

**FEDERAL GOVERNMENT OF SOMALIA**



**MINISTRY OF COMMUNICATION AND TECHNOLOGY  
(MoCT)**

**COUNTRYWIDE SECURITY RISK ASSESSMENT (SRA) AND  
MANAGEMENT FRAMEWORK (SRAMF)**

**EASTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT  
SERIES OF PROJECTS (SOP) PHASE I**

**SEPTEMBER 2023**

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## ABBREVIATIONS & ACRONYMS

AS	Al-Shabaab
BRA	Benadir Regional Administration
CERC	Contingency Emergency Response Component
CRW ERA	Crisis Response Window Early Response Allocation
CSO	Civil Society Organization
EA-RDIP	East Africa Regional Digital Integration Project
ESMF	Environmental and Social Framework
ESS	Environmental and Social Standard
FGM	Female Genital Mutilation
FGS	Federal Government of Somalia
FMS	Federal Member State
GBV	Gender-Based Violence
GBVIMS	Gender-Based Violence Information Management System
GRM	Grievance Redress Mechanisms
GSM	Global System for Mobile Communication
ICoCA	International Code of Conduct for Private Security Service Provider
IED	Improvised Explosive Devices
IDA	International Development Association
IDP	Internally Displaced Person
IVA	Independent Verification Agent
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation
MAIP	Malicious Acts Insurance Policy
MDA	Ministries Departments and Agencies
MoCT	Ministry of Communication and Technology
MEDVAC	Medical Evacuation
MoF	Ministry of Finance
MoPIED	Ministry of Planning and Economic Development
NGO	Non-Governmental Organization
OPM	Office of the Prime Minister
PDO	Project Development Objective
PBIED	Person Born Improvised Explosive Devices
PIU	Project Implementation Unit
POM	Project Operations Manual
PPE	Personal Protective Equipment
PSC	Project Steering Committee
PSEA	Preventing Sexual Exploitation and Abuse
SGBV	Sexual and Gender-Based Violence
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SMF	Security Management Framework
SMP	Security Management Plan
SPT	State Project Team
SWS	South West State
TTL	Task Team Leader

TPM	Third Party Monitor
VBIED	Vehicle Born Improvised Explosive Devices
WCMU	World Bank County Management Unit

# EXECUTIVE SUMMARY

## PROJECT INFORMATION

Somalia, with a total population of about 16 million in 2022 and one of the highest rates of urbanization in Africa, has long sought to make advances in digital economy. At the start of 2022, 47.3 percent of Somalia’s population live in urban centres, while 52.7 percent live in rural areas. Somalia’s gross domestic product (GDP) per capita has consistently been ranked among the five lowest in the world throughout the last decade: in 2020 it was the second lowest in the world (only Burundi had a lower GDP per capita in 2020). The World Bank estimated GDP per capita for 2021 was 446 US dollars. This translates into well below the international poverty line of 1.90 US dollar a day and the target for SDG1: eradicate extreme poverty. Through East Africa Regional Digital Integration Project (EA-RDIP), the Federal Republic of Somalia will benefit from USD 100 million to support series of projects towards regional connectivity market, regional data market, and regional online and digital market. The Project Components are summarized in **Table E.1** below.

**Table E.1: Project Components**

Component	Sub-component	Description
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	n/a	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.

## SECURITY AND CONFLICT BACKGROUND

The security situation in Somalia remains volatile and characterized by entrenched conflict between Al-Shabaab and the FGS, FMS and associated groups<sup>1</sup>. Between 1<sup>st</sup> January 2021 and 1<sup>st</sup> August 2022, the Armed Conflict Location & Event Data Project (ACLED) recorded 4,090 incidents of battles, explosions/remote violence and violence against civilians, causing 5,520 fatalities<sup>2</sup>. The SRA provides an overview understanding of the current situation across Somalia (FMS) from a political and security perspective. The main risks discussed in this report revolve around issues related to (i) Armed militia

<sup>1</sup> UN Security Council, Situation in Somalia, 13 May 2022, S/2022/392, [www.ecoi.net/en/file/local/2073538/N2233663.pdf](http://www.ecoi.net/en/file/local/2073538/N2233663.pdf), paras 13-21; UN Security Council, Situation in Somalia, 8 February 2022, S/2022/101, [www.ecoi.net/en/file/local/2068141/S\\_2022\\_101\\_E.pdf](http://www.ecoi.net/en/file/local/2068141/S_2022_101_E.pdf), paras 19-27; UN Security Council, Letter Dated 5 October, 6 October 2021, S/2021/849, [www.ecoi.net/en/file/local/2062553/S\\_2021\\_849\\_E.pdf](http://www.ecoi.net/en/file/local/2062553/S_2021_849_E.pdf), pp. 4, 7-17.

<sup>2</sup> Al-Shabaab was involved in at least 3,302 of these incidents. The regions most affected were Lower Shabelle (1042), Benadir (904), Jubbaland (672), Bay (335) and Middle Shabelle (270). ACLED, Data Export Tool, accessed 25 August 2022, <https://acleddata.com/data-export-tool/>.



groups<sup>3</sup> (ii) Political Instability (iii) Clan Conflicts (iv) Conflicts over pasture and water (v) Calamities such as Flooding and (vi) Border Dispute with Somaliland

The information used to package this SRA and SRAMF was gathered from literature review from previous similar report, expertise working in Somalia on similar bank funded projects and intelligence information from UNCHR report<sup>4</sup>. Somalia ranks second on the Fragile State Index from 2019 with a total score of 112.3, only topped by Yemen with a score of 113.5.<sup>5</sup> Somalia’s indicators on factionalized elites, and demographic pressures score the highest.

**LINKAGE OF PROPOSED PROJECT INTERVENTION TO THREAT SITUATION**

The maps in **Figure E-1 below** provides an overlay of proposed priority fiber links planned to be implemented under EA-RDIP component 1 and 2 on existing threat map for Somalia. **Table E-2** below provide a summary of interpretation of level of risks with regards to proposed intervention under EA-RDIP for each Federal Member State.

**Table E-2: Interpretation of EA-RDIP Interventions and Nature and Type of Security Risks**

FMS	Priority 1 (Yes/No)	Priority 2 (Yes/No)	Priority 3 (Yes/No)	Priority 4 (Yes/No)	Nature Threat	Types of Risk
Jubaland	Yes	Yes	Yes	Yes	Extreme	<ul style="list-style-type: none"> <li>• Al-Shabaab Attacks</li> <li>• Political Instability</li> <li>• Clan Conflicts</li> </ul>
South West	Yes	Yes	Yes	No	Extreme	
Hisharbelle	Yes	Yes	No	No	Extreme	
Gulmudug	Yes	Yes	No	No	Extreme	
Puntland	Yes	No	No	No	Substantial	<ul style="list-style-type: none"> <li>• Political Instability</li> <li>• Clan Conflicts</li> <li>• Border Dispute with Somaliland</li> </ul>
Somaliland	Yes	Yes	Yes	No	Substantial	<ul style="list-style-type: none"> <li>• Border Dispute with Puntland</li> <li>• Clan Conflicts</li> </ul>

<sup>3</sup> Al-Shabaab

<sup>4</sup> UNHCR International Protection Considerations with Regard to People Fleeing September 2022

<sup>5</sup> Fragile State Index 2019, accessed at: <https://fragilestatesindex.org/data/>

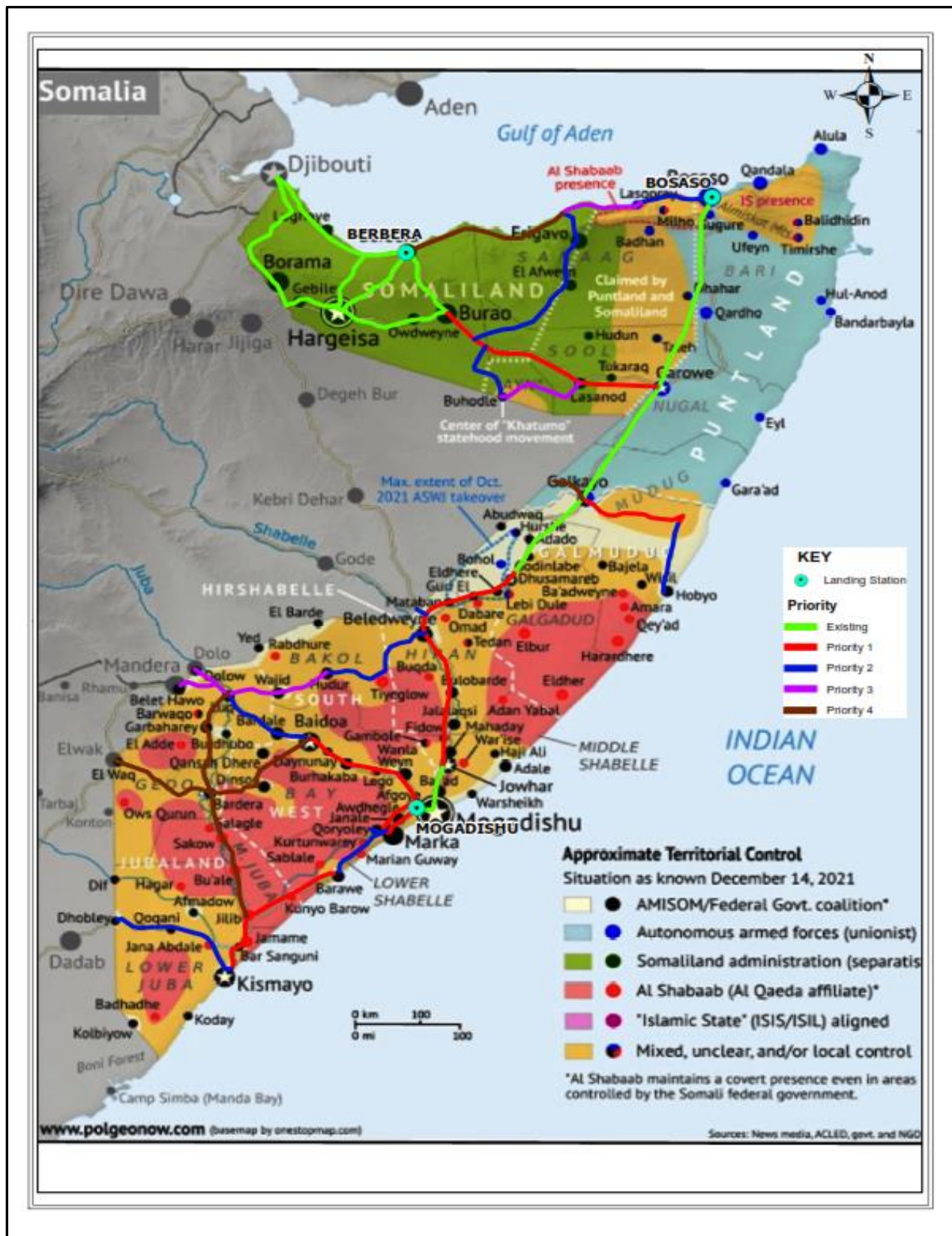


Figure E-1: EA-RDIP Interventions Overlaid on Security Situation Map

SUGGESTED APPROACH TO MANAGING SECURITY RISKS

### **Development of the Approach:**

To balance (i) the need to support development benefits with (ii) managing the significant security risks, the project attempts a threefold approach:

- Screening out extremely high-risk areas, with a phased approach allowing reassessments and potential integration of areas where the situation improves over time;
- Risk management measures for moderate to substantial risk areas which remain volatile.
- Measures to scale down and or delay interventions in volatile areas with increasing risks informed by reassessments.

Preparatory assessment activities so far (and which are incorporated in the draft PAD):

- Security risk assessments developed during project preparation have helped determine the security profile of sub-regions where networks will be deployed in Somalia and South Sudan. Sub-national regions in the two countries have been categorized into risk levels, low, moderate, high, and extreme following the ISO 31000 process.
- Several of the sub-regions are categorized as high risk (see section 3.3) on account of likelihood of civil unrest, politically motivated armed conflict, GBV and Sexual Exploitation and Abuse (SEA), ambush and complex attacks that are likely to impact project workers.

The Proposed Approach and Protocols to be incorporated in the Security Risk Assessment and Management Plans:

### **Phased approach:**

The following phased approach in managing security risks is proposed

- The World Bank Country Management Unit ( WCMU,) in agreement with the Somalia government, and in consultation with design risk engineers, will determine balancing of the security risks with the potential development benefits in high risk areas.
- Project activities will initially focus on deploying links in sub-regions with a moderate security threat profile, and gradually deploy additional links in more insecure areas, as and when the security context evolves positively and provides a more permissible operating environment.
- Site-specific assessments in the sub-regions will be required prior to the commencement of the infrastructure works through support from security risk management firms;
- Only for acceptable risk levels, a no objection to commence works for specific sites will be provided by the Bank.
- Further protocol details and holding point structures will be included in the Project Operation Manual. This will include a procedure to include management views on World Bank no objection to launch new phases of network deployment or initiating contracts in previously higher risk areas.

### **Additional measures**

Further additional measures are provided below.

- For areas where works are at acceptable risk level, basic risk management approaches will be outlined in the site specific Security Management Plans (SMP). Training workers on-site on basic security elements, response to and reporting incidents among other will also be undertaken.
- In addition, capacity strengthening measures including security advisors in the PIUs will be required from the client in this case MoCT
- The task team will work with procurement to ensure flexibility in contracting and budgeting in need for a 'security premium' for contractors to hire additional security; while a militarized approach to security will be avoided.
- Specialized security risk management firms will be hired to support assessments as needed.
- Local SMPs are available and included in bidding documents,
- Security will not be used as a competitive element in the bidding process, beyond ensuring that the contractor has minimal qualifications including an appropriate security track-record;
- The contractors will not cut back on security measures without PIU endorsement

### **Adaptation and Monitoring**

Adaptation and Management Will be undertaken as detailed below.

- While security risks are likely to continue to be high throughout the project implementation period, they are also dynamic (e.g., recent gains have been made by government forces in southern Somalia). There could be a possibility of requiring suspension of or limiting project activities until permissible conditions are achieved in areas with high risk.
- Similarly, in areas with low risks, activities are expected to proceed with continuous review of the risk situation and implementation. Flexibility will be built into contracting to allow for a stop-start approach if the threat profile changes.
- Local site-specific assessments and evaluation of potential security risks will help in determining the level and types of security arrangements required to be put in place. The SMP will outline a tier approach to assessments to reduce the required number of reiterations for detailed site assessments
- Use of third-party monitoring agents to provide independent assessments and reassessments of the evolving security risk profile and the adequacy of risk mitigation measures deployed

If risk level reduces, Implementing Parties (IPs) can choose to reduce risk mitigation measures which will potentially have cost saving implications) if a risk level is raised then immediate action will be taken as detailed in chapter (8) on escalating or de-escalating security postures. All IPs have the right to take their own internal decisions on the suspension of activities due to prevailing insecurity and with the view to protecting their respective workers and project communities.

# 1 INTRODUCTION

## 1.1 Project Information

Somalia, with a total population of about 16 million in 2022 and one of the highest rates of urbanization in Africa, has long sought to make advances in digital economy. At the start of 2022, 47.3 percent of Somalia's population live in urban centres, while 52.7 percent live in rural areas. Somalia's gross domestic product (GDP) per capita has consistently been ranked among the five lowest in the world throughout the last decade: in 2020 it was the second lowest in the world (only Burundi had a lower GDP per capita in 2020). The World Bank estimated GDP per capita for 2021 was 446 US dollars. This translates into well below the international poverty line of 1.90 US dollar a day and the target for SDG1: eradicate extreme poverty. Through East Africa Regional Digital Integration Project (EA-RDIP), the Federal Republic of Somalia will benefit from USD 100 million to support series of projects towards regional connectivity market, regional data market, and regional online and digital market.

## 1.2 Project Components

### 1.2.1 *Component 1: Connectivity market development and integration*

**Sub-component 1.1: Cross-border and backbone network connectivity:** The sub-component aims to support the deployment of up to 4,600 km of new fiber along prioritized routes<sup>6</sup> including connecting three main cable landing stations (Mogadishu, Bossaso, and Berbera) and connecting to cross-border links to Kenya, Ethiopia. The fiber is likely to be deployed in phases, starting in the north, based on a more permissible security context. A feasibility study will inform the design of fiber layout (underground, aerial, or via optical ground wire (OPGW) along the power grid for the prioritized routes.

Subsidies will be provided for the deployment of new fiber networks, where needed and awarded to selected providers who will be expected to co-finance, design, build,<sup>7</sup> and operate network infrastructure deployment on an open access basis at reasonable rates.

**Sub-component 1.2: Last mile connectivity including in borderland areas:** To connect remote, rural, borderland locations where the commercial incentive for last-mile network expansion is insufficient. Financing will be provided towards connecting population centers, public institutions along the fiber route

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<sup>6</sup> The pre-study looked at the ideal backbone network configuration for Somalia, which considered (i) projected demand, ensuring that the maximum number of population centers are connected; (ii) opportunities for parallel deployment with other linear infrastructures, including planned energy transmission and road networks; (iii) planned deployment that is already commercially viable from a private sector standpoint; (iv) strategic cross-border links that would help integrate regional backbone networks; (v) related investments in submarine cable that could complement a terrestrial cable, such as via a festoon cable; (vi) a realistic assessment of the security context; and (vii) suitable technology solutions.

<sup>7</sup> Construction is expected to be led by the private sector covering passive (for example, ducts) and active infrastructure (fiber cores), with rights of way, and dig-once obligations.

and establishing low-cost portable, emergency response options of Wi-Fi hotspots, nomadic RANs, network transceivers in host communities and IDP/refugees camps in borderland areas.

**Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment:** Technical assistance (TA) will be provided to strengthen the institutional capacity of MoCT and boost the regulatory maturity of the NCA to effectively spearhead the connectivity agenda and universal services targets through the development of new policy and regulatory instruments.

#### **1.2.2 Component 2: Data market development and integration**

**Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity:** Support will build-on cybersecurity activities previously supported under SCALED-UP (P168115) and will continue to strengthen the cybersecurity framework and build capacity for responding to cyber threats/cybercrimes and create greater awareness on cyber security.

**Sub-component 2.2: Data exchange, governance and protection:** To improve the efficiency of data storage, transmission and build resilience for government data storage. Financing support for data-backups through public cloud subscriptions enabling disaster risk management. Technical assistance would be provided on policies and institutional governance for data protection policies including operationalizing the new Data Protection Authority (DPA).

#### **1.2.3 Component 3: E-service market development and integration**

**Sub-component 3.1: Digital cross-border trade, payment and service enablers:** To support the creation of the Somalia's Digital Public Infrastructure, including enabling Digital Government frameworks, with an aim to expand adoption of e-services and foster the cross-border interoperability of such systems and solutions.

**Sub-component 3.2: Regional research and education networks (RENs), and training for digital skills:** To strengthen the higher educational network through the REN and integration with regional RENs allowing for network economies and knowledge transfer. Relatedly, leveraging enhanced capacity of universities through RENs and in partnership with the government, digital learning programs would be conducted for civil servants and university students.

#### **1.2.4 Component 4: Project Management and Implementation Support**

This component would finance the establishment and operations of the PIU's at MOCT for project implementation. Implementation would entail functions of project management and coordination, including procurement, financial management (FM), and M&E, as well as environmental and social safeguards management. Specifically, this component would consist of (a) operating and staff costs of the PIU, including the recruitment of expert consultants in key areas; (b) development and maintenance of a dedicated website for the project; (c) support for stakeholder consultations and M&E, including collecting gender disaggregated data; and (d) coordination with the regional PIU at IGAD level.



