

FEDERAL GOVERNMENT OF SOMALIA



Ministry of Labour & Social Affairs

**PROJECT:
SHOCK RESPONSIVE SAFETY NET FOR LOCUST
RESPONSE PROJECT**

SOCIAL MANAGEMENT PLAN (SMP)

June 2020

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Abbreviations and Acronyms

BRA	Banadir Regional Authorities
CBT	Cash-Based Targeting
CPF	Country Partnership Framework
CFW	Cash for Work
DLRP	Emergency Desert Locusts Response Program
DPFP	Data Protection Focal Person
EAFS	External Assistance Fiduciary Section
ECT	Emergency Cash Transfers
ELRP	Emergency Locust Response Project
FAO	Food and Agriculture Organization of the United Nations
FCV	Fragility, Conflict, and Violence
FGS	Federal Government of Somalia
FM	Financial Management
FMFA	Financial Management Framework Agreement
FMS	Federal Member States
FSNAU	Food Security and Nutrition Analysis Unit
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanism
IDA	International Development Association
IFR	Interim Financial Report
MAM	Moderate Acute Malnutrition
M&E	Monitoring and Evaluation
MEB	Minimum Expenditure Basket
MIS	Management Information System
MoF	Ministry of Finance
MoLSA	Ministry of Labor and Social Affairs
MPA	Multiphase Programmatic Approach

MTR	Midterm Review
NDP	National Development Plan
NGO	Nongovernmental Organization
OCHA	Office for the Coordination of Humanitarian Affairs of the United Nations
PDO	Project Development Objective
PIU	Project Implementation Unit
PP	Procurement Plan
PPSD	Project Procurement Strategy for Development
SAM	Severe Acute Malnutrition
SCALED-UP	Somalia Capacity Advancement, Livelihoods and Entrepreneurship through Digital Uplift Project
SEA	Sexual Exploitation and Abuse
SEP	Stakeholders Engagement Plan
SNHCP	Shock Responsive Safety Net for Human Capital Project
SNLRP	Shock Responsive Safety Net for Locust Response Project
SP	Social Protection
SSN	Social Safety Net
SRM	Social Risk Management
STEP	Systematic Tracking of Exchanges in Procurement
TA	Technical Assistance
TOR	Terms of Reference
TPM	Third-Party Monitoring
TTL	Task Team Leader
UCS	Use of Country System
UN	United Nations
UNDSS	United Nations Department of Safety and Security
UNICEF	United Nations Children's Fund
USR	Unified Social Registry
WFP	World Food Programme
CBT	Cash-Based Targeting

CBPT	Community Based Participatory Targeting
CFM	Complaints and Feedback Mechanism
CPF	Country Partnership Framework
CSC	Community Steering Committee
DFID	U.K. Department for International Development
DPFP	Data Protection Focal Person
DWG	Donors Working Group
EAFS	External Assistance Fiduciary Section
EU	European Union
FAO	Food and Agriculture Organization of the UN
FCV	Fragility, Conflict, and Violence
FGS	Federal Government of Somalia
FM	Financial Management
FMFA	Financial Management Framework Agreement
FMS	Federal Member States
FRS	Federal Republic of Somalia
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanism
HIPC	Heavily Indebted Poor Countries
IDA	International Development Association
ICSP	Interim Country Strategic Plan (WFP)
IDP	Internally Displaced Person
IFMIS	Integrated Financial Management Information System
IFR	Interim Financial Report
IMF	International Monetary Fund
IPC	Integrated Phase Classification
MAM	Moderate Acute Malnutrition
M&E	Monitoring and Evaluation
MEB	Minimum Expenditure Basket

MIS	Management Information System
MoF	Ministry of Finance
MoLSA	Ministry of Labour and Social Affairs
MTR	Midterm Review
NDP	National Development Plan
NGO	Nongovernmental Organization
PDO	Project Development Objective
PFM	Public Financial Management
PIU	Project Implementation Unit
PP	Procurement Plan
PPA	Public Procurement, Concessions, and Disposal Act
PPSD	Project Procurement Strategy for Development
SAM	Severe Acute Malnutrition
SCALED-UP	Somalia Capacity Advancement, Livelihoods and Entrepreneurship through Digital Uplift Project
SCD	Systematic Country Diagnostics
SEA	Sexual Exploitation and Abuse
SEP	Stakeholders Engagement Plan
SMP	Staff-Monitored Program
SNHC	Shock Responsive Safety Net for Human Capital Project
SP	Social Protection
SSN	Social Safety Net
STEP	Systematic Tracking of Exchanges in Procurement
TA	Technical Assistance
TAF	Technical Assistance Facility
TOR	Terms of Reference
TMT	Transfer Management Team
TPM	Third-Party Monitoring
UCS	Use of Country Systems
UCT	Unconditional Cash Transfers

UN	United Nations
UNICEF	United Nations Children's Fund
WFP	World Food Programme

1. Country context:

1.1. **The Shock Responsive Safety Net for Locust Response Project (SNLRP) for the Federal Republic of Somalia is the proposed second phase of the World Bank’s regional response to the Desert Locust crisis – the ‘Emergency Locust Response Program’ (ELRP) – using the Multiphase Programmatic Approach (MPA).** The ELRP was approved by the World Bank’s Executive Directors on May 20, 2020. The ELRP financing envelope is up to US\$ 500 million International Development Association (IDA) grant/credit financing for country responses, including US\$ 40 million IDA grant for the proposed SNLRP.

1.2. **The worst desert locust plague in decades is threatening the food security and livelihoods of tens of millions of people across East Africa, the Middle East, and South Asia.** The desert locust is the most dangerous migratory pest in the world. As of mid-April 2020, 23 countries from Pakistan to Tanzania have been affected by the desert locust outbreak. Since early 2020, swarms have spread across the wider East Africa region – ranging from Djibouti to as far south as Tanzania and as far west as the Democratic Republic of Congo, where swarms were last seen in 1944. They have since also affected every country on the Arabian Peninsula. The extent to which the locusts can travel during a plague – known as the invasion area – spans as vast as about 32 million km². In addition, it is a voracious eater and highly mobile when traveling in swarms, traits that make it a formidable threat to livelihoods and food security. Each insect can consume its body mass each day (2 grams), and when swarming, can travel up to 150 km or more in a day. A small swarm (1 km²) can comprise as many as 80 million locusts and can consume the same amount of food in one day as 35,000 people. Larger swarms, such as the one covering 2,400 km² spotted in Kenya in late January 2020, can consume as much as 1.8 million metric tons of green vegetation every day, according to the United Nations (UN), equivalent to enough food to feed 81 million people. As such, it is uniquely difficult and costly pest to combat, which will be exacerbated by the overlapping COVID-19 pandemic that is spreading across the regions.

1.3. **Resilience of countries and populations in the desert locust affected regions to shocks of this magnitude has been steadily weakened by climate change, fragility and conflict, and now the COVID-19 pandemic.** In East Africa and parts of the Arabian Peninsula, locusts are impacting some of the most vulnerable populations that are significantly negatively impacted by Fragility, conflict, and violence (FCV). For example, the Greater Horn of Africa¹ before the current locust invasion had already experienced the forced displacement of over 12 million people (including 4.2 million refugees) and had just over 22 million severely food insecure people (IPC 3 or worse)² by December 2019. Anticipated food shortages and tightening of food markets due to the COVID-19 pandemic will likely amplify food insecurity and fragility in hard-hit areas and could further population displacement and localized conflict. In the Horn of Africa, the potential of severe localized losses of food, fodder and forage could result in over three million farmers and half a million pastoralists being added to the existing population already classified as severely food insecure (IPC 3+).

