



**REPUBLIC OF SOMALILAND  
MINISTRY OF INFORMATION AND COMMUNICATION  
TECHNOLOGY (MICT)**

**EASTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT  
(EA-RDIP)**

**STAKEHOLDER ENGAGEMENT PLAN**





GOVERNMENT OF SOMALILAND

MINISTRY OF INFORMATION AND COMMUNICATION  
TECHNOLOGY

**EASTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT –  
SOMALILAND**

STAKEHOLDER ENGAGEMENT PLAN

October 2024

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## Abbreviations and Acronyms

AfDB	African Development Bank
CBO	Community-based organization
CMM	Cybersecurity Maturity Model
CoC	Code of Conduct
DPA	Data Protection Authority
EAC	East African Community
EA-RDIP	Eastern Africa Regional Digital Integration Project
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
EHS	Environmental, Health and Safety
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
GoSL	Government of Somaliland
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HoA	Horn of Africa
IA	Implementing Agency
IGAD	Intergovernmental Authority on Development
IT	Information Technology
LGB	Local Governance Board
MICT	Ministry of Information and Communication Technology
NCA	National Communications Authority
MNO	Mobile Network Operators
NGO	Non-Governmental Organisation
OHS	Occupational, Health and Safety

PPA	Project Preparation Advance
PIU	Project Implementation Unit
QOS	Quality of Service
REC	Regional Economic Communities
SEP	Stakeholder Engagement Plan
UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific and Cultural Organisation
NDRA	National Disaster
MoECC	Ministry of Environment and Climate Change
MICT	Ministry of Information and Communication Technology
MoEM	Ministry of Energy and Minerals
SSWE	Somaliland society Women Engineers
MoTT	Ministry of Trade and Tourism
WB	World Bank

# INTRODUCTION

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

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

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

## Background

The Government of Somaliland, located on the coast of the HoA, relies heavily on remittances and traditional livelihoods that are highly vulnerable to climate change. Somaliland benefits substantially from foreign remittances, which are estimated to constitute upwards of 31.2 percent of the country's GDP. The livelihoods of roughly half of the Somaliland population of 5.7 million rely on pastoralism, with the livestock sector accounting for some 18.3 percent of GDP. Since 2017, the country has experienced devastating floods and drought, as well as locust infestations, which have left about half million people<sup>1</sup> in need of humanitarian assistance and at risk of food insecurity. Poverty levels remain pervasive, with nearly 38% Rural population and 29% in Urban population<sup>2</sup> percent of Somaliland population living on less than US\$1.90 a day in purchasing power parity terms.

Somaliland remains a semi-autonomous region. Progress has been made on institution building, transparency and formalizing key economic sectors, including telecommunications.

The Ministry of Information and Communication Technology (MICT) is charged with promoting the digital agenda. A presidential decree was adopted in 2021, which supports development of an open and competitive digital market, grounded in a vision of providing universal, affordable, and quality digital services. However, the Government lacks the funding required to support its full implementation. MICT spearheaded the adoption of the 2011 Communications Act, and the law suggests the establishment of a new industry regulatory body – the National

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<sup>1</sup> NDR, Number of the Camps and House Holds in Somaliland , 2022

<sup>2</sup> World Bank, Somaliland Poverty Assessment , 2025

Communications Authority— which will support the adoption of universal licensing and other foundational regulatory frameworks, spectrum management, roaming, quality of service (QoS) and consumer protection.

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

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

Somaliland still needs to strengthen national frameworks, capacity and awareness related to cybersecurity and data protection to build trust and encourage safe usage of emerging digital services. Somaliland is still in the ‘start-up’ stage of developing its cybersecurity ecosystem, according to the Cybersecurity Maturity Model (CMM) diagnostic conducted in 2021. The government is expected to pass a new data protection bill, mandating the creation of a Data Protection Authority (DPA) and the registration of data processors and controllers. Further support will be needed to address growing data protection and privacy risks, ensure compliance, and continued capacity building.

Somaliland’s data governance and data infrastructure remains underdevelopment, limiting scope for local and regional data sharing and processing, as well as growth in data-driven service. Somaliland lacks a comprehensive, agile, and climate-smart data strategy, and will need to adopt interoperability and data standards to enhance data governance. While some commercial data centers existing, government needs to enhance its management of data and facilitate data

sharing, e.g., via enhanced data hosting arrangements for government-owned data. An effective IXP in Somaliland could also improve the regional internet ecosystem, the quality of traffic exchange and facilitate access to content at lower cost, building on existing caches in Hargeisa.

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

Limited digital skills are a key barrier to the adoption of online services in Somaliland. The availability of digital skills training is currently limited and will need to be expanded to increase the digital skills base to fuel adoption and growth in e-services. Only 55 percent of the population are actively engaged in the labor market, currently, and youth unemployment is estimated to be roughly 35 percent. Access to basic and secondary education in Somaliland is among the lowest in the world, which impacts the systematic development of digital skills, particularly for women. Concerted efforts are therefore needed to boost women's digital skills attainment. There is room to strengthen the capacity of the Somaliland Education and Research Network (SomaliREN), which currently serves 4 higher education institutions across Somaliland, to expand connectivity among higher educational institutions (HEIs), including through collaboration with more mature NRENs in the region. However, HEIs also need to be supported to introduce high-quality training programs in digital skills. This includes training institutes such as the Somaliland Innovation Zone (SIZ), which is tasked with training the civil service in digital skills.

## Project Components

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

### Component 1: Connectivity market development and integration

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

This subcomponent will support the deployment of key missing cross-border and backbone fiber links to improve the resilience, coverage, and integration of regional and national connectivity networks. It will support the deployment of up to 1287 km of new fiber along prioritized backbone network routes, including connecting the main cable landing station in Berbera to the major population centers, as well as establishing new cross-border links to Somalia and Ethiopia. The fiber is likely to be deployed in phases, starting in the north. 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<sup>81</sup> and/or licensing arrangements, that aim to maximize private sector financing.
- *Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment*  
This subcomponent will strengthen existing ICT frameworks and boost regulatory maturity to effectively spearhead the connectivity agenda and universal services targets through the development of new strategic, policy and regulatory instruments.

## Component 2: Data market development and integration

- *Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity*  
This sub-component will strengthen local capacity to effectively detect, respond to and mitigate evolving cyber threats and cybercrimes as well as support implementation of forthcoming cybersecurity legal and strategic frameworks.
- *Sub-component 2.2: Data exchange, governance and protection*  
This subcomponent will support investments in enabling data infrastructure and governance frameworks that facilitate cost-effective and secure data storage, processing and sharing.

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

- *Sub-component 3.1: Digital cross-border trade, payment and service enablers.*  
This subcomponent aims to enhance readiness to expand digitally enabled cross-border trade and service delivery, by introducing key enablers.
- *Sub-component 3.2: Regional research and education networks (RENs), and training for digital skills.*  
This subcomponent will support the development of the digital skills base through support for SomaliREN, and new digital skills training programs.

## Component 4: Project Management and Implementation Support

- This component will finance key project management functions, including procurement, FM, M&E, communications as well as ESF compliance, with a particular emphasis on addressing the high security- and GBV-related risks associated with the deployment of

infrastructure and civil works, including. It will finance the establishment and operations of (i) the main Project implementation Unit (PIU) at MICT, at National level; (ii) coordination with regional level via dedicated focal point/coordinators, and (iii) coordination with the regional PIU at IGAD level.