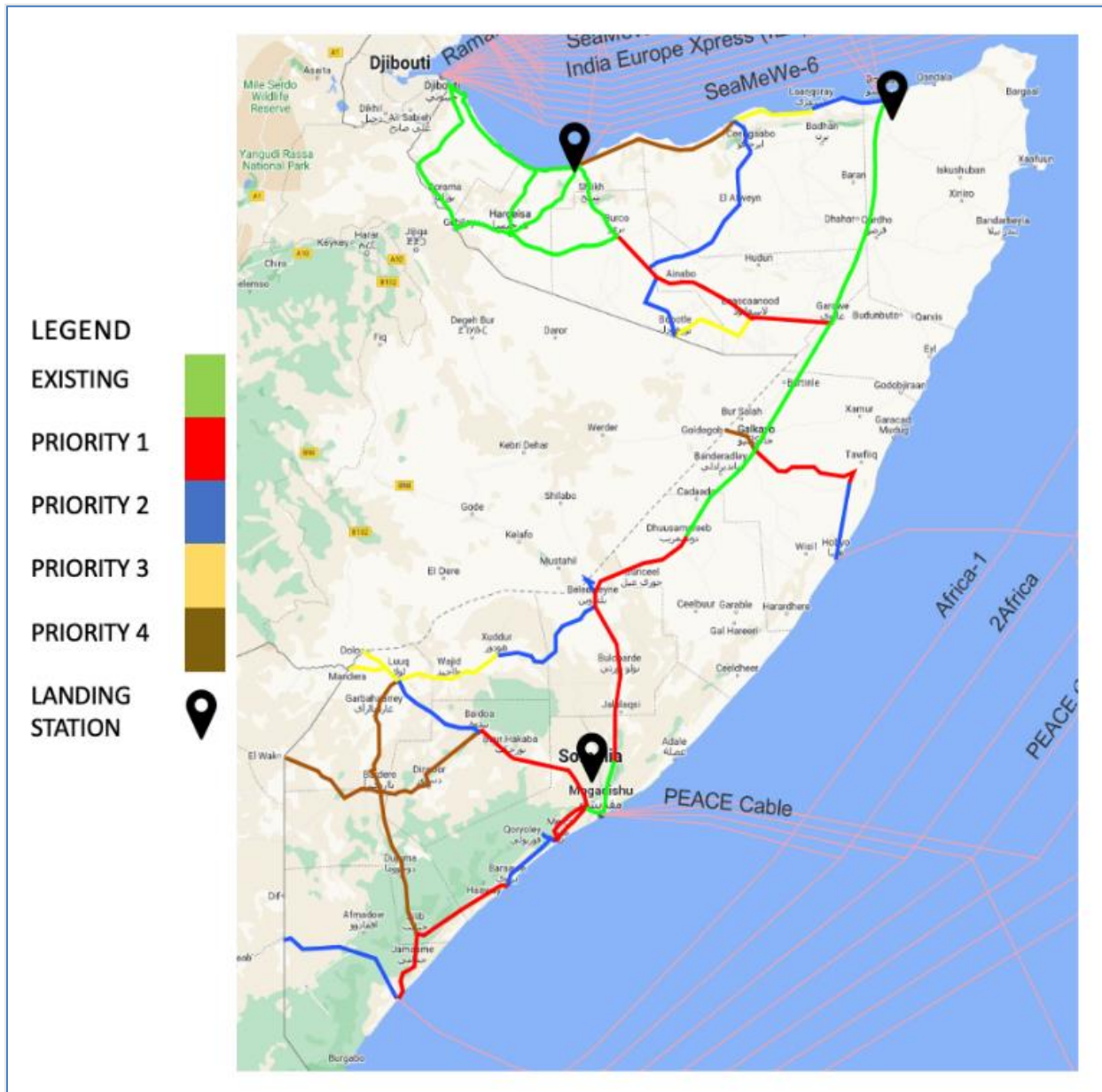


Figure 1-1: Priority fiber optic links, Somalia

### 1.3 Project Implementation Arrangements

**Regional Economic Communities (REC) activities will be implemented through two regional PIUs – at the Planning Directorate under the EAC and at the Trade Department under IGAD.** The regional PIUs will be responsible for overall implementation and coordination of project activities at regional level. At EAC, project implementation will leverage the procedures and structures, expanded as needed, of an existing PIU within the EAC Secretariat previously established under the *Eastern Africa Regional Statistics Program for Results* (P176371). At IGAD, project implementation will also leverage an existing PIU within the Trade Department – likely the PIU established under the *Food Systems Resilience Programme for Eastern and*

Southern Africa (P178566). This will allow the project to leverage existing implementation capacity, including familiarity of World Bank processes.

**In Somalia, a dedicated PIU will be established and maintained within MoCT, which will serve as the main implementing agency in Somalia.** A PIU will be established within the MoCT, which has a prior track-record of World Bank project implementation under the two phases of the *ICT Sector Support in Somalia Project* (P148588, P152358), which were completed with a “Satisfactory” rating. The PIU will include a Project Coordinator, one FM Specialist, one Procurement Specialist, one M&E Specialist, one Environment Specialists, one Social Specialist and Technical Specialists with subject matter expertise in areas such as connectivity infrastructure. **Table 1-1** below provides details of implementation arrangements

**Table 1-1: National Level Implementation Arrangements**

<b>PIU</b>	<b>New PIU at MoCT:</b> MoCT has a prior track-record of World Bank project implementation under the two phases of the <i>ICT Sector Support in Somalia Project</i> (P148588, P152358), which were completed with a “Satisfactory” rating.	
	<b>Members:</b> Recruitment or appointment of one Project Coordinator, FM Specialist <sup>8</sup> , Procurement Specialist, M&E Specialist, Environment Specialist, Social Specialist, Security Advisor, one Gender Based Violence/Gender Specialist (if needed) and Technical Specialists with subject matter expertise in areas such as connectivity infrastructure, data governance. The Project Coordinator, Procurement and FM specialists will be hired by effectiveness. Other roles are expected to be hired no later than three months after effectiveness.	
	<b>Note:</b> the PIU in Somalia will also be supported by focal point/coordinators for all Federal Member States (FMS), and a subsidiary PIU will be established in Somaliland consisting of a Project Coordinator, FM Specialist, Procurement Specialist, security officer, E&S Specialists to be recruited and/or appointed <sup>9</sup> for disbursement of funds to Somaliland on the basis of a signed subsidiary agreement	
	<b>Responsibilities:</b> The PIU will be primarily responsible for project implementation, including overseeing core project-related fiduciary functions, M&E and E&S commitments. It will also act as the single point of contact for the regional PIU at IGAD and EAC to facilitate collaboration on designing and implementing specific activities. The PIU will submit project reporting to a PSC as well as to the World Bank and engage with the TC(s) on specific matters requiring technical expertise/input on an ad-hoc basis. The detailed composition and role of the PIU will be set forth in the individual country PIMs <sup>10</sup> .	
<b>PSC</b>	<b>Chair:</b> Minister, MoCT <b>Vice-Chair:</b> State Minister, MoCT <b>Secretary:</b> PIU Project Coordinator <b>Members:</b> Representatives from MoCT, NCA, Ministry of Finance (MoF), Ministry of Commerce and Industry (MoCI), and Ministry of Planning (MoP), with additional Ministries, Department and Agencies (MDA) and FMS invited on an as needed basis, as well as members of the regional PIU at IGAD	<b>Chair:</b> Deputy Minister of MICT&PS <b>Vice-Chair:</b> Undersecretary, MICT&PS <b>Secretary:</b> PIU Project Coordinator <b>Members:</b> Representatives from MICT&PS, NCA, International Gateway, USAF, Ministry of Finance and Planning, Ministry of Roads and Bridges, Ministry of Transportation, Ministry of Higher Education, and Ministry of Trade and Industry as well as members of the regional PIU at IGAD and EAC
	<b>Responsibilities:</b> (a) approval of the AWPB; (b) biannual review of project progress; (c) review of procurement evaluations and approval; and (d) provision of strategic guidance and recommendations to	

<sup>8</sup> In Somalia, this may be a seconded Accountant from the Office of the Accountant General, rather than external recruitment of FM Specialist.

<sup>9</sup> E&S resources may for example be shared with other WB-financed project.

<sup>10</sup> These are expected to be prepared before project effectiveness.



	the PIU and the TC(s) related to project implementation. The Terms of Reference (ToR) for the PSC, including the required participants for quorum, will be detailed further in the national PIMs, to be prepared before effectiveness.	
TCs	<b>Members:</b> MoCT, NCA, MoCI, the National Identification and Registration Authority (DADSOM), Ministry of Environment, Ministry of Education, and Ministry of Public Works and FMS	<b>Members:</b> Representatives from MICT&PS, NCA, International Gateway, USAF, Ministry of Finance and Planning, Ministry of Roads and Bridges, Ministry of Transportation, Ministry of Higher Education, and Ministry of Trade and Industry as well as members of the regional PIU at IGAD and EAC
	<b>Responsibilities:</b> TCs will convene participation from the private sector and civil society as well as from relevant agencies deemed key to facilitating successful implementation and stakeholder management to support any technical-level decisions that require broader agreement, resolve operational issues or facilitate M&E and supervision. The PIU will interact with TC(s) on an <i>ad-hoc</i> basis, and the TC(s) will report to the PSC. The ToRs for the TC(s), some of which may have only a short duration, as dictated by project implementation timelines, will be detailed further in the country level PIMs.	

Figure 1-1 below provides implementation arrangement diagram

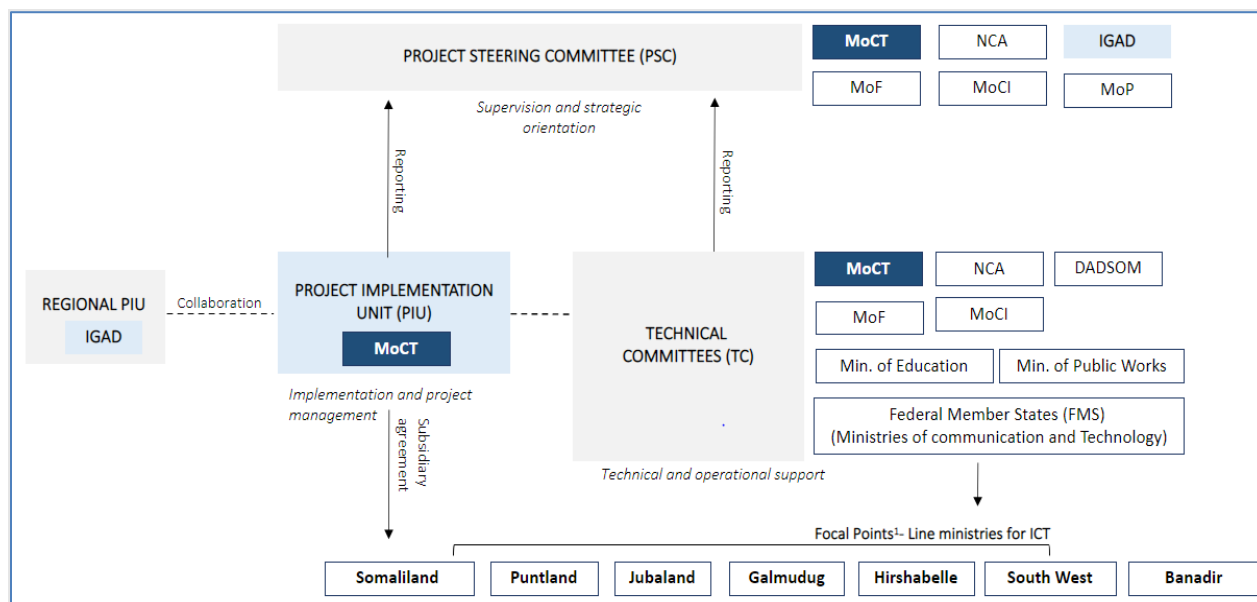


Figure 1-1 Implementation arrangements, Somalia

## 1.4 Objective, Scope and Approach

### 1.4.1 Objectives

The Security Risk Assessment (SRA) provides a summary of the contextual security situation within Somalia, as it stands. The assessment describes the scope of the project and provides project overview, including descriptions of what constitutes project workers, beneficiaries and project affected persons. The SRA identifies potential security risks and impacts of the EA-RDIP Somalia's future sites and provide thorough a Security Risks Assessment Management Framework (SRAMF) proposed mitigating measure for potential security risks and impacts. PIU will implement the measure in order to safeguard personnel and property. Specific objectives are provided below.

- To identify potential security risks and impacts to project workers and other stakeholders due to the proposed EA-RDIP interventions, in Somalia
- To assess the potential risks to Project property at project target areas in Somalia,
- To outline procedures and steps to be taken to address requirements of the World Bank on environmental and social standards applied to the proposed Project,
- To propose mitigation measures for the identified security risks and impacts as a result of project implementation,
- To define the required resources for the identified actions of the SRAMF,
- To assess and define the responsible actors, institutions and agencies for the planning and implementation of SRAMF
- Conduct consultative meetings with the responsible governmental, non-governmental and private sectors relevant to the subject and in relation to the scope of EA-RDIP Project activities
- Prepare a crisis management plan, within the Project Security Management Plan.

#### **1.4.2 Assessment Scope and Approach**

The assessment focusses on the five Federal Member States (FMS) of Somalia namely; Galmudug, Hirshabelle, Jubbaland, Puntland, Somaliland and South West. EA-RDIP interventions described under component 1, 2 and 3 will be implemented in all the FMS. The FMS have all characterized as volatile and fragile due to conflict between Al- Shabaab and the FGS, FMS and associated groups, the level of conflict and risks varies from state to state as detailed in this report. The assessment adopted below detailed approach

- Conducting an in-depth program implementation document review to understand program activities with a particular focus on environment and social risks (E&S) and security challenges in the process and as the result of implementing the project interventions;
- Reviewing the institutional and legal framework for the project implementation in light of mitigating the perceives E&S challenges;
- Examining regional and local security risks and impacts that would affect project implementation by conducting desk review and field based security risk assessment on project activities and related issues.
- Produce social risk assessment report with detailed implementation plan;

## 2 INTERNATIONAL STANDARDS AND GOOD PRACTICES

### 2.1 Somalia Context

Somali Xeer, or customary law, is a collection of unwritten agreements, passed down orally from generation to generation.<sup>11</sup> Xeer is used to manage inter-clan relations, including marriage, hospitality, rules of resource use, and compensation for crimes committed by members of one clan against another; most precepts are “about collective defence and security and political cohesion in general”. Decisions by the clan elders, usually of the offending and offended group, are precedent-based, but may also incorporate Sharia law and may fluctuate based on area or clan. Xeer holds the entire mag-paying group collectively responsible for a crime committed by one or more of its members. If the mag is not paid, then the aggrieved clan may opt to kill the criminal or other members of that person’s clan—a form of collective criminal responsibility that in theory acts as a deterrent against crimes being committed in the first place, and as a way of enforcing payment compensation. Non-payment and subsequent attacks can set off a cycle of blood vengeance between two clans until and unless elders agree on a resolution, for example through peace negotiations or further mag-payment.

Xeer is one of the most common forms of dispute resolution in Somalia; by one estimate, “between 80-90% of all legal cases in Somalia are settled through the informal justice system, of which Xeer is the most prominent.” However, Xeer can result in discriminatory outcomes for persons from minority groups and for women, especially in the context of gender-based violence (GBV). Additionally, many persons turn to local ulamas (Muslim scholars) for them to apply Sharia law to disputes; reportedly, people may turn to ulamas when a dispute has not been immediately resolved by Xeer. In Somaliland, an estimated 30 per cent of legal cases are settled through Sharia law

### 2.2 World Bank Environment and Social Standards

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

ESS1 addresses the need to assess environmental and social assessment risks and impacts, including those related to human security. As provided Annex 15(e) in ESS1, social and conflict analysis is an instrument that assesses the degree to which the program may (a) exacerbate existing tensions and inequality within society (both within the communities affected by the program and between these communities and others); (b)

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<sup>11</sup> “Xeer is not a written set of legal doctrines, but an informal system that is carefully calibrated to settle disputes among segmented clan communities.” Heritage Institute, *Rebuilding Somalia’s Broken Justice System*, 6 January 2021, [www.heritageinstitute.org/wp-content/uploads/2021/01/JusticeReport-Jan-6-.pdf](http://www.heritageinstitute.org/wp-content/uploads/2021/01/JusticeReport-Jan-6-.pdf), p. 27. “As neighbouring clans historically competed over scarce environmental resources – particularly land and water customary code of conduct, known as Xeer, was developed to settle disputes and maintain the social order. The sources of Xeer precede Islamic and colonial traditions, and are generally considered to be the agreements reached by elders of various clans who lived and migrated adjacent to one another, in an analogous way to court precedents. However, it is not a written legal code, but rather a tradition that has been passed down orally from one generation to the next.” The African Centre for the Constructive Resolution of Disputes, *Reinvigoration of Somali Traditional Justice through Inclusive Conflict Resolution Approaches*, 12 October 2017, [www.accord.org.za/conflict-trends/reinvigoration-somali-traditional-justiceinclusive-conflict-resolution-approaches/](http://www.accord.org.za/conflict-trends/reinvigoration-somali-traditional-justiceinclusive-conflict-resolution-approaches/).

have a negative effect on stability and human security; (c) be negatively affected by existing tensions, conflict and instability, particularly in circumstances of war, insurrection and civil unrest. The social and conflict analysis will be carried by the security firm to be hired and shall form part of the Local site specific Security Management Plans.

**2.2.2 ESS2: Labour and Working Conditions**

ESS2 sets out the terms and conditions of employment for employing or otherwise engaging workers on the program, specifies the requirements, standards to be met, policies, and procedures to be followed, assesses risks, and proposes implementation of compliance measures. The SRA is developed to help avoid, mitigate, and manage security risks and impacts in relation to program workers and ensure non-discrimination, equal opportunity, protection, fair treatment, and safe and healthy working conditions.

**2.2.3 ESS4: Community Health and Safety**

ESS4 addresses the health, safety, and security risks to and impacts on program-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.

As set out in ESS4 Paragraph 24, when the Borrower retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by these security arrangements to those within and outside the program site. In making such arrangements, the Borrower will be guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers. 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.

The provision in Paragraph 25 states that the Borrower will seek to ensure that government security personnel deployed to provide security services act in a manner consistent with Paragraph 24 indicated above, and encourage the relevant authorities to disclose the security arrangements for the Borrower’s facilities to the public, subject to overriding security concerns.

As per Paragraph 26, the Borrower will: (i) make reasonable inquiries to verify that the direct or contracted workers retained by the Borrower to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) require them to act within the applicable law and any requirements set out in the Environmental and Social Commitment Plan (ESCP).

Furthermore, as given in Paragraph 27, the Borrower will review all allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence and, where necessary, report unlawful or abusive acts to relevant authorities.

#### **2.2.4 World Bank's Good Practice Note on Assessing and Managing Risks of the use of Security Personnel**

When the Borrower retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by these security arrangements to those within and outside the Program site. In making such arrangements, the Borrower will be guided by the principles of proportionality and Good International Practices, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers. 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 of the threat.

The Borrower will seek to ensure that government security personnel deployed to provide security services act in a manner consistent with statements in the above paragraph, and encourage relevant authorities to disclose the security arrangements for the Borrower's facilities to the public, subject to overriding security concerns. The Borrower will (i) make reasonable inquiries to verify that the direct or contracted workers retained by the Borrower to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) require them to act within the applicable law and any requirements set out in the ESCP. The Borrower will review all allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and where necessary, report unlawful acts to relevant authorities."

Decisions on the appropriate scope of the Programs security arrangements are guided by an assessment of (a) potential risks to the Programs personnel and property, which may require a security response; (b) appropriate responses to the identified security risks; (c) potential impacts of a security incident on the Program, local communities, and other parties; and (d) potential mitigation measures.

The security arrangements for a Program may themselves pose risks to, and impacts on, Program workers and Local communities. It is important to take these risks and impacts into consideration and to determine measures to address them, and this should be part of the ongoing stakeholder engagement on the Program, as described in ESS10. Program-level grievance mechanisms that are available to Program workers, local communities, and other stakeholders allow them to provide feedback on the Program's security arrangements and personnel.

Periodic assessment of security risks during the life of the Program allows security arrangements to be updated to reflect any new risks or changes in the operating environment. It is good practice for security arrangements to be reviewed annually, or when a major event occurs that could affect the security of the Program or the Program's operating environment.

## 2.2.5 Additional World Bank References

Additional World Bank references are presented below.

- World Bank Corporate Security Department:
- <http://workgroup.worldbank.org/org/units/GSD/GSDCS/Pages/Travel-Security.aspx>
- World Bank Corporate Security Courses  
<http://workgroup.worldbank.org/org/units/GSD/GSDCS/Pages/Course-Offerings.aspx>

## 2.3 International Standards and Good Practice

There are also other international standards which could be referenced in the preparation, monitoring and implementation of upcoming EA-RDIP Security Management Plan. Common to these Good International Practices they all emphasize that the use of security forces is based on the concept that providing security and respecting human rights can and should be consistent. This translates into implementation of policies and practices that ensure security provision is carried out responsibly, with any response being proportional to the threat.

Proactive communication, community engagement, and grievance redress are central to this approach. Communications shall also often be performed through collaboration between security and community relations departments. Gender considerations are also important, as women often have different experiences and interactions with security personnel. The specific international standards and links for the full document are indicated below.

- UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials: [www.ohchr.org/EN/ProfessionalInterest/Pages/UseOfForceAndFirearms.aspx](http://www.ohchr.org/EN/ProfessionalInterest/Pages/UseOfForceAndFirearms.aspx)
- UN Code of Conduct for Law Enforcement Officials:
- [www.ohchr.org/EN/ProfessionalInterest/Pages/LawEnforcementOfficials.aspx](http://www.ohchr.org/EN/ProfessionalInterest/Pages/LawEnforcementOfficials.aspx)
- Voluntary Principles (VPs) on Security and Human Rights:
- <http://www.voluntaryprinciples.org/what-are-the-voluntary-principles>
- International Code of Conduct for Private Security Service Providers. [https://icoca.ch/wp-content/uploads/2022/01/INTERNATIONAL-CODE-OF- CONDUCT\\_Amended\\_2021.pdf](https://icoca.ch/wp-content/uploads/2022/01/INTERNATIONAL-CODE-OF- CONDUCT_Amended_2021.pdf)
- Armed Conflict Location and Event Data Program (ACLED, which has a useful risk dashboard tool: <https://www.acleddata.com/>)
- International Finance Corporation (IFC) Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts, 2017 (available in English, French, Spanish) [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_handbook\\_securityforces](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_securityforces)

## 3 SECURITY AND CONFLICT BACKGROUND

### 3.1 Security and Conflict Background

The SRA provides an overview understanding of the current situation across Somalia (FMS) from a political and security perspective. The main risks discussed in this report revolve around issues listed below.

