIDENT INVESTIGATION AND RESPECTIVE CORRECTIVE PLAN).

Date of Accident	Type of Accident	Description of Accident	# of Fatalities	Preventive measures taken after the incident

OHS TRAINING

DESCRIBE HEALTH AND SAFETY TRAINING PROGRAMS CARRIED OUT IN THE REPORTING PERIOD.

DATE	TYPE OF AUDIENCE	DESCRIPTION OF TRAINING (AND DURATION)	NUMBER OF ATTENDEES

WORKPLACE MONITORING

PLEASE PROVIDE COPY OF ANY WORKPLACE MONITORING REPORTS DEVELOPED FOR THE REPORTING PERIOD.

ESS3. Resource Efficiency and Pollution Prevention

ENVIRONMENTAL MONITORING

PROVIDE COPY OF ENVIRONMENTAL MONITORING DATA REPORTS FOR THIS REPORTING PERIOD, COLLECTED CONSISTENT WITH THE ESMPs FOR THE SUB-PROJECTS.

BRIEFLY DESCRIBE ENVIRONMENTAL MITIGATION MEASURES IMPLEMENTED DURING THE REPORTING PERIOD TO COMPLY WITH E&S REQUIREMENTS.

RESOURCES EFFICIENCY: ENERGY AND WATER

⁹⁹ The number of *lost time injuries* (LTIs) recorded for Project workers per million man-hours worked by them. LTI Frequency Rate = injuries per million hours worked = # of lost time accidents x 1,000,000 hours / total man-hours worked).

¹⁰⁰ Vehicle Collision: When a vehicle (device used to transport people or things) collides (comes together with violent force) with another vehicle or inanimate or animate object(s) and results in injury (other than the need for First Aid) or death.

PROVIDE DATA ON ENERGY AND WATER CONSUMPTION DURING THE REPORTING PERIOD. IF THE DATA REQUESTED ARE AVAILABLE IN ANOTHER FORMAT, THEY CAN BE SUBMITTED INSTEAD.

DESCRIBE THE CONCESSIONAIRES' RESOURCES EFFICIENCY MEASURES/EFFORTS BEING IMPLEMENTED TO MINIMIZE FUEL, ENERGY, AND WATER CONSUMPTION.

HAZARDOUS AND NON-HAZARDOUS WASTE¹⁰¹

EROSION CONTROL, SLOPE STABILITY AND REINSTATEMENT

PLEASE DESCRIBE STATUS AND ACTIONS IMPLEMENTED IN TERMS OF EROSION CONTROL, SLOPE STABILITY, AND REINSTATEMENT WITHIN THE PROJECT'S FOOTPRINT AND AREA OF INFLUENCE.

ESS4 Community Health, Safety and Security

COMMUNITY HEALTH AND SAFETY

PLEASE LIST AND DESCRIBE ANY INITIATIVES IMPLEMENTED IN RELATION TO COMMUNITY HEALTH AND SAFETY DURING THE REPORTING PERIOD.

PLEASE PROVIDE THE LIST AND DESCRIPTION OF THE ACTIONS, THE EXPECTED OR ACTUAL DATES OF IMPLEMENTATION, PROGRESS/STATUS, RESULTS OBTAINED. YOU CAN USE A TABULAR FORMAT (AS BELOW) OR PROVIDE THE INFORMATION AS AN ATTACHMENT OF THE REPORT.

DURING THE REPORTING PERIOD, HAVE ANY EMERGENCY DRILLS BEEN CONDUCTED WITH PARTICIPATION OF THE LOCAL AUTHORITIES, PUBLIC EMERGENCY ORGANIZATIONS, LOCAL COMMUNITIES? ARE THE COMMUNITIES AWARE OF THE EMERGENCY RESPONSE PLANS?

ACCIDENT REPORTING

PROVIDE DETAILS FOR THE NON-FATAL CASUALTIES, INVOLVING THIRD PARTIES, DURING THIS REPORTING PERIOD.

Date of Accident	Type of Accident	Description of Accident	# of People Injured	Preventive measures taken after the incident

PROVIDE DETAILS FOR FATAL ACCIDENTS DURING THIS REPORTING PERIOD (AND PROVIDE COPIES OF ACCIDENT INVESTIGATION AND RESPECTIVE CORRECTIVE PLAN).

Date of Accident	Type of Accident	Description of Accident	# of Fatalities	Preventive measures taken after the incident

GBV/SEAH/SEA ACTION PLAN

Please provide an update on the status and progress of the actions as defined in the GBV/SEAH/SEA Action Plan. You may attach relevant monitoring reports.

¹⁰¹ Waste types include but are not limited to: chemical containers, chemical sludge, containers/pallets, dewatered sludge, domestic waste, ferrous and non-ferrous scrap, hospital waste, laboratory waste, liquids, off-specification raw materials, paint waste, sludge, solids, truck and auto tires, waste fuel hydrocarbons, waste hydraulic fluids, waste lubricating hydrocarbons, waste solvents, waste treatment sludge, contaminated soil, creosote sleepers etc.

ESS5 Land Acquisition and Involuntary Resettlement

REPORT ANY ACTIVITIES THAT HAVE BEEN REQUIRED INVOLUNTARY RESETTLEMENT

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Biodiversity Management

PLEASE REPORT ON THE MITIGATION MEASURES INCLUDED IN THE ESMF AND ESMPs

AS NEEDED, USING THE TABLE BELOW DESCRIBE ANY **NEW ACTIVITIES OR EXPANSIONS** THAT HAVE INCREASED THE PROJECT FOOTPRINT INTO NEW **AREAS OF HABITAT** DURING THE REPORTING PERIOD.

New activity/expansion	Total area covered	Habitat type

ESS8 Cultural Heritage

REPORT IF CHANCE FIND PROCEDURES HAVE BEEN APPLIED IF NOT, PLEASE INDICATE NOT RELEVANT.

ESS 10 Stakeholder Engagement and Information Disclosure

ANNEX 10: WORLD BANK INCIDENT CLASSIFICATION GUIDE

Indicative

- Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people
- Does not result in significant or irreparable harm
- Failure to implement agreed E&S measures with limited immediate impacts

Serious

- An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources
- Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents
- Failure to remedy Indicative non-compliance that may potentially cause significant impacts
- Is complex and/or costly to reverse
- May result in some level of lasting damage or injury
- Requires an urgent response
- Could pose a significant reputational risk for the Bank.

Severe

- Any fatality
- Incidents that caused or may cause great harm to to the environment, workers, communities, or natural or cultural resources
- Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed
- Failure to remedy Serious non-compliance that may potentially cause severe impacts Is complex and/or costly to reverse
- May result in high levels of lasting damage or injury
- Requires an urgent and immediate response
- Poses a significant reputational risk to the Bank.