¹ According to the United National Office for the Coordination of Humanitarian Affairs, (OCHA), Greater Horn of Africa covers the following countries: Djibouti, Ethiopia, Eritrea, Kenya, Somalia, Sudan, South Sudan, Uganda

² According to the Integrated Phase Classification (IPC), at IPC 2 the livelihood assets of affected households are stressed and being used unsustainably. At IPC 3, households are using crisis strategies (e.g., pulling their children from school) and depletion of livelihood assets accelerates. At IPC 4, households are at near complete and irreversible depletion or loss of livelihood assets. At IPC 5, households have reached complete loss of assets.

1.4. **The poor are particularly vulnerable to crisis-induced livelihood loss and income shocks from locust damage, as they have the least ability to save and smooth consumption in the face of crisis, worsened by COVID-19 impacts.** At times of crisis, vulnerable households adopt negative coping mechanisms, for example, eat next season's seed, sell off productive assets, withdraw children from school, and other negative coping mechanisms to meet short-term needs. For example, studies of past locust plagues found a notable decrease in school enrollment in boys and girls in areas affected by locusts as well as evidence of stunting in infants and children.³ Further, expected increasing food prices debilitate food consumption in poorer households, known to be net purchasers of food. With caloric intake that is already inadequate, higher food prices pushes them towards less nutritious foods. Such negative coping mechanisms result in adverse long-term effects, deepening the challenge of breaking the intergenerational cycle of poverty.

1.5. **In response to the desert locust crisis, the recently approved DLRP MPA provides an operational framework for participating countries to respond through three pillars.** First pillar is “control,” which aims to help affected countries monitor and assess looming locust dangers, control locust population growth, and curb the spread of swarms, while mitigating the risks associated with control measures. Second pillar is “protect and restore,” which focuses on moving immediately to improve access to food and basic needs for the vulnerable in the short-term, but also to secure the means to generate livelihoods and enhance human capital assets in the future. This pillar requires social protection (SP) and technical interventions in agriculture and livestock to prevent further food insecurity and permanent loss of human capital and productive assets, given that productive assets such as livestock and other forms of household working capital are often sacrificed when households have no other way to cope with shocks. Third pillar is “preparedness” for the need to deal with the fact that the current outbreaks are climate-related and are likely to re-occur more frequently under climate change.

1.6. **Efforts under the proposed SNLRP will be complemented by the recently approved IDA-funded Somalia Crisis Recovery Project (SCRIP, P173315); together both projects will support all three pillars of the MPA.** The SCRIP is an US\$ 137.5 million IDA grant that aims to “support the recovery of livelihoods and infrastructure in flood and drought affected areas and strengthen capacity for disaster preparedness nationwide.” Components 1 and 3 of the SCRIP, among other interventions, will support (a) controlling the desert locust population through ground and aerial spraying operations and carrying related impact assessment and surveillance activities; (b) restoration of farmers’ livelihoods after control efforts have stabilized the situation, particularly agricultural production through the provision of inputs (i.e. seed packages and basic farming tools), as well as pre-positioning of livestock feed-stocks; and (c) development of a local locust early warning and control systems, and capacity building activities. Thus, while the SCRIP will largely concentrate on control, restoration and prevention measures, the proposed SNLRP will focus on addressing the negative immediate impact of the locust infestation on poor and vulnerable households by meeting their short-term food security and consumption needs and enhancing their resilience through emergency cash transfer.

³ Philippe De Vreyer, Nathalie Guilbert, Sandrine Mesple-Soms, Impact of Natural Disasters on Education Outcomes: Evidence from the 1987–89 Locust Plague in Mali, *Journal of African Economies*, Volume 24, Issue 1, January 2015, Pages 57–100. And Linnros, E. Plant Pests and Child Health: Evidence from Locusts Infestations in West Africa. Working Paper. September 2017.

2. Purpose of SMP

2.1. The main purpose of this Safeguards Management Plan (SMP) is to address the concerns raised in the Environmental and Social Commitment Plan (ESCP) that may arise during implementation of the 'Emergency Desert Locust Program' Somalia. The SMP aims to a) assess the social risks and impacts of the proposed project interventions; b) Develop measures to enhance positive impacts and mitigate negative risks and impacts, if any arising from the project. This document therefore establishes procedures and methodologies for social assessments, review, approval and implementation of investments to be financed under the Project, as the nature, scope and locations of activities become known during the implementation of the Project, under Component 1 only. As the Project under the Systematic Operations Risk Rating Tool (SORT) has identified Social Risks as substantial, this management plan intends to address the identified risks and mitigation measures to be addressed by Ministry of Labour and Social Affairs (MoLSA) / Federal Government of Somalia (FGS) through WFP and partners during project implementation. WFP implementing on behalf of MoLSA will support with the development of the Social Management Plan (SMP) and adhere to responsibilities apportioned under Component 1.

2.2. The SMP describes the appropriate roles and responsibilities of WFP, Cooperating Partners and other stakeholders, and outlines the reporting procedures on social issues. It describes the managing and monitoring processes of social concerns related to the project investments. It further determines the training, capacity building and technical assistance required for WFP and Partners to successfully implement the provisions of the SMP and ESCP; and provides practical information resources for implementing the SMP. It also lays out the Project's staffing and institutional arrangements clarifying the relations between WFP as the key implementer, the target communities, beneficiaries, the relevant ministries and the key stakeholders –, including their roles and responsibilities in view of the implementation of the SMP.

3. Macro political, economic and operational context

3.1. **After more than two decades of conflict and insecurity, Somalia is gradually establishing the foundations for stability and a new political settlement.** Somalia has entered a new phase of relative peace and stability since 2011, with the Agreement on the Provisional Constitution and the establishment of the Federal Republic of Somalia and a "road map" towards stabilization, recovery and reconstruction. There is a possibility of inclusive, peaceful, and credible national elections in 2020, as well as the potential for accelerated economic growth and development resulting from debt relief and progress towards the transfer of security responsibilities from the African Union Mission in Somalia to the Somali forces. The Federal system of governance, with the Federal Government of Somalia (FGS) at the centre the newly formed Federal Member States (FMS), opened a new chapter for Somalia's development and offers hope for a stable future. However, the federation process is complex and presents both a significant development opportunity, as well as uncertainty over representation and power and resource-sharing.

3.2. **Despite improvements in the macroeconomic outlook, economic challenges continue to be daunting, and growth remains insufficient to address widespread vulnerabilities.** Between 2013 and 2017, Somali real gross domestic product (GDP) was estimated to have grown at an average of 2.5 percent per year while population grew by 2.9 percent per year. This resulted in an annual contraction of per

capita GDP of 0.3 percent a year.⁴ The agriculture sector remains the backbone of the economy and accounts for about 75 percent of GDP, among the highest sectoral-share in the world.⁵ The livelihoods of roughly half of Somalia's estimated population of 15 million individuals is reliant on pastoralism or agro-pastoralism, which implies that a significant portion of Somalia's population remains highly vulnerable to climate change and natural disasters. While spending by the FGS has increased significantly over the past five years, it remains concentrated on security and public administration, reflecting the immediate priorities of peacekeeping and state-building, and neither the FGS nor the FMS is able to allocate meaningful resources for early recovery and development.⁶ Pursuing integrated approaches and bridging the divide between humanitarian aid, development cooperation, and peacebuilding are generally seen as critical pre-conditions for making meaningful progress towards sustainable development outcomes.

3.3. Wide-spread poverty and vulnerability to covariate (natural disasters and epidemics) and idiosyncratic (injury, death, or unemployment) shocks, threatens the well-being of millions of Somalis.

Nearly 80 percent of Somalis live below the international poverty line with poverty being more acute in rural areas, making Somalia the third poorest country in the region. Further, nearly half of the population does not reach average consumption of food items. While gender is not a predictor of monetary poverty in the Somali context, fewer women have access to education and social norms constrain their access to jobs and economic opportunities. Almost two thirds of Somali households reported experiencing at least one type of shock in the past 12 months related to fluctuation in climate and its impact on livelihoods and the economy. Given the dominance of agro-pastoralism in the economy, household welfare is closely linked with changes in rain patterns. One in every five households experienced high food prices and two out of five Somali households experienced multiple types of shocks within a year.