- Armed militia groups<sup>12</sup>
- Political Instability
- Clan Conflicts
- Conflicts over pasture and water
- Calamities such as Flooding
- Border Dispute with Somaliland

The information used to package the SRA and SRAMF was gathered from literature review from previous similar reports, expertise working in Somalia on similar bank funded projects and intelligence information from UNCHR report<sup>13</sup>. Somalia ranks second on the Fragile State Index from 2019 with a total score of 112.3, only topped by Yemen with a score of 113.5.<sup>14</sup> Somalia's indicators on factionalized elites, and demographic pressures score the highest.

#### **Nature of Risks / Conflicts**

There is significant conflict at different levels in Somalia. Some insecurity stems from clan competition, which goes back to historical movements and power distribution. 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<sup>15</sup>. 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. Long and well documented records of conflict and cooperation over access to water and pasture in pastoralism domain exist<sup>16</sup>. 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.

The FGS, supported by the African Union's AMISOM force and other foreign militaries, has been engaged in a challenging internal armed conflict with the Somali Islamist group, Al Shabaab continues to control or influence large swaths of South-Central Somalia. It also maintains a significant presence in Northern

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<sup>12</sup> Al-Shabaab

<sup>13</sup> UNHCR International Protection Considerations with Regard to People Fleeing September 2022

<sup>14</sup> Fragile State Index 2019, accessed at: <https://fragilestatesindex.org/data/>

<sup>15</sup> Lewis (1961) *A Pastoral Democracy*. Lewis (1998) *Understanding Somalia*. DFID (2005) *Somalia: Drivers of Conflict*. Gomes (2006) *Access to water for pastoral resources management*

<sup>16</sup> E.g.: *A pastoral democracy*, Lewis (1961), *Understanding Somalia*, DFID (2005), *Somalia: Drivers of Conflict*, Gomes (2006), *Natural Resources & conflict management- the case of Land*, Economic Commission for Africa Sub-Regional Office for Eastern Africa (SRO-EA, 2012).

Puntland. These AS areas are generally beyond urban centres secured by the African Union's AMISOM, or the FMS and FGS forces. As a consequence, AS is able to move relatively freely throughout the territory. This, in turn, has brought the conflict to major urban centres, and particularly to Mogadishu, where several deadly, mass-casualty attacks have occurred over recent years.

Importantly, Al Shabaab has ensured considerable revenue streams through a rigid system of taxation, supplemented by considerable business interests. The weakness of the Somali judicial system has seen many rural Somalis turn to Al Shabaab courts for swift justice.

Al Shabaab is avowedly opposed to the FGS and to all entities, including humanitarian and development aid agencies who collaborate with the Government. This reality severely restricts the ability of most actors to directly operate beyond urban centres. For the rare access permitted to its areas, Al Shabaab imposes significant levies, often in the form of pro rata taxation on the value of aid on offer. Somali businesses as well as many forms of land transactions are similarly subject to AS taxation. Together with the provision of justice, this means that Al Shabaab is taking over quasi-governmental functions.

In terms of freedom of movement for civilian populations, different armed groups maintain checkpoints along key arteries of the country to extract fees from travelers. People are thereby associated with their clans, and have difficulties moving and working in areas in which their clans are not prominent. Even government checkpoints can be little efficient, as they are often subject to corruption.<sup>17</sup>

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 project activities. These include militant attacks, hijackings, abductions, and killings. The state security apparatus is thereby very weak, and is underpinned by clan considerations as well. There are sometimes blurred lines between the state security apparatus, local militia or other armed factions. In addition, clan elders will often maintain complex networks in their relations with both Government and AS commanders in their respective areas. AS itself, recruits from within the clan structures and has close links with family groupings, in this respect.

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'<sup>18</sup> and one of the 'worst countries to be a mother'<sup>19</sup>. 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 apparatus has failed survivors of conflict-related SGBV<sup>20</sup>, as well as the many survivors of domestic violence and FGM. Protracted conflict and

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<sup>17</sup> Janice Sanya and Ian Mwenda, Mogadishu. When Checkpoints don't work, Horn International Institute for Strategic Studies, accessed at: <https://horninstitute.org/mogadishu-when-checkpoints-dont-work/>

<sup>18</sup> See: <http://www.theguardian.com/world/interactive/2011/jun/15/gender-afghanistan>

<sup>19</sup> Save the Children, 'The Urban Disadvantage. State of the World's Mothers 2015', Fairfield 2015, p.9.

<sup>20</sup> Implementation of the Beijing Platform for Action. Beijing +20 Review. Somalia Country Report 2014, p. 14



fragility have increased fundamentalist religious interpretations, including the acceptance of pharaonic-type FGM by a younger generation.<sup>21</sup>

The ongoing fragility and conflict in Somalia is responsible for an increasing number of Internally Displaced Persons (IDP) 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, SGBV (particularly rape) is widespread, including as a tool between social units in conflict.<sup>22</sup> The UN has consistently reported that between 75-85% of GBV incidents collected through the Gender-Based Violence Information Management System (GBVIMS) are perpetrated against IDPs.<sup>23</sup>



Figure 3-1: Map of Somalia<sup>24</sup>

<sup>21</sup> See, for example, NAFIS Network/MOLSA, Assessment of the Prevalence, Perception and Attitude of Female Genital Mutilation in Somaliland, 2014.

<sup>22</sup> See, for example, UNICEF ‘Sexual Violence as a Weapon of War, accessed at:

<http://www.unicef.org/sowc96pk/sexviol.htm>

<sup>23</sup> Somalia Humanitarian Country Team, 2019, Humanitarian Needs Overview, accessible at [https://reliefweb.int/sites/reliefweb.int/files/resources/Somalia\\_2019\\_HNO.PDF](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, accessible at

[https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec\\_GBV%20Bulletin%20%283%29.pdf](https://somalia.unfpa.org/sites/default/files/pub-pdf/Dec_GBV%20Bulletin%20%283%29.pdf); UNFPA, August 2015, Somalia: Gender Based Violence Sub-cluster Bulletin, accessible at <https://reliefweb.int/report/somalia/somalia-gbv-sub-cluster-bulletin-1-january-august-2015>

<sup>24</sup> Source: UN Geospatial Information Section. © United Nations

## 3.2 Security Situation and Security Incidences

The FGS is led by President Hassan Sheikh Mohamud, who was elected in May 2022 by the two houses of Parliament. The member House of the People (“Lower House”) and the 54-member Upper House had been extended multiple times since its creation in 2004. Somalia comprises five Federal Member States (FMS) - Galmudug, Hirshabelle, Jubbaland, Puntland and South West the Benadir Regional Administration, as well as the region of Somaliland, which claims independence. Puntland operates as an autonomous region but still considers itself part of Somalia.

The security situation in Somalia remains volatile and characterized by entrenched conflict between Al-Shabaab and the FGS, FMS and associated groups<sup>25</sup>. Between 1<sup>st</sup> January 2021 and 1<sup>st</sup> August 2022, the Armed Conflict Location & Event Data Project (ACLED) recorded 4,090 incidents of battles, explosions/remote violence and violence against civilians, causing 5,520 fatalities<sup>26</sup>.

### **Al-shabaab Controlled Areas**

According to the Panel of Experts, 2021, From January to July 2021, the United Nations Assistance Mission in Somalia (UNSOM) recorded 708 civilian casualties, mostly attributed to Al-Shabaab. By 1 August 2021, there were nearly 3 million internally displaced persons in Somalia, 537,000 of whom had fled their homes between January and July 2021 alone, with conflict-related displacement accounting for over 70 per cent of the cases. The regions most affected by the groups’ activity were Lower Shabelle, Benadir and Middle Shabelle. Between 16<sup>th</sup> December 2020 and 6<sup>th</sup> September 2021, Al-Shabaab attacked the Somalia National Army (SNA), FMS security forces and international forces at least 1,047 times, mainly in Jubbaland, South-West State, Hirshabelle and Galmudug.

As of October 2021, Al-Shabaab directly controlled “most towns in Jamame District, Lower Juba; Jilib, Bu’ale and Sakow in Middle Juba; parts of Baardheere in Gedo; towns located in southern Dinsor and Burhakaba Districts in Bay Region; Adale and Adan Yabal in Middle Shabelle; and El Dher, El Bur and Harardhere in Galmudug.”<sup>27</sup> During 2021, Al-Shabaab expanded its control in Galmudug, exploiting the vacuum resulting from the demobilization of Ahlu Sunna wal Jama’a. The group controls roads through many parts of the country, including in Jubbaland, South West and in Lower Shabelle. In areas where it has influence but not control, Al-Shabaab imposes blockades and compels local populations and clan elders to support its cause.

Additionally, Al-Shabaab maintains a large presence in Mogadishu and exerts significant influence over the population. From 16<sup>th</sup> December 2020 to 6<sup>th</sup> September 2021, the Panel of Experts documented “incidents

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<sup>25</sup> UN Security Council, Situation in Somalia, 13 May 2022, S/2022/392, [www.ecoi.net/en/file/local/2073538/N2233663.pdf](http://www.ecoi.net/en/file/local/2073538/N2233663.pdf), paras 13-21; UN Security Council, Situation in Somalia, 8 February 2022, S/2022/101, [www.ecoi.net/en/file/local/2068141/S\\_2022\\_101\\_E.pdf](http://www.ecoi.net/en/file/local/2068141/S_2022_101_E.pdf), paras 19-27; UN Security Council, Letter Dated 5 October, 6 October 2021, S/2021/849, [www.ecoi.net/en/file/local/2062553/S\\_2021\\_849\\_E.pdf](http://www.ecoi.net/en/file/local/2062553/S_2021_849_E.pdf), pp. 4, 7-17.

<sup>26</sup> Al-Shabaab was involved in at least 3,302 of these incidents. The regions most affected were Lower Shabelle (1042), Benadir (904), Jubbaland (672), Bay (335) and Middle Shabelle (270). ACLED, Data Export Tool, accessed 25 August 2022, <https://acleddata.com/data-export-tool/>.

<sup>27</sup> UN Security Council, Letter Dated 5 October, 6 October 2021, S/2021/849, [www.ecoi.net/en/file/local/2062553/S\\_2021\\_849\\_E.pdf](http://www.ecoi.net/en/file/local/2062553/S_2021_849_E.pdf), para. 11. See also, GWU, *Inside the Minds of Somalia’s Ascendant Insurgents*, March 2022, [https://extremism.gwu.edu/sites/g/files/zaxdzs2191/f/Al-Shabaab-IMEP\\_Bacon\\_March-2022.pdf](https://extremism.gwu.edu/sites/g/files/zaxdzs2191/f/Al-Shabaab-IMEP_Bacon_March-2022.pdf), p. 76.

attributed to Al-Shabaab in the 17 districts of Benadir Region including assassinations, hit-and-run attacks on government positions and grenade, improvised explosive device and mortar attacks.”<sup>266</sup> Across Somalia, Al-Shabaab’s activities increased by 17 per cent from 2020 to 2021.

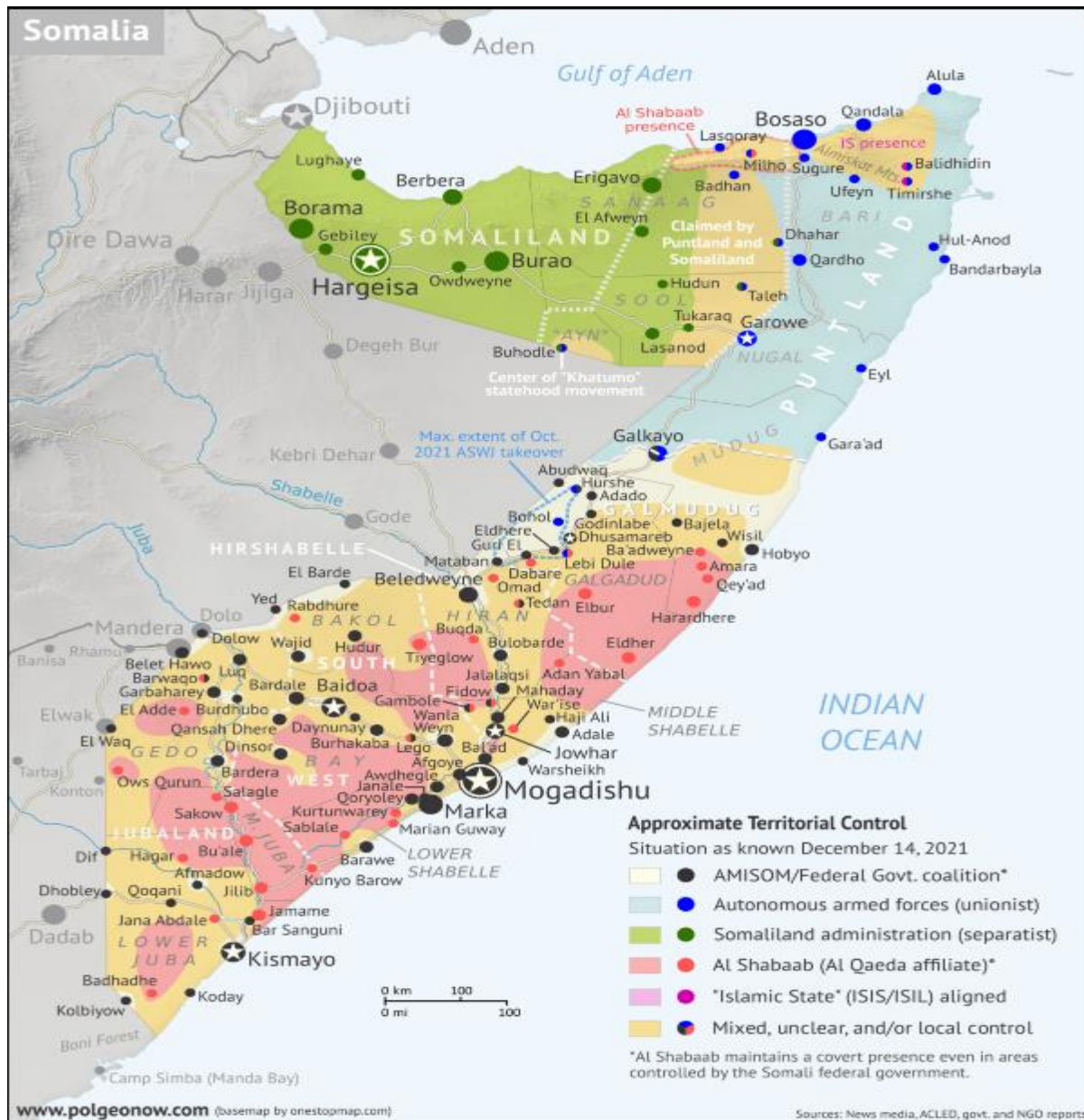


Figure 3-2: Map illustrating territorial control<sup>28</sup>

<sup>28</sup> Created by Evan Centanni and Djordje Djukic

### 3.3 Linkage of EA-RDIP proposed Intervention to Threat Map

The maps in **Figure 3-3 and 3-4** provides an overlay of proposed priority fiber links planned to be implemented under EA-RDIP component 1 and 2 on existing threat map for Somalia. **Table 3-1** below provide a summary of interpretation of level of risks with regards to proposed intervention for each Federal Member State.

**Table 3-1:**

FMS	Priority 1 (Yes/No)	Priority 2 (Yes/No)	Priority 3 (Yes/No)	Priority 4 (Yes/No)	Nature Threat	Types of Risk
Jubaland	Yes	Yes	Yes	Yes	Extreme	<ul style="list-style-type: none"> <li>• Al-Shabaab Attacks</li> <li>• Political Instability</li> <li>• Clan Conflicts</li> <li>• Political Instability</li> <li>• Conflicts over pasture and water</li> <li>• Flooding</li> </ul>
South West	Yes	Yes	Yes	No	Extreme	
Hisharbelle	Yes	Yes	No	No	Extreme	
Gulmudug	Yes	Yes	No	No	Extreme	
Puntland	Yes	No	No	No	Substantial	<ul style="list-style-type: none"> <li>• Political Instability</li> <li>• Clan Conflicts</li> <li>• Border Dispute with Somaliland</li> </ul>
Somaliland	Yes	Yes	Yes	No	Substantial	<ul style="list-style-type: none"> <li>• Border Dispute with Puntland</li> <li>• Clan Conflicts</li> </ul>





### 3.4 Threat Scenario

Threat Scenarios that are prevalent across the country as mapped out in the threat map revolve around threats to; Infrastructure; to Movement, to Worksite and Local Population and workers listed below.

Category of Workers / Affected Persons	Definition
<b>Direct Workers</b>	People employed directly by the Ministry of Communication and Telecommunication, MoCT, FGS Technical MDAs, and FMS to work specifically in relation with the Project in the PIU in Mogadishu, including staff of the PIU and the FMS State Project Teams, and FMS Project Focal Points. The category also includes any personnel directly Contracted by FGS or FMS Ministries or entities at various project sites within the states/counties.
<b>Contracted Workers.</b>	People engaged through third parties to perform work on the project, regardless of location. Under this category are included, employees of any non-governmental implementers, including international or national NGOs, CSOs or contractors, or Independent Verification Agents. The category also includes people engaged by the Government's primary suppliers. These include, for example, suppliers of road rehabilitation materials like gravel or other goods required.
<b>UN Contracted Workers.</b>	This category includes all personnel working on the project that is contracted by UN agencies and entities, including staff or consultants.
<b>Community Workers.</b>	People employed or engaged in providing community-based project interventions. These will include community members who will be working in minor road or other infrastructure works.
<b>Project-Affected Person</b>	This group includes anyone who is affected by the project in any way, and could be put in harms way through project activities. This can be, for example, a beneficiary, or an informal local authority that has been consulted on project activities.

Table 3-1 presents nature of threat to the groups identified above

Table 3-2: Threat Scenarios

Target	Nature of Threat
<b>Threat to Infrastructure</b> - These are permanent structures that are related to any Implementing Partners or Project staff (i.e. offices, compounds, government buildings, hotels, etc)	<ul style="list-style-type: none"> <li>Vehicle Born Improvised Explosive Devices (VBIED)</li> <li>Person Born Improvised Explosive Devices (PBIED)</li> <li>Improvised Explosive Devices (IED)</li> <li>Hand Grenade Attack</li> <li>Rocket-Propelled Grenade (RPG) Attack</li> <li>Complex Attack</li> <li>Indirect Fire Attack</li> <li>Civil Unrest</li> <li>Shooting</li> <li>Armed Robbery/Raid</li> <li>Sabotage</li> <li>Intimidation or Extortion</li> <li>Workplace Violence</li> <li>GBV</li> <li>Arson</li> <li>Illegal blockade or occupation of infrastructure by hostile protestors</li> <li>Compound takeover or hostage taking by hostile elements</li> <li>Kidnapping</li> </ul>

<p><b>Threat to Movement</b> - These are any moves conducted by anyone on project business</p>	<p>           VBIED            PBIED            IED            RPG Attack            Complex Attack/Ambush            Indirect Fire Attack            Civil Unrest            Shooting            Hijack            Running Attack            GBV            Kidnapping         </p>
<p><b>Threat to Worksite</b> - Semi permanent locations, utilised for a defined period of time whilst project works are ongoing</p>	<p>           VBIED            PBIED            IED            Hand Grenade Attack            Complex Attack            Indirect Fire Attack            Civil Unrest            Shooting            Armed Robbery/Raid            Sabotage            Intimidation or Extortion            Workplace Violence            GBV            Arson            Illegal Blockade/Occupation of infrastructure by hostile protestors            Compound Takeover/Hostage Taking by hostile elements            Kidnapping         </p>
<p><b>Threat to Local Population</b> - Any local population whose security is adversely affected by the presence of project activity</p>	<p>           Complex Attack            Indirect Fire Attack            IED            Hand Grenade Attack            Bombing            Intimidation or Extortion            GBV            Civil Unrest         </p>

