FEDERAL GOVERNMENT OF SOMALIA

MINISTRY OF COMMUNICATIONS AND TECHNOLOGY

EASTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT – SOMALIA

STAKEHOLDER ENGAGEMENT PLAN

13 January 2023

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Abbreviations and Acronyms

ADB	African Development Bank
AMISOM	AU Mission to Somalia
CBO	Community-based organization
CMM	Cybersecurity Maturity Model
CoC	Code of Conduct
DPA	Data Protection Authority
EAC	East African Community
EA-RDIP	Eastern Africa Regional Digital Integration Project
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
EHS	Environmental, Health and Safety
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HoA	Horn of Africa
IA	Implementing Agency
IGAD	Intergovernmental Authority on Development
IT	Information Technology
LGB	Local Governance Board
MOCT	Ministry of Communications and Technology
NCA	National Communications Authority
MNO	Mobile Network Operators

NGO	Non-Governmental Organisation
OHS	Occupational, Health and Safety
PPA	Project Preparation Advance
PIU	Project Implementation Unit
QOS	Quality of Service
REC	Regional Economic Communities
SEP	Stakeholder Engagement Plan
SOMCERT/ CC	Somalia Computer Emergency Response Team/Coordination Center
UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific and Cultural Organisation
WB	World Bank

INTRODUCTION

The World Bank proposes to engage and support the Federal Government of Somalia (FGS) as part of the Eastern Africa Regional Digital Integration Project (EA-RDIP), Phase 1, which in the long term aims to promote the expansion of an integrated digital market across Eastern Africa by increasing cross-border broadband connectivity, data flows and digital trade in the region.

Phase I of the project aims to establish the foundations for regional digital market integration in the Eastern Africa region by increasing access to affordable cross-border broadband services and strengthening the enabling environment for cross-border digital services.

Phase I will include two countries from the Horn of Africa (HoA) region, within Eastern Africa – Somalia and South Sudan, which have been identified as having the largest connectivity infrastructure deficits – and two regional economic communities (RECs) – East African Community (EAC) and Intergovernmental Authority on Development (IGAD) that will support the development of regional framework, harmonization of national framework, and coordination, ensuring that all benefit from the larger contiguous regional market supported by the project, on the back of deeper market integration.

Background

The Federal Republic of Somalia, located on the coast of the HoA, relies heavily on remittances and traditional livelihoods that are highly vulnerable to climate change. Somalia benefits substantially from foreign remittances, which are estimated to constitute upwards of 31.2 percent of the country's GDP. The livelihoods of roughly half of the Somali population of 16.3 million rely on pastoralism, with the livestock sector accounting for some 60 percent of GDP. Since 2019, the country has experienced devastating floods and drought, as well as locust infestations, which have left about 5.2 million people in need of humanitarian assistance and at risk of food insecurity. Poverty levels remain pervasive, with nearly 70 percent of Somalis living on less than US$1.90 a day in purchasing power parity terms.

Somalia has been experiencing increased political stability but is still exposed to high levels of insecurity. The adoption of the Provisional Constitution in 2011, established the basis for a federal political system, which includes five Federal Member States (FMS) – Galmudug, Hirshabelle, Jubbaland, Puntland and SouthWest, and the federally administered Banadir Administration. Somaliland remains a semi-autonomous region. Progress has been made on institution building, transparency and formalizing key economic sectors, including telecommunications. However, Al Shabaab continues to control large territories, extorting rents and wielding influence, particularly in southern parts of Somalia, where clashes still occur with the federal government and AU Mission to Somalia (AMISOM) forces. Al Shabaab also continues to launch indiscriminate and targeted attacks in and around the capital, Mogadishu.

The Federal Ministry of Communications and Technology (MOCT) is charged with promoting the digital agenda at the federal government level. A National ICT Policy and Strategy was adopted in 2019, which supports development of an open and competitive digital market, grounded in a vision of providing universal, affordable, and quality digital services. However, Government lacks the funding required to support its full implementation. MOCT spearheaded the adoption of the 2017 Communications Act, which created a new industry regulatory body – the National Communications Authority (NCA) – which has supported the adoption of universal licensing and other foundational regulatory frameworks. However, further support is needed in areas such as spectrum management, roaming, quality of service (QoS) and consumer protection.

The absence of an integrated fiber optic backbone network presents a major barrier for developing Somalia's connectivity market. This prevents cost-effective distribution of growing international capacity available to Somalia via existing terrestrial cross-border links and existing/forthcoming international submarine cables landing along the coast. Existing capacity is therefore underutilized. Network gaps also limit Somalia's ability to serve landlocked neighbors, such as Ethiopia and South Sudan, further inland. To date, fiber optic networks have been deployed in parts of Somaliland, Puntland, and in the Mogadishu metropolitan area. However, this still leaves vast parts of Somalia unconnected, particularly southern and central parts of the country, where elevated security risks continue to inhibit fiber deployment, resulting in the use of microwave links that limit transmission capacity and quality. Critical missing terrestrial fiber links include the north-south trunk, a west-east connection between Somaliland and Puntland and fiber routes to the Kenyan border in the south).

Missing network segments adversely impact deployment of access networks, but also competition and redundancy – yielding low broadband penetration figures and weak coverage in remote rural areas. Several Somali-owned operators are active in the domestic broadband market, and development of existing ICT services has been entirely led by the private sector. However, the connectivity market remains divided into smaller sub-national markets, with one operator able to dominate each region, in the absence of a stronger regulatory framework and an integrated backbone network, with infrastructure sharing. Operators see value in an integrated and shared network but lack financing and the convening power to orchestrate related investments. With further network deployment, it is estimated that approximately 73 percent of the domestic broadband market is unserviceable. Adoption of broadband services is therefore low in Somalia and access networks remain concentrated in urban areas. Mobile broadband penetration is estimated to be a mere 4 percent and many government offices (particularly at FMS-level) remain unconnected, limiting their ability to adopt digital solutions.

Somalia still needs to strengthen national frameworks, capacity and awareness related to cybersecurity and data protection to build trust and encourage safe usage of emerging digital services. Somalia is still in the 'start-up' stage of developing its cybersecurity ecosystem, according to the Cybersecurity Maturity Model (CMM) diagnostic conducted in 2021. National legal, strategic, and governance framework for cybersecurity are being developed and a Somalia Computer Emergency Response Team/Coordination Center (SomCERT/CC) was established in 2019, which is benefiting from initial WB financial assistance, but will require further

strengthening and implementation support. Similar frameworks are being introduced for data protection and privacy. The federal government is expected to pass a new data protection bill by February 2023, mandating the creation of a Data Protection Authority (DPA) and the registration of data processors and controllers. Further support will be needed to address growing data protection and privacy risks, ensure compliance, and continued capacity building.

Somalia's data governance and data infrastructure remains underdevelopment, limiting scope for local and regional data sharing and processing, as well as growth in data-driven service. Somalia lacks a comprehensive, agile, and climate-smart data strategy, and will need to adopt interoperability and data standards to enhance data governance. While some commercial data centers existing, government needs to enhance its management of data and facilitate data sharing, e.g., via enhanced data hosting arrangements for government-owned data. An effective Internet Exchange Point (IXP) in Somalia could also improve the regional internet ecosystem, the quality of traffic exchange and facilitate access to content at lower cost, building on existing caches in Mogadishu, Hargeisa and Bosaso.

There is scope to expand regional trade and e-commerce, as a means to boost economic resilience and growth. During the COVID-19 pandemic, many smaller businesses in Somalia started selling product and services online. Some 91 percent of surveyed businesses reported starting or increasing their online business activity, during the early stages of the pandemic. However, more data is needed to understand opportunities for expanding e-commerce, which will require the adoption of an e-commerce strategy. Expanding good-based e-commerce will also rely on the development of Somalia's postal and addressing systems, and adequate online consumer protection.