3.4. Somalia is highly vulnerable to natural disasters, namely repeated cycles of droughts and floods driven by climate change, resulting in protracted humanitarian crisis and large-scale food insecurity.

Somalia has experienced 14 droughts since 1960, averaging one every four years. The most recent drought in 2016/17 left an estimated 6.7 million people in urgent need of humanitarian assistance. In 2018 and 2019, Somalia also experienced major flooding, which further displaced some 230,000 and 250,000 people, respectively, worsening the impacts of the 2016/17 drought and aggravating the humanitarian crisis. According to the International Organization for Migration, about 2.6 million people remain internally displaced. These successive cycles of shock have also worsened the food insecurity whereby about 3.4 million people were estimated to be in the 'Stressed' (IPC2) phase through June 2019, while an additional 1.5 million were estimated to be in the 'Crisis' (IPC3) and 'Emergency' (IPC4) phases. The Center for Global Development therefore ranks Somalia as the most vulnerable country to climate change among 167 countries, adjusted for coping capacity.

3.5. Women and girls in Somalia face specific socio-economic challenges and gender-based violence (GBV) remains a perennial a threat.

Traditional and religious norms limit women's roles outside the domestic sphere, for example, in participation in political and public decision-making forums. Despite their increasing engagement in economic activities, women continue to be far poorer than men, as wealth is unevenly distributed in the household and across the wider economy. Even among the women engaged in income-generating activities, the majority are in the informal sector. Further, women's involvement in

⁴ World Bank. 2018. *Somalia Economic Update – Edition No 3*. Washington, DC: World Bank.

⁵ World Bank. 2018. *Country Partnership Framework for the Federal Republic of Somalia*. Washington, DC: World Bank.

⁶ World Bank. 2019. *Draft Somalia Economic Update. Rebuilding Human Capital to Return to Prosperity*. Fourth Edition. Washington, DC: World Bank.

wage labor remains low (33–40 percent) and predominantly concentrated in the agriculture sector. In addition, a 2016 GBV survey found that 17 percent of Somali women have experienced some form of physical or sexual violence from a non-partner. Intimate partner violence continues to be a common experience that has been found to be often linked to women’s engagement in income-generating activities, affecting 36 percent of women interviewed. Displaced women and girls are among the most affected due to extreme poverty, marginalization and conflict, and climate-related shocks, such as droughts.

3.6. The recent outbreak of desert locusts in Somalia further risks exacerbating the humanitarian crisis and food insecurity, worsening gender and development outcomes. In December 2019, small clusters of desert locusts were first detected in northern parts of Somalia. By February 2020, the FGS declared a state of emergency after confirmation of the worst desert locust outbreak in 25 years. Desert locusts are projected to continue breeding in the coming months, precipitating further infestation throughout the rest of Somalia and coinciding with rangeland regeneration and planting activities in the country. Consequently, it is expected that the population requiring urgent food assistance will increase by 137 percent by September 2020 due to the desert locust outbreak.

3.7. It is expected that forty-three districts will be affected by the locust infestation. Over 2.6 million people are currently located in areas affected by the desert locust outbreak. Of those, 246,000 people are already considered to be in acute food insecurity (IPC 3+),⁷ with food security of households which were previously only in “Stressed” category (IPC2) rapidly worsening. Overall, it is estimated that over half a million people will be in “Stressed” or worse food insecurity levels (IPC2+) by September 2020.

3.8. The broad impact of the desert locust infestation across different livelihood zones will likely involve reduced access to food, loss of income, resource-based conflict, increased debt levels, and limited migration options.¹⁴ For agropastoral households, this will adversely affect cropping activities, resulting in depleted harvest, declined food reserves, and minimised access to income from agricultural produce. The total annual cereal output is expected to decline by 10-15 percent,¹⁵ or the approximate equivalent of food requirements for almost half a million people over six months. Pastoral households will also face losses due to rapid depletion of rangeland resources and pasture availability, impacting quality, yield, and access to livestock products. It will thus be critical to deliver immediate relief to those acutely affected by the locust outbreak, while enabling households to mitigate and withstand the impact on income and food security throughout its duration.

3.9. To make matters worse, the locust crisis is unfolding against worsening socio-economic impacts in the country due to the COVID-19 pandemic. . As Somalia relies on food imports to feed its population, the lock down of key supply markets, closure of borders and restrictions on domestic movements are already affecting basic commodity prices, and export restrictions in source markets such as Oman and India are having a ripple effect in markets in Somalia. COVID-19 related panic buying, coupled with the Ramadan season, have led to increases in retail and wholesale prices of imported food items in markets. The March 2020 Consumer Price Index published by the Federal Directorate of National Statistics indicates an increase of up to 2.12 percent. Moreover, reports indicate that remittances, received by an estimated 40 percent of Somali households, may have dropped by as much as 50 percent. With the FGS projecting an 11 percent decline in nominal GDP through 2020, an economic slowdown threatens to impact negatively on access to livelihoods and income generating activities across Somalia, and to place

⁷ Based on FSNAU-FEWSNET projections.

additional pressures on households trying to meet basic needs. Protection related risks include forced evictions; family separation due to infection within households; increased GBV; neglect and exploitation of children and vulnerable households; and stigmatization and targeting against specific communities, particularly marginalized groups, migrants and refugees.

3.10. **Somalia's current economy is dependent on imports, which creates a trade deficit financed by remittances and international aid**⁸. Agriculture, mainly livestock, is the largest sector, the biggest employer in rural areas and the major export earner. Largely because of the growing economic importance of livestock production and exports, at least 75 percent of gross domestic product (GDP) comes from agriculture. Somali farmers lose up to 30 percent of their crop harvests annually due to poor post-harvest storage, which limits potential export growth⁹. Domestic markets are linked with Kenya and the Gulf States through ports and towns bordering Kenya, Ethiopia and Djibouti.

3.11. **Although economic growth averages 3.4 percent a year, the economy is vulnerable to market shocks, particularly commodity price fluctuations and environmental shocks**¹⁰. Government capacity to generate revenue and stabilize the macroeconomic environment is constrained by the small size of the formal economy and difficulties in collecting taxes because of insecurity and institutional constraints. Official development assistance accounted for 21 percent of Somalia's GDP in 2016¹¹. Unemployment is high: 48 percent among those under 3023 and 74 percent for women¹².

4. Cross-sectoral linkages

4.1. Poverty and a lack of a national social protection system inhibit people's access to nutritious food (SDG 1). Somalia ranks among the weakest countries in the world for health indicators¹³, reflecting consistently poor nutrition and health (SDG 3). Limited educational attainment and enrolment leave children and young people less aware of food security and nutrition and limit job opportunities and livelihoods (SDG 4). High gender inequality exacerbates food insecurity by curtailing women's access to nutritious food (SDG 5). Poor water and sanitation facilities and practices compound poor health and nutrition (SDG 6). Economic growth is insufficient to provide employment for all those able to work, affecting the ability of Somalis to purchase adequate food (SDG 8). Weak infrastructure hinders the transportation of food to markets and to vulnerable populations (SDG 9). Conflict, coupled with the resulting infrastructure damage and access challenges, limits food access and availability (SDG16).

⁸ Ibid

⁹ Ibid

¹⁰ African Development Bank. 2018. African Economic Outlook 2018.

¹¹ Ibid

¹² United Nations Development Programme. 2016. Gender in Somalia Brief 2.

¹³ For life expectancy, maternal mortality, the mortality of children aged under 5 and immunization coverage.