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

*Table 1: Summary of project components and allocation*

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

## Project Beneficiaries

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

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

- **Refugees, and IDPs.** Refugees, IDPs and people in host communities will directly benefit from enhanced network coverage and new access to mobile and emergency response ICT infrastructure boosting their resilience to withstand e.g., climate shocks.
- **Businesses.** ICT service providers, including mobile network operators (MNOs) and internet service providers (ISPs), will directly benefit from the project through contracts for infrastructure deployment and capacity purchase as well as local IT procurement, awarded on a competitive basis. The wider business community will also benefit indirectly from reforms supported and investments made, including a more secure and cost-effective environment for conducting business online, on the back of more reliable, quality and low-costs broadband services, more seamless data exchange within and across borders, and enabling digital public infrastructure deployed. The creation of a larger digital market will provide local businesses with opportunities to scale.
- **Public sector.** MDAs, particularly line ministries for ICT and trade, as well as ICT industry regulatory bodies in Somaliland will directly benefit from targeted financial and technical assistance. Public institutions (including unconnected government offices, higher education institutions) will also benefit from improved access to connectivity and access to shared digital infrastructure (e.g., IXPs, data hosting solutions). In addition, civil servants, including female staff, will be trained in the management and/or use of digital systems.
- **Disadvantaged and Vulnerable Groups.** Including IDP's, Minority groups, Women and youth in Somaliland will benefit from this project. IDP's will benefit from improving the access of internet and promoting digital skills especially young and women. Also, the youth, women and minority groups will participate the job opportunities that is created under this project in a fairness and transparency manner. In addition to that, high-quality internet and digital skills training will promote the online market enabling job creation for Youth and Women.

## Objectives of the Stakeholder Engagement Plan (SEP)

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

Overall, this SEP will serve the following purposes: stakeholder identification and analysis; planning engagement modalities through effective communication, methods and timing of engagement throughout the project life cycle, consultations and disclosure; enabling platforms for influencing decisions; define roles and responsibilities for the implementation of the SEP;

define reporting and monitoring measures to ensure the effectiveness of the SEP; elaborating on the role of grievance redress mechanism (GRM); outline project information dissemination modalities, including differentiated considerations for inclusion of poor and vulnerable populations; and documenting stakeholder consultations on proposed project design.

## SUMMARY OF STAKEHOLDER ENGAGEMENT ACTIVITIES

### Consultations Prior to the development of this SEP

The design and key activities of the project have been deliberated and refined through a series of engagements between the World Bank and GoSL representatives, and other parties involved in Phase 1 of the project (including South Sudan) including via joint missions and planning meetings conducted in Nairobi on May 16<sup>th</sup> to 20<sup>th</sup>, 2022 and Addis Ababa on August 28<sup>th</sup> to September 2<sup>nd</sup>, 2022.

Other stakeholder consultations held during the project preparation phase include consultations with:

- Key MDAs at GoSL level – directly affected by the project
- Key MDAs at GoSL level – line ministries for ICT
- Private sector – telecoms operators
- Education sector – Higher education institutions and SomaliREN
- Local Communities – IDP’s and Vulnerable groups

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

### Regional Partners

*Table 2: Summary of consultations held with South Sudan and Ethiopia in September 2022*

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

## Key MDAs at GOSL level

Consultations arranged by the PIU and took place at the Carro Edeg Hotel (October 21-22, 2024), where key Government MDA's, Education sector, Telecom operators, Business sector and Local communities attended (October 2024). Summary of consultations are provided below.

*Table 3: Summary of consultations held with MDA's, on 21<sup>st</sup> October 2024*

No	Issues/Point Raised	Responses
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1	<p>the MoECC welcomed this initiative and highlighted the importance of this project. They pointed the expected adverse environmental impacts that can associate with this project, and to overwhelm these impacts we need to adhere the national and world bank environmental legislations and policies to make the project environmentally sustainable.</p> <p>Also, the MoECC requested to be involved of all stages of the project</p> <p>The ministry is happy to work closely with this project and they highlighted for their readiness for anything needed from their side. finally, they appreciated that national Environmental policies are incorporated in the Environmental instruments and suggested to continuously update the instruments in order to incorporate the new amendments and newly developed polices, strategies and guidelines.</p>	<p>The Ministry thanked the team for their participation, and feedback and assured its commitment for close collaboration with MoECC.</p> <p>The Ministry of MICT committed that continuous dialogue and engagement will be thee and at all stages of the project and all stakeholders will be involved.</p>
2	<p>The NDRA welcomed the project and thanked the ministry for making the IDP's priority stakeholder that will benefit from this project directly</p> <p>They promised that they will work closely with the project, and happy to share any and information and documents needed.</p>	<p>The team explained How IDP's will benefit from this project, and made clear the importance role that the vulnerable group will have in this project.</p>
3	<p>The MoEM highlighted the importance of close collaboration since they are involved in Somaliland utility management specifically main cities together with electricity companies and telecom companies and water agencies</p>	<p>The MICT responded that feedback and ensured that all stakeholders will be consulted prior of every stage.</p>
4	<p>In a discussion group of all MDA's suggested:</p> <ul style="list-style-type: none"> <li>• Stakeholder engagement in all project levels</li> <li>• Enhancing community awareness</li> <li>• Collaboration and coordination of project stakeholders</li> <li>• Implementation and dissemination in local level</li> <li>• Building trust and ownership</li> <li>• Clear communication plan</li> </ul>	<p>The MICT thanked the MDA's group and considered that suggestions and mentioned that this will contribute to the project success.</p>

# Key MDAs at National level

Table 4: Summary of consultations with Telecom operators, Education Sector, and Local Communities on October 22, 2024

No	Issues/Point Raised	Responses
1	<p>The Telecom operators emphasized the importance of this project and expressed their interest in project implementation stages and that they are ready to involve in every stage.</p> <ul style="list-style-type: none"> <li>- Telecom operators showed their interest in project implementation and asked the procurement process for the companies that would be involved in component 1 (fiber expansion activities.)</li> <li>- Telecom operators asked a clarification about the validity of the baseline study conducted by the world Bank prior of the project approval, and they emphasized the importance of reconducting this study again to tailor it in Somaliland context, since the first baseline study covers all Somalia including Somaliland and that they clarified that they are ready to contribute this study.</li> <li>- Telecom Operators shared their experience in Land Acquisition and community mobilization through community engagement</li> </ul>	<p>The MICT clarified the role of the Telecom operators in this project and that communications channels are established to achieve a better engagement.</p> <ul style="list-style-type: none"> <li>- the Ministry made clear that an open, fairness and transparent procurement process will be managed in order to hire the contracting companies for the project implementation.</li> <li>- The MICT mentioned that it's planned to conduct a feasibility prior of the project implementation, this will help us to obtain a benchmark data which is relevant to our local context.</li> <li>- they ministry thanked for sharing this useful experience and mentioned that this will</li> </ul>
	<p>using community mediators and government relevant officials. They mentioned that for fiber optic expansions they use the public land alongside the roads in order to avoid community settlements and where they can't avoid, they compensate. Finally, they emphasized that issues related to land may cause delay to the project and it needs high level community engagement.</p>	<p>contribute for Environmental and Social instrument improvements.</p>

2	<p>Higher Education: Universities and Colleges attended in this workshop showed their interest and crucial role that this project will participate for the Somaliland education quality improvement. They mentioned that this project will assist creating job opportunities for the graduate students and also will enhance their digital skills through the capacity building programs associated with project.</p> <p>- Higher Educations requested that they will need to engage all the project stages.</p>	<p>MICT clarified the role of the Higher Education institutions in this project and that through Somali-REN they will get support to improve their education quality. Also, the MICT made clear that this dialogue will be continuous and will be consulted through the whole project cycle.</p> <p>- the MICT highlighted that increasing the internet coverage and speed will and promoting E-Commerce and E-Market will contribute for creating a job opportunity for young students.</p>
3	<p>Minority Groups recommended that they need continuous consultation in all stages of the project and make sure that minority groups are included in the project benefits.</p>	<p>MICT indicated that the formation is continuously shared with minority groups and ensures that minority groups are direct stakeholders of this project and will be consulted continuously. Agreement is made that will be no one left behind.</p>
4	<p>WOMEN and Youth: Somaliland Women Engineers Associations (SSWE) and NAFIS Organization recommended that women will be engaged in this project and requested to take their part in terms of the project benefits.</p>	<p>MICT committed that the project is inclusive, women will have a clear role, and they will be involved in the project in all stages.</p>