Limited digital skills are a key barrier to the adoption of online services in Somalia. The availability of digital skills training is currently limited and will needed to be expanded to increase the digital skills base to fuel adoption and growth in e-services. Only 55 percent of the population are actively engaged in the labor market, currently, and youth unemployment is estimated to be roughly 35 percent. Access to basic and secondary education in Somalia is among the lowest in the world, which impacts the systematic development of digital skills, particularly for women. Concerted efforts are therefore needed to boost women's digital skills attainment. There is room to strengthen the capacity of the Somalia Education and Research Network (SomaliREN), which currently serves 24 higher education institutions across Somalia, to expand connectivity among higher educational institutions (HEIs), including through collaboration with more mature NRENs in the region. However, HEIs also need to be supported to introduce high-quality training program in digital skills. This includes training institutes such as the National Telecoms Training Institution (NTTI), which is tasked with training the civil service in digital skills.

Project Components

The project is designed around four integrated and mutually reinforcing components, which reflect the distinct but interconnected layers of an integrated regional digital market.

Component 1: Connectivity market development and integration

- *Sub-component 1.1: Cross-border and backbone network connectivity*

  This subcomponent will support the deployment of key missing cross-border and backbone fiber links to improve the resilience, coverage, and integration of regional and national connectivity networks. It will support the deployment of up to 4,600 km of new fiber along prioritized backbone network routes, including connecting the three main cable landing stations (Mogadishu, Bossaso, and Berbera) and major population centers, as well as establishing new cross-border links to Kenya and Ethiopia. The fiber is likely to be deployed in phases, starting in the north, where the security context is more permissible, and adapting to the evolving security context. Gap financing will be provided for the deployment of related routes, using a range of modalities to crowd in private sector financing. Commercial providers are expected to co-finance, design, build, and operate network infrastructure deployed on an open access basis and at reasonable rates to support affordable service expansion and competition.

- *Sub-component 1.2: Last mile connectivity including in borderland areas*

  This sub-component will providing catalytic funding to unlock further infrastructure deployment in unserved or underserved areas, which are highly correlated with higher poverty levels and climate vulnerability (including in refugee/IDP camps and their host communities, located in rural and borderland areas) and to connect public institutions along fiber route. Infrastructure financed will be deployed using a range of modalities, including reverse auctions, bulk purchase of capacity and/or licensing arrangements, that aim to maximize private sector financing.

- *Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment*

  This subcomponent will strengthen existing ICT frameworks and boost regulatory maturity to effectively spearhead the connectivity agenda and universal services targets through the development of new strategic, policy and regulatory instruments.

Component 2: Data market development and integration

- *Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity*

  This sub-component will strengthen local capacity to effectively detect, respond to and mitigate evolving cyber threats and cybercrimes as well as support implementation of forthcoming cybersecurity legal and strategic frameworks.

- *Sub-component 2.2: Data exchange, governance and protection*

  This subcomponent will support investments in enabling data infrastructure and governance frameworks that facilitate cost-effective and secure data storage, processing and sharing.

Component 3: E-service market development and integration

- *Sub-component 3.1: Digital cross-border trade, payment and service enablers.*

This subcomponent aims to enhance readiness to expand digitally enabled cross-border trade and service delivery, by introducing key enablers.

- *Sub-component 3.2: Regional research and education networks (RENs), and training for digital skills.*
  This subcomponent will support the development of the digital skills base through support for SomaliREN, and new digital skills training programs.

Component 4: Project Management and Implementation Support
- This component will finance key project management functions, including procurement, FM, M&E, communications as well as ESF compliance, with a particular emphasis on addressing the high security- and GBV-related risks associated with the deployment of infrastructure and civil works, including. It will finance the establishment and operations of (i) the main Project implementation Unit (PIU) at MOCT, at federal government level; (ii) coordination with FMS via dedicated focal point/coordinators, and the establishment of a PIU in Somaliland; and (iii) coordination with the regional PIU at IGAD level.

Table 1 below presents a summary of the project components and allocation:

Table 1: Summary of project components and allocation

COMPONENT	Allocation & Source of Financing (US$ million)			
	Regional IDA	National IDA	Commercial Financing (Unguaranteed)	Total
Component 1: Connectivity Market Development and Integration	34.7	17.3	10.0	62.0
1.1: Cross-border and backbone network connectivity	22.3	11.7	10.0	44.0
1.2: Last mile connectivity including in borderland areas	9.3	4.7	0.0	14.0
1.3: Enabling legal, regulatory and institutional ICT environment	1.0	1.3	0.0	4.0
Component 2: Data Market Development and Integration	5.7	2.8	0.0	8.5
2.1: Cybersecurity frameworks, infrastructure and capacity	2.7	1.3	0.0	4.0
2.2: Data exchange, governance and protection	3.0	1.5	0.0	4.5
Component 3: Online Market Development and Integration	4.3	2.2	0.0	6.5
3.1: Digital enablers for cross-border trade and service delivery	1.0	0.5	0.0	1.5
3.2: Research and education networks (RENs) and training for digital skills	3.3	1.7	0.0	5.0
Component 4: Project Management and Implementation Support	8.7	4.3	0.0	13.0
Component 5: Contingency Emergency Response	0.0	0.0	0.0	0.0
Total	**53.3**	**26.7**	**10.0**	**90.0**

Project Beneficiaries

The project will benefit citizens, refugees, Internally Displaced People (IDPs), businesses, public sector Ministries, Departments, and Agencies (MDAs) at both the Federal Government and Federal Member State (FMS) level through improved access to connectivity, an environment enabling digital services, and provision of digital skills:

- **Citizens.** Citizens will benefit both indirectly and directly from wider opportunities to participate in an expanding regional digital market, which offers new employment opportunities and access to new public and commercial services online. Expansion of network coverage will directly benefit unserved or underserved communities, particularly in rural and borderland areas, where new networks are deployed or upgraded, supporting greater digital access and inclusion. Network coverage of population is expected to increase to 85 percent in Somalia on the back of infrastructure investments supported. At least 30 percent women will also benefit directly from digital skills trainings, which increase their readiness to both access online service and contribute to the development of the digital market.

- **Refugees, and IDPs.** Refugees, IDPs and people in host communities will directly benefit from enhanced network coverage and new access to mobile and emergency response ICT infrastructure boosting their resilience to withstand, e.g., climate shocks.

- **Businesses.** ICT service providers, including mobile network operators (MNOs) and internet service providers (ISPs), will directly benefit from the project through contracts for infrastructure deployment and capacity purchase as well as local IT procurement, awarded on a competitive basis. The wider business community will also benefit indirectly from reforms supported and investments made, including a more secure and cost-effective environment for conducting business online, on the back of more reliable, quality and low-costs broadband services, more seamless data exchange within and across borders, and enabling digital public infrastructure deployed. The creation of a larger digital market will provide local businesses with opportunities to scale.

- **Public sector.** MDAs, particularly line ministries for ICT and trade, as well as ICT industry regulatory bodies in Somalia will directly benefit from targeted financial and technical assistance. Public institutions (including unconnected government offices, higher education institutions) will also benefit from improved access to connectivity and access to shared digital infrastructure (e.g., IXPs, data hosting solutions). In addition, civil servants, including female staff, will be trained in the management and/or use of digital systems.

Objectives of the SEP

The SEP seeks to define a structured, purposeful, and culturally appropriate approach to consultation and disclosure of information, in accordance with ESS 10. It recognizes the diverse and varied interests and expectations of project stakeholders and seeks to develop an approach for reaching each of the stakeholders in the different capacities at which they interface with the project. The aim is to create an atmosphere of understanding that actively involves project-affected people and other stakeholders leading to improved decision making.