5. Hunger gaps and challenges

5.1. The underlying causes of food insecurity and malnutrition are complex. Household access to food is hampered by poor crop production and high livestock losses in consecutive years, poverty, conflict, displacement, political and economic instability, gender inequality, low income and climate shocks. This is more challenging for poor households; IDPs; marginalized groups including women and disadvantaged minorities; and vulnerable social classes such as women-headed households, children, the elderly and the disabled. Somalis rely on social capital and kinship networks to meet their basic needs. Years of conflict have degraded natural capital, increasing vulnerability and acute hunger. Drought has exacerbated existing vulnerabilities and the social, economic and political marginalization of women, who bear disproportionate responsibilities¹⁴ that can hamper their ability to meet their own food needs and those of their dependants.

5.2. Food insecurity is more frequent and intense in parts of regions in the north (Awdal, Bari, Sool, Sanaag, Togdheer and W. Galbeed), centre (Galgaduud, Hiiraan and South Mudug) and south (Bay, Bakol, Gedo, Lower Sabelle and Lower/Middle Juba) and among IDP populations mainly concentrated around urban centres¹⁵. Given the limited capacity to withstand shocks and stressors, coupled with the frequency of droughts and flooding, food insecurity is likely to continue to rise in the absence of assistance.

5.3. Migration to the main urban centres is increasing, exacerbated by recurrent droughts. Food insecurity is increasingly linked to urban poverty, and IDPs (who have largely lost their livelihood opportunities and community support networks) regularly have the highest GAM and food-insecurity rates. Rising numbers of returnees and refugees from neighbouring countries face similar challenges and require help to protect their food security and nutrition status.

5.4. A nutrition causal analysis study in southern Somalia found that malnutrition is driven by food insecurity and socio-cultural factors that lead to suboptimal infant and young child feeding practices and care¹⁶. These factors include systemic gender inequalities evident in women's disproportionate workloads (domestic and casual labour), the prevalence of girl marriage and early motherhood, low formal education rates for girls, restrictions on mobility, lack of sexual and reproductive health services, and discriminatory socio-cultural beliefs about childcare and health-seeking practices.

6. Environment and Social Standards (ESS)

6.1. The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development. Through the ESS policy and a set of Environmental and Social Standards that

¹⁴ Federal Government of Somalia, World Bank, the European Union and the United Nations. 2018. Drought Impact Needs Assessment.

¹⁵ Somalia integrated context analysis 2007–2017.

¹⁶ Strengthening Nutrition Security in South Somalia Consortium. 2015. Nutrition Causal Analysis Study: South and Central Somalia.

are designed to support Borrowers' projects, the Bank aims to help end extreme poverty and promote shared prosperity. At the appraisal stage of the project, the social risks associated with this project were rated as substantial. This is due to the possibility that the unconditional cash transfers might generate exclusion, selection bias, elite capture, gender-based violence, and security-related challenges to access the site for project delivery and monitoring, as well as inward migration. These risks would in turn upset the delicate socio-political balance in the project areas. Owing to these factors the following social standards apply:

- a. **ESS 1: Assessment and Management of Environmental and Social Risks and Impacts.** Based on the Bank risk classification of this project, which is rated as substantial, this document looks at the type, location, sensitivity, and scale of the project; the nature and magnitude of the potential social risks and impacts; and the capacity and commitment of the Federal Government of Somalia (including WFP responsible for the implementation of the project) to manage the social risks and impacts in a manner consistent with the ESS.
- b. **ESS 2: Labor and Working Conditions:** ESS2 recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. WFP on behalf of the Federal Government of Somalia will promote sound worker-management relationships and enhance the development benefits of the project by treating workers in the project fairly and providing safe and healthy working conditions. This section is covered in the Labor Management Plan, which is a separate document
- c. **ESS 10: Stakeholder Engagement and Information Disclosure:** ESS 10 recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. The project will undertake effective stakeholder engagement to improve the social sustainability of project, enhance project acceptance, and make a significant contribution to successful project design and implementation. This section is covered in the Stakeholder Engagement Plan, which is a separate document.

7. WFP Interim country strategic Plan (ICSP) 2019 -2021

7.1. The WFP ICSP lays out the overarching framework for all WFP activities in Somalia. The following section provides a brief background to the rationale for WFP engagement and its Strategic Objectives in Somalia.

7.2. For over the past twenty years, Somalia has experienced frequent conflict, political instability, and environmental and economic shocks, resulting in widespread hunger and malnutrition. Despite significant political progress, poverty is rife, and many Somalis still do not have access to basic public services. Chronic food insecurity and poor nutrition, exacerbated by shocks and weak food systems and national capacity, pose a challenge to the achievement of Sustainable Development Goal (SDG) 2, on achieving zero hunger. To address these challenges, WFP has adopted a holistic approach that recognizes the interconnected nature of relief, nutrition, resilience, food systems, capacity building and partnership. Through this interim country strategic plan, WFP will continue to respond to critical needs while supporting national systems – such as by working with national authorities and partners to establish reliable safety nets that respond to

shocks, to strengthen food systems and to strengthen national capacity through a consolidated approach. Thus, while continuing to draw on its comparative advantage and coverage to respond to crises, WFP will implement broader safety net and resilience-strengthening activities, working across the humanitarian-development peace nexus.

7.3. WFP's interim country strategic plan (ICSP)¹⁷ encompasses lessons learned from WFP programming and reflects feedback gathered across Somalia during stakeholder consultations. It is closely aligned with the Somalia National Development Plan (2017–2019) and regional development plans, as well as the humanitarian and recovery priorities for food security and nutrition set out in the humanitarian response plan and the drought impact needs assessment for Somalia. This reinforces WFP's commitment to work within national priorities to achieve SDG 2. WFP will work with a range of actors to deliver efficient, effective and equitable assistance, including through innovative partnerships with national and regional government institutions, United Nations and international organizations, international and national non-governmental organizations, civil society and the private sector.

7.4. The ICSP contributes to SDGs 2 and 17 and WFP strategic results 1, 2, 4, 5 and 8 through six strategic outcomes: ➤ Strategic outcome 1: Food-insecure and nutrition-insecure people in areas affected by natural or human-caused disasters have access to adequate and nutritious food and specialized nutritious foods that meet their basic food and nutrition needs during and in the aftermath of shocks. ➤ Strategic outcome 2: Food-insecure people in targeted areas are better able to withstand shocks and stresses throughout the year. ➤ Strategic outcome 3: Malnourished and food-insecure children, adolescent girls, pregnant and lactating women and girls, and clients undergoing anti-retroviral therapy or directly observed treatment for tuberculosis in areas with persistently high rates of acute malnutrition have improved nutritional status throughout the year. ➤ Strategic outcome 4: National institutions, private sector actors, smallholder farmers and food-insecure and nutritionally vulnerable populations benefit from more resilient, inclusive and nutritious food systems by 2021. ➤ Strategic outcome 5: National institutions have strengthened policies, capacities and systems for supporting food-insecure and nutritionally vulnerable populations by 2021. ➤ Strategic outcome 6: The humanitarian community is better able to reach vulnerable people and respond to needs throughout the year. Together, these outcomes will support Somalia on the path towards zero hunger, recovery and lasting stability.

8. Shock Responsive Safety Net for Locust Response Project (SNLRP) Project Development Objective(s)

8.1. The SNLRP Project Development Objective (PDO) is to *“protect food security and livelihoods of poor and vulnerable households affected by the locust outbreak.”*

8.2. The project will respond to the threat of the locust outbreak by protecting the poor and vulnerable from falling into deeper food insecurity. This will be achieved through the provision of emergency cash

¹⁷ Interim Country Strategic Plan 2019-2021. <https://www.wfp.org/operations/so01-somalia-interim-country-strategic-plan-2019-2021>

transfers to targeted poor and vulnerable households, delivered through the FGS' World Bank-funded ongoing Shock-Responsive Safety Net for Human Capital Project (SNHCP), or the Baxnaano Program in Somali.

