



Additional Financing Appraisal Environmental and  
Social Review Summary  
Appraisal Stage  
**(AF ESRS Appraisal Stage)**

Date Prepared/Updated: 10/11/2023 | Report No: ESRSAFA622



I. BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Somalia	EASTERN AND SOUTHERN AFRICA		
Project ID	Project Name		
P181469	Somalia Shock Responsive Safety Net For Human Capital Project Third Additional Financing		
Parent Project ID (if any)	Parent Project Name		
P171346	Shock Responsive Safety Net for Human Capital Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	10/16/2023	12/15/2023
Estimated Decision Review Date	Total Project Cost		
10/23/2023	0		

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Proposed Development Objective

The project development objective is to provide cash transfers to targeted poor and vulnerable households and establish the key building blocks of a national shock-responsive safety net system.

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project Activities

The Shock Responsive Safety Net for Human Capital Project (SNHCP) supports the Federal Government of Somalia's national social protection platform 'Baxnaano'. The project provides poor and vulnerable households nutrition linked cash transfers to meet their immediate consumption gaps and protect against famine and malnutrition risks expected as a result of the developing drought in 2019. With a view towards longer term development, the project also support efforts by the Federal Government of Somalia (FGS) to strengthen institutional resilience, establish key delivery



mechanisms of a national social protection system and supports pilots on key social protection interventions. The project also supports establishment of a national Unified Social Registry, its data collection and update mechanisms.

The project has four components:

1. Nutrition-Linked unconditional cash transfers - An unconditional cash transfer program which covers 200,000 chronically poor and vulnerable households with focus on households with children aged under five years in 25 districts across all Federal Member States (FMS) and Somaliland. The component also supports provision of emergency cash transfers to 338,000 drought affected households.
2. Delivery Systems and Institutional Capacity Building - The component supports development of a Unified Social Registry and Baxnaano management information system (MIS).
3. Project Management, Monitoring and Evaluation, and Knowledge Management - The component finances the Project Implementation Unit (PIU) within MoLSA and helps strengthen horizontal coordination with other line ministries as well as between FGS and FMS. The component also supports implementation of key social protection intervention pilots.
4. Household Registration in the USR - This component finances the expansion of the USR by registering households not yet included in the database using its common registration form (CRF).

## **D. Environmental and Social Overview**

### **D.1 Overview of Environmental and Social Project Settings**

Situated in the Horn of Africa, Somalia is bordered by Ethiopia to the west, Djibouti to the northwest, the Gulf of Aden to the north, the Guardafui Channel and Indian Ocean to the east, and Kenya to the southwest. With a total land area of 637,657 square kilometers and situated between 2°S and 12°N latitudes and 41° and 52°E longitudes, Somalia is the 43rd biggest country on earth and has the longest coastline on Africa's mainland. The country's terrain consists mainly of plateaus, plains and highlands. Somalia has a seaboard that stretches 3,333 kilometres. Somalia contains seven terrestrial ecoregions: Ethiopian montane forests, Northern Zanzibar–Inhambane coastal forest mosaic, Somali Acacia–Commiphora bushlands and thickets, Ethiopian xeric grasslands and shrublands, Hobyo grasslands and shrublands, Somali montane xeric woodlands, and East African mangroves. The nation has 10,320 square kilometres of wetlands. Climatically, hot conditions prevail year-round, with periodic monsoon winds and irregular rainfall.

Somalia has an estimated population of around 17 million, of which over 2 million live in Mogadishu, the capital city. The country has been described as Africa's most culturally homogeneous country. Despite the homogeneity, Somalia operates under a complex system in which traditional clan and sub-clan dynamics interact with the formal machinery of state. This is against a backdrop of conflict, contestation, limited resources, poverty and continuing instability. In addition, gender dynamics in Somalia can be restrictive for the target beneficiaries of the project. Most people in rural Somalia rely on agriculture or pastoralism. As a result, over 70% of Somalis live in poverty, and many more are vulnerable to recurring droughts and violent conflicts.

In response to this, the Ministry of Labour and Social Affairs (MoLSA) rolled out its first government-led social protection program, the Shock-responsive Safety Net for Human Capital Project (SNHCP), nationally referred to as the Baxnaano program, in 2019. The project is being implemented countrywide in areas of fragility due to endemic poverty, acute drought and protracted conflict. There are four project components. Component 1 ('Nutrition-linked Unconditional Cash Transfers') has supported 198,164 households with quarterly cash transfers, up till June 30, 2024.