Overall, this SEP will serve the following purposes: stakeholder identification and analysis; planning engagement modalities through effective communication, consultations and disclosure; enabling platforms for influencing decisions; define roles and responsibilities for the implementation of the SEP; define reporting and monitoring measures to ensure the effectiveness of the SEP; elaborating the role of grievance redress mechanism (GRM); outline project information dissemination modalities, including differentiated considerations for inclusion of poor and vulnerable populations; and documenting stakeholder consultations on proposed project design.

SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES

Consultations Prior to the development of this SEP

The design and key activities of the project have been deliberated and refined through a series of engagements between the World Bank and FGS representatives, and other parties involved in Phase 1 of the project (including South Sudan) including via joint missions and planning meetings conducted in Nairobi on May 16th to 20th, 2022 and Addis Ababa on August 28th to September 2nd, 2022. The mission participants list is included as an annex.

Other stakeholder consultations held during the project preparation phase include consultations with:
- Tripartite regional consultations between the relevant ministries of Somalia, Ethiopia and South Sudan on the implementation of the regional components and regional cooperation
- Key MDAs at FGS level – directly affected by the project
- Key MDAs at FMS level – line ministries for ICT
- Private sector – telecoms operators
- Education sector – Higher education institutions and SomaliREN

These meetings are summarized below, and the list of participants is provided in Annex 1. Further meetings will continue to take place to inform the engagement process. The MOCT, through the new PIU, will continue engaging in inclusive consultations with all relevant stakeholders including other MDAs, the Federal Member States (FMS), local municipalities in project areas, community leaders, entities representing disadvantaged groups and small businesses. Information gathered through the consultations will be used to update the SEP, as necessary.

A Project Preparation Advance has been approved that can be leveraged to conduct further consultations prior to project approval, which will be administered by the Somalia Capacity Advancement, Livelihoods and Entrepreneurship through Digital Uplift Project (SCALED-UP) – (P168115).

Regional Partners

Table 2: Summary of consultations held in September 2022

No	Issues/Point Raised	Responses
1	Information sharing on the readiness of the links on both sides and specifically commenting on the missing links study to ensure alignment of the middle-mile links on both sides of the border	Agreement on the importance of implementing links that add value to the participating countries through the alignment of the middle-mile links across the borders; and working closely with the operators to ensure that last-mile connectivity is available and accessible to the communities along the borders
2	Strengthening regional cooperation on cross-border e-trade	Tripartite discussions, as well as bilateral meetings alongside the Addis Ababa mission emphasized an agreement on strengthening cross-border e-trade, knowledge sharing on e-government and cybersecurity

Key MDAs at FGS level

Consultations took place with the Ministry of Finance (July 2022), the Ministry of Public Works (July 2022), Ministry of Commerce and Industry (November 2022), NCA (July and September 2022), CBS, and DADSOM. Summary of consultations is not yet available for all meetings.

Table 3: Summary of consultations held with Ministry of Commerce and Industry on 23rd November 2022

No	Issues/Point Raised	Responses
1	The MOCI welcomed the EARDIP initiative and thanked the Ministry for engaging the team in early discussion. The team confirmed their commitment to support as and where necessary and requested to be continually informed on how to actively participate and support direct initiatives.	The Ministry thanked the team for their participation and assured its commitment to continue feedback and loop-in MOCI on initiatives as they further develop and commence.
2	The MOCT noted the significance of building E-commerce/digital trade and other trade facilitation regulations, policies and strategies. MOCI welcomes the initiatives highlighted in the presentation on data protection law, consumer protection, cyber security and their overlap and significance to support and build an enabling reforms environment for the country. The MOCT requested further details beyond concept on how beneficiary countries implement the project and how the two ministries (MOCT and MOCI) may collaborate on implementation. The Ministry is happy to share existing documents and ongoing initiatives with the MOCI.	The team explained that South Sudan and Somalia are beneficiary countries of EARDIP. The team highlighted there is a proposed Technical Assistance (TA) for capacity building for MOCI and development of E-Commerce strategy and implementation road map and MOCI engagement in this from the initial stages is crucial. Further documents on his will be shared in due course.

Key MDAs at FMS level

Table 4: Summary of consultations with Federal Member states line ministries for ICT on the implementation of the project.

No	Issues/Point Raised	Responses
1	The FMS ministers for ICT expressed concerns related to their participation of the project and emphasized the need for the FMS members to be part of the implementation.	MoCT confirmed its commitment to ensure the participation of the FMS line ministries in the project and especially reiterated the importance of a continuous consultation during the preparation phase as well as during the implementation.
2	FMS ministries for ICT expressed interest in the decisions for the PPP.	MoCT clarified the role of the government including the FMS ministries in the PPP discussions and indicated that the private sector should lead the PPP discussions. MoCT and the FMS ministries will consider the significant role the private sector should play in these discussions.
3	FMS ministries suggested that they should be part of the PIU formation.	MoCT indicated that the formation of the PIU is an independent procurement process led by the MoCT and the WBG-appointed procurement team.
4	FMS ministries recommended that further consultations should be held in the FMS cities and should be a continuous activity.	MoCT committed to hold the next consultation activities in the other cities, and the next one will be organized in Garowe, Puntland State.
5	FMS ministries expressed concern that some of the states do not have member universities.	MoCT and the FMS representatives agreed that those states that do not have member institutions in SomaliREN consortium should work closely with SomaliREN to include their universities in the NREN.
6	FMS ministries recommended that the relevant FMS commerce ministries should participate in the activities related to e-Trade in the project.	It was agreed that such engagements should be facilitated during the subsequent consultation meetings.
7	FMS ministries demanded that information should be shared on the project in a systematic way.	MoCT indicated that the stakeholder engagement plan for the project should accommodate all the information and communications protocols for the project to ensure that all the stakeholders are well-informed.

Private sector

Table 5: Summary of consultations held with telecoms operators on 12ᵗʰ November 2022

No	Issues/Point Raised	Responses
1	The participants welcomed the project initiatives and objectives. The participants noted their support for further engagement as the project implementation commences. Requested to the Ministry to be further engaged and updated.	The Ministry thanked the participants on their positive feedback on this initial consultation to introduce the new EA-DRIP initiative. The Ministry assured its commitment to continue to work with the private sector and update on how the private sector and other stakeholders will be engaged as implementation begins. Mode of communications was agreed to be through email, direct telephone and formal meetings. This includes overall sector engagements.
2	Some of the participant organizations noted their keen interest for further information on how to actively participate and support the government. Explore areas of potential collaboration.	The project team assured that private sector participation and engagement is a key for several aspects of the project and will reach out in due course as project plans are further developed, refined and initiated.

Education sector

Consultations took place with the Somalia Research and Education Networks (Somali-REN)

Table 6: Summary of consultations with SomaliREN on August 31, 2022.

No	Issues/Point Raised	Responses
1	SomaliREN member institutions expressed appreciation for their inclusion in the EA RDIP project and the predecessor ICT sector support project. They also attributed the success of the NREN to the World Bank support under the ICT sector support project.	MoCT acknowledged the success of SomaliREN as an NREN and its contribution to the Somali higher education sector.
2	SomaliREN members expressed concern over how the UbuntuNet Alliance has unfairly priced connectivity for SomaliREN under the previous project. The 20% contribution to the AfricaConnect 3 project which the EA RDIP project will support might not be effectively used unless serious negotiations are made with the UbuntuNet Alliance.	MoCT requested that SomaliREN management and the World Bank team engage with the UbuntuNet Alliance on the state of the previous engagements and how this counterpart funding by the project will be used. The prices of connectivity have gone down and should be reflected in the subsequent agreements.
3	SomaliREN member institutions requested support to ensure the sustainability of the NREN, and similar model should be followed with regards to the	MoCT indicated that it will put effort into supporting the sustainability of the NREN and its empowerment. The procurement processes

implementation of the eReadiness activities as a sole-source contract to deliver on the assignment as well as support the bottom-line of the institution and its sustainability.	shall be discussed with the world bank team and the PIU that will be formed.