Component 1: Emergency Cash Transfers (US\$ 39 million equivalent)

8.3. Component 1 will respond to the threat of the locust outbreak by providing emergency cash transfers to approximately 100,000 poor and vulnerable rural locust-affected households, equivalent to some 600,000 persons. The transfers will be delivered using the delivery system and procedures of the FGS' Baxnaano program (supported by the SNHCP, P171346). MoLSA will strategically partner with WFP to support the implementation of Component 1, governed by a Standard Output Agreement.

8.4. Beneficiaries of the ECT will be selected poor and vulnerable households residing in locust impacted districts. The SNLRP will target the 43 locust-affected districts, as determined by the data from the Food Security and Nutrition Analysis Unit (FSNAU) and in consultation with the Ministry of Agriculture and Irrigation. Households that are registered under Baxnaano for cash transfer and reside in locust-affected districts will automatically become eligible for the ECT. Households that are not part of Baxnaano and reside in locust-affected districts will have to meet eligibility criteria, namely those whose livelihoods depend on activities related to agriculture (small crop) or livestock either as subsistence farmers or as farm laborers, and those assessed to be at risk of food insecurity). These new households will be selected through the Baxnaano's participatory and transparent community-based targeting (CBT) process. In an effort to address the gender gap, particularly in terms of access to income, in eligible households, the direct beneficiary of the SNLRP transfer will be females, with the exception of cases when adult females are not present.

8.5. The SNLRP beneficiaries will receive a flat benefit of US\$ 60 per household per month for a total of 6 months. Households already benefiting from the Baxnaano Program will receive a temporary top-up of US\$ 40, in addition to their regular benefit of US\$ 20 per household per month. Households that are not regular Baxnaano beneficiaries will be paid US\$ 60 per household per month.

8.6. As a result of the COVID-19 pandemic, the SNLRP includes measures to minimize the risk of spreading the virus during the delivery cycle, mainly beneficiary targeting, registration, and payment distribution. The project will adopt simplified community targeting and ensure compliance with social distancing and sanitation protocols during community targeting and registration events, including sanitation of surfaces of biometric scanners, among other measures. Additionally, the project will use mobile money payments, which reduces the risk of contagion by significantly limiting the extent of physical contact necessary for payment transfers, while allowing flexibility to beneficiaries to cash money anytime they need to. Monitoring activities under the SNLRP will include regular reviews, and discussions on the COVID-19 situation and any potential impact on project implementation, with adjustment to implementation processes explored and agreed upon, as needed.

8.7. The SNLRP will also undertake robust communication in order to manage beneficiary expectations and ensure a clear exit strategy for the project. The SNLRP provides temporary cash assistance that is limited to a six-month coverage, after which the Baxnaano program will be scaled-back to its regular coverage and the SNLRP beneficiaries will exit the program. The SNLRP communication campaign will therefore emphasize the shock-responsive short-term nature of this assistance. Nonetheless, some household may still require additional assistance after the ECT under the SNLRP ends. For these households, the exit strategy will involve possible linkages to humanitarian support.

Additionally, at the post-emergency stage, the SNLRP beneficiaries may become eligible to participate in the SCRP's livelihood restoration interventions.

Component 2: Project Management and Monitoring and Evaluation (US\$ 1 million equivalent)

8.8. **Component 2 will support the overall management and administration, monitoring of the project implementation, and learning from the experience of the locust response.** Project management and administration will be supported by the well-staffed Project Implementation Unit (PIU) of the SNHCP/Baxnaano, housed within MoLSA. Specifically, the PIU will monitor the implementation of the project components and coordinate project activities at the local level. Given the shock-responsive nature of the project, the PIU will be enhanced with a position focused on managing MoLSA's humanitarian coordination with stakeholders on the SNLRP, particularly with the Ministry of Humanitarian Affairs and Disaster Management and Ministry of Agriculture and Irrigation, as well as broader humanitarian partners and agencies. Further, component 2 will support additional operational activities linked to the monitoring and management of the SNLRP activities, such as field visits by the PIU and other MoLSA representatives in non-Baxnaano districts, and consultations with FMS representative on relevant aspects of the SNLRP implementation, especially communication, among others .

8.9. **Monitoring the implementation of the regular Baxnaano cash transfers will be conducted by an independent TPM agency on a quarterly basis using a systematic sample-based monitoring approach.** Component 2 under the SNLRP will support the expansion of the TPM activities in terms of increased size and geographic coverage of the TPM sample to reflect the coverage of new districts and additional ECT beneficiaries. Beneficiary views and feedback will be collected through the TPM exercise.

8.10. **Component 2 will contribute to the MPA global learning agenda by producing an analytical product that will critically assess the experience of expanding the existing safety nets in response to the locust outbreak,** documenting challenges encountered and lessons learned. The report will draw on TPM reports, the targeting evaluation, and grievance redress mechanism (GRM) reports, paying special attention to lessons related to coordination of multiple locust response interventions and avoiding overlaps and duplication of coverage.

9. Management of Social Risk

Social Risks Management Plan

9.1. **Security:** Conflict and insecurity remain persistent challenges in Somalia, and have in the past, impeded delivery of emergency services. Ensuring security for project operations amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the locust invasion, will remain a significant challenge. This general insecurity may impact both the project workers and beneficiaries.

Mitigation: By design, the project will only operate in relatively accessible parts of the country, with security of operations and access to site for monitoring and supervision key criteria in the selection of districts for support. Moreover, given that payments will be delivered entirely through mobile money

platforms, the need for armed security is not anticipated. Further, the choice of WFP as an implementing partner provides the project access to the UN's system and local capacity for identifying and managing security threats to operations. In Somalia, the United Nations Security Management System (UNSMS), of which WFP is part of, uses a structured Security Risk Management (SRM) approach for implementing safe and efficient humanitarian actions. The SRM assists UNSMS to proactively identify, manage and mitigate operational risks. Partner organizations are accountable for the safety and security of their personnel in accordance with their 'duty of care' obligations as employing organizations. Moreover, the WFP service agreement with project service providers contains a contractual obligation for the service provider and any contracted security to uphold humanitarian principles such as "do no harm" and to protect beneficiaries (from violence, exploitation and abuse). They also contain an obligation to ensure the security of their own personnel or workers by implementing appropriate risk prevention and mitigation strategies to reduce the likelihood of a harmful event occurring and to mitigate the impact of a security event if it were to occur. To support this effort, the WFP has developed a safe distribution guideline, and an accompanying checklist, that are provided to NGOs establish the basic mechanism for WFP to perform its oversight role. The checklist is designed to document the NGO's consistency and completeness, or the lack of it, in implementing the guidelines. It also provides evidence to WFP of a minimum risk management system being put in place at distribution sites, which could then be measured or verified .

9.2. **Exclusion:** Security and other challenges associated with working in rural Somalia make effective stakeholder engagement and community participation very challenging. As such, the challenges of ensuring the project reaches vulnerable community members (such as minorities, people with disabilities or widows) present in any cash transfer project are amplified.

Mitigation: Through FSNAU, the project has identified 43 districts that will be significantly affected by the desert locust infestation. The SNLRP will target all 43 of them. The Baxnaano Program is operational in 14 of them. Since the locust invasion may not affect the entire district equally, FSNAU has identified specific locust-affected areas within each district. To ensure transparency of the CBT process, the list of beneficiaries selected by the community committee will be made public prior to final registration and enrolment in the SNLRP, using the WFP's SCOPE system. Any objections to the list will be recorded through the project GRM. To monitor the application and effectiveness of the targeting process, the WFP carries out their own monitoring of this system. Where they are unable to carry out their own monitoring, a monitoring contractor is used.

9.3. **Selection bias and elite/clan capture:** The project targets poor and vulnerable households who are affected by the loss of income, livelihood or are at risk of severe food insecurity due to the locust infestation. As such political, social and cultural dynamics will need to be managed to ensure that the cash transferred is not being captured by spouses, family, nominated caregivers, community leaders or armed groups, but that it instead reaches the intended beneficiaries.