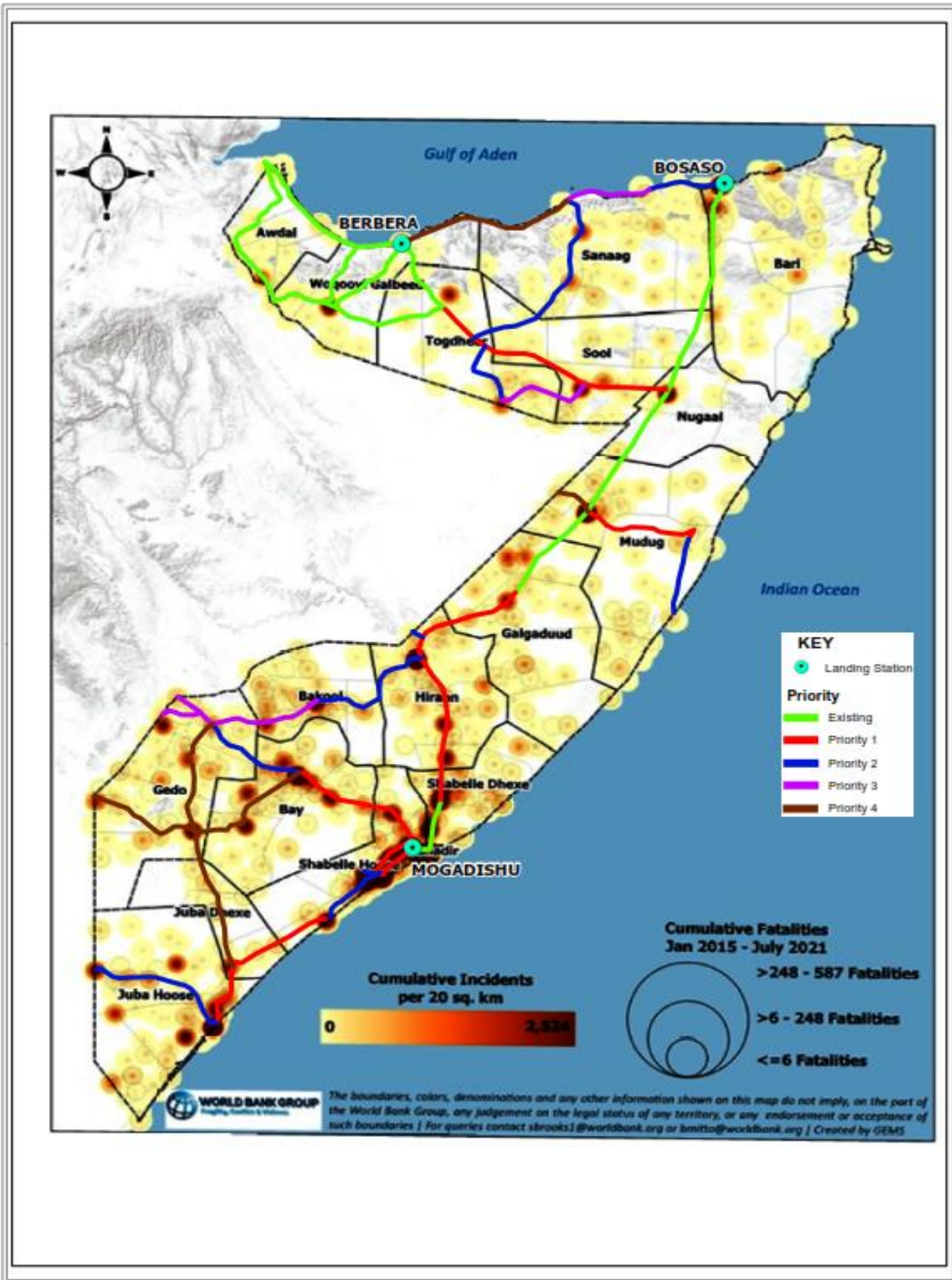


Figure 3-4: EA-RDIP Intervention on Threat Map



## 4 DETAILED RISK SITUATION IN THE FEDERAL MEMBER STATES (FMS)

### 4.1 Overview

The report provides detailed describing of clan dynamic in South Central Somalia related to Banadir<sup>29</sup>, additionally clannism in Puntland and Somaliland is also discussed. Somalis are not ethnically homogenous, and there are significant variations in culture and language, especially between communities in southern and central Somalia<sup>30</sup>. There is, however, a “dominant” ethnicity associated with the northern pastoralist groups, the Samaal, whose social structures have become pervasive in Somali society over several centuries and who traditionally spoke Af-Maxaa-tiri, which is present-day Somalia’s official language<sup>31</sup>. The history of the Samaal expansion into modern-day southern and central Somalia has been one of interaction with, but eventually domination of other ethnic groups, including of the sedentary agro-pastoralists in the inter-riverine area, as well as other minority or “outcaste” groups. The latter non-Samaal groups have either been expected to adapt to Samaal culture, or face social exclusion, discrimination and, in some cases, persecution<sup>32</sup>.

The position of a Somali vis-à-vis the clan system of the Samaal continues to be a primary defining factor in that person’s social relations, access to justice and other civil and political rights, and their political allegiances. The clan structure is based on a “vertically oriented segmentary lineage system” in which an individual’s clan identity is passed down through the male line. The segmentary lineage system can be differentiated into categories of clan-family, clan, sub-clan, primary lineage and diya-paying group (also called mag-paying group) as divisions of varying size.

The “most basic and functional lineage unit” is the diya or mag-paying group, which consists of a “few hundred to a few thousand men” who trace their lineage to a common ancestor removed 4-8 generations and which is responsible for paying blood compensation, which is 100 camels in the case of homicide according to Sharia law. The foundation of Somali customary law, called Xeer, is that violations can be compensated by a mag-

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<sup>29</sup> Somali banaadir, which means “coast”, in reference to the southern Somali coastal cities of Cadalle, warsheikh Mogadishu, Merka and Barawa

<sup>30</sup> World Bank, *Conflict in Somalia: Drivers and Dynamics*, January 2005, <http://siteresources.worldbank.org/INTSOMALIA/Resources/conflictsomalia.pdf>, p. 7.

<sup>31</sup> The lineages of the pastoral Somalis are united by a common, mythological perception of direct lineal descent from the forefather Samaal and the household of the prophet Mohammed, notably the Qurayshi clan, and specifically his cousin, Aqil Bin Abi-Talib. Today, this segmentary clan system is represented by three to four main clan families descending from Darood, Hawiye, Dir and depending on who you ask, Isaaq.” Danish Refugee Council (DRC) / OXFAM Novib, *The Predicament of the ‘Oday’: The Role of Traditional Structures in Security, Rights, Law and Development in Somalia*, November 2006,

[https://cdn.logcluster.org/public/documents/Gundel\\_The%2520role%2520of%2520traditional%2520structures.pdf](https://cdn.logcluster.org/public/documents/Gundel_The%2520role%2520of%2520traditional%2520structures.pdf) (hereafter: DRC / OXFAM Novib, *The Predicament of the ‘Oday’*, November 2006, [https://cdn.logcluster.org/public/documents/Gundel\\_The%2520role%2520of%2520traditional%2520structures.pdf](https://cdn.logcluster.org/public/documents/Gundel_The%2520role%2520of%2520traditional%2520structures.pdf)), p. 5. These are sometimes referred to as the “noble” clans. ACCORD, *Clans in Somalia: Report on a Lecture by Joakim Gundel, COI Workshop Vienna*, 15 May 2009, [www.ecoi.net/en/file/local/1193130/90\\_1261130976\\_accord-report-clans-in-somalia-revised-edition-20091215.pdf](http://www.ecoi.net/en/file/local/1193130/90_1261130976_accord-report-clans-in-somalia-revised-edition-20091215.pdf).

<sup>32</sup> See University of Milan-Bicocca, *The Gaboye of Somaliland: Legacies of Marginality, Trajectories of Emancipation*, 2017, [https://boa.unimib.it/retrieve/handle/10281/180856/257222/phd\\_unimib\\_734232.pdf](https://boa.unimib.it/retrieve/handle/10281/180856/257222/phd_unimib_734232.pdf); Minority Rights Group International (MRG), *No Redress: Somalia’s Forgotten Minorities*, 2010, <https://minorityrights.org/wp-content/uploads/old-site-downloads/download-912-Click-here-to-download-full-report.pdf>; OCHA, *A Study on Minorities in Somalia*, 1 August 2002, <https://reliefweb.int/report/somalia/study-minorities-somalia>. For more information on the current treatment of minority groups in Somalia, see Section III.A.4

paying group. Therefore, each member of a clan is part of a mag-paying group, and membership in the group defines a person's social, political and legal participation in society.

## 4.2 Banadir / Mogadishu

### 4.2.1 Clans and Sub Clans

#### Clan Dynamics

As of February 2022, Banadir Regional Administration, which coincides with the capital city of The Administrative Region is of significant political importance for the FGS<sup>33</sup>, as it “hosts the FGS, has an airport and a port Mogadishu, was the only region in Somalia completely controlled by the FGS. (the country's largest two revenue sources) and is the only city where the FGS collects taxes”. In 2019, the President appointed Omar Mohamud Mohamed Filish as the Mayor of Mogadishu and the regional Governor of Banadir<sup>34</sup>. The previous mayor, Abdirahman Omar Osman, was killed by an Al-Shabaab suicide attack on 24 July 2019. 166 The region is allocated five seats in the Lower House of Parliament.<sup>167</sup> However, the region holds no seats in the Upper House of Parliament, a fact which has caused protests in the past and which Mogadishu residents allege strips them of adequate representation.<sup>168</sup>

The main clans in Mogadishu are the Hawiye subclans Abgaal, Habar Gedir and Murasade, along with the Benadiri, specifically the Reer Hamar<sup>35</sup>. Banadir, specifically the city of Mogadishu, is a complex and diverse environment. The city has representatives from all the main Somali clans; and many of the sub-clans. Alongside the clans there are large Internally Displaced People (IDP) camps, private and public sector entities and Somalia's political elite. **Table 4-1** below provides a breakdown of the major clans and sub-clans present in the region.

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<sup>33</sup> Heritage Institute, *State of Somalia Report 2021*, 8 February 2022, <https://reliefweb.int/sites/reliefweb.int/files/resources/SOS-REPORT-2021English-version.pdf>, p. 28.

<sup>34</sup> Somali Dispatch, *Somali President Appoints New Governor for Banadir*, 23 August 2019, [www.somalidispach.com/featured/somali-president-appoints-new-governor-for-banadir/](http://www.somalidispach.com/featured/somali-president-appoints-new-governor-for-banadir/); Garowe Online, *Somalia's President Fires Army Chiefs, Appoints New Mogadishu Mayor*, 22 August 2019, <https://garoweonline.com/en/news/somalias-president-fires-army-chiefs-appoints-new-mogadishu-mayor>.

<sup>35</sup> The three Hawiye subclans reportedly constitute 75 per cent of Mogadishu's population. The Benadiri (Reer Hamar) live primarily in the old medieval town. 2021, [https://euaa.europa.eu/sites/default/files/publications/2021\\_09\\_EASO\\_COI\\_Report\\_Somalia\\_Security\\_situation\\_new\\_AC.pdf](https://euaa.europa.eu/sites/default/files/publications/2021_09_EASO_COI_Report_Somalia_Security_situation_new_AC.pdf), pp. 88-89. The Reer Hamar are unique among minority groups and have “mitigating factors” which offset their minority group status, namely that their diaspora raised their profile inside and outside of Somalia, persons from the group have been successful in running for political office and they have been able to create ties to the majority Hawiye clan via intermarriage. ACCORD, *Clans in Somalia: Report on a Lecture by Joakim Gundel, COI Workshop Vienna*, 15 May 2009, [www.ecoi.net/en/file/local/1193130/90\\_1261130976\\_accord-report-clans-in-somalia-revised-edition-20091215.pdf](http://www.ecoi.net/en/file/local/1193130/90_1261130976_accord-report-clans-in-somalia-revised-edition-20091215.pdf), pp. 17-18.

**Table 4-1: Major Clans and Sub Clans within Banadir Region**

Clan	Description
Hawiye	<p>The Hawiye Clan is generally considered to be the most influential clan in the Banadir region. The major sub-clans of Hawiye are Abgaal, Murusade and Haber Gider. There are many other, comparably small, sub-clans of Hawiye.</p>
Abgaal-Daud (sub-clan)	<p>The Daud Clan is a sub-clan of Abgaal which in turn is a sub-clan of Hawiye. Three of the last four Governors of Banadir were from the Daud sub-clan, including the current Governor, Omar Mohamud Mohamed, who is known by his nickname Finnish. It is reported that Finnish was previously a part of the Alliance for the Restoration of Peace and Counterterrorism (ARPCT), an organisation which fought against the Islamic Courts Union (ICU).<sup>1</sup> The other two Abgaal governors were Engineer Yarisow and Yusuf Jim'ale, who served between 2015 and 2017.</p> <p>Senator Muse Sudi Yalahow is currently a member of the Upper House of the Federal Parliament of Somalia (FPS) and is a highly influential figure within the Daud sub-clan. He has been very outspoken against President Mohamed Abdullahi Mohamed's (Farmajo) Administration, alongside historical reports of contention between other officials in the Banadir Administration.<sup>2</sup></p> <p>Ahmed Daaci, former Commissioner of Wadjir District, is another important figure within Daud power dynamics. In recent years, he has been less politically active aside from a small number of high-profile media interviews. Mohamud Ali Ugaas is another well-known actor, specifically within the Daud Clan's traditional leadership structure.</p> <p>Apart from Governor Omar Finnish, all other prominent Daud figures are believed to be in opposition and hostile towards the Federal Government of Somalia (FGS). Therefore, and it is important to note that, the Daud political support base is highly valued by the FGS leadership.</p>
Abgaal-Harti (sub-clan)	<p>Another Abgaal sub-clan which is important to acknowledge is the Harti Clan. This sub-clan holds significant influence in the Banadir region, wider Somali politics and the Somali National Army (SNA).</p> <p>High ranking Harti figures include the former Presidents Sheikh Sharif Ahmed and Ali Mahdi, former Prime Minister Ali Mohamed Geedi, the newly elected President of Hirshabelle Ali Guudlawe, former Federal Minister of Internal Security Mohamed Abukar Islow (Duale), presidential candidate and powerful businessman Abdikadir Cosoble, influential traditional elder Iman Mohamed Yusuf, Chief of the Somali Armed Forces General Odawa Yusuf Raag and many other senior officers within the security sector</p>
Other Hawiye sub-clans	<p>Waceysle is also an influential sub-clan of Abgaal, with key figures such as former President Hassan Sheikh Mohamud, presidential candidate Dahir Mohamud Gelle and former Banadir Governor Thabit Abdi.</p> <p>Another key sub-clan of Hawiye includes Duduble. They are are not politically prominent but are well-known for their connections to Hormuud Telecom, the largest telecoms provider in Somalia. Hawadle is also notable sub-clan of Hawiye, specifically amongst the business community in Mogadishu</p>
Murusade	<p>Murusade is another distinctly powerful clan. The clan has considerable connections within the business community and are politically influential in Banadir, both at a regional and national</p>

	<p>government level. In accordance with regional power sharing frameworks, the position of Deputy Minister of Finance and Administration is allocated to the Murusade Clan.</p> <p>Prominent Murusade political figures include former Prime Minister Hassan Ali Khaire, Member of Parliament (MP) Mustafe Dhuhulow, and MP and former Head of Intelligence General Gafowe. MP Mohamed Qanyare Afrah, who claimed significant influence in Mogadishu during the civil war, also hailed from Murusade.</p>
Haber Gider	<p>Haber Gider has substantial political and economic influence in Banadir and beyond. It is understood that Haber Gider own the most businesses and properties of all the clans in Banaidr, hence their influence in regional and national politics. The current Prime Minister Mohamed Hussein Roble, two key presidential candidates Abdirahman Abdishakur and Abdikareem Guleed, the President of Galmudug and several cabinet members are all from the Haber Gider Clan.</p>

#### 4.2.2 Contentious Issues and Risks

##### Political Instability

As of the 23rd February 2021, there still has yet to be a political agreement between the FGS, the FMS and other stakeholders for a political roadmap ahead. The Federal President’s term officially expired on the 8th February 2021 and opposition leaders now do not recognise his legitimacy. Tensions and protests continue, whilst the government have now banned any further protests, opposition or otherwise, including the ones planned for 26th February 2021.

On 17th September 2020, an agreement was reached to hold indirect elections, but the implementation process of such an agreement has proven to be a difficult task. The Federal Electoral Committees, Somaliland Electoral Committee (whose elections are due to be held in Mogadishu) and the power struggle between President Farmajo and Jubbaland leader Ahmed Madobe regarding the control of Gedo region, all remain unresolved issues.

On 5th November 2020, the FGS appointed the Federal Electoral Implementation Team (FIET). Presidential candidates alongside the Puntland and Jubbaland Administrations expressed concerns about certain committee members who are allegedly members of the National Intelligence and Security Agency (NISA), civil servants and known supporters of President Farmajo.<sup>6</sup>

Another electoral matter is the management of the Somaliland parliamentary seats. As per the 2020 agreement, the Somaliland elections are due to take place in Mogadishu. The disagreement is between the Speaker of the Upper House, veteran politician Abdi Hashi, and the Federal President. Speaker Hashi argues that he is the most senior elected official from the Somaliland region and therefore has the right to select the Somaliland Electoral Committee, whereas President Farmajo and his allies from the region, including the Deputy Prime Minister and Minister of Information, argue the management of the electoral process is the responsibility of the Government rather than the speaker of the Upper House.

In mid-February 2021, the Technical Committee representing the FGS, and the FMS, met in Baidoa. They subsequently indicated to the media that they have reached technical solutions to these outstanding issues. Following the Baidoa discussions, President Farmajo called a meeting with FMS leaders in Mogadishu, originally planned for the 18th and 19th February. The meeting has been met with delays due to the violent clashes between opposition backed protesters and the security forces on the 19th February 2021.

The legal mandates and legislative and executive branches of government institutions expired on the 8th February 2021. The power vacuum now apparent is a likely source of significant conflict, instability and increase in al-Shabaab militant activity over the capital and beyond.

Continued economic fears in Somalia indicate that the FGS may soon face a cash crisis and not be able to pay the salaries of the security forces or civil servants, which will cause further security and social problems if accurate. The situation could further undermine peace and state-building. The current climate surrounding the elections makes the situation very unpredictable; even if there is a political agreement on the elections, it is clear the country will have a severe period of transition and uncertainty.

### **Al-shabaab Attacks**

Al-Shabaab uses IED attacks throughout Somalia, targeting, inter alia, individuals, hotels, military posts and Somali government institutions<sup>36</sup>. The group also uses suicide and complex attacks, including to attack targets in urban centres such as Mogadishu. In a particularly deadly attack in March 2022, an Al-Shabaab suicide bomber targeted a female MP in Beledweyne, with another suicide bomber targeting the civilians who were injured in the first explosion; the two blasts killed 48 people, including the MP, and injured another 108 persons.

**Key players** in Banadir include; FGS, Council of Presidential Union, Highly influential private sector, African Union Mission in Somalia (AMISOM) – Ugandan People’s Defense Force, (UPDF) contingent, Traditional leaders, Civil society groups and Al-Shabaab.

## **4.2.3 Jubbaland**

### **Border Conflicts**

Jubbaland comprises Middle Jubba, Lower Jubba and Gedo provinces<sup>37</sup>. The two main clans in Jubbaland are the Ogadeen and the Marehan, both sub-clans of the Darod. In August 2019, Jubbaland re-elected Ahmed “Madobe” Mohamed Islam as its president in a disputed election<sup>38</sup>. The FGS refused to recognize the election, which led to clashes along clan and political lines in Gedo. Then-President Farmajo has Marehan roots, whereas

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<sup>36</sup> War on the Rocks, *Al-Shabaab’s Improvised Explosive Device Supply Chain Gambit in Somalia*, 22 September 2020, <https://warontherocks.com/2020/09/al-shabaabs-improvised-explosive-device-supply-chain-gambit-in-somalia/>. See also, UN Security Council, *Situation in Somalia*, 13 May 2022, S/2022/392, [www.ecoi.net/en/file/local/2073538/N2233663.pdf](http://www.ecoi.net/en/file/local/2073538/N2233663.pdf), paras 17, 19.

<sup>37</sup> Heritage Institute, *The State of Somalia Report 2020*, 10 February 2021, <https://reliefweb.int/sites/reliefweb.int/files/resources/SOS-REPORT-2020-Final-2.pdf>, p. 12.

<sup>38</sup> Al Jazeera, *Somalia’s Jubbaland Region Re-elects Ahmed Mohamed as President*, 22 August 2019, [www.aljazeera.com/news/2019/8/22/somalias-jubaland-region-re-elects-ahmed-mohamed-as-president](http://www.aljazeera.com/news/2019/8/22/somalias-jubaland-region-re-elects-ahmed-mohamed-as-president). He won 56 out of 74 votes cast. UN Security Council, *Report of the Secretary General on Somalia*, 15 November 2019, S/2019/884, <https://undocs.org/S/2019/884>, para. 5. “A number of opposition candidates who had been barred from registering for the election said they had held their own vote in Kismayo on Thursday, electing Abdirashid Mohamed Hidig.” Reuters, *Leader of Somalia’s Jubbaland, at Odds with Mogadishu, Wins New Term*, 22 August 2019, [www.reuters.com/article/us-somalia-politics-idUSKCN1VC15B](http://www.reuters.com/article/us-somalia-politics-idUSKCN1VC15B).

Madobe is Ogadeen, and the opposing forces split along these lines, with the FGS sending troops into the Marehan region of Gedo in February 2020 and clashes occurring near Kismayo and in the town of Belet Xaawo. In 2019, President Ahmed Mohamed Islam (Madobe) won a disputed election to maintain his position as President of Jubbaland, supported by Kenya. The FGS rejected this result for almost one year however, in mid-2020 President Farmajo publicly acknowledged Madobe as the interim President of Jubbaland.