STAKEHOLDER IDENTIFICATION AND ANALYSIS

Project stakeholders

The first part of the stakeholder engagement process is identification of the key stakeholders to be informed and consulted about the project, including individuals, groups, or communities that are affected or likely to be affected by the project (project-affected parties); may have an interest in the project (other interested parties); or are disadvantaged or vulnerable.

- **Affected Parties**: persons, groups and other entities within the project area that are directly influenced or potentially influenced and thus need to be to be closely engaged. This includes government agencies, including local district administrations, and implementing partners and direct sector participants.

- **Other Interested Parties**: individuals, groups, and entities that may not experience direct impacts from the project but could affect the project and the process of its implementation in some way.

- **Disadvantaged or vulnerable groups**: to achieve inclusiveness of the engagement process is to ensure the participation of vulnerable individuals in public consultations and other engagement forums established by the project. Within the Project area of influence, vulnerable groups may include and are not limited to the following: youth, elderly persons, persons with disabilities, women's groups, minority ethnic groups, cultural minorities, and internally-displaced persons (IDPs), and small businesses not represented by business groups or associations.

Stakeholder engagement principles

In order to meet best practice approaches, this SEP will apply the following core value principles for stakeholder engagement:

- **Openness and life-cycle approach**: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;

- **Informed participation and feedback**: information will be provided to and widely distributed among all stakeholders in an appropriate format, opportunities are provided

for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;

- **Inclusiveness and sensitivity**: inclusive, informed and country context sensitive continual stakeholder identification for better communications and strengthened relationships with stakeholders

Identification of stakeholders

The table below summarizes the potential role, interests, and influence for each of the stakeholder groups for the project. There are several categories of persons and institutions that will need to be consulted and engaged in the project activities across all regions where project activities are conducted.

Table 7: Project Stakeholder needs

Level	Stakeholder Group	Key Characteristics	Summary of interests	Language required	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
Regional Level	Regional bodies / RECs	Affected Parties	Will support development of regional frameworks to be implemented at national level. Somalia currently a member of IGAD and has applied for EAC membership.	English	Engagement via project activities an institutional arrangement in proposed.	N/A
	South Sudan	Affected Parties	Other countries under phase 1 of the project		Engagement via project activities an institutional arrangement in proposed.	
	Other countries in East Africa	Affected Parties		English	Engaged via RECs	N/A
National Level	Ministries Department and Agencies (MDAs) – Federal level (e.g., Ministry of Commerce and Industry, Ministry of Public Works, Ministry of Finance, Central Bank of Somalia, National ID agency)	Affected Parties	Project updates, communications on those activities that relate to their specific mandates	Somali	Memo/letter, email, telephone calls, in-person meetings	Meetings on at least semi-annual basis, hand-outs.

Level	Stakeholder Group	Key Characteristics	Summary of interests	Language required	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
	Business Associations and Digital Businesses	Interested Party	Digital services and innovation ecosystem updates from the relevant project components; business opportunities	Somali	Memo/letter, website, email, telephone calls, in-person meetings	Meetings on at least semi-annual basis, hand-outs.
	Education sector – digital skills providers (Higher education institutions)	Affected Parties	Opportunities related to how the project can benefit them through SomaliREN, contracting opportunities for potential performance-based grants	Somali	Email, website, telephone calls, in-person meetings	Face to face meetings on a regular basis.
	Telecom Operators (MNOs, ISPs, etc.)	Interested Party	Information on PPP arrangements	Somali/English	Email, telephone calls, in-person meetings	Face to face meeting on a regular basis.
	Telecom Regulator: NCA	Affected Party		Somali	Email, telephone calls, in-person meetings	Face to face meeting on a regular basis.
	Construction Companies	Interested Party		Somali	Website, emails	
	Donor Partners and Multilaterals (AfDB, EU, USAID, DFID, SIDA)	Interested Party	Information and updates on the project to avoid development aid overlap, impact, etc.	English	Website, emails, in-person meetings	
	International NGOs	Interested Party		English	Website, emails	
Local Level	Federal Member States	Affected Parties		Somali and locally applicable languages	Email, telephone calls	Need for close coordination and information sharing

Level	Stakeholder Group	Key Characteristics	Summary of interests	Language required	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
					Face-to-face meetings, radio	for smooth implementation.
	Municipal leadership	Interested Party		English and locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Very important body - link between the community, the county and development partners. Contact should be initiated on a regular basis during implementation
	Local leadership	Interested Party		Locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Regular contact
	Women and girls	Vulnerable Group		Locally applicable languages	Face-to-face meetings at community level, notice boards, radio	May be illiterate, methods must cater for that. Child care needs
	Vulnerable Households	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	Cannot afford services at high cost and may be illiterate
	Youth	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	Need to be empowered and should therefore be well as being integrated into consultations

Level	Stakeholder Group	Key Characteristics	Summary of interests	Language required	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
	IDPs and Returnees	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	May find that their place of origin or home is occupied by other people
	Ethnic minority groups	Vulnerable Group		Somali and locally applicable languages – in particular language of the minority group	Notice board, Face-to-face meetings at community level, radio	Feel marginalized and mechanisms need to be in place to empower and involve them in productive endeavours
	Persons with disabilities	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	May require different engagement methods to cater for disability and allow information to reach them
	General community members	Potentially Influencing Party		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	Need to have clear information dissemination in order to be inclusive

STAKEHOLDER ENGAGEMENT PLAN

Purpose and Timing of Stakeholder Engagement Program

Project preparation has relied significantly on stakeholder engagement in order to gain a granular understanding of needs and priorities at each level and assess any potential environmental and social risks the project may have.

The objectives of information dissemination, and consultations under the EA-RDIP, are: (a) understanding of the digital needs of the citizens of Somalia; (b) reception of feedback and comments as well as grievances from all stakeholders on project design and implementation; (c) feedback on potential environmental and social risks and impacts and mitigation measures in relation to construction activities; (d) provision of regular information to stakeholders related to project implementation progress and any other emerging issues throughout the project cycle; (e) provision of transparent and accountable mechanisms on all aspects of the project and subproject design and implementation; and (f) provide ongoing engagement with community leaders and other stakeholders in construction areas to ensure information flow and timely response to security risks and mitigation measures.

To ensure this, a grievance redress mechanism (GRM) will be set up and implemented throughout the life cycle of the project (see below). It is designed to allow all affected individuals and groups to report on project-related grievances or to provide comments and feedback. In addition, the ESCP and ESMF will be publicly disclosed at the county level in selected counties to ensure that everyone is informed about social and environmental risks and respective mitigation measures. For this purpose, a non-technical summary will be prepared in the local languages.

Table 8: Stakeholders Consultation Matrix

Consultation Stages	Consultations Responsible within Project	Consultations Beneficiaries including disadvantaged individuals and groups	Method of engagement	Purpose
Verification of project locations/sites, conducting site visits	Project consultants (social specialists), PIU and other stakeholders	Identified groups, community leaders and elders	Face-to-face consultation meetings, official communications, mobile phones, email.	Create project awareness, understand benefits and any potential challenges, keep informed on progress

Consultation Stages	Consultations Responsible within Project	Consultations Beneficiaries including disadvantaged individuals and groups	Method of engagement	Purpose
Assessing proposed intervention in project areas	Project consultants (social specialists), PIU and other stakeholders CBOs	Affected groups (IDPs, pastoralists, nomadic groups), CBOs, community leaders and elders	Face-to-face consultation meetings, official communications, mobile phones, email.	Keep informed on project objectives, create awareness, identify and address concerns on project impacts, feedback from would-be affected persons
Detailed analysis of project impact and assessments	Project consultants (social specialists), PIU, CBOS, NGOs and other stakeholders	Key project informants, focus groups, Affected persons, community leaders	Both formal and informal interviews, Focus group discussions on specific risks and mitigation measures	Identification of key issues and concerns, agreement and development of early mitigation measures
Operations and implementation	PIU, Consultants, NGOs & CBOs, implementing partners	Individuals and groups of disadvantaged groups, community leaders/elders and other stakeholders	Implementation, monitoring and evaluation, steering committees (formal or informal)	Address issues, effective implementation, inclusion plan,
Monitoring and Evaluation	PIU, Consultants,	Individuals and disadvantaged groups	Formal participation in review and monitoring	Identify solutions to issues and effectively implement in inclusion plan

Proposed Strategy for Information Disclosure

Information disclosure to all potential stakeholders will rely on the following key methods: website, radio broadcasting, community meetings in coordination with local authorities (county governments), phone communication (SMS), and notices at the local level. Information will be disclosed in English or the respective local language, where appropriate. Local authorities, such as traditional authorities, religious leaders, and county governors will be requested to inform communities in community meetings and through disclosure at project locations.