Mitigation: Payments will be made through a mobile money platform whereby cash will be transferred only to those phone numbers whose owner's ID in the mobile provider's records match the name registered in SCOPE. In case there is a discrepancy between the ID information of the beneficiary and the data of the mobile payment provider, the mobile payment provider will issue a new SIM card (free of charge). The recipient will then be able to receive transfers only to the account linked to that SIM card with the matched named between registration and SIM card. Baxnaano relies on the GRM mechanisms established by the SCOPE for handing of grievances. On the program side, the Baxnaano PIU has a GRM

Officer who will coordinate GRM activities with SCOPE's GRM staff. All grievances related to the ECT will be handled through the same GRM mechanism.

9.4. **GBV:** Closely associated to the selection risks noted above, the project design necessitates effective management of GBV risks. Sexual exploitation through the exchange of sexual favours for registration or transfer of funds, or the spousal abuse to receive cash are the key points of GBV/SEA risks for the project.

Mitigation: The PIU will develop and implement robust actions to manage the risks of GBV (within households or at payment points), in particular sexual exploitation and abuse risks, such as sexual favors for registration or release of funds that may extend from receipt of cash transfers by women. As articulated above, the Baxnaano GBV Action Plan, which includes critical measures linked to training and sensitization, response and referral protocols, and accountability procedures to manage cases should they arise, will be expanded to cover the SNLRP activities, and will include measures for mitigating GBV risks.- indicative measures include outreach to local communities to inform them of risks, raise awareness on reporting mechanisms and to address potential barriers to reporting. Measures will also include expanded identification of GBV services for integration into referral pathways as well as mandatory signing of code of conduct and associated training on expectations for behaviour for relevant partners and project actors responsible for registration and beneficiary authentication or other key activities to the project.

9.5. **Systemic weakness:** As noted below, the Borrower's capacity for the preventing adverse social impacts on the project is limited, as is the Borrower's capacity for redressing the impacts of social harm where it has occurred.

Mitigation: The project has two primary approaches to overcoming the low capacity of the Borrower. The first is the use of WFP as the implementing agent for the cash transfer system. WFP has a proven track record for delivering unconditional cash transfers in rural Somalia. It also noteworthy that the project will work with regional and district governments as well, where the capacity is significantly higher than in the FGS.

9.6. **Difficulty monitoring:** Security concerns and the remoteness of the project target areas combine to provide a significant challenge for monitoring and supervising project implementation. This can include challenges for community and stakeholder engagement, grievance redress and other risk mitigation protocols. COVID-19 restrictions are further likely to exacerbate project monitoring challenges.

Mitigation: Under WFP's rules in Somalia, except in extreme lifesaving circumstances, they can only operate in environments permissible enough to monitor the implementation of their risk management processes. For this project, WFP will use their already established capability for monitoring their operations. WFP have a multifaceted approach to monitoring involving WFP staff, a contracted company that provides staff for monitoring where WFP staff cannot access, and a complaints hotline. The hotline is also used for proactive verification by making calls to beneficiaries to check how the project is operating. WFP is also monitored by other donors (notably United States Agency for International Development and UK Department for International Development). In addition, the World Bank will hire a TPM agency to oversee this operation. Where COVID-19 restrictions limit effective community engagements, traditional channels of communications such as , radio and etc. can be employed.

To mitigate the above-mentioned risks, the following measures will be put in place. Some of the measures address multiple risks and are accordingly referred to the relevant section within this document.

Security

Security: Conflict and insecurity remain persistent challenges in Somalia, and have in the past, impeded delivery of emergency services. Ensuring security for project operations amid armed groups in a region with a recent history of relative lawlessness and the potential for increased conflict due to the locust invasion, will remain a significant challenge. This general insecurity may impact both the project workers and beneficiaries. In addition, the presence of security services in the project area can pose a threat to the community through violence, exploitation, and abuse.

Mitigation: The current model adopted by WFP for safe distributions is designed to ensure the safety and security of the beneficiaries. The model respects and represents the right of the beneficiary to humanitarian assistance in a manner which preserves their dignity and well-being in an environment which is safe and free from harassment. The Saving Lives Together directive encouraged the formal development and adoption safe and protective measures to be considered and included in the distribution of relief assistance during and after an emergency. The “Do No Harm” principle must be used as part of the guidance during planning of humanitarian assistance, so beneficiaries are never placed at further risk of harm. These guidelines and checklists are aimed at providing a framework for implementing partners at the field level to understand protection issues that may arise during distribution activities. There are also some simple checklists which can be used to identify “best practice” actions that should be incorporated into the planning of distributions in the field.

9.7. **Security procedures within the UN System:**

9.8. Security measures that have been adopted under the SNHCP project will be extended to the SNLRP project by World Food Programme (WFP). In its operations in Somalia, WFP is part of the Security Management System (UNSMS) of the United Nations Organization. Without prejudice to, and while not abrogating the responsibility of a Host Government for its obligations, the United Nations has a duty as an employer to reinforce and, where necessary, supplement, the capacity of the Host Government to fulfil these obligations in circumstances where United Nations personnel are working in areas which are subject to conditions of insecurity which require mitigation measures beyond those which the Host Government can reasonably be expected to provide. The UNSMS Framework for Accountability specifies the responsibilities and accountabilities of United Nations officials and personnel for such measures. The goal of the UNSMS is to enable the conduct of United Nations activities while ensuring the safety, security and well-being of personnel and the security of United Nations premises and assets. To achieve this goal, all organizations shall maintain a robust and cohesive security management system and adhere to three principles:

9.9. **Determination of acceptable risk:**

- Provision of adequate and sustainable resources to manage the risk to personnel and their eligible dependents, premises and assets; and

- Development and implementation of security policies and procedures.

9.9.1. The overall **governance of security management** for the UNSMS is constituted as follows:

- The Inter-Agency Security Management Network (IASMN), consisting of the senior managers who have oversight of security functions within each member organization of the UNSMS, reviews existing and proposed policies, procedures and practices of the UNSMS and their implementation, and provides its recommendations on these to the High-Level Committee on Management (HLCM); and
- A comprehensive review of policies and resource-related issues pertaining to the entire United Nations security management system is a standing item on the agenda of the HLCM; the HLCM reviews the recommendations made by the IASMN, and either decides on them directly or recommends their endorsement and implementation to the United Nations System Chief Executives Board for Coordination (CEB), which is chaired by the Secretary-General.

9.9.2. **Staff movement and security coordination in Somalia**

9.9.3. In accordance with WFP's established security protocols for Somalia and in conformity with Inter-Agency Standing Committee's (IASC) non-binding guidelines, WFP uses armed escorts for humanitarian convoys. The non-binding guidelines seek to advise and enable WFP UN and non-UN humanitarian organizations to collectively and/or individually assess the need for, and the impact of using, armed escorts for humanitarian actions.

9.9.4. In 2013, the IASC convened to hold a common position on critical security matters. The IASC recognizes that every humanitarian organization (UN or non-UN) adopts security measures according to its own risk profile and differentiated needs. While it is not possible for all agencies to operate in an identical manner, common position on critical matters can potentially increase the level of security for all. Consequently, the UN Designated Official (DO) should consult widely within the humanitarian community (UN and non-UN) before deciding on the use of armed escorts by the United Nations. Similarly, non-UN humanitarian organizations considering using armed escorts should consult with the UN Designated Official before deciding. Besides the DO led SMT, the Humanitarian Country Team (HCT) chaired by the UN Resident Coordinator (RC) provides an ideal platform for such consultations. As an operational decision-making forum participated by operationally relevant humanitarian agencies (UN and non-UN) the HCT provides invaluable inputs for adopting common position on critical security matters.