*Table 3: Summary of consultations held with MDA's, on 21<sup>st</sup> October 2024*

1	Issues/Point Raised	Responses
	<p>The MoTT welcomed this initiative and thanked MICT for their early engagement. The MoTT thanked WB for their funding a project like this, and stated the success story of the BRLS project funded by the WB that delivered integrated Electronic License system.</p>	<p>The MICT-PIU introduced the project to the MoTT and outlined the role of MoTT in this initiative. They made it clear that the project will support the development of policy frameworks that will enable integration with neighboring countries, and will also foster the development of e-commerce and e-</p>

	<p>- The MoTT raised the issue that they face challenges in cross-border trade integration with neighboring countries due to a lack of integrated policies. This project is crucial as it develops policies and a legislative framework, providing a foundation for cross-border trade.</p> <p>- Finally, the (MoTT) expressed their interest in the project and affirmed that they will fulfill their role to achieve its ultimate goals. They also requested that all project documents be shared with them and that they be engaged periodically.</p>	<p>market data integration in the region. Furthermore, the project will support increasing the level of digital skills among the youth by providing a capacity-building program.</p> <p>The MICT stated that this project is ongoing on in the eastern Africa countries and promotes to deliver single connectivity, single market and single data in the region. For Somaliland to achieve the project will increase the broadband areas, will develop policies and will increase the capacity.</p> <p>- The MICT shared the project documents and pointed out that all the documents are available on the ministry's website as well as the World Bank's website, emphasizing the project's transparency.</p>
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*Table 5: Summary of consultation with NFOC and Telecom Operators (September 9, 2025)*

No	Issues/Point Raised	Responses / Agreed Actions
1	<p>Priority Fiber Optic Routes: The meeting discussed the selection of priority routes for deployment. Key routes identified included Burco–Ceerigaabo (280km) to cover the unserved Sanaag region, and Berbera–Hargeisa due to its economic importance as a cable landing gateway.</p>	<p>Prioritization Agreed: The stakeholders agreed on the priority ranking:</p> <ol style="list-style-type: none"> <li>1. Burco – Ceerigaabo</li> <li>2. Berbera – Hargeisa</li> <li>3. Wajaale – Buuhoodle (Critical for cross-border connectivity).</li> </ol> <p>NFOC committed to sharing the consolidated map designs for these routes.</p>
2	<p>Cost Estimation: Operators presented preliminary cost estimates for the priority routes. However, clarification was needed regarding what costs should be included (e.g., E&amp;S and Security).</p>	<p>Revision of Estimates: It was agreed that operators would revise and resubmit estimates focusing only on route deployment and logistics, excluding Environmental &amp; Social (E&amp;S) assessment and Security Risk Management (SRM) costs, which are covered separately by the project.</p>
3	<p>Private Sector Contribution (Last Mile): There was a need to define the specific financial or infrastructure contributions expected from the Internet Service Providers (ISPs).</p>	<p>Commitment Secured: Telecom Companies (Telesom, Somcable, and Somtel) agreed to take full responsibility and cover the cost of Last Mile deployment across all three priority routes.</p>
4	<p>Project Governance &amp; Coordination: Operators suggested the need for a formal body to support smooth implementation and avoid delays.</p>	<p>Steering Committee: It was agreed to establish a Steering Committee comprising MICT, NFOC, ISPs, and the EA-RDIP PIU to oversee implementation and conduct regular meetings.</p>

*Table 6: Summary of consultation with SomaliREN and Universities (September 23, 2025)*

No	Issues/Point Raised	Responses / Agreed Actions
1	Implementation Roles & Delays: Participants emphasized the need for clarity on universities' specific activities. They suggested that directly involving universities in implementation could mitigate delays often caused by limited ministerial capacity. Concerns were also raised regarding potential delays caused by World Bank processes.	Follow-up Planned: The PIU acknowledged the need for role clarity. It was agreed to convene a specific follow-up meeting in October 2025 to discuss and refine the project workplan. The Minister urged stakeholders to accelerate preparations given the limited project timeframe.
2	Infrastructure & Connectivity Needs: Through group work, University Presidents and ICT Directors identified critical priorities: last-mile fiber deployment to campuses, establishment of data centers, LAN connectivity, and provision of dedicated bandwidth (1-2 Gb).	Integration into Design: The EA-RDIP Coordinator confirmed that universities would directly benefit through last-mile access. The PIU committed to discussing these presented priorities with the World Bank Team to provide feedback and ensure alignment.
3	Digital Skills & Inclusion: Stakeholders prioritized ICT literacy programs (e.g., ICDL), capacity building for lecturers, and specifically addressing the gender digital divide through student gender assessments and skills training.	Commitment to Capacity Building: The project's Component 3 was presented as the vehicle for these activities. The meeting reaffirmed the commitment to bridging the skills gap and addressing gender disparities in digital access.
4	Data Security & Legislation: Concerns were raised regarding data security in inter-university information sharing and the status of ICT-related legal documents at the government level.	Clarification: The Coordinator acknowledged gaps in national ICT legislation due to parliamentary delays but urged SomaliREN members to maintain focus on shared operational priorities despite legislative challenges.
5	Coordination: The need for a streamlined communication channel between the project and the various universities was identified.	Focal Points: It was agreed that SomaliREN members would formally appoint university focal points by October 2025 to facilitate effective communication with the PIU.

*Table 7: Summary of consultation on Draft Legal Framework Gap Analysis Report (October 9, 2025)*

No	Issues/Point Raised	Responses / Agreed Actions
1	Missing Key Legislation: It was highlighted that critical legal instruments, specifically the ICT Act and the Fiber Optic Act, are currently missing and require urgent attention. Participants emphasized the need to prioritize these Acts as the foundation for subsequent policies and regulations.	Prioritization Strategy: The meeting identified a list of 20 priority regulations to focus on, including the Post and Telecommunications Act (Amendment), Broadband & Fiber Optic Infrastructure Regulation, and E-Waste Management Regulation. It was agreed to focus first on developing the Acts.
2	Strategic Alignment: The Ministry's current Five-Year Strategic Plan is nearing completion. There is a need to align the legal framework with the redevelopment of the new Strategic Plan for the period 2026–2030.	Integration: The Ministry 5-year Strategic Plan (2026 – 2030) was identified as the top priority in the list of regulations/strategies to be developed to ensuring alignment with national development goals.
3	Review of Draft Report: Participants reviewed the draft report and suggested that specific titles of regulations needed updating and that the "missing regulations" section was incomplete.	Action Plan: The Technical Advisor was assigned to:  1. Complete the missing regulations and update titles by October 15, 2025. 2. Incorporate the prioritized regulations into the final report by October 23, 2025.
4	Consultation Timeframe: Although the report was initially expected to be finalized by October 1st, participants agreed that additional time was required to gather comprehensive input from various departments.	Timeline Extension: It was agreed to extend the timeline. Departmental directors will provide specific inputs to the Technical Advisor. A final draft will be circulated to departments for input by October 25, 2025.