Table 9: Disclosure of project information at different stages of the project cycle

Information to be disclosed	Method used	Target stakeholders	Responsibilities
Before appraisal			
Disclosure of project documents (PAD, SEP, ESCP)	• Websites – FGS and WBG • Brief summaries of the main features of the project SEP	All key stakeholders	• PIU
After appraisal			
Publicity on project approval and roll-out plans	• Audio-visual messages on project information (radio, TV) • Newspaper stories/supplements • Printed materials on project information • Social Media (Twitter, Facebook, Instagram, WhatsApp) • Emails • Press releases • Speeches • Websites (FGS, WBG)	All key project stakeholders	• PIU • Communication expert • Social specialists
Disclosure of the project documents SMPs, updated SEP, LMP, GBV Action Plan, among others	• Websites - FGS and WBG • Brief summaries of the main features of the project SEP • Audio-visual messages on the project (radio, TV) • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails • Press releases • Speeches	• FGS and all partners involved in the project • Open access to all interested parties • Distribution of printed flyers to schools and other institutions	• PIU • WBG Team
During implementation			
Roll-out of direct support to the SCSC, CSI and other institutions/agencies and civil servants	• Key informant interviews with stakeholders • Newsletters • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails) • Press releases • Speeches • Mobile phone block messages	• Civil servants • Supported institutions • The public	• PIU • Communication expert • Social specialists
Highlights on project activities, achievements and lessons learned	• TV/Radio spots/activations and announcements • Print materials (newsletters and flyers) • Town hall meetings • Newspaper stories/supplement • Social Media (twitter, Facebook, Instagram WhatsApp) • Emails • Press releases	-Project beneficiaries -Other interested parties	• Social specialists

Information to be disclosed	Method used	Target stakeholders	Responsibilities
	• Speeches • Mobile phone block message		
Update on project process	• Print materials (newsletter, flyers, etc.) • Project progress reports • Town hall meetings	All stakeholders	• Social specialists • PIU
Complaints/ compliments about the project implementation	• Logs and reports from the national GRM focal person, • State GRM focal persons • (GRM complaints points in schools, district education offices, government offices etc.)	• Receivers of information and services • Information or Data managers	• PIU and social specialists
	• Surveys and direct observations of the project beneficiaries	• Different stakeholders • Disadvantaged populations	• GoSL • Communication Officer • M&E Officer
Monitoring and reporting			
Feedback of effectiveness of different modalities of engagement	• Semi-structured interviews • Online surveys • Satisfaction surveys	Project primary beneficiaries	• Social specialists • M&E Officer
Quarterly	• Progress report including summaries of complaints and resolution	FGS offices at the Federal and State level offices	M&E officer

Proposed Strategy for Consultation

This plan lays out the overall consultative processes of the project with its different stakeholders. The GRM will be another means of consultation, as complaints received will be filed, assessed and responded to (see below).

Table 10: Strategy for Consultation

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
Project Design	Overall project activities	PIU, GRM, face to face meetings, community meetings	By project effectiveness and throughout implementation	National and county level: Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership Community level: Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	Understanding of the overall project activities	MOCT and the PIU
	SEP (including GRM)	GRM, face to face meetings, community meetings		National and county level: Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing	Reception of feedback and comments as well as grievances from all stakeholders on project design, as well as potential environmental and social risks and impacts and mitigation measures	MOCT and the PIU

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
				Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership Community level: Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	Provision of transparent and accountable mechanisms on all aspects of the project and design	
	ESCP	Project Steering Committee, GRM, email	By project appraisal, at negotiations and throughout implementation	National and county level: Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership	Provision of transparent and accountable mechanisms on all aspects of the project and design	MOCT and the PIU
	ESMF	Project Steering Committee, GRM, face to face meetings, community meetings	By project effectiveness and throughout implementation	National and county level: Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers;	Reception of feedback and comments as well as grievances from all stakeholders on project design, as well as potential environmental and	MOCT and the PIU

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
				Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership	social risks and impacts and mitigation measures	
Project launch / Entry	Introduction of the project	Stakeholder meeting / conference	By project effectiveness	National and county level: Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership	Understanding of the project activities and objectives	MOCT and the PIU
Project Implementation	ESMPs / RAPs	Community meetings, notice boards at county level	County	Community and county level: county authorities; local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	Understanding of planned works and feedback on particular E&S risks and impacts	MOCT and the PIU

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
	Project Implementation as a whole, including security parameters for project-affected persons	Radio, community meetings, notice boards at county, level	State/County	<u>Community and county level</u>: county authorities; local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	Provide regular information and feedback to stakeholders related to project implementation progress and any other emerging issues	MOCT and the PIU
	M&E	Stakeholder meetings, community meetings, notice boards at county level	State/County	<u>National and county level</u>: Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership <u>Community level</u>: Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community	Reception of feedback and comments as well as grievances from all stakeholders on project design, implementation as well as potential environmental and social risks and impacts and mitigation measures Regular information and feedback to stakeholders related to project implementation progress and any other emerging issues	MOCT and the PIU

INCLUSION PLAN

The project aims to increase access to broadband connectivity and digital service and in order to ensure positive outcomes through social inclusivity it is important to ensure that no community or social group is left behind or prevented from benefiting from the project. The inclusion plan in the SEP highlights the necessary steps for the project to become inclusive and accessible to people within the project areas who may be discriminated against and/or excluded due to disability, gender, geography, income, age or other characteristics. These groups may be excluded due to difficulties accessing information or understanding information received about the project and its environmental and social impacts and mitigation strategies. Other reasons for exclusion may be due to clannism or elite capture. These groups include; minority clans and groups, internally displaced persons, communities living in remote rural areas and/or areas characterized by insecurity, nomadic pastoralist communities, adults and children living with mental and/or physical disabilities, single head of households and/or widows and orphans.

Engaging disadvantaged and marginalized groups

The project will ensure there is wide representation from all identified disadvantaged and marginalized groups in all stakeholder consultations throughout the project lifetime. This includes preparation, implementation, and handover phases of the project. The consultations will provide information to marginalized communities and other interested persons or groups as well as the project team to understand the project expectations and levels of involvement and provide feedback on the results of the project. The PIU team will ensure any committees within FGS/FMS levels are trained on information disclosure without discrimination and in an effective timely manner. Relevant and specific approaches to engaging vulnerable groups will be used to further ensure inclusion such as focus group discussions (based on age, gender and occupation, dialect preferences), interviews, and key informants.

Table 11: Vulnerable groups Feedback incorporation strategy

No	Vulnerable Group	Proposed strategy for consultation
1	Vulnerable Groups	Through representative bodies and organizations and other community members ensuring effective participation and culturally appropriate engagement, sharing key and specific information in local dialects/languages, providing relevant timelines for internal-decision making process amongst groups.
2	Persons with disabilities (deaf)	Use of sign language and other appropriate assistive tools as required, providing translations where necessary including local dialects, facilitate transport where necessary, engage through representative organizations and/or persons, provide relevant timelines for internal-decision making process amongst groups.