This major component of the SNHCP seeks to provide nutrition-linked unconditional cash transfers to vulnerable households in all states in Somalia and Somaliland. The SNHCP cash transfers are targeted at poor households with at least a child aged under five. Districts and villages are first selected through geographical targeting; households are then selected based on a community-based targeting approach. Each selected household is given USD 20 per month.

Component 2 ('Delivery Systems and Institutional Capacity Building') is focuses on systems development, and is implemented under an Agreement for Delivery of Outputs between MoLSA and UNICEF. Component 3 ('Project Management, Monitoring and Evaluation, and Knowledge Management') meets the costs of running the Project Implementation Unit (PIU) within MoLSA. Component 3 of the project would be restructured such that resources will be used for a pilot to test the Baxnaano service delivery mechanism and Health and Nutrition Co-Responsibility Cash Transfer, to be directly implemented by Ministry of Labour, Somalia. The proposed pilot is expected to provide 16,000 poor pregnant and lactating mothers with cash transfers and promote their uptake of selected Health and Nutrition services made available at Baxnaano Facilitation Centers in the capital city, Mogadishu. Some project interventions may result in medical waste being generated.

Component 4 ('Household Registration in the USR') finances the expansion of the USR by registering households not yet included in the database using its common registration form (CRF).

The cash transfers cover five Federal Member States (Jubaland, Puntland, South-West, Hiirshabelle, Galmudug) and Somaliland, with 21 districts in total. Recipient selection is based on an initial geographic targeting and, subsequently, a three-step community-based targeting (CBT) approach: (a) selection of districts based on their distress ratings (a composite index comprising food insecurity, malnutrition, and concentration of rural population), security, accessibility, and political economy considerations, then (b) selection of communities in the targeted districts, and finally (c) community-based participatory targeting (CBPT) of households. Today, Baxnaano is being increasingly recognized as a national social protection platform that facilitates coordination and collaboration with humanitarian programs, with a vision to transition from a humanitarian mode of operation and take on a longer-term programmatic developmental focus. A project impact scoping and evaluation study in November 2022 established that the project was largely successful in ensuring inclusion of poor and marginalized households, with a finding that among SNHCP beneficiaries, 62 percent came from the poorest two quintiles of the population. The study noted that “recipient households have a significantly lower likelihood of receiving domestic and international remittances, as well as social and insurance income, compared to non-recipients:” this speaks to the project’s success with targeting the most vulnerable Somalis and including them in the program.

## **D.2 Overview of Borrower’s Institutional Capacity for Managing Environmental and Social Risks and Impacts**

The client's capacity for management of environmental and social risks has been steadily growing. The performance of the project's applicable Environmental and Social Standards is assessed as being satisfactory. The Ministry of Labour has had success with legislation, including enacting a new labour code for Somalia. MoLSA’s reporting on their management of environmental and social risks has been timely and relevant, with timely submission of reports. The client has, however, had challenges in data protection and privacy that have seen some beneficiaries receive calls from fraudsters - although this is being addressed robustly. The GRM remains accessible and effective with lessons learnt from complaints and grievances received being used to proactively manage and stem the generation of more complaints and grievances. No accidents or adverse events related to the client's failure to adhere to Bank's ESF



(including OHS policies) or unforeseen and unexpected events have been reported. All project instruments are being updated for this AF with the client, and specifically MOLSA, in the driving seat. In addition, the project also continues to rely on systems of high capacity implementers, WFP and UNICEF, to deliver project activities in an environmentally safe and socially sustainable manner. Under Component 2 (Delivery Systems and Institutional Capacity Building) there is an Agreement for Delivery of Outputs between MoLSA and UNICEF, which serves to further deepen MoLSA’s capacity.