*Table 8: Summary of consultation with Neighboring Stakeholders on PIU Office Construction (December 4, 2025)*

No	Issues/Point Raised	Responses / Agreed Actions
1	Mosque Operations & Security: The Imam of the Ministry Mosque emphasized the need for a clear boundary demarcation between the new office and the mosque. He requested the installation of CCTV cameras for security and suggested that the women's prayer section be incorporated within the mosque structure rather than the new office building.	Design & Safety Assurance: The PIU confirmed that construction would not disrupt mosque activities as there is an alternative entrance. The advice regarding the women's section and CCTV security measures was noted for incorporation into the final site management plan.
2	Traffic Management & Congestion: Representatives from the Red Crescent raised concerns about traffic congestion caused by construction vehicles. The Telesom Electricity Company (TEC) also highlighted access issues.	Alternative Access Route: TEC offered collaboration by providing access through their garage as an alternative route to the Ministry premises to alleviate congestion at the main gate. The PIU committed to implementing a strict Traffic Management Plan.
3	Noise & Disturbance: The Siilaanyo National Library representatives expressed concern regarding construction noise, noting that the library requires a quiet environment for students and readers.	Noise Mitigation: The meeting agreed on the importance of managing noise levels. The PIU will coordinate construction schedules (e.g., restricting high-noise activities during peak library/prayer hours) to minimize disturbance.
4	Coordination with Other Projects: The Ministry's digitalization team noted that another construction project (Taiwan/ICDF Data Center) is already underway, raising concerns about cumulative impacts.	Joint Coordination: It was agreed to coordinate efforts between the EA-RDIP construction and the Taiwan-supported project to manage cumulative impacts effectively.
5	Safety & Security: Concerns regarding electrical safety measures (raised by TEC) and general site security (raised by the Security Officer) were discussed.	Compliance: The PIU confirmed that the new building design will meet high standards, including electrical safety measures and support for site security personnel.

*Table 9: Summary of Technical Stakeholder Consultation on Universal Access (December 15, 2025)*

No	Issues/Point Raised	Responses / Agreed Actions
1	Coordination & Access for Fiber Rollout: The Minister and Project Coordinator emphasized that the successful deployment of fiber optic infrastructure along priority routes relies heavily on government institutions providing access and facilitating coordination with telecom operators.	Institutional Support: Government institutions agreed to support access and coordination along priority fiber routes. The PIU emphasized that timely collaboration is critical to prevent implementation bottlenecks.
2	Universal Access & Data Requirements: The meeting highlighted the need for accurate baseline data to measure the project's "Universal Access" objectives and Key Performance Indicators (KPIs). Participants engaged in group work using questionnaires to provide institutional inputs.	Data Submission: Participants provided initial technical inputs via structured questionnaires. It was agreed that stakeholders would promptly complete and submit any outstanding questionnaire data to the PIU for integration into the M&E framework.
3	Institutional Focal Points: The Director General noted that effective daily coordination requires specific contact persons within the partner organizations, particularly the private sector.	Nomination of Focal Points: It was agreed as a key action point that Telecommunications operators will formally nominate official project focal points to facilitate effective coordination and communication.
4	Security & Operational Risks: The closing remarks highlighted the need to be mindful of security considerations and other contextual factors in the deployment areas.	Enhanced Coordination: All parties agreed to enhance coordination mechanisms, specifically considering security and operational risks during the physical deployment phase.

# STAKEHOLDER IDENTIFICATION AND ANALYSIS

## Project stakeholders

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

- **Affected Parties:** persons, groups and other entities within the project area that are directly influenced or potentially influenced and thus need to be to be closely engaged. This includes government agencies, including local district administrations, implementing partners and direct sector participants.
- **Other Interested Parties:** individuals, groups, and entities that may not experience direct impacts from the project but may have an interest in the project e.g., non-governmental organizations.

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

## Stakeholder engagement principles

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

- **Openness and life-cycle approach:** public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate format, opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns;
- **Inclusiveness and sensitivity:** inclusive, informed and country context sensitive continual stakeholder identification for better communications and strengthened relationships with stakeholders

## Identification of stakeholders

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

Table 7: Project Stakeholder needs

Community	Stakeholder Group	Key Characteristics	Summary of interest	Language requirements	Preferred notification means (email, radio, phone, letter)	Specific needs (accessibility, large print, child care, daytime meetings etc.)
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<b>Regional Level</b>	Regional bodies / RECs	Affected Parties	Will support development of regional frameworks to be implemented at national level.	English	Engagement via project activities and institutional arrangements is proposed.	N/A
	South Sudan	Affected Parties	Other countries under phase 1 of the project		Engagement via project activities and institutional arrangements is proposed.	
	Other countries in East Africa	Affected Parties		English	Engaged via RECs	N/A
<b>National Level</b>	Ministries Department and Agencies (MDAs) – Ministry of Investment and Industry, Ministry of Public Works, Land and Housing, Ministry of Finance, Central Bank of Somaliland, National ID agency)	Affected Parties	Project updates, communications on those activities that relate to their specific mandates	Somali	Memo/letter, email, telephone calls, in-person meetings	Meetings on at least semi-annual basis, hand-outs.

	Business Associations and Digital Businesses	Interested Party	Digital services and innovation ecosystem updates from the relevant project components ; business opportunities	Somali	Memo/letter , website, email, telephone calls, in-person meetings	Meetings on at least semi-annual basis, hand-outs.
	Education sector – digital skills providers (Higher education institutions)	Affected Parties	Opportunities related to how the project can benefit them through SomaliREN, contracting opportunities for potential performance-based grants	Somali	Email, website, telephone calls, in-person meetings	Face to face meetings on a regular basis.
	Telecom Operators (MNOs, ISPs etc.)	Interested Party	Information on PPP arrangements	Somali/English	Email, telephone calls, in-person meetings	Face to face meeting on a regular basis.
	Telecom Regulator:	Affected Party		Somali	Email, telephone calls, in-person meetings	Face to face meeting on a regular basis.
	Construction Companies	Interested Party		Somali	Website, emails	
	Donor Partners and Multilaterals (AfDB,	Interested Party	Information and updates on the project to avoid developmen	English	Website, emails, in-person meetings	

	EU, USAID, DFID, SIDA)		t aid overlap, impact, etc.			
	International NGOs	Interested Party		English	Website, emails	
<b>Local Level</b>		Affected Parties		Somali and locally applicable languages	Email, telephone calls Face-to-face meetings, radio	Need for close coordination and information sharing for smooth implementation.
	Municipal leadership	Interested Party		English and Somali	Email, telephone calls Face-to-face meetings, radio	Very important body - link between the community, the county and development partners. Contact should be initiated on a regular basis during implementation
	Local leadership	Interested Party		Somali	Email, telephone calls Face-to-face meetings, radio	Regular contact
	Women and girls	Vulnerable Group		Somali/English	Face-to-face meetings at community level, virtual meetings, notice boards, radio	May be illiterate, methods must cater for that. Child-care needs
	Vulnerable Households	Vulnerable Group		Somali	Notice board, Face-to-face meetings at community level, radio	Cannot afford services at high cost and may be illiterate
	Youth	Vulnerable Group		Somali	Notice board, Face-to-face meetings at	Need to be empowered and should therefore be well as being

					community level, radio	integrated into consultations
	IDPs and Returnees	Vulnerable Group		Somali	Notice board, Face-to-face meetings at community level, radio	May find that their place of origin or home is occupied by other people
	Ethnic minority groups	Vulnerable Group		Somali	Notice board, Face-to-face meetings at community level, radio	Feel marginalized and mechanisms need to be in place to empower and involve them in productive endeavours
	Persons with disabilities	Vulnerable Group		Locally applicable languages	Notice board, Face-to-face meetings at community level, radio	May require different engagement methods to cater for disability and allow information to reach them
	General community members	Potentially Influencing Party		Somali	Notice board, Face-to-face meetings at community level, radio	Need to have clear information dissemination in order to be inclusive

## STAKEHOLDER ENGAGEMENT PLAN

### Purpose and Timing of Stakeholder Engagement Program

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

The objectives of information dissemination and consultations under the EA-RDIP are: (a) understanding of the digital of the citizens of Somaliland; (b) reception of feedback and comments as well as grievances from all stakeholders on project design and implementation; (c) feedback on potential environmental and social risks and impacts and mitigation measures in relation to construction activities; (c) provision of regular information to stakeholders related to project implementation progress and any other emerging issues throughout the project cycle and (d) provision of transparent and accountable mechanisms on all aspects of the project and

subproject design and implementation; e) provide constant engagement with community leaders

and other stakeholders in construction areas to ensure information flow and timely response to security risks and mitigation measures.