3	Women	Engage through representative organizations and/or persons, provide focused and relevant meetings in culturally appropriate settings for comfort and safety in asking questions or raising concerns, meeting schedules that are time appropriate to ensure participation and sufficient interaction, ensuring meeting venues are located in close proximity to resident area, translation into local dialects and meetings with female facilitators.
4	Persons with disabilities	Engage through representative organizations and/or persons, provide focused and relevant meetings in culturally appropriate settings for comfort and safety in asking questions or raising concerns, provide relevant timelines for internal decision-making process amongst groups.
5	Elderly	Host one to one meetings where necessary, provide transportation to meeting venues, consult on meeting settings and timelines with participants, provide language or dialect translator and/or facilitators, ensure meeting settings are culturally appropriate.
6	Children	Engage through representative organizations where possible, obtain consent from parent/caregivers, meeting locations familiar to the child e.g., local school venues or community meeting centers where possible, use child friendly means and language to communicate.

The Inclusion Plan will be achieved to the extent in which disadvantaged and marginalized groups participate and engage with the project activities from design to implementation. PIU will undertake consultations with the various groups on local development issues and concerns if it is likely there may be adverse impacts of project activities. The objective of the consultations will focus on understating project operational structures, receiving input/feedback to avoid and/or reduce adverse effects associated with project activities and agree on relevant and effective mitigation measures.

GRIEVANCE REDRESS MECHANISM

Under the World Bank ESSs, Bank-supported projects are required to facilitate mechanisms that address concerns and grievances that arise in connection with a project. 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. This Project GRM should facilitate the project to respond to concerns and grievances of the project-affected parties. The Project will provide mechanisms to receive and facilitate resolutions to such concerns. This section lays out the grievance redressal mechanisms (GRM) for the EA-RDIP.

As per World Bank standards, the GRM will be operated in addition to a separate GBV/SEA/SH Action Plan, which includes reporting and referral guidelines. However, the Project GRM will also handle GBV/SEA/SH cases where necessary. Additionally, in line with the provisions of ESS2, a grievance mechanism will be provided to all direct workers and contracted workers to raise

workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. This worker grievance mechanism is included in the project's Labor Management Procedures (LMP) (see ESMF). Given the small-scale nature of works and focus on locally sourced labor, the intake mechanisms of the overall GRM will also allow intake of grievances under ESS2. Note that for SH in the workplace, provisions under the GBV/SEA Action Plan apply.

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

GRM Core Principles

The GRM is based on six core principles:

- **Fairness**: Grievances are treated confidentially, assessed impartially, and handled transparently.

- **Objectiveness and independence**: The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment in each case. GRM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).

- **Simplicity and accessibility**: Procedures to file grievances and seek action are simple enough that stakeholders can easily understand them. Project stakeholders have a range of contact options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety.

- **Responsiveness and efficiency**: The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.

- **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.

- **Participation and social inclusion:** A wide range of stakeholders are encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensure that marginalized or vulnerable groups, including those with special needs, are able to access the GRM.

GRM Steps

Step 1: Grievance Uptake: Multiple channels must be available for stakeholders to file their complaint, grievance, or feedback. The stakeholder must be able to select the most efficient institution, the most accessible means of filing a grievance, and must be able to circumvent partial stakeholders in the Project, which may be implicated in the complaint. He or she must further be able to bypass some grievance channels that are perceived as potentially not responsive or biased.

Means of Filing a Grievance

There are four distinct means, at least two of which must be made available at the sub-project locality for people to file a grievance (see complaints log, complaints form and grievance register, Annex 2,3,4):

1. A phone number for a hotline operator: The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator should be available from 8.00 am to 5.00 pm every day. The hotline operator is set up and managed by the PIU. Any concerned party can call the hotline number and file a grievance with the Project.

2. A help desk will be set up during the implementation of sub-project activities in a specific locality, especially where construction activities are undertaken. It should be manned by the implementing staff, in close coordination with local authorities. At the help desk, stakeholders can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk.

3. Relevant assigned personnel available in each project site will be required to accept grievances and ensure that avenues for lodging grievances are accessible to the public. The first point of contact for all potential grievances from community members may be the contractor or a local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance.

4. A suggestion box will be installed at the nearest sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the suggestion box must be expressed in writing.

Step 2: Sort and Process: All registered grievances will be transferred to the PIU GRM Officer – either by the Hotline Operator, local personnel, or the Help Desk Officer. The GRM Officer will categorize the complaint. Worker-related grievances will be handed over to a workers' GRM. Where grievances are of sexual nature, the focal point has to handle the case appropriately, and refer the case to the GBV reporting protocols and referral system, defined in the SEA/SH Action Plan. Dedicated training on how to respond to and manage complaints related to SEA/SH will be required for all GRM operators and relevant project staff.

Where grievances can be handled locally, the GRM Officer will return these grievances to the appropriate local structures to be handled by existing dispute settlement mechanisms. However, these can only be involved if the GRM Officer assesses that the complainant is not a member of a vulnerable group or minority that would not be catered to by the local mechanism in an equal manner.

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

The GRM Officer will also transfer the grievance information into a more comprehensive grievance register.

Step 3: Acknowledgement and Follow-Up: The PIU will decide whether a grievance can be solved locally, with local authorities, contractors, or NGOs, and whether an investigation is required. The first ports of call will have in-depth knowledge of communal socio- political structures and will therefore be able to recommend to the GRM Officer the appropriate individuals that could be addressed with the case, if the case can be solved at the local level. At all times, the GRM Officer will provide feedback promptly to the aggrieved party (unless the case was filed anonymously), within 5 working days after the grievance is filed. Feedback can be provided through the phone, in writing or through the community facilitators. Feedback is also communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Step 4: Verify, Investigate and Act: The GRM Officer will then undertake activity-related steps in a timely manner. The activities will include: verifying, investigating, redressing action and plan.

Verification: Check for eligibility (objectively based on set standards and criteria) of the complaint in terms of relevance to the project; escalate outright grievances that require high level interventions; refer outright grievances that are outside the project jurisdiction (e.g., refer to PIU Project Manager or relevant external institution)

Once eligibility is determined, the GRM Officer will categorize the complaint into defined categories:

Investigation:
- GRM Officer to appoint an independent investigator (E&S Specialists, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation

- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence
- Analyze to establish facts and compile a report

Grievance Action Plan
- Based on the findings determine the next steps and make recommendations: (i) direct comprehensive response and details of redress action; (ii) referral to the appropriate institution to handle the grievance, where the IP has no jurisdiction
- undertake mutually agreed follow-actions
- Update of complainant
- Provide complainant with a grievance redress status update and outcome at each stage of redress, (iii) update the IP or PIU on grievance redress across the GRM value chain.

Step 5: Monitor, Evaluate and Provide Feedback: The GRM Officer will provide feedback to GRM users and the public at large about: results of investigations; actions taken; why GRM is important; enhance the visibility of the GRM among beneficiaries; and increase in users' trust in the GRM.

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

The PIU will evaluate the GRM by: analyzing grievance data to reveal trends and patterns; sharing GRM analysis in management meetings; and taking corrective action on project implementation approaches to address the grievance.

Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment (GBV, SEA, SH)

Step 1: Grievance Uptake: Given the sensitive nature of GBV complaints, the GRM provides different ways to submit grievances. All grievance uptake channels can be used to report on SEA/SH-related grievances. No grievance uptake mechanism can reject such grievances, and all personnel directly receiving grievances will be trained in the handling and processing of SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors prior to any disclosure of case details, for example through initial awareness raising sessions on the GRM. This will allow protect the survivor-centered approach from mandatory reporting.