Since that initial easing of tensions, further conflict has arisen surrounding the Gedo region of Jubbaland. In January 2021, fighting between local Jubbaland security personnel and FGS troops was reported. One source claimed people died in the conflict however, official sources are conflicting. At the time, the FGS stated that the Kenyan Defence Force (KDF) were also supporting the local Jubbaland troops<sup>39</sup>. The conflict continues between the Jubbaland Administration and the FGS for control of the Gedo region<sup>40</sup>. Further fuelling these tensions is the accusations of Kenya providing sanctuary to the fugitive Jubbaland Minister of Security, who escaped from FGS custody in 2020.<sup>15</sup>

### **Political Instability**

A point of contention between wider Federal political parties is the issue of who should manage the 16 parliamentary seats planned to take place in Gedo. The Federal President is reported to be micromanaging this process because of his roots to Gedo. The Jubbaland Administration is of the opposing view that Gedo is part of Jubbaland and therefore, the local FMS authority should manage the electoral process which claimed at least 26 lives in 2019.<sup>17</sup> In late 2020, the Chairman of the Jubbaland Chamber of Commerce,

### **Al-shabaab Attacks**

Shafi Kahin, died after an attack on a mosque in Kismayo, 18 highlighting al-Shabaab's ability to successfully target high-profile individuals.

**The key actors** in Jubbaland are as follows: Jubbaland Authority, FGS, Jubbaland Darwish, SNA, Somali Police Force (SPF), KDF, Jubbaland Security and Intelligence Agency (JISA), Traditional elders and Al-Shabaab.

## **4.3 South West State**

### **Political Instability**

Established in 2014, South West State is comprised of Lower Shabelle, Bay and Bakool regions. South West State contains large populations of the Digil-Mirifle or Rahanweyn clan. On 19 December 2018, South West State elected Abdiasis Mohammed "Laftagareen," a former MP and minister, as president, after the FGS arrested the other candidate, a former Al-Shabaab leader. Shabelle Region. However, the Southwest State Administration is based in the city of Baidoa which operates as the de facto capital.

Parliamentary elections took place in March 2020, after the state reduced the number of MPs from 149 to 95 to bring it into line with the size of other regional administrations.<sup>199</sup> Shortly after, the parliament voted to extend the president's term by one year to align presidential and state assembly terms. <sup>200</sup> The state

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<sup>39</sup> <https://www.reuters.com/article/uk-somalia-security-idUSKBN29U1RQ>

<sup>40</sup> <https://www.africanews.com/2021/02/07/somalia-vote-under-threat-as-leaders-in-deadlock/>

administration has tried to set up local councils across the region, but in Barawe and El-Barde districts the process has stalled over disputes about the allocation of seats to non-Rahanweyn candidates. 201. During 2021, Al-Shabaab controlled supply routes throughout South West State and continued actively fighting FGS forces.

Many different clans are present in Southwest State however, it is mainly dominated by the Digil and Mirifle clans; both sub-clans of the Rahanweyn Clan. Almost every clan of Somalia has at least one MP and/or a Minister in the Southwest State Administration; making this FMS both unique and diverse.

Members of the Digil Clan are mainly farmers who live in the coastal areas, whilst the Mirifle Clan are predominantly pastoralists reliant on livestock. Many of the Rahanweyn sub-clans are dispersed across vast areas of Somalia, residing in Mogadishu, Bay, Bakool, Lower Shabelle, Middle and Lower Juba, Gedo, north-eastern Kenya and the Somali region of Ethiopia. The main power contestation and conflict in Southwest State is between the Digil Clan, with 7 sub-clans, and Mirifle, with 21 sub-clans.

### **Clan Disputes**

The clan quota system for the Rahanweyn Clan and its sub-clans is always based on the disputation between the Mirifle and Digil sub-clans. For example, the Presidency and Baidoa Mayoral positions are occupied by Hariin which are Mirifle sub-clans. The Speaker of the Parliament, Dr. Ali Saeed Fiqi, is from the Tunni sub-clan of Digil; he is one of the most influential politicians from the Digil Clan and previously served as the Somali Ambassador to the European Union (EU). The Governor of the Bay region and the Minister of Interior are from the Mirifle sub-clan, Laysaan; the Minister of Finance is from the Mirifle sub-clan, Hadame; the Minister of Justice is from the Mirifle sub-clan Luway. There are numerous more examples covering each sub-clan.

Equally, amongst the business elite there are representatives from Laysan, Luway, Harin and Elay. Naturally this distribution is also embedded within the power structure of traditional and religious leaders of influence. This is not likely to change in the foreseeable future.

### **Al- Shabaab Attacks**

There are several active and violent clan disputes in Galmudug that have resulted in deaths, injuries, and abductions, including during 2021. In early 2022, a cycle of violence continued between Habar Gedir and Marehan clans in Mudug<sup>41</sup>. In three districts in Galmudug, clan conflicts are controlled by Al-Shabaab, but there are concerns that these clan conflicts could re-erupt once these districts are returned to Galmudug government control

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<sup>41</sup> "Galkayo has a violent history of recurrent political and clan-based conflicts, which have limited the development of its full economic potential. [...]The border that runs through Galkayo—between Puntland and Galmudug states—has not always been there. It began as the un-marked boundary between warring clans, separating the city into a northern part dominated by the Majerteen clan family, and a southern part inhabited by members of the Hawiye." Rift Valley Institute, *Contested Commerce: Revenue and State-Making in the Galkayo Borderlands*, 2021, [www.ecoi.net/en/file/local/2064876/RVI+2021.11.23+Contested+Commerce\\_0.pdf](http://www.ecoi.net/en/file/local/2064876/RVI+2021.11.23+Contested+Commerce_0.pdf), pp. 5, 7. Militias from the two groups clashed on 25 July 2021 and 10 November 2021. ACLED, *Data Export Tool*, accessed 25 August 2022, <https://acleddata.com/data-export-tool/>.



### 4.3.1 Contentious Issues and Risks

The overall political situation is stable in Southwest State, compared to the other FMS in the south of Somalia. However, there is yet to be a full consensus between the FGS, FMS and other political stakeholders. The current security situation in Southwest State has a medium to high risk overall. The fight between al-Shabaab fighters and anti-al-Shabaab forces remains active and because of this, al-Shabaab is the main threat to the general security of Southwest State.

It is assessed that al-Shabaab is on the offensive, taking advantage of the current situation in Ethiopia across the nearby border, and the likelihood of attacks from the group is high. The planned parliamentary and presidential elections only increase the possibility of further attacks, allowing further space for al-Shabaab militants to take advantage including the targeting of polling stations and electoral delegates. Such a move would disrupt the election and its legitimacy.

All types of attacks including hand grenade attacks, vehicle-borne improvised explosive devices (VBIEDs), personnel-borne improvised explosive devices (PBIEDs), remote-controlled improvised explosive devices (RCIEDs), landmines, mortar attacks, armed attacks, complex attacks and assassinations are likely during the election period. This is common across all the southern regions of Somalia including Jubbaland, Hirshabelle and Banadir.

**The key actors** in Southwest State are as follows: Southwest State Administration, FGS, Private sector, Traditional leaders, Civil society groups, SNA, AMISOM, Ethiopian National Defence Force (ENDF), Southwest State Police, SPF, Southwest State Darwish, NISA and Al-Shabaab

### 4.4 Hirshabelle

Hirshabelle State was established in 2016 and consists of Hiiraan and Middle Shabelle. Hirshabelle's dominant clans are the Hawadle in Hiiran and the Abgaal in Middle Shabelle, two Hawiye sub-clans.

There is also a Bantu minority in the region<sup>42</sup>. These groups, and other smaller sub-clans, have engaged in conflict over, inter alia, power, land and resources.<sup>206</sup>

When Hirshabelle was formed, the Federal Government brokered a power sharing agreement by which the capital would be in Jowhar (Middle Shabelle) and, in return, only persons from the Hawadle clan, the majority in the Hiiran region, could run for the state presidency. On 11 November 2021, the State Assembly elected Abdullahi Ali Hussein "Gudlawe" (Hawiye-Abgaal sub-clan) to the presidency and Yusuf Ahmed Hagar "Dabageed" (Hawiye-Hawadle sub-clan) as Vice President; this allegedly broke the power sharing agreement and led to accusations of election rigging and public protests in Beledweyne. Tensions between Hawadle militia and Hirshabelle forces flared during July and August 2021, and forces opposing the President took over

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<sup>42</sup> MRG, *Somalia: Bantu*, accessed 25 August 2022, <https://minorityrights.org/minorities/bantu/>; Somali Journalists Syndicate (SJS), *SJS and SOMA Are Concerned by the Threats and Intimidation Against Minority Journalists Covering Elections in Hirshabelle*, 8 November 2021, <https://sjsyndicate.org/2021/11/18/sjs-and-soma-are-concerned-by-the-threats-and-intimidation-against-minority-journalists-covering-elections-in-hirshabelle/>; Berghof Foundation, *Conflict Assessment Report: Hirshabelle State, Somalia*, 16 January 2018, <https://berghof-foundation.org/library/conflict-assessment-report-hirshabelle-state-somalia>, p. 9.



administration offices in Beledweyne, which they occupied until an agreement was reached on 25<sup>th</sup> August 2021. Despite ongoing reconciliation efforts.

The most powerful clans in Hirshabelle are Abgaal and Hawadle, whilst Gaaljecel, Jareer, Gugundhabe and Ujeejeen also have great influence. The Dir Clan and other small collective clans are the lowest in the scheme of power, similar to those in other FMS. Abgaal and Hawadle entered into an informal agreement to exchange the state capital and the presidency, and that political dynamic continues to play a key role in the governance of Hirshabelle

#### **4.4.1 Contentious Issues and Risks**

##### **Political Instability**

There is current resistance against the local Hirshabelle Administration, with a separatist movement having formed in 2020 demanding secession from the FMS. The group is called the Hiiraan Rescue Council and is led by General Hud, which is now supported by armed militia from the Gaaljecel Clan.<sup>43</sup> In December 2020, fighting occurred in the city of Beledweyne when General Hud's forces became aware of the Hirshabelle President's plans to land in the city. The FGS sent an envoy to lead reconciliation talks between the two conflicting parties.

##### **Al-shabaab Attacks**

Al-Shabaab are a continued and prevalent risk in Hirshabelle, with both militant attacks and government operations affecting people's lives on a regular basis. On the 18th February 2021, it was reported that four al-Shabaab militants were killed and another arrested outside of the FMS capital, Jowhar; the operation having been conducted by AMISOM personnel from Burundi and the SNA. On the same day in the neighbouring region of Lower Shabelle, another al-Shabaab militants were reportedly killed near Janale.

##### **Flash Floods**

Though situated in Southwest State, the location is geographically very close to Hirshabelle and highlights the ongoing and recent presence of al-Shabaab in that area. Natural emergencies also severely affect this FMS, with flash flooding in 2018 causing massive internal displacement, and again in 2019 and 2020.<sup>2627</sup> Differing from the flooding, Hirshabelle also suffers from droughts. This creates serious and damaging humanitarian situations affecting the population of Hirshabelle<sup>44</sup>.

**The key actors** in Hirshabelle are as follows: FGS, Hirshabelle Administration, AMISOM – Djibouti Armed Forces (DJAF), SPF, NISA, SNA, Hiiraan Rescue Council, Civil society groups, Traditional elders and Al-Shabaab

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<sup>43</sup> [https://www.hiiraan.com/news4/2020/Nov/180888/clan\\_militia\\_join\\_separatist\\_general\\_hud\\_faction\\_in\\_hiiraan\\_region.aspx](https://www.hiiraan.com/news4/2020/Nov/180888/clan_militia_join_separatist_general_hud_faction_in_hiiraan_region.aspx)

<sup>44</sup> <https://www.uri.org/uri-story/20180313-somesha-recounts-hirshabelle-regional-state-humanitarian-assistance-appeal>

## 4.5 Galmudug

Galmudug State was formed in 2015 when Galgaduud and Mudug regions merged<sup>45</sup>. Despite this, until 2020 the structure of the government and distribution of power remained split between the FGS- supported administration and Ahlu Sunna Wal Jama'a (ASWJ), a Sufi militia which had fought against Al-Shabaab, until 2020. The parliamentary seats for Galmudug are allocated by clan based on the 4.5 formula and "there are 11 clans involved in power-sharing arrangements: five HabarGidir sub-clans (Sa'ad, Saleeban, Saruur, Ayr and Duduble); Marihan; Dir; Abgaal (Wa'esle subclan); Murursade of the wider Hawiye family clan); Shekhal; and several smaller clans collectively known as Beesha Shanaad (including the sub-clans of Madhibaan and Tumaal)".

In 2017, State President Ahmed Duale Geele Haaf reached a power-sharing deal with ASWJ which allowed the government to move back to Dhusamareb City; he also negotiated the boundary in Galkayo with Puntland. The deal with ASWJ promised the group seats in the State Parliament and the integration of ASWJ fighters with Galmudug security forces.

### **Political Instability**

However, tension escalated during the 2019 elections between the FGS-supported administration, opposition groups and ASWJ, culminating in a presidential election boycotted by opposition candidates and a parallel election by ASWJ, resulting in a brief period where Galmudug had three presidents and three parliaments claiming legitimacy. While the new president, Ahmed Abdi Karie "Qoorqoor", was able to reach an agreement with the opposition, fighting broke out between ASWJ and the SNA in Dhuusamarreeb on 27 and 28 February 2020.<sup>1</sup> The SNA defeated the ASWJ with the leadership of the group surrendering on 29 February 2020, leaving the country shortly afterwards.

The return of ASWJ leadership sparked a violent clash between the group and the Galmudug authorities in Bohol village on 30 September 2021, with 10 fatalities. ASWJ then took control of Guri Ceel and Matabaan in Hiraan. On 23 October 2021, ASWJ and the Galmudug authorities engaged in heavy fighting in Guri Ceel, causing the displacement of over 100,000 persons and the deaths of 120 persons, mostly civilians. After successful mediation efforts, ASWJ pulled back to Bohol. As of August 2022, only sporadic further violence between ASWJ and State forces had been reported

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<sup>45</sup> Somalia National Bureau of Statistics, *Somali Health and Demographic Survey: Galmudug Report*, 2021, [www.nbs.gov.so/wp-content/uploads/2021/07/Galmudug\\_Report\\_2021.pdf](http://www.nbs.gov.so/wp-content/uploads/2021/07/Galmudug_Report_2021.pdf), p. 2. The Mudug region is partially claimed by Puntland. "The complexity of Galmudug's state formation process is notable: a territorial dispute with Puntland led to a constitutional anomaly, with Galmudug being formed of 1.5 states – despite the provisional constitution stipulating that FMSs must be formed of at least two whole regions." Saferworld, *Clans, Contention and Consensus: Federalism and Inclusion in Galmudug*, June 2020, [www.saferworld.org.uk/downloads/clans-consensus-and-contention--inclusion-and-federalism-in-galmudug.pdf](http://www.saferworld.org.uk/downloads/clans-consensus-and-contention--inclusion-and-federalism-in-galmudug.pdf), p. 2.

#### 4.5.1 Contentious Issues and Risks

**Al-Shabaab's presence** in the FMS is one of the main challenges that the State faces. The Galmudug Administration, including the Ministry of Internal Security (MOIS) and the Security Forces, are formalising a security plan to eradicate the militant group. The government has carried out many operations to pursue al-Shabaab and an FGS statement was released during the 2020 Dhushmareb Conference that the SNA, in partnership with US personnel, had killed a senior al-Shabaab bomb maker<sup>46</sup>.

The al-Shabaab presence is a continued threat in certain areas of Galmudug, with FMS Security Forces working towards liberating these areas from the militant group. One of the most recent, and deadly, al-Shabaab attacks in Galmudug was again in Dhushmareb; resulting in the deaths of 12 intelligence officials including the Head of NISA for that area, Abdirashid Abdinur<sup>47</sup>.

#### **Dispute over Pasture**

Grazing land and irrigation for livestock also causes disputes between the resident clans of Galmudug, which can often lead to deaths and injuries. The FMS has set up a mechanism of reconciliation dialogue on traditional conflicts for the disputing clans, which has been proven to reduce tensions amongst the clans.

**The key actors** in Galmudug are as follows: FGS, Galmudug Administration, Traditional elder, Civil society groups, SNA, NISA, Galmudug Darwish and Al-Shabaab

#### 4.6 Puntland

Puntland is the “oldest, most stable and most developed” member state in Somalia, founded as an autonomous region prior to the formation of the federal government<sup>48</sup>. According to its 2009 Constitution, Puntland consists of Bari, Nugaal, Sool, Ayn, Karkaar, Mudug, Haylan, and Sanagis regions, which in terms of Somalia’s 18 official regions correspond to parts of Sanaag and Sool, as well as Bari, Nugaal and Mudug regions<sup>49</sup>. Parts of Sanaag and Sool remain contested between Puntland and Somaliland. The dominant clan in Puntland is the Majeerteen, part of the Harti sub-clan of the Darood, and minority groups present in Puntland include Madhiban, Muuse Diriye, Tumaal and Yibir.<sup>2</sup>

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<sup>46</sup> <https://www.voanews.com/africa/us-drone-strike-kills-high-ranking-al-shabab-bomb-maker-somalia>

<sup>47</sup> <https://www.reuters.com/article/us-somalia-blast-idUSKBN2A70I6>

<sup>48</sup> Heritage Institute, *State of Somalia Report 2021*, 8 February 2022, <https://reliefweb.int/sites/reliefweb.int/files/resources/SOS-REPORT-2021-English-version.pdf>, p. 19. “During the latter stages of the civil war and “once it had become clear that a united Somalia would not be re-established in the short term, people in the north-east (part of the former Italian territory) agreed to establish Puntland as an autonomous regional state. In the way it was set up, leaders in Puntland mimicked Somaliland, establishing a government through inter-clan conferences and traditional authorities. Their aims, however, are different: Puntland does not claim independence but works to rebuild a federal Somalia. Consequently, Puntland has rejected Somaliland’s unilateral secession and ignored the full significance of its shared border, imposed by Hargeysa.” Rift Valley Institute, *Between Somaliland and Puntland: Marginalization, Militarization and Conflicting Political Visions*, 2015 <https://reliefweb.int/sites/reliefweb.int/files/resources/Between%20Somaliland%20and%20Puntland%20by%20Markus%20Hoehne%20-%20RVI%20Contested%20Borderlands%20%282015%29%20%281%29.pdf>, p. 15.

<sup>49</sup> OCHA, *Somalia: Administrative Map*, 31 July 2017, <https://reliefweb.int/map/somalia/somalia-administrative-map-31072017>; *Constitution of Puntland State of Somalia*, December 2009, <http://citizenshiprightsafrika.org/wp-content/uploads/2020/10/Somalia-Puntland-Constitution-Dec2009.pdf>, art. 7(1).

The current President of Puntland, Said Abdullahi Deni was elected on 8 January 2019 by the Puntland Parliament, which is comprised of 66 members chosen by elders according to a clan-based system.<sup>215</sup> In October 2021, Puntland organized pilot elections in Qardho, Eyl and Ufeyn districts on a one-person, one-vote basis, a move which was celebrated by international partners and which is meant to pave the way for elections on a similar basis for the State Assembly in 2022. Puntland completed its elections for the Upper House of Parliament in August 2021, but the elections for the Lower House were not complete until the end of April 2022

### **Border Disputes**

The regions of Sool and Sanaag have historically been contested between Puntland and Somaliland, a dispute which has frequently turned violent. Tensions flared during 2018, with at least 20 armed clashes between Puntland and Somaliland forces between January and June 2018.<sup>219</sup> Political violence broke out from 22 to 24 December 2021 between factions loyal to the President of Puntland and forces loyal to the Director of the Puntland Security Forces, who the President had dismissed on 24 November 2022.<sup>220</sup> The fighting killed dozens and displaced thousands, making it “the most intense [fighting] that Puntland had seen in over a decade”. Puntland continues to fight against Islamic State in the northern areas<sup>50</sup>.

### **Clan Disputes**

Although clan conflicts have been previously recorded in Puntland, such as between rival clans Darood and Hawiye<sup>51</sup>, there has been relative stability since January 2020. In Galkayo, which is partially controlled by Puntland, a conflict continues between the Omar Mohamud/Majerten, which is a sub-clan of the Darood, and the Sa’ad/Habargadir, which is a sub-clan of the Hawiye.

## **4.6.1 Contentious Issues and Risks**

### **Political Instability**

As in other FMS, the current political climate across Somalia has seen the President of Puntland, Said Abdullahi Deni, now reject the legitimacy of President Farmajo. The Federal President has “blamed Puntland and Jubbaland leaders for the failure of Dhusamareb electoral talks”, indicating further tensions between the FGS and Puntland. Puntland is also uniquely positioned in not only having to contend with frictions between with the FGS, but also having both al-Shabaab and Daesh militant bases in the FMS. The Puntland Security Forces have ongoing operations against both groups, with one of the most recent attempted attacks stopped by

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<sup>50</sup> US Department of State, *2021 Country Report on Human Rights Practices: Somalia*, 12 April 2022, [www.ecoi.net/en/document/2071126.html](http://www.ecoi.net/en/document/2071126.html); Heritage Institute, *State of Somalia Report 2021*, 8 February 2022, <https://reliefweb.int/sites/reliefweb.int/files/resources/SOS-REPORT-2021-English-version.pdf>, pg 19.