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

*Table 8: Stakeholders Consultation Matrix*

Consultation Stages	Consultations Responsible within Project	Consultations Beneficiaries including disadvantaged individuals and groups	Method of engagement	Purpose
Verification of project locations/sites, conducting site visits,	Project consultants (social specialists), PIU and other stakeholders	Identified groups, community leaders and elders	Face-to-face consultation meetings, official communications, mobile phones, email.	Create project awareness, understand benefits and any potential challenges, keep informed on progress
Assessing proposed intervention in project areas	Project consultants (social specialists), PIU and other stakeholders CBOs	Affected groups (IDPs, pastoralists, nomadic groups), CBOs, community leaders and elders	Face-to-face consultation meetings, official communications, mobile phones, email.	Keep informed on project objectives, create awareness, identify and address concerns on project impacts, feedback from would-be affected persons
Detailed analysis of project impact and assessments	Project consultants (social specialists), PIU, CBOS, NGOs and other stakeholders	Key project informants, focus groups, Affected persons, community leaders	Both formal and informal interviews, Focus group discussions on specific risks and mitigation measures	Identification of key issues and concerns, agreement and development of early mitigation measures

Social assessments	PIU (social specialists) - Consultants	Adversely affected individuals, households and groups	Project and sector specific questions and surveys, focus on qualitative and quantitative information	Feedback from disadvantaged groups and identification of issues that may be addressed within incorporated design review and implementation of the project
Operations and implementation	PIU, Consultants, NGOs & CBOs, implementing partners	Individuals and groups of disadvantaged groups, community leaders/elders and other stakeholders	Implementation, monitoring and evaluation, steering committees (formal or informal)	Address issues, effective implementation, inclusion plan,
Monitoring and Evaluation	PIU, Consultants,	Individuals and disadvantaged groups	Formal participation in review and monitoring	Identify solutions to issues and effectively implement in inclusion plan

## Proposed Strategy for Information Disclosure

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

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

Information to be disclosed	Method used	Target stakeholders	Responsibilities
<b>Before appraisal</b>			
Disclosure of project documents (PAD, SEP, ESCP)	<ul style="list-style-type: none"> <li>Websites – GOSLGoSL and WBG</li> <li>Brief summaries of the main features of the project SEP</li> </ul>	All key stakeholders	<ul style="list-style-type: none"> <li>PIU</li> </ul>

<b>After appraisal</b>			
Publicity on project approval and roll-out plans	<ul style="list-style-type: none"> <li>• Audio-visual messages on project information (radio, TV)</li> <li>• Newspaper stories/supplements</li> <li>• Printed materials on project information</li> <li>• Social Media (Twitter, Facebook, Instagram, WhatsApp)</li> <li>• Emails</li> <li>• Press releases</li> <li>• Speeches</li> <li>• Websites (GOSL, WBG)</li> </ul>	All key project stakeholders	<ul style="list-style-type: none"> <li>• PIU</li> <li>• Communication expert</li> <li>• Social specialists</li> </ul>
Disclosure of the project documents EMPs, updated SEP, LMP, GBV Action Plan, among others	<ul style="list-style-type: none"> <li>• Websites - GOSL and WBG</li> <li>• Brief summaries of the main features of the project SEP</li> <li>• Audio-visual messages on the project (radio, TV)</li> <li>• Newspaper stories/supplement</li> <li>• Social Media (twitter, Facebook, Instagram WhatsApp)</li> <li>• Emails</li> <li>• Press releases</li> <li>• Speeches</li> </ul>	<ul style="list-style-type: none"> <li>• GOSL and all partners involved in the project</li> <li>• Open access to all interested parties</li> <li>• Distribution of printed flyers to schools and other institutions</li> </ul>	<ul style="list-style-type: none"> <li>• PIU</li> <li>• WBG Team</li> </ul>
<b>During implementation</b>			
Roll-out of direct support to the SCSC, CSI and other institutions/agencies and civil servants	<ul style="list-style-type: none"> <li>• Key informant interviews with stakeholders</li> <li>• Newsletters</li> <li>• Newspaper stories/supplement</li> <li>• Social Media (twitter, Facebook, Instagram WhatsApp)</li> <li>• Emails)</li> <li>• Press releases</li> <li>• Speeches</li> <li>• Mobile phone block messages</li> </ul>	<ul style="list-style-type: none"> <li>• Civil servants</li> <li>• Supported institutions</li> <li>• The public</li> </ul>	<ul style="list-style-type: none"> <li>• PIU</li> <li>• Communication expert</li> <li>• Social specialists</li> </ul>
Highlights on project activities, achievements and lessons learned	<ul style="list-style-type: none"> <li>• TV/Radio spots/activations and announcements</li> <li>• Print materials (newsletters and flyers)</li> <li>• Town hall meetings</li> <li>• Newspaper stories/supplement</li> </ul>	<ul style="list-style-type: none"> <li>-Project beneficiaries</li> <li>-Other interested parties</li> </ul>	<ul style="list-style-type: none"> <li>• Social specialists</li> </ul>

	<ul style="list-style-type: none"> <li>• Social Media (twitter, Facebook, Instagram WhatsApp)</li> <li>• Emails</li> <li>• Press releases</li> <li>• Speeches</li> <li>• Mobile phone block message</li> </ul>		
Update on project process	<ul style="list-style-type: none"> <li>• Print materials (newsletter, flyers, etc.)</li> <li>• Project progress reports</li> <li>• Town hall meetings</li> </ul>	All stakeholders	<ul style="list-style-type: none"> <li>• Social specialists</li> <li>• PIU</li> </ul>
Complaints/compliments about the project implementation	Logs and reports from the national GRM focal person, State GRM focal persons (GRM complaints points in schools, district education offices, government offices etc.)	<ul style="list-style-type: none"> <li>• Receivers of information and services</li> <li>• Information or Data managers</li> </ul>	PIU and social specialists
	Surveys and direct observations of the project beneficiaries	<ul style="list-style-type: none"> <li>• Different stakeholders</li> <li>• Disadvantaged populations</li> </ul>	<ul style="list-style-type: none"> <li>• GoSL</li> <li>• Communication Officer</li> <li>• M&amp;E Officer</li> </ul>
<b>Monitoring and reporting</b>			
Feedback of effectiveness of different modalities of engagement	<ul style="list-style-type: none"> <li>• Semi-structured interviews</li> <li>• Online surveys</li> <li>• Satisfaction surveys</li> </ul>	Project primary beneficiaries	<ul style="list-style-type: none"> <li>• Social specialists</li> <li>• M&amp;E Officer</li> </ul>
Quarterly	Progress report including summaries of complaints and resolution	GOSL offices at the National and regional level offices	M&E officer

## Proposed Strategy for Consultation

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

*Table 10: Strategy for Consultation*

Project Stage	Topic of Consultation	Suggested Method	Timetable: location and dates	Target stakeholders	Expected Outcome	Responsibilities
Project Design	Overall project activities	PIU, GRM, face to face meetings, community meetings	By project effectiveness and throughout implementation	<u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers;	Understanding of the overall project activities	MICT and the PIU

				<p>Internet Service Providers (ISP); and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership</p> <p><u>Community level:</u> Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community</p>		
SEP (including GRM)	GRM, face to face meetings, community meetings			<p><u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership</p> <p><u>Community level:</u> Local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with disabilities; general community</p>	<p>Reception of feedback and comments as well as grievances from all stakeholders on project design, as well as potential environmental and social risks and impacts and mitigation measures</p> <p>Provision of transparent and accountable mechanisms on all aspects of the project and design</p>	MICT and the PIU
ESCP	Project Steering Committee, GRM, email	By project appraisal, at negotiations and throughout implementation		<p><u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and</p>	<p>Provision of transparent and accountable mechanisms on all</p>	MICT and the PIU