WFP has good capacity and existing procedures to effectively implement the cash transfers under Component 1. The project has been using WFP systems for beneficiary selection, database management, social accountability, monitoring, capacity building and grievance redress. WFP has been managing cash transfers in Somalia as part of various drought responses for more than ten years. To do so, the agency has developed procedures for managing the security risks faced by project implementers, risks posed by security forces to the community, and the secondary risks that operating in an insecure environment can have on the project’s efficacy (such as elite capture or diversion of funds) laid out in their Safe Distribution Handbook. Moreover, WFP systems are intended to maximize the efficiency of targeting, avoiding leakage and community conflict, to ensure intended beneficiaries are reached. WFP has a well established, tested and effective system for managing gender-based violence (GBV) when it occurs in the Project area. As such, the Project will rely on WFP systems and practices, augmented where necessary. The Social Management Plan (SMP) developed and currently under implementation has largely catalogued measures required to effectively manage identified risks. This includes measures acceptable for reporting cases of GBV where they occur. In addition a Third Party Monitoring (TPM) agency has been recruited by MoLSA to undertake quarterly monitoring and verification of the cash transfers. The TPM primarily aims to verify operational compliance with the targeting mechanism, beneficiary identity verification, payment delivery standards, and to collect beneficiary feedback. This mechanism also monitors social outcomes as well as provides support for the identification, reporting and resolution of severe incidences procedures as useful. The TPM firm has a social specialist who supports the monitoring the performance social standards. These arrangements will continue under the AF.

Under Component 2, which finances institutional strengthening of MoLSA to gradually take on full implementation and management responsibilities for Baxnaano and lay the foundation for a comprehensive safety net system, MoLSA has entered into an Agreement for Delivery of Outputs with the United Nations Children’s Fund (UNICEF), which further enhances its capacity for implementation. Under Component 3, the Project Implementation Unit (PIU) at MoLSA includes dedicated personnel to monitor E&S issues. This serves to enhance MoLSA's capacity to manage E&S risks and impacts.

**II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

Moderate

**A.1 Environmental Risk Rating**

Moderate

The Environmental risks of the project are rated as ‘Moderate.’ Key environmental risks include: a) Occupational Health and Safety (OHS) risks for project workers resulting mainly from fragility, rehabilitation of project-supported healthcare facilities, exposure to hazardous chemicals, and prevalence of security incidences; and b) risks of infection

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and potential gaps in the proper handling and management of medical wastes, resulting from the improper disposal or use of sterilization unit waste, disinfectants, antiseptics, reagents as well as biological and infectious waste (bandages, needle tips, specimen containers, blood bags) and radioactive waste. In addition, we anticipate risks from congregating persons during project outreach activities that may have implications on human health, especially with regards to the COVID-19 transmission. While Component 3 (project management, M&E, and knowledge management) support, may generate some e-waste through the purchase of computers for the FGS, the amount produced is likely to be minimal and the management of waste should be a relatively simple matter for the team implementing the project. Collectively, and given the existing strong track record and robust systems for effective implementation to date, risks and impacts are considered moderate. However, the residual contextual risks of operating in a conflict zone with endemic fragility and protracted conflict and insecurity means complex dynamics where community consultations, oversight and variable capacity to redress harm, can easily lead to substantial risks and impacts. There are concerns on the security risks for the project, especially in the light of unstable security environment in the country as a whole. The project has environmental benefits associated with reduced transaction costs, the boosting of local markets and increased quality of assistance to drought-stricken households in Somalia

**A.2 Social Risk Rating**

Moderate

Activities under the proposed AF are expected to have Moderate social risks and impacts given the magnitude, geographical spread, quantum of anticipated risks and implementation track record. Key social risks include: a) selection bias leading to elite capture and potential exclusion of the target population and particularly poor, vulnerable and minority women and youth; b) Sexual Exploitation Abuse and Sexual Harassment (SEA/SH) arising from gender norms and practices particularly in the allocation of benefits; c) fragility and social conflicts that might create and/or exacerbate security risks and impacts on community health and safety including attacks on CCC centers and on beneficiaries seeking services ; d) systemic challenges arising from MoLSA’s developing capacity to identify and mitigate risks and impacts as they occur; e) risks of data privacy breaches resulting from compromised data protection and privacy protocols. Collectively, and given the strong track record and robust systems for effective implementation to date, risks and impacts are considered moderate. However, the residual contextual risks of operating in a conflict zone with endemic fragility and protracted conflict and insecurity means complex dynamics where community consultations, oversight and variable capacity to redress harm, can easily lead to substantial risks and impacts.