<sup>51</sup> Puntland “extends as far south as the city of Galkayo in Galkayo District of Mudug Region. A clear dividing line in the city separates the Majeerteendominated north from Haber Gedir-dominated south. The extent of Puntland territory east and west of Galkayo, however, is poorly demarcated and remains a potential flash point for conflict between the two traditionally strongest clan families in Somalia, the Hawiye and Darod.” UN Security Council, *Report on Somalia of the Monitoring Group on Somalia and Eritrea*, 19 October 2015, [www.undocs.org/S/2015/801](http://www.undocs.org/S/2015/801), p. 55, see also p. 17. “On September 5 [2016], at least 15 persons were killed and 40 injured in clan fighting between the Sacad subclan of the Hawiye and the Omar Mahmoud sub-clan of the Darood in rural areas east of Galkayo town in Mudug Region”. US Department of State, *Country Report on Human Rights Practices: Somalia*, 2016, [www.ecoi.net/en/document/1394902.html](http://www.ecoi.net/en/document/1394902.html), p. 38.

security personnel in the port city of Bosaso on the 18th February 2021.<sup>52</sup> The presence of both groups has also encouraged a historical airstrike campaign by the United States in Puntland.<sup>52</sup>

**The key actors** in Puntland are as follows: Puntland Government, Puntland Security Force (PSF), Puntland Darwish Force (PDF), Puntland Maritime Police Force (PMPF), Puntland Police Force (PPF), Puntland Intelligence Agency (PIA), Civil society, Traditional elders and Al-Shabaab.

#### 4.7 Somaliland

Somaliland declared independence from Somalia in 1991 and does not consider itself affiliated with the FGS.<sup>53</sup> It continues to arrest and detain persons critical of independence as well as residents who are employed by the FGS. Somaliland's borders were not formed along clan lines, and its territory comprises areas inhabited by Dir sub-clans, such as Ciise and Gadabuursi, the Isaaq, which are the dominant clan and constitute almost two-thirds of the population, and the Harti sub-clans the Dhulbahante and Warsangeli along the border with Puntland. Minority groups present in Somaliland include Gaboye, Tumul and Yibir. Somaliland continues to lobby for international recognition as an independent State.<sup>227</sup> While Somalia and Somaliland have previously engaged in diplomatic talks, these faltered during 2021.

Somaliland has its "own civilian administration, armed forces and currency, and it runs its own elections." Despite some concerns about police actions during campaigning, and despite long delays, Somaliland held free and fair elections on 31 May 2021 for parliamentary and local council positions.

The opposition Waddani party won the majority of seats in the House of Representatives and other key local positions, and formed a controlling coalition with the Justice and Welfare Party (UCID), another opposition party. While one Gabooye candidate was elected to a parliamentary seat, which was considered a step towards minority representation, no women were elected. Presidential elections are scheduled for November 2022. Allegations from opposition parties that the President intended to extend his term and delay the elections sparked protests in August 2022.

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<sup>52</sup> <https://www.voanews.com/africa/suspected-us-airstrike-hits-islamic-state-militants-somalia>

<sup>53</sup> See, for example, Heritage Foundation, *Somalilanders' Quest for Independence Isn't "Neocolonial" Plot. It's Self-Determination.*, 9 May 2022, [www.heritage.org/africa/commentary/somalilanders-quest-independence-isnt-neocolonial-plot-its-self-determination](http://www.heritage.org/africa/commentary/somalilanders-quest-independence-isnt-neocolonial-plot-its-self-determination).

<sup>54</sup> "Somaliland authorities continued to detain Somaliland residents employed by the federal government in Mogadishu, sometimes for extended periods. Somaliland authorities did not authorize officials in Mogadishu to represent Somaliland within or to the federal government and viewed such actions as treason, punishable under Somaliland law." US Department of State, *2021 Country Report on Human Rights Practices: Somalia*, 12 April 2022, [www.ecoi.net/en/document/2071126.html](http://www.ecoi.net/en/document/2071126.html). See also, Somaliland Human Rights Center, *Annual Report of Human Rights Center 2021*, 12 February 2022, <http://hrcsomaliland.org/wp-content/uploads/2022/02/Annual-report-2021.pdf>, pp. 13-16; All Africa, *Somalia: Former Deputy Somali PM Arrested in Hargeisa*, 15 December 2021, <https://allafrica.com/stories/202112160116.html>; Somaliland Standard, *SL Police Detain 50 Youth for Wearing the Attire Flag of Somalia in Borama*, 27 June 2021, <https://somalilandstandard.com/sl-police-detain-50-youth-for-wearing-the-attire-flag-of-somalia-in-borama/>; Italian Institute for International Political Studies, *Somaliland: 30 Years of De Facto Statehood, and No End In Sight*, 12 May 2021, [www.ispionline.it/en/pubblicazione/somaliland-30-years-de-facto-statehood-and-no-end-sight-30363](http://www.ispionline.it/en/pubblicazione/somaliland-30-years-de-facto-statehood-and-no-end-sight-30363); All Africa, *Somalia: Somaliland Releases Detained Musicians*, 24 June 2020, <https://allafrica.com/stories/202006250225.html>; Somali Dispatch, *Somaliland: Singer Salah Arab Released from Detention*, 11 May 2020, [www.somalidispach.com/latest-news/somaliland-singer-salah-arab-released-from-detention/](http://www.somalidispach.com/latest-news/somaliland-singer-salah-arab-released-from-detention/).

## **Clan Clashes**

Clashes between Habar Yonis/Sa'ad Yonis and Habar Je'lo/Bi'de sub-clans in El Afweyne in the Sanaag region of Somaliland have persisted for many years<sup>55</sup>. On 10 March 2020, following an agreement by traditional and religious leaders, the two rival sub-clans began an exchange of compensation for victims of the conflict. When an inter-clan conflict between Reer Hagar and Hayaag in the Togheer region resulted in the killing<sup>56</sup> of a Hayaag man in 2019, it sparked a cycle of revenge violence, costing 27 lives in less than one year, until mediation ended the dispute and ordered compensation. In April 2021, a conflict between Dhulbahante sub-clans Jama Siyaad and Ugaadhyahan/Naaleeye Ahmed in the Sool region caused at least 15 deaths; peace negotiations were ongoing as of June 2021. Dhulbante clan members clashed with Habar Je'lo members in April 2021 in the Togdheer region, causing at least four deaths<sup>57</sup>.

### **4.7.1 Contentious Issues and Risks**

Somaliland has not suffered a successful terrorist attack in the region since 2008, there is a consistent and current threat at the time of writing. The understanding is that this threat is in relation to the Government of Somaliland (GoSL) expressing sympathies for the death of General Galal during the January 2021 al-Shabaab attack on Afrik Hotel in Mogadishu. This threat, specifically against large cities in Somaliland, has increased the overall threat level for the majority of the region. This is visualised in the attached threat maps **figure 3-3 and 3-4**. Other issues in Somaliland include the rise of sexual violence and rape cases, clan conflicts and a reduction of civil liberties. Two opposition party candidates were arrested in Hargeisa in February 2021, and a social media figure was detained without charge for two months in late 2020.

## **Border Dispute**

The issue which connects both Somaliland and Puntland is that of the disputed regions of Sool and Sanaag, which results in frequent skirmishes between their two respective security forces. Fighting in Tukaraq in Sool, is commonplace, and resulted in a number of deaths in 2018. There have been instances reported of Puntland soldiers also defecting to Somaliland, and vice versa, which highlights the ongoing complexity of the relationship between the two regions

**The key actors in Somaliland** are as follows: GoSL, The National Security Committee (NSC), Ministry of Interior (MOI), Somaliland National Armed Forces, Somaliland Coastguard, National Intelligence Agency (NIA), Ministry of Defence (MOD), Regional Security Committee, Traditional elders and Al-Shabaab

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<sup>55</sup> "President Bihi's administration [in Somaliland] has faced a recurrent inter-clan conflict in Ceel Afweyn, in Sanaag region, that pits two major branches of the Isaq clan – Bicido/Habar Jeclo and Saad Yonis/Habar Yonis – against each other. The conflict's roots lie in a long-running Habar Jeclo versus Habar Yonis feud that intensified during the 2017 election, which Bihi, backed by a Habar Jeclo-led alliance, won." ICG, *Averting War in Somalia*, 27 June 2018, [www.crisisgroup.org/africa/horn-africa/somaliland/141-averting-war-northern-somalia](http://www.crisisgroup.org/africa/horn-africa/somaliland/141-averting-war-northern-somalia).

<sup>56</sup> "As of June 2021, four men (two Dhulbahante and two Habar Je'lo) were killed." EASO, *Somalia: Targeted Profiles*, 20 September 2021, [www.ecoi.net/en/file/local/2060580/2021\\_09\\_EASO\\_COI\\_Report\\_Somalia\\_Targeted\\_profiles.pdf](http://www.ecoi.net/en/file/local/2060580/2021_09_EASO_COI_Report_Somalia_Targeted_profiles.pdf), p. 80

<sup>57</sup> "The bone of contention was a well. The fighting left 18 men dead, including 15 from the Ugaadhyahan sub-clan and 3 from the Jaama Siyaad [...] Peace negotiations are ongoing (as of June 2021)." EASO, *Somalia: Targeted Profiles*, 20 September 2021, [www.ecoi.net/en/file/local/2060580/2021\\_09\\_EASO\\_COI\\_Report\\_Somalia\\_Targeted\\_profiles.pdf](http://www.ecoi.net/en/file/local/2060580/2021_09_EASO_COI_Report_Somalia_Targeted_profiles.pdf), p. 79. See also, Somali Affairs, *Casualties in Clan Clashes in Sool*, 16 April 2021, [www.somaliaffairs.com/news/somalia-casualties-in-clan-clashes-in-sool/](http://www.somaliaffairs.com/news/somalia-casualties-in-clan-clashes-in-sool/); UN Security Council, *Letter Dated 5 October*, 6 October 2021, S/2021/849, [www.ecoi.net/en/file/local/2062553/S\\_2021\\_849\\_E.pdf](http://www.ecoi.net/en/file/local/2062553/S_2021_849_E.pdf), para. 32

## 5 ASSESSING THE RISK

### 5.1 Overview

The purpose of assessing risk is to enable project activity in a safe and secure manner. Recognizing primacy of life as the critical concern, all risk assessments are designed to establish an understanding of the dangers posed by malign actors to project affected personnel and local communities in the context of the local environment. These risk assessments do not seek to identify risks posed by natural disasters, acts of God or other causes, neither do they seek to understand the risk to property or project a ctivity.

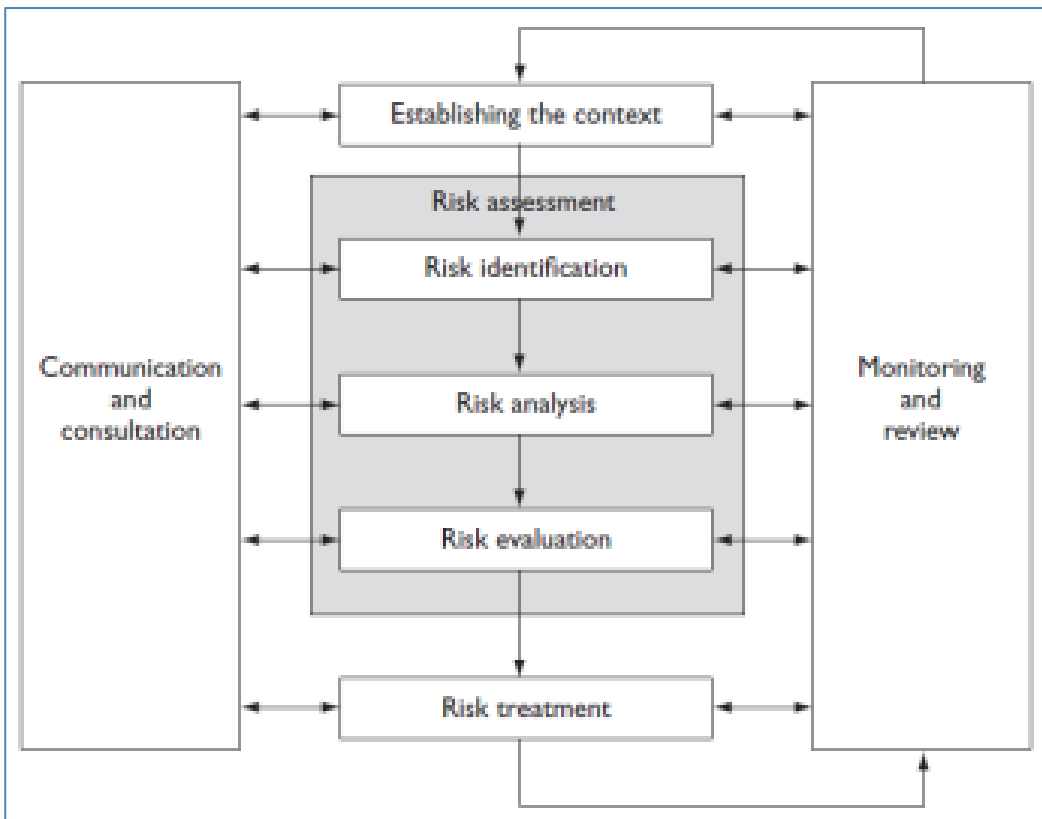
The assessment methodology employed is a “Risk Based” approach in which risk is a function of the likelihood of a threat, the severity of the consequences, and the vulnerability of the project in terms of the effectiveness of existing and proposed risk mitigation measures.

**Table 5-1: The assessment follows six stages**

1	<b>Identify Critical Assets.</b> In this case it is the lives and the safety of the Project affected personnel and local communities.
2	<b>Identify Threat Scenarios.</b> Security threats to the project are identified and the principal threat scenarios are described
3	<b>Threat Likelihood and Impact.</b> The threat scenarios identified in the previous stage are ranked in a matrix according to their likelihood and impact
4	<b>Vulnerability Assessment.</b> The project’s vulnerability to each of the identified threat scenarios is assessed and ranked in terms of the effectiveness of the mitigation measures currently in place
5	<b>Current Risk Exposure.</b> The Likelihood, Impact and Vulnerability scores are combined to define the current, pre-treatment risk score.
6	<b>Post Risk Exposure – Incorporating Local SMP risk mitigation measures.</b> Working off the risk scores identified in step 5, a local SMP is written providing risk mitigation measures for each identified threat scenario. This results in a new vulnerability score for each threat scenario. This revised score is combined with the earlier Likelihood and Impact scores to give a new risk score.

In the context of security situation in Somalia, a Security Risk Management firm will be recruited by the PIU under the PPA , the firm will develop governing country wide Security Management Plan (SMP) as well as local SMPs. The local SMPs will be established all the FMS including; Jubbaland, Galmudug, Hirshabelle, South West, Puntland and Somaliland. SMPs will be established according to the five standard components detailed in ISO 31000 as presented in **figure 5-1 below**.





**Figure 5-1: ISO 31000 Risk Management Process**

## 5.2 Security Risk Assessments and Safety Audits

The Security Risk Management Firm, contracted by the PIU, will conduct a country-wide risk assessment, as well as local risk assessments in Puntland, Jubaland, Southwest and central, Somaliland State and Hirshabelle and any other geographical cluster in which subprojects or activities are planned for implementation. Risk assessments will include assessments of threats, risks and likelihoods based on security and conflict dynamics; an assessment of potential local security providers and their political economy background; as well as identification of particular vulnerable groups in a specific area. Risk assessments will further include GBV safety audits in the particular area of assessment (see EA-RDIP GBV Action Plan). Security risk assessments will include site visits, communication with key actors in each location, interviews with women’s organizations and other entities working addressing GBV concerns or providing referral pathway services, data mining and analysis, and general information gathering. A key methodology for local security risk assessments will be developed by the Security Risk Management Company and will be presented to the World Bank for approval.

Local security risk assessments will result in recommendations for mitigation measures. Based on these assessments, some decisions on beneficiary counties may be overturned and a revised county list will be provided to the World Bank. These assessments will be conducted prior to the commencement of activities, and whenever required or updates are requested. Assessment results will be written up in a confidential document, which will be shared with the PIU and the WB. Local security risk assessments will be conducted throughout project implementation, specifically prior to bidding processes for local IPs, and prior to commencement of any activities.



### 5.3 Likelihood Scoring

The Country Security Risk assessment provides an overview of the level of risk to project affected personnel and local communities across the country. Specifically, it provides an in depth summary of the security environment across the country including recent history in the security context, summary of main protagonists, local factors that drive conflict, current security situation, threat mapping and a list of all prevalent threats to project personnel.

The Country Security Risk Assessment compiles every security threat to project personnel and lists them. It then scores each threat scenario in terms of likelihood in each district within which EA-RDIP project activity is likely to occur. This is derived from a database of previous security incidents and analysis of the current security situation in the district. The likelihood scoring system is summarized in table

**Table 5-2: Likelihood Scoring**

Likelihood Score	Likelihood	Definition
1	IMPROBABLE	The risk will occur only in the most exceptional circumstances
2	LOW	The risk is not expected to occur in most circumstances
3	MEDIUM	The risk will occur in some circumstances
4	PROBABLE	The risk will occur in most circumstances
5	FREQUENT	The risk will occur in just about all circumstances

The total likelihood score of all threat scenarios in a district is added together to give the risk likelihood score for each district. Dependent on the likelihood/ impact of, and vulnerability score the district is categorized as **No-go, Extreme, Substantial, Partial and Low**. These categories are color coded and each district on the map of Somalia is colored according to its risk likelihood category.

### 5.4 Potential Risk Impact

Local Security Risk Assessments are conducted specific to a project activity or a group of activities operating in the same geographical area. As with the Country Risk assessment, the local risk assessment provides a summary of the local security environment in the area, without any threat mapping. Threat Scenarios are redefined in the context of specific project activities and locations. Project affected personnel are also divided into three categories;

- Category A – International project workers (a project worker is any individual employed to fulfil project activity and can be from the PIU, IPs, private contractors or government employees)
- Category B – Local National project workers
- Category C – Local Population

Likelihood scores are generated for each threat scenario for each category of project affected personnel. The threat scenarios are then analyzed in terms of the potential impact to project affected personnel. The Impact scoring system can be seen below;

**Table 5-3: Potential Risk Impact**

Impact Score	Impact	Definition
1	VERY LOW	Insignificant Injuries or health effects
2	LOW	Minimal Injuries or health effects
3	MEDIUM	Moderate Injuries or health effects
4	HIGH	Permanent disability and/or multiple hospitalizations, major health effects

5	EXTREME	Fatalities, multiple permanent disabilities or multiple hospitalizations, major health effects
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The risks is then analyzed using the current risk mitigation measures provided by friendly security forces in the local area, for each threat scenario and each category of project affected person, existing mitigation measures are identified and assigned a score according to their ability to deter, detect or defend against the event. The Vulnerability scoring system can be seen below;

**Table 5-4: Vulnerability Scoring**

Vulnerability Score	Vulnerability	Definition
1	INSIGNIFICANT	Protection measures are complete.
2	MINOR	Protection measures are extensive and mostly effective; the chances of the event occurring are low.
3	MODERATE	Protection measures are moderate and partly effective: it is possible that the event will occur.
4	MAJOR	Protection measures are few or partly effective; event is probable.
5	EXTREME	Protection measures are non-existent or ineffective; event is expected to occur.

By multiplying the likelihood score with the Impact score and the vulnerability score a Risk Score is generated for each threat scenario for each category of worker. Again, these Risk scores are categorized into 'Risk Levels', these are;

- STOP (Project Activity),
- Extreme,
- Substantial,
- Partial
- Low.

Local risk assessments are reviewed continuously and as new information is made available, action required as summarized in Table 5.5 below.

**Table 5-5: Risk Exposure and Action Required**

Risk Score	Risk Level	Action Required
<b>76-125</b>	Stop project activity	PROJECT ACTIVITY TO BE SUSPENDED UNTIL RISK SCORE REDUCES (This is likely due to the activity of malign actors, implementing further risk mitigation measures will not have a measurable effect on the risk score).
<b>51-75</b>	Extreme	Implement further mitigation measures with highest priority until risk reduced to acceptable level (<15). If risk cannot be reduced, the safety of project affected personnel is in doubt. Limited project activity allowed to continue on a case by case basis and only after sign off for each proposed activity by PIU Project Coordinator.
<b>31-50</b>	Substantial	Project activity can continue with required risk mitigation measures in place. PIU will continuously review the likelihood of threat scenarios and the risk mitigations measures in place including M&E and audits of activity on the ground.
<b>16-30</b>	Partial	Project activity can continue with required risk mitigation measures in place. PIU will regularly review threat likelihood and risk mitigation measures.
<b>1-15</b>	Low	Project Activity can continue, PIU will regularly review threat likelihood.

In each local SRA a risk score and risk level will be generated for each identified threat scenario, for each category of project affected personnel. From the table, acceptable risk is denoted as substantial, whereby the project activity can continue with required risk mitigation measures in place. However, the PIU will continuously review the likelihood of threat scenarios and the risk mitigations measures in place including M&E and audits of activity on the ground.



## 6 SECURITY RISKS MITIGATION MEASURES

### 6.1 Approach to Managing Security Risk

#### 6.1.1 Development of the Approach:

To balance (i) the need to support development benefits with (ii) managing the significant security risks, the project attempts a threefold approach:

- Screening out extremely high-risk areas, with a phased approach allowing reassessments and potential integration of areas where the situation improves over time;
- Risk management measures for moderate to substantial risk areas which remain volatile.
- Measures to scale down and or delay interventions in volatile areas with increasing risks informed by reassessments.