				Insurance Providers; Internet Service Providers (ISP); Telecom Regulator and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership	aspects of the project and design	
	ESMF	Project Steering Committee, GRM, face to face meetings, community meetings	By project effectiveness and throughout implementation	<u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership	Reception of feedback and comments as well as grievances from all stakeholders on project design, as well as potential environmental and social risks and impacts and mitigation measures	MICT and the PIU
<b>Project launch / Entry</b>	Introduction of the project	Stakeholder meeting / conference	By project effectiveness	<u>National and county level:</u> Business Associations and Digital Businesses; Universities and Educational Centers; Telecom and Insurance Providers; Internet Service Providers (ISP); and Implementing Authorities; Donor Partners and Multilaterals; International NGOs; County Government; Municipal leadership	Understanding of the project activities and objectives	MICT and the PIU
<b>Project Implementation</b>	ESMPs / RAPs	Community meetings, notice boards at county level	County	<u>Community and county level:</u> county authorities; local leadership; Women and girls; Vulnerable Households; Youth; IDPs and Returnees; Ethnic minority groups; Persons with	Understanding of planned works and feedback on particular E&S risks and impacts	MICT and the PIU

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

## INCLUSION PLAN

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

### Engaging disadvantaged and marginalized groups

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

Table 11: Vulnerable groups Feedback incorporation strategy

No	Vulnerable Group	Proposed strategy for consultation
1	Vulnerable Groups	Through representative bodies and organizations and other community members ensuring effective participation and culturally appropriate engagement, sharing key and specific information in local dialects/languages, providing relevant timelines for internal-decision making process amongst groups.
2	Persons with disabilities (deaf)	Use of sign language and other appropriate assistive tools as required, providing translations where necessary including local dialects, facilitate transport where necessary, engage through representative organizations and/or persons, provide relevant timelines for internal-decision making process amongst groups.
3	Women	Engage through representative organizations and/or persons, provide focused and relevant meetings in culturally appropriate settings for comfort and safety in asking questions or raising concerns, meeting schedules that are time appropriate to ensure participation and sufficient interaction, ensuring meeting venues are located in close proximity to resident area, translation into local dialects and meetings with female facilitators.
4	Persons with disabilities	Engage through representative organizations and/or persons, provide focused and relevant meetings in culturally appropriate settings for comfort and safety in asking questions or raising concerns, provide relevant timelines for internal decision-making process amongst groups.
5	Elderly	Host one to one meetings where necessary, provide transportation to meeting venues, consult on meeting settings and timelines with participants, provide language or dialect translator and/or facilitators, ensure meeting settings are culturally appropriate.
6	Children	Engage through representative organizations where possible, obtain consent from parent/carers, meeting locations familiar to the child e.g., local school venues or community meeting centers where possible, use child friendly means and language to communicate.

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

reduce adverse effects associated with project activities and agree on relevant and effective mitigation measures.

## GRIEVANCE REDRESS MECHANISM

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

As per World Bank standards, the GRM will be operated in addition to a separate GBV/SEA/SH Action Plan, which includes reporting and referral guidelines. However, the Project GRM will also handle GBV/SEA/SH cases where necessary. Additionally, in line with the provisions of ESS2, a grievance mechanism will be provided to all direct workers and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them against any reprisal for its use. This worker grievance mechanism is included in the project’s Labor Management Procedures (LMP) (see ESMF). Given the small-scale nature of works and focus on locally sourced labor, the intake mechanisms of the overall GRM will also allow intake of grievances under ESS2. Note that for SH at the workplace, provisions under the GBV/SEA Action Plan apply.

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

### GRM Core Principles

The GRM is based on six core principles:

- **Fairness:** Grievances are treated confidentially, assessed impartially, and handled transparently.
- **Objectiveness and independence:** The GRM operates independently of all interested parties in order to guarantee fair, objective, and impartial treatment in each case. GRM

officials have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).

- **Simplicity and accessibility:** Procedures to file grievances and seek action are simple enough that stakeholders can easily understand them. Project stakeholders have a range of contact options including, at a minimum, a telephone number. The GRM is accessible to all stakeholders, irrespective of the remoteness of the area they live in, and their level of education or income. The GRM does not use complex processes that create confusion or anxiety.
- **Responsiveness and efficiency:** The GRM is designed to be responsive to the needs of all complainants. Accordingly, staff handling grievances are trained to take effective action, and respond quickly to grievances and suggestions.
- **Speed and proportionality:** All grievances, simple or complex, are addressed and resolved as quickly as possible. The action taken is swift, decisive, and constructive.
- **Participation and social inclusion:** A wide range of stakeholders are encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensure that marginalized or vulnerable groups, including those with special needs, are able to access the GRM.

## GRM Value Chain

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

## Means of Filing a Grievance

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

1. **A phone number for a hotline operator:** The phone number of a grievance hotline operator must be widely disseminated among project stakeholders. The Hotline Operator should be available from 8.00 am to 5.00 pm every day. The hotline operator is set up and managed by the PIU. Any concerned party can call the hotline number and file a grievance with the Project.
2. **A help desk** will be set up during the implementation of sub-project activities in a specific locality, especially where construction activities are undertaken. It should be manned by

the implementing staff, in close coordination with local authorities. At the help desk, stakeholders can inquire about information in regard to project activities, or they can file a grievance directly with the person manning the desk.

3. Relevant assigned personnel available in each project site will be required to accept grievances and ensure that avenues for lodging grievances are accessible to the public. The first point of contact for all potential grievances from community members may be the contractor or a local government official. Such personnel will be required to accept formal grievances; or they can point out the Hotline Operator's number, the Help Desk or Suggestion Box. If no reasonable other modality of filing a grievance is available for the respective complainant, the staff has to accept and register the grievance.
4. A suggestion box will be installed at the nearest sub-project site. Suggestion boxes provide a more anonymous way of filing a grievance or for providing feedback. Grievances or feedback submitted to the suggestion box must be expressed in writing.

## SEA/SH-related Grievance

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

The GBV survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor's informed consent – report the case to one of the Project's formal GRM. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

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

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

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

## Incident reporting

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

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

Records of all feedback and grievances reported will be established by the PIU. All feedback is documented and categorized for reporting and/ or follow-up if necessary. For all mechanisms, data will be captured in an excel spreadsheet. The information collected, where possible, should include the name of the person providing feedback as well as the county, (where applicable), the project activity and the nature of feedback or complaint.

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

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

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

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

## GBV/SEA/SH

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

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

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

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

## GBV/SEA/SH

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

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

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

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

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

Investigation:

- GRM Officer to appoint an independent investigator (E&S Specialists, professional outside the Implementing institution) who is a neutral investigator with no stake in the outcome of the investigation
- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, videos)
- Collect and preserve evidence
- Analyze to establish facts and compile a report

Grievance Action Plan

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

## GBV/SEA/SH

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

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

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

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

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

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

**Step 5: Monitor, Evaluate and Provide Feedback:** The GRM Officer will provide feedback to GRM users and the public at large about: results of investigations; actions taken; why GRM is

important; enhance the visibility of the GRM among beneficiaries; and increase in users' trust in the GRM.

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

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

### EARDIP Grievance Redress Service (GRS)

Focal Person: Muna Ibrahim

Title: EADIP - Social Specialist

Email: [Grm@eardipsomaliland.com](mailto:Grm@eardipsomaliland.com)

Website: <https://mict.govsomaliland.org/#0>

Facebook: <https://www.facebook.com/profile.php?id=61565469795183&mibextid=ZbWKwL>

### WB's Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org)

- Guidelines and Tools for Reporting and Processing Grievances

- Uptake channels will be established at various levels to facilitate access to local communities. Each of the specific SEPs for subprojects will further identify additional channels based on the specific circumstances. Complaints can be in any language and form and the complainant may choose to remain anonymous.
- Grievances will be filed by an aggrieved person at the entry-level using a complaint form or through a designated grievance channel.
- The form will describe the complaint and provide for action at the three levels of redress- community district, Municipal. Ideally, complaints should be acknowledged in 7 days, provide feedback in 21 days and resolved within Forty-Five (45) days, except complaints and grievances that relate to the valuation of affected assets that need to be managed by a unit set up by the project.