**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1 Relevance of Environmental and Social Standards**

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

Relevant

The Project is expected to have moderate environmental risks and moderate social risks and impacts. Key environmental risks include: a) risks of Occupational Health and Safety (OHS) for project workers resulting mainly from fragility, rehabilitation of project-supported healthcare facilities, exposure to hazardous chemicals, and prevalence of security incidences; and b) risks of infection and potential gaps in the proper handling and management of medical wastes, resulting from the improper disposal or use of sterilization unit waste, disinfectants, antiseptics, reagents as well as biological and infectious waste (bandages, needle tips, specimen containers, blood bags) and radioactive waste. Given the existing strong track record and robust systems for effective implementation to date, environmental risks and impacts are considered moderate.

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Key social risks relate to exclusion of the target population and particularly poor, vulnerable and minority women from project benefits and remoteness and other security risks that restrict access to areas in Somalia for effective stakeholder engagement, community participation and grievance redress. This is further exacerbated by security risks which pose a risk to project workers and beneficiary communities. All these make effective stakeholder engagement and community participation very challenging hence heightening the risk of exclusion. As such, the challenges of ensuring project benefits reach vulnerable community members (such as minorities, people with disabilities, or widows) project are amplified. This also includes risks related to data protection.

As activities and implementation arrangements under the proposed AF will remain largely consistent with the parent Project, measures already in place to manage environmental and social risks and impacts will continue to apply with some modifications to adapt to the new activities. These include: a) a robust USR based selection criteria hardwired into the project design; b) a detailed security risk assessment and management to enable the profiling and understanding of security risks thereby enabling project interventions in areas of relative security and safety; c) a meticulous application of the newly enacted data privacy and protocols; d) adoption of the already established medical waste management protocols prepared under the Improving Healthcare Services in Somalia Project (“Damal Caafimaad”, P172031); and e) strengthened monitoring and supervision through the inclusion of E&S considerations in ToRs for TPM agents. Community consultations will be conducted in new districts where new households will be targeted for Baxnaano participation, and Environmental and Social Commitment Plan (ESCP) and Stakeholders Engagement Plan (SEP) will be updated and disclosed prior to completion of appraisal. In addition, the Environmental and Social Management Framework (ESMF) incorporating a new Infection Control and Medical Waste Management Plan (IC-WMP) and an updated SEA/SH Action Plan, a Labor Management Procedures (LMP); and a Security Management Plan (SMP) will be updated and disclosed by negotiations. To strengthen effective management of E&S risks, the project will evaluate the possibility of acquiring technical cross-support by an SEA/SH expert working in one of the existing PIUs.

These risks have been mitigated largely through the partnership with WFP for the delivery of cash using mobile money. WFP has strong procedures and arrangements in place to identify and manage risks related to selection bias, elite capture and exclusion due robust targetting and selection protocols based on poverty and vulnerability proxies. Risks related to data protection and insecurity risks are also managed through strong data protection policies under MoLSA. Further, the selection of the original project locations where the AF activities will operate only included relatively secure and accessible area. The use of mobile money also helps to mitigate risks related to payment delivery as well as possible capture of cash assistance.

In addition, robust community participation and sustained information dissemination helps provide another layer of risk mitigation. The WFP guidelines for community participation (adapted by the Project) in targeting uses a community driven process for identifying vulnerable people at risk of exclusion. To monitor the application and effectiveness of the targeting process WFP carries out its own monitoring or uses a monitoring contractor as needed.

Moreover, there are risks that contextual gender dynamics can be restrictive for women leading to exacerbation of GBV and SEA/SH where registration for cash transfers is exchanged for sexual favors with systemic weakness making it difficult to effectively respond to these risks and impacts. In mitigation, the existing operation has an already



established and adequate Grievance Redress Mechanism (GRM) and other mechanisms to respond to GBV incidents due to project activities. In addition, WFP's established systems and capacities will continue to be utilized to mitigate risks related to systemic weaknesses, including on monitoring of implementation of mitigation measures, while MoLSA continues to strengthen its safeguards capacities. This includes MoLSA taking on greater responsibilities including exclusively on the CCC and the EI activities.

The use of mobile payment platforms significantly protects beneficiaries from exposure to SEA-H and security risks. This is further addressed by faithful application of the targeting criteria and periodic evaluation of intrahousehold dynamics including in Somalia seeking to better observe and understand this effect. In addition, WFP has developed a robust and multitiered monitoring system including a hotline for anonymous reports. Where offenders are individuals, they are dismissed, or where the problem is systemic, contracts with implementing partners may be terminated and the matter is addressed with local authorities. The small amount of the cash transfer (\$20 per month) is also seen as a mitigation measure for this effect.