Preparatory assessment activities so far (and which are incorporated in the draft PAD):

- Security risk assessments developed during project preparation have helped determine the security profile of sub-regions where networks will be deployed in Somalia and South Sudan. Sub-national regions in the two countries have been categorized into risk levels, low, moderate, high, and extreme following the ISO 31000 process.
- Several of the sub-regions are categorized as high risk (see section 3.3) on account of likelihood of civil unrest, politically motivated armed conflict, GBV and Sexual Exploitation and Abuse (SEA), ambush and complex attacks that are likely to impact project workers.

The Proposed Approach and Protocols to be incorporated in the Security Risk Assessment and Management Plans:

#### 6.1.2 Phased approach:

The following phased approach in managing security risks is proposed

- The CMU, in agreement with the Somalia government, and in consultation with design risk engineers, will determine balancing of the security risks with the potential development benefits in high risk areas.
- Project activities will initially focus on deploying links in sub-regions with a moderate security threat profile, and gradually deploy additional links in more insecure areas, as and when the security context evolves positively and provides a more permissible operating environment.
- Site-specific assessments in the sub-regions will be required prior to the commencement of the infrastructure works through support from security risk management firms;
- Only for acceptable risk levels, a no objection to commence works for specific sites will be provided by the Bank.
- Further protocol details and holding point structures will be included in the Project Operation Manual. This will include a procedure to include management views on World Bank no objection to launch new phases of network deployment or initiating contracts in previously higher risk areas.

### 6.1.3 Additional measures

Further additional measures are provided below.

- For areas where works are at acceptable risk level, basic risk management approaches will be outlined in the site specific Security Management Plans (SMP). Training workers on-site on basic security elements, response to and reporting incidents among other will also be undertaken.
- In addition, capacity strengthening measures including security advisors in the PIUs will be required from the client in this case MoCT
- The task team will work with procurement to ensure flexibility in contracting and budgeting in need for a 'security premium' for contractors who will hire additional security; while a militarized approach to security will be avoided.
- Specialized security risk management firms will be hired to support assessments as needed.

### 6.1.4 Adaptation and Monitoring

Adaptation and Management Will be undertaken as detailed below.

- While security risks are likely to continue to be high throughout the project implementation period, they are also dynamic (e.g., recent gains have been made by government forces in southern Somalia). There could be a possibility of requiring suspension of or limiting project activities until permissible conditions are achieved in areas with high risk.
- Similarly, in areas with low risks, activities are expected to proceed with continuous review of the risk situation and implementation. Flexibility will be built into contracting to allow for a stop-start approach if the threat profile changes.
- Local site-specific assessments and evaluation of potential security risks will help in determining the level and types of security arrangements required to be put in place. The SMP will outline a tier approach to assessments to reduce the required number of reiterations for detailed site assessments
- Use of third-party monitoring agents to provide independent assessments and reassessments of the evolving security risk profile and the adequacy of risk mitigation measures deployed
- Local SMPs are available and included in bidding documents,
- Security will not be used as a competitive element in the bidding process, beyond ensuring that the contractor has minimal qualifications including an appropriate security track-record;
- The contractors will not cut back on security measures without PIU endorsement

## 6.2 Security Risks Mitigation Measures

For all threat scenarios that are detected in any local SRA a suite of risk mitigation measures will be identified specific to that threat scenario. For each Risk Level (STOP, Extreme, Substantial, Partial and Low) a proportionate amount of these risk mitigation measures will be assigned to the threat scenario.

IPs will be informed during the tender process of the perceived threat scenarios to their specific project activity, the risk level of each threat scenario for each category of worker and the required risk mitigation measures they are obligated to implement. In this manner IPs can cost for the required risk mitigation measures as part of the tender process. It may be that a variety of risk mitigation measures can be used to effectively mitigate the risk and in this case the implementing partner will be given the choice of which mitigation measures to enact.

A full list of all threat scenarios, with their risk scores/risk levels and required risk mitigation strategies will be found in the Local Security Management plan. IPs, prior to commencing project activity, will be required to produce an Activity Security Plan (ASP). In this plan they will pick from the local SMP all threat scenarios that are relevant to their project activity and articulate via the ASP template which of the proscribed risk mitigation measures they intend to implement. This plan will be presented for sign off to the PIU Security Officer. **Table 6-1** below table lists the potential security risks and potential mitigation measures.

**Table 6-1: Potential Security Risks and Potential Mitigation Measures**

Risks	Mitigation Measures
<p><b>Security risks for all Project Workers</b>, including due to possible entanglement in local conflicts; due to attacks by armed militias or AS; or threats from other third parties</p>	<ul style="list-style-type: none"> <li>• Conduct subproject or site-specific security risk assessment</li> <li>• Develop subproject or site-specific Security Management Plan (SMP)</li> <li>• Select IPs or partner them with local organizations that have a good understanding of local dynamics and can help manage exposure to security threats</li> <li>• Select IPs for implementation at the local level, which have existing informal local networks that will aide their protectio</li> <li>• Deploy or partner with international organizations that have solid security management systems and valuable knowledge and experience in delivering specialized operations in target locations and provide relative advantage to challenges of access to site and the identification and mitigation of security threats</li> <li>• No operation in AS-controlled areas</li> </ul>
<p><b>Security risks for beneficiaries and other project affected persons</b>, due to their involvement in the project activities (e.g. resulting attacks from opposition groups or attacks by AS).</p>	<ul style="list-style-type: none"> <li>• Conduct subproject or site-specific security risk assessments</li> <li>• Develop subproject or site-specific Security Management Plan (SMP)</li> <li>• Select IPs or partner them with local organizations that have a good understanding of local dynamics and can help manage exposure to security threats</li> <li>• Deploy or partner with international organizations that have solid security management systems and valuable knowledge and experience in delivering specialized operations in target locations and provide relative advantage to challenges of access to site and the identification and mitigation of security threats</li> <li>• No operation in AS-controlled areas</li> <li>• Stop interventions if security risks are rising, in order to protect beneficiaries and other project-affected parties. Ensure that cancelations of operations are properly communicated to all stakeholders</li> </ul>
<p><b>Insecurity as a risk for project workers and their access to communities</b></p>	<ul style="list-style-type: none"> <li>• Conduct subproject or site-specific security risk assessment</li> <li>• Develop subproject or site-specific Security Management Plan (SMP)</li> <li>• Follow minimum conditions for commencement of interventions at community level</li> </ul>
<p><b>Security risks for all project workers and project affected parties due to systemic weakness in functionality of police and security forces</b></p>	<ul style="list-style-type: none"> <li>• Engage with local formal security providers in the course of the intervention, create coordination mechanisms between the FMS-level government actors and local IPs, and communities</li> <li>• Conduct subproject or site-specific security risk assessment that includes consideration of local formal security forces and identifies possible security companies to assist Project implementation by IPs.</li> <li>• Develop subproject or site-specific Security Management Plan (SMP)</li> </ul>
<p><b>Inconsistencies in security information coordination and sharing</b></p>	<ul style="list-style-type: none"> <li>• PIU to engage federal level Security Risk Management Company to assist in information and knowledge dissemination and coordination in security matters</li> </ul>
<p>Inability to analyze and make informed decisions about involvement in a specific area</p>	<ul style="list-style-type: none"> <li>• PIU to engage federal level Security Risk Management Company to assist in information and knowledge dissemination and coordination in security matters</li> <li>• Conduct subproject or site-specific security risk assessment</li> <li>• Develop subproject or site-specific Security Management Plan (SMP)</li> </ul>

<p><b>Security risks due to opportunistic armed actors targeting provision of cash deliveries or other materials/assets</b></p>	<ul style="list-style-type: none"> <li>•</li> <li>• Conduct subproject or site-specific security risk assessments</li> <li>• Develop subproject or site-specific Security Management Plan (SMP), including identification of local security companies that can assist with protection of material or cash deliveries</li> <li>• Select IPs or partner them with local organizations that have a good understanding of local dynamics and can help manage exposure to security threat</li> <li>• Select IPs for implementation at the local level, which have existing informal local networks that will aid their protection</li> <li>• Deploy or partner with international organizations that have solid security management systems and valuable knowledge and experience in delivering specialized operations in target locations and provide relative advantage to challenges of access to site and the identification and mitigation of security threats</li> </ul>
<p><b>Lack of guidelines for emergency responses</b></p>	<ul style="list-style-type: none"> <li>• PIU to contract Security Risk Management firm that develops concrete guidelines for emergency responses to be implemented by all IPs</li> </ul>
<p><b>Security risks through armed guards used for project interventions (eg provision of cash)</b> Security guards are likely to be armed in line with the statutory provisions. The use of arms in itself generates safety and security risks for the security guards themselves, other Project Workers present and the host community in case of misuse or accidents.</p>	<ul style="list-style-type: none"> <li>• Contract reputable security companies (including their track record of service delivery in the country; the contracted security company has a good reputation, employs highly disciplined and trained personnel with thorough induction on the code of conduct) . Further, Where possible, security companies should be members of ICoCA. If not, they should be encouraged to follow ICoCA's code; <a href="https://icoca.ch/the-code/">https://icoca.ch/the-code/</a></li> <li>• The Service Contract should stipulate requirements, including references made to Anti-Fraud and Anti-Corruption Policies, Protection with a focus on Child Labour and PSEA, that are referenced as contractual obligations and form the basis of expected behaviour by the security personnel in regard to project workers and the host community. Further, the service contracts should stipulate employment of local community members, where possible and in line with national recruitment policies.</li> <li>• Carry out start-up training and annual refresher courses to the security personnel on pertinent issues including GBV/PSEA and Child Abuse</li> <li>• Ensure host communities are well informed on the conduct expected from the security personnel and are educated on the GRM as documented in the SEP to ensure any form of misconduct by the security personnel is reported.</li> <li>• Ensure that through stakeholder engagement, the management of the security company attends community meetings and makes declarations that their security personnel are under strict contractual obligation to exhibit good conduct, encouraging the community to report any misconduct</li> <li>• Restrict residence time for the security personnel in the community to the time of the activity only, and ensure they drive in and out immediately before and after</li> <li>• IP staff to accompany every distribution to undertake on site monitoring if cash distributions are carried out in accordance with standards and policies, including security personnel's behaviour and compliance. During this time, the security personnel should have no direct contact with the community as well as prior and after. The community sensitization, organisation, crowd control and other measures are carried out by the IP</li> </ul>



<b>Potential heightened GBV risks due to workers influx and cash injections</b> (e.g. receipt of cash by women)	See LMP and GBV Action Plan
<b>Risks of sexual exploitation and abuse or sexual harassment</b> , such as requests for sexual favors, extending from registration or release of funds or other goods	See LMP and GBV Action Plan
<b>Increased GBV risks based on the design and location of infrastructure:</b> infrastructure maybe designed without taking into account women and girls safety considerations (privacy, location), dignity (privacy and women’s requirements for use) and accessibility (no ramps etc) to facilitate access for persons with disabilities.	Local security risk assessments to include safety audits for all relevant activities to ensure protection and security of affected communities and alignment with global protection standards
<b>Some project locations remain inaccessible due to AS activities</b>	Areas currently held by AS or frequently intruded by AS are on the list of non-eligible project sites
<b>Lack of security protocols</b> for project implementation can put investments and staff at risk	PIU to monitor and inspect compliance with SMF by all Project actors

## 7 ESCALATING AND DEESCALATING SECURITY POSTURES

The Security situation in Somalia and particularly within the proposed project activity areas is volatile. As the situation evolves the likelihood of any particular threat scenario may increase or decrease. The local SRA is a dynamic document. If new information becomes available that materially changes the assessment of the likelihood of a particular threat, the likelihood scores will be adjusted and therefore the risk score for a threat scenario will change. If the change in the risk score moves the threat scenario into a different risk level (STOP, Extreme, Substantial, Partial, Low) then the current risk mitigation measures will no longer be proportional and will need to be adjusted.

Whilst the lowering of a risk level is of less concern (predominately it may mean IPs can choose to reduce risk mitigation measures which will potentially have cost saving implications) if a risk level is raised then immediate action will need to be taken.

If a risk level is raised an immediate flash message will be generated by the PIU<sup>58</sup>. It will be sent to all relevant IPs and Security stakeholders within the EA-RDIP and World Bank. The message will clearly articulate which project activities and locations are affected, which threat scenarios have changed, what the new risk level is and what action is to be taken. Action to be taken may include cessation or curtailing of project activity as well as mandated extra mitigation measures to be implemented by IPs. It is very likely that once a risk level is raised that project activity will be suspended, at least in the short term, to allow IPs to rebalance and put in place new risk mitigation measures.

All IPs have the right to take their own internal decisions on the suspension of activities due to prevailing insecurity and with the view to protecting their respective workers and project communities. Their decisions should be informed by their respective security advisors and assessments, and should be taken in consultation with the PIU. The PIU cannot prevent IPs from their own decisions to suspend activities if IPs assess the environment as too insecure for the implementation of activities. This right is clearly laid out in bidding processes and subsequent contracts. In addition, as noted above, IPs and contractors will receive the relevant information on potential risks and mitigation measures, their obligations and rights, in the bidding process.

In case of decisions taken by the PIU or IPs to exit a project area due to security risks, appropriate communication with the communities, local governments and state governments will be made where possible to ensure that all stakeholders understand why activities have been suspended. Such communication will be conducted through locally applicable means such as radio, as well as engagement with local authorities (both formal and informal) prior to exiting the areas.

It must be noted that escalating security postures and increasing security risk mitigation measures will have cost implications for IPs. This must be made clear in the bidding process and IPs must maintain a reserve budget specifically if more costly risk mitigation measures are required to enable project activity.

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<sup>58</sup> This service will be contracted to available mobile telecommunication companies and Somalia, the contracted company will agree with the PIU on a communication protocol of transmitting the flash message

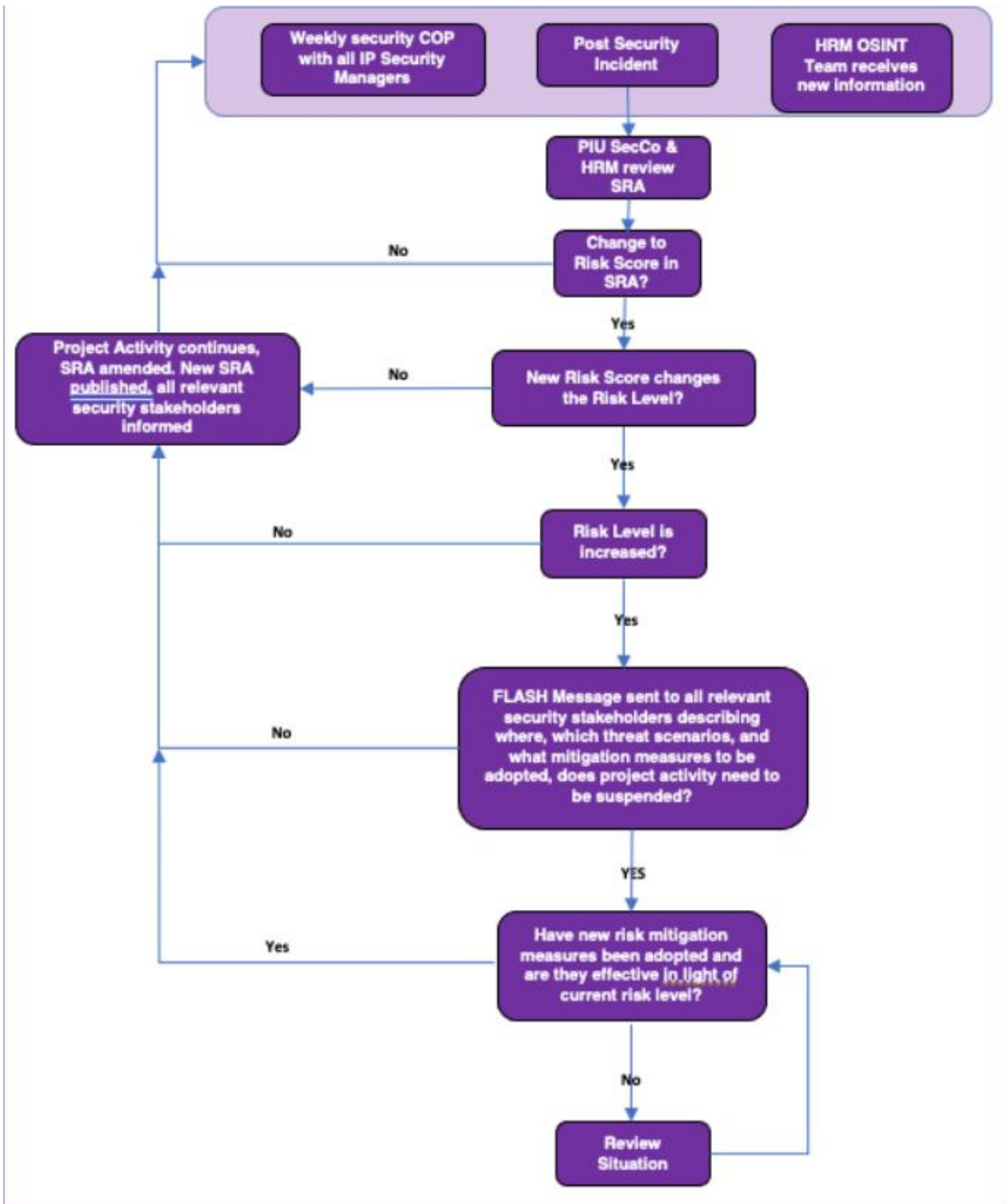


Figure 7-1: Security Posture Escalation Process<sup>59</sup>

<sup>59</sup> Source: Adopted from HRM-SCRIP Draft Country SMP– 25th February 2021

## **8 IN-EXTREMIS EVENTS**

Whilst the raising of a risk level may suffice, inducing a short break from project activity followed by a resumption of activity with more robust mitigation measures in place, in some instances the security situation may deteriorate rapidly and/or catastrophically. As part of the IP ASP in-extremis protocols and SOPs will be presented for sign off. These will include evacuation and relocation plans (including shelter in place) and 'actions on' in extremis events such as complex attack, ambush, indirect fire attack, etc. The requirements for these protocols and SOPs are clearly laid out in the ASP template provided as an appendix and will be articulated in the bidding process.

In an in-extremis event the PIU will support IPs by assisting in liaison with FGS, FMS and AMISOM security forces. This is not to say that IPs should not have their own direct links to local commanders, indeed this is a mandated requirement for all IPs, and however EA-RDIP as an FGS project will bring to bear all possible influence it can on local government and AMISOM forces to assist IPs if required. Equally, if the security situation rapidly deteriorates and IPs are instructed by the PIU, or take the decision themselves, to trigger their evacuation and relocation plans (which may include shelter in place), the PIU will again seek the support of local security forces to assist the IP.

In case of decisions taken by the PIU or IPs to exit a project area due to security risks, appropriate communication with the communities, local governments and state governments will be made where possible to ensure that all stakeholders understand why activities have been suspended. Such communication will be conducted through locally applicable means such as radio, as well as engagement with local authorities (both formal and informal) prior to exiting the areas.

## **9 LOCAL SECURITY MANAGEMENT PLAN**

The security risk assessments will be used as a basis for the development of local Security Management Plans (SMPs) for each area of implementation. They will be developed by the Security Risk Management Firm in close coordination with the PIU. Local SMPs should be detailed documents that stand up to the potential scrutiny that will apply should security incidents occur to Project Workers and Project-Affected Parties. They should include key procedures on the management of security in a particular area, as well as a specific section on the prevention and response opportunities to GBV cases in the particular area. They should list detailed approaches for protection of the different types of Project Workers and Project Affected Parties – including specific measures for the groups identified as particularly vulnerable.

A template for local SMPs will be developed by the Security Risk Management Company, as part of the overall Project SMP during the inception phase of the Project, and before commencement of activities. The SMP, as well as all local SMPs prepared will be submitted to the World Bank for approval. Local SMPs will be developed throughout project implementation, when new areas are envisaged for activities. Existing local SMPs will also be updated throughout the lifetime of activities taking place.

## **10 ACTIVITY SECURITY PLAN**

As an IP is on boarded to the project and their scope of work and specific deliverables have been confirmed, once they have formulated their work plan they will submit this and a proposed Activity Security Plan to the PIU. To populate the ASP the IP will refer to the Local SMP. The IP will pick out the relevant threat scenarios that apply to its activities and personnel, it will list these in the ASP. Taking note of the mandated

risk mitigation measures for each threat scenario it will provide a detailed description of how it intends to implement said measures.

The ASP will also include the IP completed ESMF Security checklist and a copy of the IP relocation and evacuation plans (if relevant), medical evacuation plans, and in-extremis ‘actions on’ SOPs. These actions on will include detailed contact lists of local security partners and specific protocols on how to call for support. The ASP template can be found at appendix to this report. The ASP must be completed, submitted to the PIU, reviewed and signed off by the PIU prior to the IP commencing project activity.

## 11 PROJECT APPROVAL PROCESS

The resulting threat scenarios and risk levels will be used to generate a list of risk mitigation measures documented as a Security Management Plan (SMP) which will be fed back into the project planning cycle in order for project planners to accurately budget for IP involvement as detailed in Project Approval and Security gateway figure below.