The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the

survivor's informed consent – report the case to one of the Project's formal GRM. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

The grievance recipient will be responsible for the recording and registration of the complaint. A GRM operator cannot reject a SEA/SH complaint. At the same time, however, the project can only respond to a SEA/SH complaint if it is directed into the designated GRM channels.

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

Informed Consent: The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up. Asking for consent means asking the permission of the survivor to share information about him/her with others (for instance, with referral services and/or IPs or PIU), and/or to undertake any action (for instance investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation or other intervention with which she does not feel comfortable. A survivor can also at any time decide to stop consent. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on. In the case of children, informed consent is normally requested from a parent or legal guardian and the children

Incident reporting
Severe incidents (defined as an incident *that caused significant adverse effect on the environment, the affected communities, the public or workers*, for example: serious injuries, fatality, GBV, forced or child labor, damage on Project infrastructure, as well as organized large scale robbery, looting etc., abuse and cases of mistreatment of communities and/ or workers by security forces (including GBV/SEA/SH, spread of communicable diseases among workforce, kidnapping, etc.), will be reported within 48 hours to the PIU and onwards to the World Bank.

At all times, the PIU will provide feedback promptly to the aggrieved party, for example through the phone. Feedback is also communicated through stakeholder meetings and beneficiary meetings during project activities. For sensitive issues, feedback is given to the concerned persons bilaterally.

Records of all feedback and grievances reported will be established by the PIU. All feedback is 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, should

include the name of the person providing feedback as well as the county, (where applicable), the project activity and the nature of feedback or complaint.

Step 2: Sort and Process: All reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information which may lead to the identification of the survivor and any potential risk of retribution (see specific SEA/SH reporting form, Annex 5).

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

If the survivor provides informed consent, the grievance recipient should inform the GRM Specialist. The GRM Specialist at the PIU will inform the World Bank. The report will be on the anonymized incident as soon as it becomes known to the PIU. Data shared will include the nature of the allegation; if the alleged perpetrator is associated with the Project; the survivor's age and sex' and whether the survivor was referred to other services. The Project's SEA/SH Action Plan has mapped all referral services in the different counties designated for interventions. The project team will keep an updated list available of these services.

Step 3: Acknowledgement and Follow-Up: Referrals are a process through which the survivor gets in touch with professionals and institutions regarding her case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The grievance recipient will instantly provide the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient will provide allowances. Referral services are provided even in cases where the survivor opts to not pursue the case through the GRM or through legal channels.

The grievance recipient explains to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information. The survivor will be informed about his or her right to place limitations on the type of information they want shared. The survivor's consent must be documented.

Step 4: Verify, Investigate and Act: The PIU GRM Specialist will be the key focal point for management of such grievances and concerns and will work closely with respective GBV Specialist counterparts at the Ministry of Gender and Social Welfare. Once a case has been taken in by a GRM recipient, and informed consent of the survivor is obtained to proceed with the case, the case file will be submitted to the GRM Specialist. The GRM Specialist will first ensure that the

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

Where the SEA/SH grievance was allegedly committed by a project worker, the grievance will be reported to the respective employer. The GRM Specialist will follow up and determine the likelihood that the allegation is related to the project. The GRM Specialist will follow up and ensure that the violation of the Code of Conduct is handled appropriately, e.g., the worker is removed from his or her position and employment is ended. The responsibility to implement any disciplinary action lies with the employer of the alleged perpetrator, in accordance with local labor legislation, the employment contract, and the code of conduct. The GRM Specialist will report back to the survivor on any step undertaken and the results.

Where the survivor has opted to take a formal legal route, the GRM Specialist will ensure that the survivor has all the support required to file a case at court. The GRM process will still proceed with the survivors' consent. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GRM's remit to conduct investigations, to make any announcements, or to judge the veracity of an allegation. The GRM should refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.

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

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

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

WB Grievance Redress Service (GRS)

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 WB's Grievance Redress Service (GRS). 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

RESOURCES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION

Management

The PIU under the Ministry of Communications Technology will have full responsibility for engaging with the stakeholders of the project. The PIU will be headed by a Project Manager and include a team of experts; financial management specialist, procurement specialist, communication specialist and safeguards officers. A social development specialist recruited and an environmental specialist, will be guiding the SEP within the PIU, ensuring it is implemented, monitored, and evaluated effectively. The project budget contains funds allocated for stakeholder engagements.

The PIU will be responsible for coordinating the implementation of the project and providing project management oversight, decision-making, co-design and co-management of activities including the annual work plan and budget, co-monitor program activities, conducting quarterly progress reviews and make collaborative decisions on issues pertaining to implementation and ensure open communication and accountability.

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

Resources

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

Table 12: Indicative Budget for implementation of SEP

Stakeholder Engagement Activity	Total Cost (USD)
Social experts	
Dedicated social safeguards specialist at PIU	Included in staff costs (20% of time)
Consultation and disclosure	
Consultation sessions in all the works-affected communities	300,000
Establishment and maintenance of website	100,000
Radio broadcasts	100,000
Other disclosure campaigns	100,000
Grievance redress mechanism	
GRM Hotline	10,000
Dissemination of information on GRM	20,000
Monitoring and documentation of SEPESMF implementation	

Stakeholder Engagement Activity	Total Cost (USD)
Verification of SEP activities (field visits, etc.)	Included in PIU travel budget
TOTAL	630,000

MONITORING AND REPORTING

Stakeholder engagements will be monitored during the different stages of the project's lifetime and records maintained detailing all public consultation, disclosure information and grievances collected and associated corrective/preventative actions available for public review on request. The SEP will be regularly (monthly/quarterly) updated to ensure information and methods of engagement remain relevant, consistent, and effective. Any major modifications in schedule, project status, activity will be reflected in the SEP by PIU.

The PIU social specialist will develop monthly reports on stakeholder engagement activities for activities conducted during each month, public outreach activities including entries to the complaints log, any new stakeholder groups that may have been identified and details of plans for short term and longer-term stakeholder engagement events.

Table 13: Monitoring Plan

Key components	Timeline	Methods	Responsible entity
Stakeholders access to project information and consultations.	Project preparation stage and throughout implementation	Surveys, interviews and observation	PIU
Awareness for beneficiaries on activities and their entitlements and responsibilities.	Project preparation stage and throughout implementation on monthly/quarterly basis	Surveys, interviews and observation	PIU
Relevance and appropriateness of consultation and engagement approaches	Monthly/quarterly and through implementation of project	Surveys, interviews and observation/review of project progress reports	PIU

Key components	Timeline	Methods	Responsible entity
Awareness of GRM platforms and their relevance	Monthly/quarterly and through implementation of project	Surveys, interviews and observation/review of project progress reports	PIU
Engagement of facilitators with stakeholder target beneficiaries.	Monthly/quarterly and through implementation of project	Surveys, interviews and observation/review of project progress reports	PIU
Status of reported grievances	Monthly/quarterly and through implementation of project	Interviews and review of project progress reports and GRM records	PIU

The following indicators have also been embedded in the project response framework to ensure robust racking of GRM performance, including related to GBV:

- Grievances registered that receive an adequate response within 30 days
- Code of Conduct and allegation procedures for GBV designed and implemented for contractors and service providers

ANNEXES

Annex 1: Consultation meetings held with key stakeholders

<u>Government Ministries and Agencies</u>

Virtual meeting with Ministry of Commerce and Industry, 23rd Nov 2022, 2 PM

No	Participant Name	Organization
1	Zakarie Hassan	MOCI
2	Ahmed Warsame (General Manager Department of Commerce)	MOCI
3	Abdullahi Gulled	MOCI
4	Abdullahi Bihi	MOCT
5	Zakrie Ismael	MOCT