9.9.5. In Somalia, the United Nations Security Management System (UNSMS) uses a structured Security Risk Management (SRM) approach for implementing safe and efficient humanitarian actions. The SRM assists UNSMS to proactively identify, manage and mitigate operational risks. The information gathered through this type of decision-making, planning and incident management. One of the outcomes of the risk assessment is the recommendation to use armed escorts to mitigate or manage some of the identified risks. WFP has developed an internal guideline on considerations for use of armed escorts. It is pertinent to note that in accordance with the IASC guidelines, WFP does not impose the use of armed escort or security forces on NGO partners – recognizing that every humanitarian agency has its own risk profile and corresponding security management considerations and

strategies. Each organization therefore must consider its own position on the use of armed escorts or security forces.

9.9.6. Security procedures applicable to Cooperating Partner NGOs and Service Providers (Mobile Banking)

9.9.7. WFP works with over one-hundred national and international NGOs in Somalia. Majority of the cooperating partners are small community-based Local NGOs (LNGOs) that are well-grounded within the local communities. The implementation arrangements with cooperating partners are governed by a Field Level Agreement (FLA), which refers to the SPHERE standards regarding well-being and security of personnel. In particular, the first chapter of SPHERE states the common standards which, among others, defines the responsibility of actors towards the safety and protection of their staff as well as their beneficiaries. According to chapter 8.9 of the Core Humanitarian Standards, regarding Policies in place for the security and the well-being of staff: “ an agency’s duty of care to its workers includes actions to promote well-being and avoid long-term exhaustion, burnout, injury or illness”; “ Managers must make aid workers aware of the risks and protect them from exposure to unnecessary threats to their physical and emotional health. Measures that can be adopted include effective security management, preventative health advice, active support to work reasonable hours and access to psychological support when required”.

9.9.8. Partner organizations are accountable for the safety and security of their personnel in accordance with their ‘duty of care’ obligations as employing organizations. This responsibility extends to the NGO provided guesthouses, as applicable. However, in practice, this mainly applies to International NGOs as local NGOs typically do not operate guesthouses.

9.9.9. Accordingly, organizations that wish to cooperate under the Saving Life Together Framework (in annex) are required to maintain internal security risk management procedures, contingency planning as well as adequate and reliable arrangements to respond to security emergencies.

9.9.10. Updated in 2015, Saving Lives Together is a series of recommendations aimed at enhancing UN and NGO security collaboration in the field. SLT is a voluntary engagement. Under the SLT framework, the UN and the humanitarian community cooperate in the collection, analysis and dissemination of critical security and safety information, while operational decisions made on the basis of such information remains the responsibility of the respective organizations.

9.9.11. Organizations that wish to become SLT partner organizations are required to commit to the adoption of the principles, objectives and arrangements comprised in this framework.

9.9.12. Partners must consult on security coordination with host country authorities and other local actors with a view to achieving a coordinated and/or common approach where appropriate; and consult with UNDSS on contracted security services, e.g. security escorts, with a view to achieving a coordinated and/or common approach, where appropriate.

- 9.9.13. Each NGO perceives risks and assess vulnerabilities differently, accepts different levels of risks, and implements security arrangements, which they consider suitable for their organisation and operational conditions. For instance, local NGOs, who constitute most of WFP partners, have strong roots in the local communities, and their social and information networks, as well as acceptability within the communities, minimize their exposure to security risks.
- 9.9.14. WFP will not provide NGOs with internal security risk management procedures, contingency planning, or arrangement mechanisms to respond to security emergencies. Also, WFP will not individually assess NGO security risk management arrangements. However, in line with the SLT Framework, and following the SLT guidelines endorsed at the IASC, WFP shall provide NGO partners involved in the implementation of projects with safe distribution guidelines, regardless if the NGO is part of the SLT or not (Annex 3 refers). WFP designed a safe distribution guide to enhance partner NGOs' ability to make informed decisions and implement necessary security arrangements to improve the safety and security of their personnel and beneficiaries in WFP funded projects only.
- 9.9.15. Once an NGO receives training on the safe distribution guide, it effectively becomes responsible for putting in place appropriate mitigation measures to prevent and respond to incidents within its operational environment. The NGO is responsible for sensitizing staff on threats and risks and corresponding mitigating measures. With this, an NGO must also have appropriate support and insurance in place to assist staff affected by an incident, which WFP cannot be held liable for or expected to provide. The WFP guidelines and accompanying checklist provided to NGOs establish the underlying mechanism for WFP to perform its oversight role. WFP designed the list to document and NGO's consistency and completeness, or the lack of it, in implementing the guidelines. The list also provides evidence to WFP that a minimum risk management system is in place at distribution sites, which could then be measured or verified.
- 9.9.16. WFP will keep on file each NGO's checklist, which will serve as the primary record to undertake periodic oversight reviews, where access is feasible, to ensure responsible security management practices on the part of the NGO.
- 9.9.17. In addition to the above, in Somalia, the International NGO Safety Organisation (INSO) supports NGOs regarding workers' safety. INSO is an international charity based in The Hague and Dubai with projects in fourteen countries. INSO provides registered NGOs with a range of free services including real-time incident tracking, analytical reports, safety related data and mapping, crisis management support, staff orientations and training.
- 9.9.18. INSO services helps NGOs with their day-to-day risk management responsibilities and improve their overall situational awareness to support evidence-based humanitarian access decisions. The menu of services on offer has been developed over many years in close consultation with literally hundreds of NGOs and can be adapted to local context as needed. INSO Services are recognized as meeting the most fundamental requirements in almost any context.
- 9.9.19. In addition to its services, INSO coordinates with the United Nations Department of Safety and Security (UNDSS) in order to facilitate effective NGO/UN cooperation under the Saving

Lives Together framework. The presence of dedicated INSO staff in Somalia ensures the consistent, reliable and secure sharing of security information with NGOs and facilitates implementation of other aspects of SLT, such as, engagement with UN security managers, meeting common security related needs and collaborating and consulting on the development and delivery of training.

9.9.20. Hormud and Telsom/ Golis in Somaliland, contracted for mobile money transfers have a network of agents across the country. Their presence is well established and integrated into the local community market service provision. They are small and non- conspicuous vendors. Mobile money transfers, opposed to the traditional banking system, has greatly reduced the risk factor associated with directly collecting money from the bank agent. Mobile money being a very common mode of transaction, in Somalia, reduces the possibility of drawing attention to the beneficiary. The beneficiary can choose a time as per their convenience to redeem their benefits. The WFP hotline is a ready option for the beneficiaries to file complaints related to security incidents.

9.10. **Security Incident Response and Reporting**

9.10.1. In principle, NGOs are responsible for responding to and reporting security incidents that involve their staff, assets, and activities. The necessary process for responding to an incident begins with the security guards hired by the NGO. They are typically the first responders, followed by the local police force. WFP does not directly respond to an incident at the behest of an NGO. However, upon receiving information of an incident involving either the NGO itself or beneficiaries during a distribution, WFP may provide, if required, assistance on determining the cause of the event. WFP may further assist the NGO in coordinating with the local authorities or the local community leadership the identification of additional measures or resources to be implemented or deployed, if feasible, to prevent the reoccurrence of an incident. WFP follows an internal reporting process that records all NGO/beneficiaries security-related incidents and additional measures to be implemented, if any, through a corporate security information management and reporting system. All incidents involving NGO partners or beneficiaries are also reflected annually in WFP's global security trends reporting to the Executive Board.

Exclusion

Exclusion: Security and other challenges associated with working in rural Somalia make effective stakeholder engagement and community participation very challenging. As such, the challenges of ensuring the project reaches vulnerable community members (such as minorities, people with disabilities or widows) present in any cash transfer project are amplified.