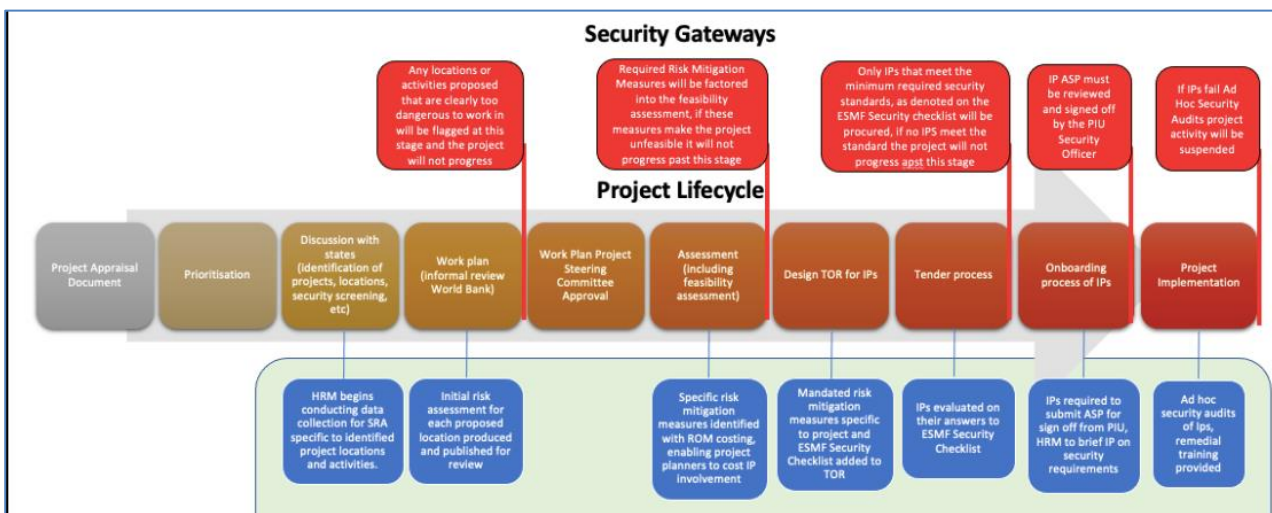


Figure 11-1: Security Posture Escalation Process<sup>60</sup>

<sup>60</sup> Source: adopted from HRM-SCRP Draft Country SMP– 25th February 2021

## **12 SECURITY GATEWAYS**

During a project lifecycle there are five security gateways. At each security gateway the EA-RDIP Project Coordinator in consultation with the PIU Security officer must provide sign off authority for the project to progress. The five gateways are;

- Initial Risk Assessment and Work Plan Review
- Project Feasibility Assessment
- Tender Process
- IP Onboarding process
- Security Audit during project implementation

### **12.1 Initial Risk Assessment and Work Plan Review**

Once a project has been proposed, the security firm will conduct an immediate Risk Assessment of in light of the proposed location and activities. Assessing IP access, implementation methodologies (direct/indirect), local area protection measures, local community and beneficiary engagement, threat (armed, GBV, OHS, community exposure, ESS), contingency measures, and liaison with arms carriers as well as the extant threat from malign actors, the security firm will give an immediate go/no go recommendation to the PIU Security Officer, who will in turn brief the Project Coordinator. Given the extreme security environment in some of the project proposed locations it very well may be that a project is not deemed viable due to the nature of the threats and the risk mitigation measures required.

### **12.2 Project Feasibility Assessment**

As part of the wider project feasibility assessment the security firm will provide to the planning team the proposed risk mitigation measures required to provide security to the project affected personnel. The security firm will also provide ROM costing for all risk mitigation measures and the feasibility of implementing these risk mitigation measures e.g. finding a quality private security company within the proposed area of operations or relying on AMISOM support. These costs will be factored into the project planning assumptions and included in proposed budgets. Once completed the security component will form part of the final feasibility assessment which requires Project Coordinator sign off before the project can progress.

### **12.3 Tender Process**

IPs responding to a tender for works will be required to complete the ESMF Security Checklist. The results of the ESMF checklist will be evaluated by the PIU Security Officer. Any IPS failing to meet the minimum mandatory criteria will not be awarded EA-RDIP works contracts.

### **12.4 IP Onboarding Process**

As part of the onboarding process, IP's are required to populate an ASP in response to the Local SMP relevant to that IP's activities. The completed ASP is reviewed by the PIU Security Officer. If the ASP does not adequately describe the how an IP intends to implement the mandatory risk mitigation measures, or does not provide in-extremis SOPs and evacuation plans in sufficient detail the PIU Security Officer will not sign off on the IP conducting project activity. In this event the PIU Security Officer and the security firm will work with the IP to fill capability shortfalls and enable them to pass this security gateway.

## **12.5 Security Audit during project implementation**

At unspecified times security firm will conduct physical and remote security audits of IP activities. If it is found these activities are not being conducted in keeping with the IP ASP or the mandated risk mitigation measures as laid out in the relevant local SMP the IP will be ordered to halt project activity. The IP will be instructed to implement the required risk mitigation measures, if the IP struggles to implement these effectively the PIU and the security firm will work with the IP to ensure the safety and security of project affected personnel and allow the IP to resume project activity as soon as possible.

## **13 IMPLEMENTING PARTNERS SECURITY REQUIREMENTS**

### **13.1 Procurement**

All IPs will be required to formally respond to an RFP process in order to be procured for the EA-RDIP project. As part of this process a Terms of Reference will be drawn up, clearly identifying the IPs role and responsibilities. Within this TOR, the IP's Security responsibilities will be made clear. These responsibilities will include specific risk mitigation measures that the IP must implement whilst it is engaged in project activity. Some of these risk mitigation measures will have a cost associated to them and the IP must factor in these costs when designing its operational solution.

Throughout the lifecycle of an IP's contract with the EA-RDIP it must be noted that the security environment can change. If this is the case the risk mitigation measures that were stipulated in the RFP may no longer be fit for purpose. If a security environment, within which an IP is operating, begins to deteriorate then the IP will be required to escalate its security posture by increasing security risk mitigation measures in line with the local SMP. To do this may have cost implications for the IP. It will be solely the responsibility of the IP to meet these extra costs. This will be made clear in the bidding process and IPs must maintain a reserve budget whose utilization will be authorized by the PIU, intended specifically if more costly risk mitigation measures are required to enable project activity.

### **13.2 ESMF Security Checklist**

The ESMF Security Checklist as presented as appendix will be a mandatory criteria in every IP tender process. IPs will be made aware that their answers will be audited at some point during the contract and discrepancies may result in suspension of project activity and/or the removal of the IP from the contract.

The results of the ESMF Security checklist will be evaluated by the security firm in conjunction with the PIU Security Officer as part of the tender evaluation process. Those IPs deemed to be 'at risk' with insufficient security policies and procedures in place will be flagged to the PIU. An 'at risk' IP, may not be awarded a contract on the grounds of their response to the Security Checklist. If, however it is deemed that the IP's capabilities are necessary for contract activity, the security firm may be engaged separately by the PIU to ensure that the IP meets the relevant security standards. The security firm will achieve this through consulting to and the training of the IP.

### **13.3 Activity Security Plan**

IPs will be required to complete an Activity Security Plan (ASP), having been awarded a contract and prior to engaging in project activity. The template for the ASP is provided in the appendix. The security firm, as part of the IP ESMF onboarding process will brief the precise requirement and the detail required in the ASP to the IPs. The ASP will be evaluated by the PIU Security Officer, supported by the security firm. If the IP ASP fails to meet the required standard security firm will work with the IPs to implement the required risk mitigation measures to enable project activity. Until this is achieved the IP will not be signed off by the PIU Project Coordinator to commence work on the ground.

### **13.4 Security Audit Process**

Throughout the lifecycle of an IP's contract the PIU can demand to audit, either physically, remotely or by proxy or through a third party, the security policy and procedure held by the IP. The basic format of the audit will follow the ESMF Security Checklist, where the PIU will demand to view the individual security



policies and procedures that the IP has attested to possessing in its response to the Security Checklist. Further to policy and procedure, the IP may also be requested to present historical records as evidence of its adherence to its own policies. All IPs are required to cooperate fully with these security Audits and where IPs are found to not possess the required documentation in sufficient detail or at all, their project activity may be curtailed, suspended or cancelled altogether. The full security audit process can be found at appendix to this report.

### **13.5 Monitoring and Evaluation**

Further to the audit process above, the PIU will carry out monitoring and evaluation of the IP's stipulated risk mitigation measures on the ground. It may do this either with or without the IP's knowledge utilizing its own personnel, the security firm personnel or those of another third party. The results of an M&E process will be documented with evidence in the form of time/date stamped and geo located photography and video. The results will be shared with the IP by the PIU and a constructive dialogue initiated to identify best practice and capability shortfalls. Again, if IPs are found not to be implementing risk mitigations measures as described in their own ASPs their project activity may be curtailed, suspended or cancelled altogether. The full security M&E process can be found at Annex F and forms part of the larger ESMF M&E framework.

### **13.6 Security Exercises**

From time to time the PIU will require the IP to conduct either a table top or physical security exercise with its security partners. This is in order to ensure that the correct procedures and relationships are in place to assist IPs and their personnel in the event of an in-extremis event. The exercise will be planned in collaboration with the IP Security representative and will be run by the security firm on behalf of the PIU. Liaison with the necessary Security partners will be conducted through the PIU Stakeholder engagement officer and an exercise scenario will be generated by the security firm. Security Exercise policy can be found at Annex G and includes testing criteria, basic scenarios and the regularity of testing required.

### **13.7 Training**

The security firm to be hired, on behalf of the PIU will provide security training as and when required to IP's where capability shortfalls are identified. This training will cover all manner of risk management from the writing of effective risk management policy and procedure, conducting risk assessments, writing effective security management plans and implementing effective risk mitigation measures. The PIU, utilizing The security firm will seek to enable IP's to operate in extreme security environments, allowing IP personnel to work in a safe and secure manner.

## **14 SECURITY PARTNERS**

### **14.1 FMS/FGS**

With much of the proposed project activity being conducted in areas where the security environment is extreme, engagement and support from the FGS and FMS security apparatus will be imperative for the successful implementation and continuation of project activity.

The PIU and the EA-RDIP itself does not have direct control of security assets. IP's may hire private security companies to provide a level of protection but this is only ever a stop gap measure (private security companies are generally only ever contracted to defend a site in the event of attack for up to 60 mins prior to local government security forces arriving). In many cases, the use of local private security companies at the project level will be a requirement under the IP's engagement.

Support from the FGS and FMS Security organizations and agencies needs to be established and exercised in order to provide assurance that project affected personnel can receive assistance in a timely manner when required. Assistance will range from up to date intelligence on anti-government elements, to, armored escorts and area security, to, rapid response to in-extremis events.

The PIU Stakeholder Engagement Officer will facilitate communication between the PIU and FGS and FMS Security organizations, including the Somali Police Force (SPF), Somali National Army (SNA) and the National Intelligence and Security Agency (NISA). All known contact details of local commanders will be published in the Local SMPs for IPs to integrate into their ASPs.

The PIU, utilizing the security firm, will endeavour to put in place protocols for officially requesting assistance and exercise in-extremis responses. Where the situation requires it, in order to maintain the continuation of project activity IPs can request FGS and FMS support to the PIU who will make an official request to the relevant security organization.

Whilst the PIU will endeavour to seek the support of FGS and FMS Security organization through the top down approach, it is vital, indeed mandated, that IPs form relationships of their own with their relevant local FGS and FMS security commanders. As previously stated the contact details for all local commanders will be collated by the PIU and published in the local SMPs for use by the IPs. As part of the reporting framework IPs will be required to report on their continued engagement with local commanders.

As per the ESMF any potential deployment of public security forces must conform its implementation activities in line with the provisions of ESS2 on Labour and Working Conditions and ESS4 on Community Health and Safety, in particular in relation to paragraphs 24-27 on "Security Personnel," and the relevant provisions of the World Bank Guidance Note to ESS4. The PIU will enter MoUs on security partnership prior to project effectiveness with the relevant state and national level public security forces to cover these provisions and the PIU will audit activity conducted in support of the project to ensure compliance.

### **14.2 AMISOM**

Potentially the most effective security partner, AMISOM, will also be courted by the PIU Stakeholder Engagement Officer for support. Again, protocols to request assistance will be established at government level and IPs are required to seek to establish relationships at the local level.

Enlisting the support of AMISOM will be vital specifically for large flagship projects that will almost certainly be targeted by anti-government actors. If project activity is to continue it will almost certainly require a dedicated element of support from AMISOM.

### **14.3 Local Clan Militia**

Whilst the PIU cannot endorse official relationships with quasi legal armed groups it is recognized that IPs may receive a level of support from local communities who benefit from the project activity. If this were to happen deconfliction may be required to ensure that project security partners and local support do not clash to the detriment of all concerned.

IPs will be required to report on the level of local support they are receiving and its perceived impact on their security. The PIU security officer will evaluate each situation on a case by case basis and work with the IP and local security partners to ensure that IP personnel and other projected affected personnel are receiving the correct level of security and that the risk of conflict between official security partners and local support is diminished.

### **14.4 Private**

Private Security Companies will be required by IPs to provide a level of risk mitigation for most projects. However, private security companies themselves can represent a security risk. IPs will be restricted to procure only those private security companies that have been pre-qualified by the PIU and that meet the standards as laid out in ESS 1 and 4. Private Security activities are likely to include;

- Armed and Unarmed Static guarding of project infrastructure and work sites.
- Armed Close protection of project personnel
- Armed Movement support
- Tracking of personnel and vehicles
- Security Advisory Services

The security firm will conduct all prequalification exercises on proposed private security companies through its defined audit process. Whilst PIU will identify private security companies who wish to be prequalified, if IPs wish to propose other security companies these will also be prequalified by the security firm, membership to ICoCA . Where Security companies do not meet the required standards but their support is deemed critical to project activity the security firm will conduct training and provide consultancy order to upskill the private security company and enable them to be procured by the relevant IP.

## 15 INFORMATION INPUTS

### 15.1 Third Party Security Reporting

The PIU will source and collate independent security reporting from the UN, INSO and FGS and FMS. These reports will be read and analysed by the PIU team and relevant data extracted. The data will be formatted and inputted manually into the EA-RDIP IMS.

### 15.2 IP Information Requirements/Reporting

IPs, as the organizations at the very forefront of the project activity, will be privy to first hand sources of information that will be vital to the ongoing planning and continued security of project affected personnel. As such there is a contractually mandated security reporting requirement placed upon IPs. This forms part of the larger reporting required as part of the project however, for ease of reference, the specific security requirements in the reporting package are listed here.

IP Information requirements begin during the tender process when they are required to submit their response to the ESMF Security Checklist. Subsequently, upon award of contract and prior to commencing project activity IPs are required to submit an ASP for sign off from the PIU.

During the performance of the contract IPs shall submit reports as per the below schedule. All security reporting will be conducted online through the EA-RDIP IMS system portals within which IPS will find all reporting templates.

**The Weekly work plan** shall be as per the template provided by the PIU and it will include;

- Brief description of expected activities and locations in the field for the following week
- Detailed locations of all activities
- Numbers and nationalities of personnel involved in each activity
- Round up of any security incidents in the past week
- Arms carrier networking and community engagement feedback

**The Monthly Update** shall be as per the template provided by the PIU and it will include;

- Risk / issue updates
- Field security update based on implementing partner network and community input to include incident reporting, local security developments, field movements (interesting to discuss expectations on this point), local community engagement/ feedback, conflict evolution, movement limitations.

The Quarterly Progress Report shall be as per the template provided by the PIU and it will include;

- Risks / Issues including security and impact on project activities
- Security Incident (Flash) Report shall be as per the template provided by the PIU and it will include;
- Type of incident – what has occurred
- Time of the incident – when it occurred
- Location of the incident – where it occurred
- Full description of incident – what happened, to whom and by whom
- Current Activities – What is the current situation

IP security reps will also be required to form working groups hosted by security firm and chaired by the PIU to assist in adding and editing content to SMPs relevant to their activities. The security firm will maintain sole writing and editing privileges ensuring the documents are managed correctly.

### **15.3 Third Party Information Sources**

The security firm will establish an Open Source Intelligence (OSINT) and Collection team that will provide in depth, uniquely detailed OSINT product that merges the capability of both technology and people. The team will comprise of three analysts, one team leader and an intelligence manager who are permanently focused on the Somali information environment. The team will be formed from the native Somali analysts and understand local dialects.

Utilising automated collection tools, local networks and the very best open source collection techniques ensures access to primary sources for reporting and the tradecraft employed in collection allows wider access to more sensitive information.

All data collected from tertiary sources is read and analysed, extracted, formatted and manually inputted into the EA-RDIP IMS by the PIU Team.

### **15.4 Security Risk Assessments**

As previously described the local SRAs will be used to inform the local SMPs. Data extrapolated from the EA-RDIP Security IMS will be used to adjust the likelihood and (in rare occasions) the impact scores for specific threat scenarios in local SRAs. As trends are identified and security incidents mapped The security firm will analyse the data and adjust risk scores accordingly.

### **15.5 Security Management Plans**

Local SMPs will provide a summary of the local security situation and will include;

- Recent security incident mapping, showing what type of incidents have occurred and their specific locations,
- Clan dynamic mapping, showing areas of influence and key stakeholders,
- Access mapping showing within which areas project activity can occur and extrapolating from this which routes are safe to use
- Identified security trends and Tactics, Techniques and Procedures of local anti- government elements and malign actors.

### **15.6 Weekly Security Cop**

The primary method by which collaboration between the PIU, Security partners, Security Stakeholders and IPs is achieved will be via the weekly security CoP. Hosted by the PIU Project Coordinator or his nominated representative (the PIU Security Officer) and attended by World Bank, Safeguards, IP Security Reps and FMS and FGS Security Reps.

The CoP provides the forum within which;

- A summary of the latest intelligence is shared, including security incidents for the past week, anti-government element movements, perceived targets and new TTPs.
- Security direction from the PIU is given,
- Requests are made to FGS and FMS Security partners
- Security best practice is shared.
- IPs can voice concerns and request additional support
- Feedback is provided to the PIU to help shape internal policy and procedures.

The full Weekly CoP TOR can be found at appendix to this report. IPs will be required to attend with their nominated security representative.

### **15.7 PIU Travel Policy**

From time to time PIU personnel or those working directly on behalf of the PIU (UNOPS/CTG) will be required to travel to proposed or actual project sites and/or visit FMS Government personnel. These personnel will fall under the PIU Travel Policy, which can be found at appendix to this report and denotes the precise policy and procedures that must be followed in order to ensure the safety and security of personnel. The PIU Travel Policy, like Local SMPs is informed by Local SRAs and lays out the precise risk mitigation measures that must be adopted by any personnel travelling on PIU business.

Prior to any mission involving PIU personnel or those working on behalf of the PIU commencing, sign off for the mission must be obtained by the EA-RDIP Project Coordinator. The Project Coordinator will be advised in this regard by the PIU Security Officer who will only recommend the mission go ahead once they have been reassured all the required risk mitigation measures as stipulated in the PIU Travel policy have been observed and implemented.

### **15.8 Crisis Management Plan**

Whilst the Security Management Plans mandate risk mitigation measures for IPs, as does the PIU Travel Policy for PIU personnel, there is still always the potential for a crisis. For clarity, and in the context of this Security Management Plan, a crisis is defined as any incident with potentially severe consequences that occurs outside or in a form different from the expected course of events and which threatens the life or safety of PIU affected personnel. The EA-RDIP Crisis Management Plan can be found at annex to this report.

## 16 Roles and Responsibilities

Roles and Responsibilities are summarized below

**Table 16-1: The Roles and Responsibilities**

Roles and Responsibilities related to Security Risk Management		
PIU	MDAs	SPTs
<ul style="list-style-type: none"> <li>• Contract and oversee a Security Risk Management Company</li> <li>• Ensure the development of site- or activity specific security risk assessments and SMPs</li> <li>• Ensure the development of a Project-wide SMP</li> <li>• Ensure communication of security risk assessment results to the MoCT SPT</li> <li>• Ensure the development of local Security Management Plans (SMPs)</li> <li>• Seek WB no objections on SMPs</li> <li>• Ensure the integration of local SMP requirements and adequate budgeting fo security measures into bidding processes during procurement of CSOs/IPs</li> <li>• Monitor the implementation of SMPs by IPs</li> <li>• Report on the implementation of SMPs by IP as part of the reporting on environmental and social standards (see ESMF)</li> </ul>	<ul style="list-style-type: none"> <li>• Contribute to the localized security risk assessments or support their process</li> <li>• Contribute to the development of local SMPs</li> <li>• Integrate SMF/SMP considerations into subproject design</li> <li>• Integrate SMF/SMP requirements into the subproject bidding documents</li> <li>• Supervise IPs in the implementation of the SMPs, including site supervision and inspection</li> <li>• Contribute to reporting on SMP impementation to the PIU</li> <li>• Contribute to decision making on implementation sites under due considerations of security risks.</li> </ul>	<ul style="list-style-type: none"> <li>• Through community consultations contribute to security risk assessments</li> <li>• Contribute to the development of local SMPs</li> <li>• Review IP compliance with SMP requirements</li> <li>• Report possible non-compliance the the PIU</li> </ul>

**Signed**  
**National Coordinator,**

**East Africa Regional Digital Integration Project (EA-RDIP)**



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