## RESOURCES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION

### Management

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

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

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

### Resources

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

*Table 12: Indicative Budget for implementation of SEP*

Stakeholder Engagement Activity	Total Cost (USD)
<b>Social experts</b>	
Dedicated social safeguards specialist at PIU	Included in staff costs
<b>Consultation and disclosure</b>	
Consultation sessions in all the works-affected communities	150,000
Establishment and maintenance of website	10,000
Radio broadcasts	5,000
Other disclosure campaigns	50,000
<b>Grievance redress mechanism</b>	
GRM Hotline	10,000
Dissemination of information on GRM	20,000
<b>Monitoring and documentation of SEPESMF implementation</b>	
Verification of SEP activities (field visits, etc)	Included in PIU travel budget
<b>TOTAL</b>	<b>245,000</b>

## MONITORING AND REPORTING

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

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

*Table 13: Monitoring Plan*

Key components	Timeline	Methods	Responsible entity
Stakeholders access to project information and consultations.	Project preparation stage and throughout implementation	Surveys, interviews and observation	PIU

Awareness for beneficiaries on activities and their entitlements and responsibilities.	Project preparation stage and throughout implementation on monthly/quarterly basis	Surveys, interviews and observation	PIU
Relevance and appropriateness of consultation and engagement approaches	Monthly/quarterly and through implementation of project	Surveys, interviews and observation/review of project progress reports	PIU
Awareness of GRM platforms and their relevance	Monthly/quarterly and through implementation of project	Surveys, interviews and observation/review of project progress reports	PIU
Engagement of facilitators with stakeholder target beneficiaries.	Monthly/quarterly and through implementation of project	Surveys, interviews and observation/review of project progress reports	PIU
Status of reported grievances	Monthly/quarterly and through implementation of project	Interviews and review of project progress reports and GRM records	PIU

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

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

## ANNEXES

### Annex 1: Consultations meetings held with key stakeholders

## **Government Ministries and Agencies**

### **Physical meeting with MDA's, 21<sup>ST</sup> October 2024, 08:00 AM – 12:00 PM**

Name	Organization	Email
Mohamed Jama Abdirahman	Beder University	Mutafaqjama11@gmail.com
Suleikha Isahaq	Somaliland innovation	Siz.mict@sldovoc
Abdirahman Mohamed	MICT	Planning.mict@sldov.org
Sayid Omer Aided	MICT	Hr.mict@jld
Hodo Ahmed Abdilahi	Gollis University	publicrelationsdirector@gollis
Suad Ali Mohamed	SSWE	Suadali78@gmail.com
Mohamed Abdi Ismail	Daami Youth	Dayd04@gmail.com
Awil Ahmed Mohamed	Yott	Indho2010@gmail.com
Suleiman Ismail Botan	Telesom Group	botan@telesom.com
Jaafar Mohamed Dirie	Telesom Group	jaafardirie@telesom.com
Abdirahman Mahad	Somcable	a.mahad@somcable.com
Abdirahman Muse	Somtel	Abdirahman.muse@somtel
Ahmed Yasin	Horn Technology	ayazzin@gmail.com
Mohamed Mohamoud	SLNTV	maxayiilo@gmail.com
Suhaib Qassim	MMTV	Zuhaibqazim725@gmail.com
Ahmed khalif	EARDIP	Axmedkhalif59@gmail.com
Muna Ibrahim	EARDIP	Munaibrahim3223@gmail.com
Saed Sulub	EARDIP	drsaedsulub@gmail.com
Mohamed Madar	EARDIP	Madar803@gmail.com
Abdi Hussein	EARDIP	husseinmuruf@gmail.com
Khayre Osman	MICT-DG	DG.MICT@Sldov.org

### **Physical meeting with MDA's, 22<sup>nd</sup> October 2024, 08:00 AM – 12:00 PM**

Name	Organization	Email
Mohamed Ahmed	Ministry of interior	Mohamed2070@gmail.com
Abdilahi Ahmed	Development.Mopnd@sldovgov.org	Siz.mict@sldovoc
Rahma Abdilahi	NAFIS Network	Rahma.abdilahi@nafis.org
Shadia Abdi	MICT	shadiakhalif@gmail.com
Muna hassan ahmed	NDRA	Munahappy413@gmail.com
Sabah Omer dualeh	NDRA	Sabaxcumar@gmail.com

Abdisamad khadar dahir	MICT	Abdisamadkho1@gmail.com
Mohamed Omer	NFOC	Mohamed.qaro@gmail.com
Mohamed Omer Ahmed	Ministry of investment	Mohamedomer2017@gmail.com
Adam Nour	Ministry of Environment	Adam.nour13@gmail
Mohamed Abdilahi	Ministry of Environment	Mohamed.sanjar18@gmail.com
Abdirashid Ahmed	Ministry of Water	rashiidahmed@gmail.com
Mohamed ahmed ismail	Ministry of Energy	Engmohamedkarama@gmail.com

Ismail Abdirahman	Ministry of Energy	Ismail1992@gmail.com
Abdiaziz Hiis Aidid	MICT	abdiazizkaramani@gmail.com
Ahmed khalif	EARDIP	Axmedkhaliif59@gmail.com
Muna Ibrahim	EARDIP	Munaibrahim3223@gmail.com
Saed Sulub	EARDIP	drsaedsulub@gmail.com
Mohamed Madar	EARDIP	Madar803@gmail.com
Abdi Hussein	EARDIP	husseinmuruf@gmail.com
Khayre Osman	MICT-DG	DG.MICT@Sldov.org

### Physical Meeting with Moll October 30<sup>th</sup> 2024

Name	Institution	Email
Abdiqani Mohamed Ahmed	MoTT	<a href="mailto:Abdiqani.mott@sldgov.org">Abdiqani.mott@sldgov.org</a>
Ibrahim	MoTT	<a href="mailto:engibraa@gmail.com">engibraa@gmail.com</a>

**Meeting:** Consultation Meeting with SomaliREN Universities

**Date:** September 23, 2025

**Venue:** IPCS Hall, University of Hargeisa

#### List of Attendees:

1. Jamal Mohamed Jama – Minister of MICT
2. Dr. Mohamed Sulub – President, University of Hargeisa & Chairperson of SomaliREN
3. Dr. Abdirashid I Mohamed – Vice President, University of Hargeisa
4. Prof Dr. Mohamed Muse Jibril – President, Amoud University
5. Mubarik Ibrahim Aar – President, Beder University
6. Mustafe Mohamed Ahmed – Vice President, University of Burao
7. Mustafe Ibrahim Jama – Academic Director, Gollis University
8. Awil Ahmed Mohamed – ICT Director, University of Hargeisa
9. Fathi Mohamed Harir – Dean of IT, Gollis University
10. Mohamed Abdi Elmi – Dean of ICT, University of Burao
11. Muhyadin Farah – ICT Director, Amoud University
12. Mohamed Jama Abdi – Dean of ICT, Beder University
13. Suleiman M. Abdi – Project Coordinator, EA-RDIP
14. Mohamed Jama Madar – M&E Specialist, EA-RDIP

15. Rooble Mohamed – Communications Specialist, EA-RDIP
16. Siham Abdillahi Mumin – GBV Specialist, EA-RDIP
17. Ahmed Khalif – Environmental Specialist, EA-RDIP
18. Muna Ibrahim Ahmed – Social Specialist, EA-RDIP