Addis Ababa Mission Delegation List: 28th August - 2nd September 2022

No	Name	Title	Institution
1	H.E. Jama Hassan Khalif	Minister	MoCT
2	Abdiaziz Duwane Issak	Director General	MoCT
3	Suleiman	Director General	MOF
4	Abdiaziz Ibrahim Adan	Director General	MOCI
5	Abdulahi AbdiMuslim Farah	Director Planning /EA-RDIP Focal Point	MoCT
6	Abdirahman Farah	ICT Advisor/SCALED-UP Focal Point	MoCT
7	Zakarie Ismael Sheikh	e-Government Advisor	MoCT
8	Abdullahi Guled Ibrahim	Cybersecurity Advisor	MoCT
9	Mohamed Abdi Sultan	Technical Advisor	MoCT
10	Mustafa Yaasin Sheik	Deputy General Manager	NCA
11	Abdullahi Bihi Hussein	Technical Advisor	MoCT
12	Abdiaziz Mohamed Shire	Technical Advisor	
13	Ahmed Ali Ugas	Coordinator	NCA
14	Ali Abdi	Focal point/Technical Advisor	NCA

Nairobi Mission May 16- 20th 2022

No	Name	Title	Institution
1	Abdiaziz Duwane Issake	Director General	MoCT
2	Liban Hussein Artan	Director of Finance	MOF
3	Abdullahi Guled Ibrahim	Cyber-security Advisor	MoCT
4	Zakarie Ismael Sheikh	E-government Advisor	MoCT

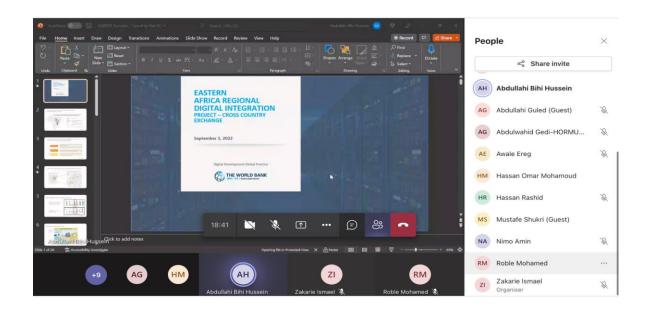**Federal Member of State participants List from 28th November to 1st December**

Names	Titles	
Jaamac Khaliif Hassan	Minister of MOCT	FGS
Ahmed Diiriye	State Minister of MOCT	FGS
Hussein Ahmed Olosow	Deputy minister of MOCT	FGS
Abdi Aziz Duwane Isaac	Director General of MOCT	FGS
Mustafe Yasin Sheikh	Manager of NCA	FGS
Eng. Maxamed Caydiid Dirir	Puntland minister of MTITC	FMS
Abdifataah Ahmed Farah	Jubaland minister of MPCT	FMS
Abbas Huseen Ali	Hirshabeele minister of MOCT	FMS
Abdullahi Sheikh Dahir	Galmudug Deputy minister MPCT	FMS
Abdirishiid Maxamed Ducale	South-West minister of MPCT	FMS

Meeting with Ministry of Finance, Ministry of Communication and Technology, Ministry of Public Works, and NCA

Names	Titles	
Abdiaziz Duwane	Director General	MOCT
	Director General	MOF
	Director General	MOCI
Abdullahi Guled		MOCT
Zakarie Ismael		MOCT
Ali Dahir		NCA
Ahmed Ugas		NCA
	Director of Planning	MPWR
SA Farimos		MPWR
Anat Lewin		World Bank

Somalia Private sector service providers
Virtual meeting, 12th Nov 2022, 2 PM

No	Participant Name	Organization
1	Abdirahman Dhiblawe	Hormuud Telecom
2	Abdirahman Mohamed	
3	Abdullahi Guled	MoCT
4	Awale Ereg	BlueCom
5	Hassan Omar Mohamed	SomTEL
6	Hassan Rashid	Somtel
7	Said Mohamed	Hormuud Telecom
8	Abdirahman A Osman	
9	AbdulWahid Gedi	Hormuud
10	Mustafe Shukri	Somtel
11	Roble Mohamed	SON
12	Zakarie Ismael	MOCT
13	Abdullahi Bihi	MOCT

Annex 2: Complaints log

Date and complaint from	Complaint, e.g., communication lag	Officer/ department complained against	Remedy granted	Corrective/ preventive action to be taken	Feedback given to complainant

Annex 3: Grievance Redress Mechanism (GRM) Form

Reference No: _____

Details of Complainant:
Full name: _____
❏ I wish to raise my grievance anonymously
❏ I request not to disclose my identity without my consent
Contact
_____

❏ **By Mail:** Please provide mailing address:
_____

Gender of Complainant:
Age of Complainant:
❏ By Telephone: _____
❏ By E-mail _____

❏ One time incident/grievance Date _____/_____/
❏ Happened more than once (how many times) _____
❏ On-going (currently experiencing problem)

Description of Incident or Grievance:

Location of grievance:

_____
What would you like to see happen to resolve the problem?

Annex 4: Grievance Register

The grievance register will contain the following information (ideally in an excel file, or if at local level in a book) :

Table 11 Grievance Register

Type of Information	Response
Complaint/ Log number	
Reference document (s)	
Date complaint made	
Date complaint received	
Category of Grievance	
Method of Logging: Direct Communication; Suggestion Box; Toll-free Line;	
Complaint name (state if anonymous)	
Location in which complained action took place (district, village)	
Caller contacts for follow up	
Gender	
Age	
Parties against whom complaint is made (unit/contractor/agency, etc.)	
Nature of Complaint ["SEA/GBV"; "Timing of Payment"; "Amount of Payment"; "Inclusion or Issue regarding Project benefits" or create standard categories based on complaint type]	
Description of Complaint	
Nature of feedback (describe)[In case issue type is GBV/SEA immediate referral to the GBV referral system]	
Verification and investigation (describe)	
Recommended action (describe)	
Timeline of Initial feedback (within 5 days) [investigate the claim within 5 working days, and share findings/feedback with relevant stakeholder]	
Status update (and justification if it is not expected to be resolved within the timeframe set out)	
Date resolved	
Indicate if a spot check has been conducted (you can include then in the narrative reports spot checks for resolutions of x number of complaints have been conducted)	

Annex 5: Gender-based Violence / Sexual Exploitation and Abuse (GBV/SEA) Case Registration Form

Table 12 GBV/SEA Case Registration Form

GBV/SEA/SH Case Registration Form	
Administrative Information	
Grievance ID	
2 Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)	
3 Date of grievance registration	
4 Date of Incident	
5 Reported by survivor or an escort of the survivor, in the presence of the survivor	
6 Reported by someone other than the survivor without survivor present	
Survivor Information	
7 Gender / age	
8 Location / Residence	
9 Current civil/marital status	
1 Occupation	
1 Is the survivor a person with mental or physical disabilities?	
1 Is the survivor an unaccompanied or separated child?	
1 Was the perpetrator related to the project?	
1 Has Informed Consent been provided? yes/no?	
Has the case been reported elsewhere (including police / lawyer/health services/psychosocial counseling, other)?	
Sub-Section for Child Survivor	
If the survivor is a child (less than 18 years), does he or she live alone?	
If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; elative; spouse; other)	
What is the caretaker's current marital status?	
Details of the Incident (in survivor's words)	

Details of the incident	
Incident location and time	
Were money, goods, benefits and/or services exchanged in relation to the incident?	
Alleged Perpetrator Information	
Number of alleged perpetrators	
Sex of alleged perpetrators	
Age group of alleged perpetrator(s)	
Indicate relationship between perpetrator(s) and survivor	
Main occupation of the alleged perpetrator(s)	
Employer of the alleged perpetrator(s)	
Planned Actions / Actions Taken	
Was the survivor referred by anyone?	
Was the survivor referred to a safe house / shelter?	
Which services does the survivor wish to be referred to? • Psychosocial services • Legal services • Police • Health services • Livelihood program	
What actions were taken to ensure the survivor's safety?	
Describe the emotional state of the client at the beginning of the report	
Other relevant information	