The Project continues to perform reasonably well on E&S risk management. There exists a functioning Grievance Redress Mechanism (GRM) that continues to uptake and process complaints and grievances. No significant incidences have been reported to date, including GBV and occupational health and safety incidents. E&S capacity at the PIU includes a social development specialist who also benefits from augmented capacity from WFP and UNICEF.

As there are some material changes proposed in the project design for the AF, portending new E&S risks, these risks can be adequately managed through the updating of the existing E&S risk mitigation instruments. The AF will prepare an Environmental and Social Management Framework (incorporating the parent project's SMP, which was the main instrument for managing the social and cultural dynamics of the Project and which outlines the risk mitigation measures to be used). The project will also update the LMP to mitigate the risk of exploitation of and by workers on this project and ensure equity, diversity and transparency in recruitment of project staff and enshrine the requirements of ESS2 in project implementation.

The SEP will be similarly updated to reflect the additional consultations and information dissemination in respect to the expanded scope under this Third AF. The ESCP will be likewise updated to detail MoLSA's obligations and commitment to implement material measures for managing environmental and social risks and impacts.

### ESS2 Labor and Working Conditions

Relevant

ESS2 (Labor and Working Conditions) applies to direct project workers, contracted workers (including WFP-contracted partners, mainly NGOs) and primary supply workers. To ensure recruitment and management of labour on the Project is in accordance with ESS2 and to take cognizance of new OHS issues associated with the newly proposed project activities, the LMP will be updated and cleared before project effectiveness. Key issues to be addressed in the LMP's update (especially for new activities and interventions under AF) for project workers include terms and conditions of employment, non-discrimination and equal opportunity, and worker's organizations. Due diligence is also needed to ensure that the Borrower meets requirements on child labour, forced labour and occupational health and safety for all workers including safety concerns and OHS.

The LMP ensures that both the PIU and the contracted workers observe safety and health at work and promote fair treatment, non-discrimination and equal opportunity for project workers including vulnerable workers such as





women, persons with disabilities, the elderly and youth as appropriate. It also lays down provisions for the prevention of all forms of forced labor and child labor and to provide project workers with accessible means to raise workplace concerns.

As the major components of the parent project will remain the same, no major changes are expected to the LMP, including no major changes over labor risks and impacts and proposed management procedures. However, the LMP reflects on increase in numbers and sequencing of workers relevant to AF new activities and interventions. Project workers grievances are handled using a separate mechanism via the GRM/Social Risk Management Specialist at the MoLSA PIU. The GRM is also adapted to uptake complaints and grievances related to GBV and SEA/SH from project workers.

Medical facilities are a potential source of infectious waste in gaseous, liquid or solid forms. These could pose unsafe conditions for healthcare staff. Of particular concern are janitors handling infectious waste (including sharps) without adequate protective gear, storage of sharps in containers that are not puncture-proof. To mitigate against this, the project will develop Infection Control and Waste Management Plan for medical workers in project-supported health facilities in Benadir, including health workers and support staff (i.e., waste management personnel) at the health facilities.

**ESS3 Resource Efficiency and Pollution Prevention and Management**

Relevant

The generation of significant amounts of solid and liquid waste in the health centres to be supported under this project will require well-prepared disposal facilities. Options open to the project include designated waste disposal pits (especially in rural areas, where pits can be developed more easily), the use of licensed hazardous waste disposal/storage sites, and the use of incinerators (which may be an option in land-stressed densely populated large cities in Somalia, such as Mogadishu). Implementation of project activities under Component 3 is likely to generate some e-waste through the purchase of computers for the FGS, the amount produced is likely to be minimal. The Project will ensure that any e-waste generated from project funding is segregated from other forms of waste and is taken to licensed refurbishers, collection centers or recyclers in the country or in neighbouring countries as applicable. Procedures for collection, sorting and recycling have been detailed in the Project Operations Manual (POM).

**ESS4 Community Health and Safety**

Relevant

Key risks and impacts for community health and safety relate to GBV and SEA/SH and security, in addition to COVID-19 transmission risks during the occasional project outreach activities. The targeting of women and youth as beneficiaries necessitates the management of GBV risks. The exchange of sexual favors for registration or transfer of funds, or spousal abuse, are key risks. To mitigate these risk the Project has developed and is implementing measures and actions to assess and manage such risks. The GBV Action Plan included in the SMP includes measures for minimizing GBV and SEA/SH including outreach to local communities.