**Meeting: Consultation on Draft Legal Framework Gap Analysis Report**

**Date: October 9, 2025**

**Venue: Innovation Zone, Hargeisa**

**List of Attendees:**

1. Suleikha Isahak – Director, Somaliland Innovation Zone
2. Shadia Abdi – Connectivity Specialist, EA-RDIP
3. Mohamed Farah Abdillahi – Technical Advisor, EA-RDIP
4. Mubarhik Mohamed Farah – Director of Postal, MICT
5. Sakariye Khadar Abdikarim – Director of ICT, MICT
6. Yusuf Mohamed Diriye – Director of Legal, MICT
7. Abdirahman Mohamed – Director of Telecom, MICT
8. Suleiman M. Abdi – Project Coordinator, EA-RDIP
9. Rooble Mohamed – Communications Specialist, EA-RDIP

**Meeting: Stakeholder Meeting on PIU Office Reconstruction with Neighboring Stakeholders**

**Date: December 4, 2025**

**Venue: MICT Meeting Hall**

**List of Attendees:**

1. Rooble Mohamed – Communications Specialist, EA-RDIP
2. Bashir Yasan – Admin and Finance
3. C/Xakiin Jamaal – ICT Director, Ministry of Health Development (MOHD)
4. Eng. Ayanle Mohamed – Engineer, Telesom Electricity Company (TEC)
5. Ahmed Nour – Manager, Telesom Electricity Company (TEC)
6. Hamze Ahmed – MICT
7. Sakariye Abdigani – MICT
8. Sihaam Abdilahi – GBV Specialist, PIU/EA-RDIP
9. Muna Ibrahim – Social Specialist, PIU/EA-RDIP

10. Abdirahman Mohamed – Director of Telecom, MICT
11. Mohamed Farah Abdillahi – Technical Advisor, EA-RDIP
12. Ahmed Khalif – Environmental Specialist, EA-RDIP
13. Abdalla Hassan Habane – HR Department, MICT
14. Nasri Mohamed Yussuf – Siilaanyo National Library
15. Sh. Abdirazaq Xaji – Imam, Ministry Mosque
16. Ibrahim Isse – Security

**Meeting:** Technical Stakeholder Consultation Meeting (Universal Access & M&E)

**Date:** December 15, 2025

**Venue:** Carro Edeg Hotel, Hargeisa

**List of Attendees:**

1. MukhtaSaleban – Director, MICT
2. Mohamed Farah – Technical Advisor, EA-RDIP
3. Rooble Mohamed – Communications Specialist, EA-RDIP
4. Ahmed Imaan – Head of Department, Ministry of National Planning (MONPD)
5. Abdiwasir Mohamed – Engineer, Somcable
6. Abdirahman Mahad – CTO, Somcable
7. Amal Abdillahi Fadal – Director, Ministry of Justice (MOJ)
8. Naima Soleban Duelle – ICT Department, Ministry of Interior (MOI)
9. Warfa Mohamed Khayre – ICT Department, Police Officer
10. Abdi Salan Omar Ahmed – Police Officer
11. Abdi Fatah Osman Abdi – Director, State Electricity Commission (SEC)
12. Abdirahman Yasin Ahmed – Director, National Commission for Higher Education (NCHE)
13. Hodan Nur Yusuf – Deputy Director, MICT
14. Sahra Ibrahim Abdullahi – Health Service, Ministry of Health Development (MOHD)
15. Khalid Idan Yare – Member, SomaliREN
16. Abdisamad Ali – CTO, Somtel
17. Khadar Mohamoud Egal – Manager, Telesom
18. Abdirahman Ahmed Elmi – Diector, Tedesom
19. Rahma Cabdi Ismacil – Head of National Displacement and Refugee Agency (NDRA/MORHA)

20. Mohamed Ahmed Ibrahim – Head Section, National Displacement and Refugee Agency (NDRA/MORHA)
21. Abokor Abdi Ismacil – Head Strategy and Innovation, Somtel
22. Faysal Yousuf Ali – Regional Coordination, MICT
23. Mohamed Farah Ali – Director, Ministry of Energy & Minerals (MOES)
24. Asayr Aadan Saleban – Deputy, Ministry of Energy & Minerals (MOES)
25. Abdirahman Mohamed – Director of Telecom, MICT

**Annex 2: Complaints log template**

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

**Annex 3: Grievance Redress Mechanism (GRM) Form**

**Reference No:** \_\_\_\_\_

**Details of Complainant:**

**Full name:** \_\_\_\_\_

- I wish to raise my grievance anonymously
- I request not to disclose my identity without my consent

Contact

\_\_\_\_\_  
 **By Mail:** Please provide mailing address:

Gender of Complainant:

Age of Complainant:

- By Telephone: \_\_\_\_\_
- By E-mail \_\_\_\_\_

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

Description of Incident or Grievance:

Location of grievance:

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

#### Annex 4: Grievance Register Template

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

*Table 11 Grievance Register*

Type of Information	Response
Complaint/ Log number	
Reference document (s)	
Date complaint made	
Date complaint received	
Category of Grievance	
Method of Logging: Direct Communication; Suggestion Box; Toll-free Line;	
Complaint name (state if anonymous)	
Location in which complained action took place (district, village)	
Caller contacts for follow up	
Gender	
Age	
Parties against whom complaint is made (unit/contractor/agency etc)	

Nature of Complaint ["SEA/GBV"; "Timing of Payment"; "Amount of Payment"; "Inclusion or Issue regarding Project benefits" or create standard categories based on complaint type]	
Description of Complaint	
Nature of feedback (describe)[In case issue type is GBV/SEA immediate referral to the GBV referral system]	
Verification and investigation (describe)	
Recommended action (describe)	
Timeline of Initial feedback (within 5 days) [investigate the claim within 5 working days, and share findings/feedback with relevant stakeholder]	
Status update (and justification if it is not expected to be resolved within the timeframe set out)	
Date resolved	
Indicate if a spot check has been conducted (you can include then in the narrative reports spot checks for resolutions of x number of complaints have been conducted)	

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

Table 12 GBV/SEA Case Registration Form

GBV/SEA/SH Case Registration Form	
Administrative Information	
	Grievance ID
2	Code of Survivor (Employ a coding system to ensure that client names are not easily connected with case information)
3	Date of grievance registration
4	Date of Incident
5	Reported by survivor or an escort of the survivor, in the presence of the survivor
6	Reported by someone other than the survivor without survivor present
Survivor Information	
7	Gender / age
8	Location / Residence

9	Current civil/marital status	
1	Occupation	

1	Is the survivor a person with mental or physical disabilities?	
1	Is the survivor an unaccompanied or separated child?	
1	Was the perpetrator related to the project?	
1	Has Informed Consent been provided? yes/no?	
	Has the case been reported elsewhere (including police / lawyer/health services/psychosocial counseling, other)?	
<b>Sub-Section for Child Survivor</b>		
	If the survivor is a child (less than 18 years), does he or she live alone?	
	If the survivor lives with someone, what is the relation between her/him and the caretaker? (parent/guardian; elative; spouse; other)	
	What is the caretaker's current marital status?	
<b>Details of the Incident (in survivor's words)</b>		
	Details of the incident	
	Incident location and time	
	Were money, goods, benefits and/or services exchanged in relation to the incident?	
<b>Alleged Perpetrator Information</b>		
	Number of alleged perpetrators	
	Sex of alleged perpetrators	
	Age group of alleged perpetrator(s)	
	Indicate relationship between perpetrator(s) and survivor	
	Main occupation of the alleged perpetrator(s)	
	Employer of the alleged perpetrator(s)	
<b>Planned Actions / Actions Taken</b>		
	Was the survivor referred by anyone?	
	Was the survivor referred to a safe house / shelter?	
	Which services does the survivor wish to be referred to? <ul style="list-style-type: none"> <li>• Psychosocial services</li> <li>• Legal services</li> <li>• Police</li> <li>• Health services</li> <li>• Livelihood program</li> </ul>	
	What actions were taken to ensure the survivor's safety?	
	Describe the emotional state of the client at the beginning of the report	
	Other relevant information	

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