Conflict and insecurity remain persistent challenges in Somalia and have, in the past, impeded delivery of drought relief services. Ensuring security for project operations amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the drought, will remain a significant challenge.. This general insecurity may impact both the Project workers and beneficiaries. In mitigation, the Project will continue to operate in

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relatively permissive parts of the country, with security of operations and access to site for monitoring and supervision key criteria in the selection of districts for support.

Further, the choice of WFP as key implementing partners provides the Project access to the United Nations Department of Safety and Security (UNDSS) and local capacity for identifying and managing security threats to operations. UNDSS provides overarching security for all UN agencies. Moreover, the WFP agreements with service providers contain a contractual obligation for the service provider and any contracted security to uphold humanitarian principles such as “do no harm” and to protect beneficiaries (from violence, exploitation and abuse). They also contain an obligation to ensure the security of their own personnel or workers by implementing appropriate risk prevention and mitigation strategies to reduce the likelihood of a harmful event occurring and to mitigate the impact of a security event if it were to occur. WFP’s Safe Distribution Guidelines outline their requirements and provide training to contracted entities in their use.

The Security Management Plan for the project will be updated, based on new and current security risk assessments conducted for the Third AF. The updated plan will outline new measures for screening and assessment of the deployment of armed security, guided by principles of proportionality and good international industry practice, and by applicable law and rules of conduct, training, equipping, and monitoring of such security workers. It also assigns responsibility for security planning and evacuation procedures, pre and post distribution security measures, and training and coordination with the FGS.

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**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement** Not Currently Relevant  
This Standard is not relevant

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources** Not Currently Relevant  
This Standard is not relevant

**ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities** Not Currently Relevant  
This Standard is not relevant

**ESS8 Cultural Heritage** Not Currently Relevant  
This Standard is not relevant

**ESS9 Financial Intermediaries** Not Currently Relevant  
This Standard is not relevant

**ESS10 Stakeholder Engagement and Information Disclosure** Relevant  
The project will update the parent project's SEP with new details on (i) stakeholder identification and analysis; (ii) planning for stakeholder engagement; (iii) consultations and disclosures; (iv) communication and sensitization



campaigns; (v) participatory citizen engagements and, (vi) grievance redressal systems. Stakeholders to be consulted for the Third AF are Ministry of Finance, MoLSA, Ministry of Planning and Economic Development, WFP, UNICEF, Food and Agriculture Organization (FAO) and other development partners. The Project has also been consulting with female beneficiaries, female non-beneficiaries in the Project area, alternate caregivers, beneficiary households, male community members, adjacent communities, and Vulnerable Members of the community (widows, disabled, single women) including minorities, local leaders and local government.

The existing GRM would continue. The GRM makes use of a WFP hotline where complaints are registered and a mechanism for follow up and redress is recorded and reported. Complaints are classified according to their risk level (high, medium, low and residual risk) and are captured in a WFP online case management software. In case of reports of conflict of interest, abuse of power or harassment by project staff, cases are escalated through the Risk Management and Compliance Officer. Reports of sexual exploitation and sexual harassment will be referred to WFP SEA/SH focal points who have appropriate response pathways in place. The hotline covers all WFP operations in Somalia and as such will resolve complaints about WFP staff, contractors, sub-contractors, and anyone else associated with their operations. The SEP also draws upon on the experience and expertise of the contracted cooperating partners who have a sound understanding of the local context and have existing implementing systems.

**B.2 Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**B.3 Other Salient Features**

**Use of Borrower Framework** No

Use of Somali national systems for managing the E&S risks and impacts of this project is not envisaged

**Use of Common Approach** No

Not envisaged

**C. Overview of Required Environmental and Social Risk Management Activities**

**C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required during implementation?**

1. Environmental and Social Commitment Plan - (to be updated) -
2. Stakeholder Engagement Plan - (to be updated) -
3. Labour Management Procedures - (to be updated) -
4. Environmental and Social Management Framework including Infection Control and Waste Management Plan, SEA/SEAH Action Plan and Security Management Plan (to be updated)

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**III. CONTACT POINTS**

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**IV. FOR MORE INFORMATION CONTACT**

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**V. APPROVAL**

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