Mitigation: Through FSNAU, the project has identified 43 districts that will be significantly affected by the desert locust infestation. The SNLRP will target all 43 of them. Since the locust invasion may not affect the entire district equally, FSNAU has identified specific locust-affected areas within each district. To ensure transparency of the CBT process, the list of beneficiaries selected by the community committee will be made public prior to final registration and enrolment in the SNLRP, using the WFP's SCOPE system. Any objections to the list will be recorded through the project GRM. To monitor the application and effectiveness of the targeting process, the WFP carries out their own monitoring of this system. Where they are unable to carry out their own monitoring, a monitoring contractor is used.

Objective Targeting process

9.11. WFP will undertake targeting following a multi-tiered approach that combines geographic targeting and community-based targeting of households. To ensure that the most vulnerable households are identified from the targeted communities, this will be jointly agreed with key stakeholders with eligibility criteria applied at the district, community, and household level.

9.12. Geographical targeting of locust-affected districts and areas within the districts. District selection is based on the expected risk of exposure of a given district to the desert locust outbreak. The Food Security and Nutritional Analysis Unit (FSNAU) of the Food and Agriculture Organization (FAO) of the United Nations (UN) has identified 43 districts that will be significantly affected by the desert locust infestation. The SNLRP will target all 43 of them. Since locust may not affect the entire district equally, FSNAU has identified specific locust-affected areas within each district.

9.13. There will be two targeting modalities within the locust-affected districts: one for households who are regular Baxnaano beneficiaries and another for households who are not Baxnaano beneficiaries.

9.13.1. *Households that are registered for Baxnaano*, become automatically eligible for the temporary top up benefit, provided they reside in a severely locust affected district and in a locust affected community. WFP and MoLSA are currently in the process of identifying

communities that will be affected by the locust infestation.¹⁸ All Baxnaano beneficiaries in locust affected districts and communities will receive transfers under the project as top up to their regular benefit under Baxnaano¹⁹. No additional eligibility criteria will be applied to avoid creating confusion and tensions.

9.13.2. *Household that are not part of Baxnaano will have to meet eligibility criteria.* The clarity in selection criteria mitigates against any possibility of new household members seeking to join the program and provide transparent guidance to identify new households. The selection criteria will apply to new households that live in communities that are currently covered by Baxnaano and those that are not. The following eligibility criteria will be used:

1. Community eligibility. Within eligible districts only households that reside in rural communities that have been identified as severely locust-affected are eligible for the emergency cash transfer.
2. Household eligibility. A household is eligible for the temporary benefit if it is selected through the community-based targeting (CBT) process. The CBT process is undertaken by the community beneficiary selection committees, consistent with Baxnaano's standard approach, but is facilitated by cooperating partners, either local or international NGOs contracted by WFP through their partnership processes. The **community-based participatory targeting methodology** will be used to select beneficiary households in the target communities. Through this approach, WFP's cooperating partners (CPs) will organize community committees comprised of representatives from the different groups, including village authorities, elders, women, men, disabled, and minority groups, in order to consult the community itself, through an open and transparent process, on the beneficiaries that meet the vulnerability criteria and are eligible to be selected as beneficiaries of the SNHCP.
3. The CBT process will be further guided by a specific set of eligibility criteria consistent with the objective of reaching households affected by the locust infestation. Community committees will be instructed to select beneficiaries only from households that meet all of the following criteria:
 - a. Household depends on agriculture and livestock for livelihood (small crop or livestock farmers, or agricultural wage workers)
 - b. Locust infestation has had a severe impact on household welfare: only households severely affected by the locust will be eligible, i.e. lost a significant amount of crop or livestock to the locust and/or from the spraying of pesticides when the spraying results in sale/income losses, lost a source of livelihood, was forced to sell assets to subsist during the crisis
 - c. The household is very poor.

¹⁸ Severely affected communities or districts are those that reported the highest infestation, and those that had reported or are reporting breeding of new locust. In those areas, locust will still have the greatest negative impact due to the growth of the nymphs if control measures are not adequate.

¹⁹ Benefit amount under Baxnaano is limited to \$20/household/month and accounts for approximately 30% of the average MEB for food. Baxnaano is designed with shock-responsiveness feature to allow vertical and horizontal scale up during shocks, like the locust crisis.

4. The final list of all the selected beneficiaries will be displayed in a prominent place for all community members to view. Any complaints of irregularity can be registered through the partner hotline or WFP hotline. This information is conveyed to the beneficiary.

Community Inclusive Targeting

9.14. To avoid exclusion at the micro level or community level, the process of Community Based Participatory Targeting (CBPT) enables the vulnerable community members to have a say in the selection process.

9.15. Within the targeted communities, WFP and partners conduct community-based participatory targeting (CBPT) to select the most vulnerable households in the community as beneficiaries of the programme. To ensure that the CBPT process is inclusive and minimizes potential exclusion, it consults not only local authorities and clan leaders, but also various groups such as women groups, and clan minority groups. Based on the cultural sensitivities, women's meetings will be held separately to those of the men. The Community consultation is also aimed at sharing information regarding the project. The information includes; the project design; geographical target location; target population; selection criteria and methodology; feedback and complaints mechanisms. The following steps will be implemented in the targeting process²⁰.

- i. The CP, MoLSA and WFP will sensitize community leaders (traditional, elected and religious) on the criteria of selection to ensure clarity and understanding, but also to seek their support on the methodology. A broad agreement on the modalities of the selection process will enable the targeting process to continue with the consent of the local leaders.
- ii. The CP, MoLSA and WFP will hold consultative meetings with men, women, disabled, the elderly and the clan minority group representatives to share details of the project and selection criteria, and get their views on the project and criteria.
- iii. A selection committee is established with full membership drawn from the different stakeholders, including local traditional leaders, religious leaders, representatives from local Government/municipality, women's group and minority groups. A selection committee is formed through a nomination process. Names are proposed, discussed, and the final list of committee members validated.
- iv. The committee organises village consultative meetings, which are open meetings. The committee shares project information on aim and objectives, coverage, target group, targeting criteria and entitlements, collaborations and targeting process.
- v. Based on the established selection criteria elaborated under Objective Targeting process, given above, beneficiaries will be selected. The list is then read publicly for confirmation and validation. Once validated, the list is signed by the committee and submitted to the CP. A window period of one week is given for any complaints or feedback from any community

²⁰ For details on the planned Targeting process, refer to the updated Targeting Note of the SNLRP PAD.

member. If preferred, the feedback can be given anonymously to the CP, WFP, or through the WFP hotline.

Complaints and Feedback Mechanism (CFM)

9.16. WFP has established a Complaint and Feedback Mechanism (CFM), which includes a toll-free hot line to provide a direct channel for interface. In case issues with the selection process arise, people will be able to call the hotline and log in their complaint with WFP directly. The CFM not only aims at strengthening accountability to communities but also to identify a range of protection, fraud and diversion issues as well as other concerns related to delivery of WFP assistance.

9.17. The toll-free hotline is managed by WFP through a call centre located in Somalia (Puntland), which is open from Sunday through Thursday from 8.30 am to 5 pm. The call centre hosts 14 WFP staff, and can be reached through four different phone numbers, most of which are toll-free, from several operators from all over Somalia. The WFP Somalia hotline numbers are: Hormud: 0617 140164 (toll-free); Golis: 0907 053722 (toll-free); Telesom: 0633 228003 (toll-free); Somtel: 0627 795373. The entire country is covered by either of these mobile phone operating companies. Information on WFP's CFM and hotline number are widely available through posters distributed at food distribution points. Hotline numbers are also printed on the back of beneficiaries' SCOPE cards.

9.18. Telephone coverage has been expanding very fast in Somalia over the past years and phones are now accessible to most Somalis. In 2013, according to a study based on a national survey conducted by the Broadcasting Board of Governors (BBG), and Gallup, more than seven in 10 Somalis (72.4%) said they personally owned a mobile phone. As of end 2018, according to the World Bank, about 9 in 10 Somalis over the age of 16 owned a phone. In the rare case when they do not own one, people borrow a relative's or a neighbour's when there is a need.

9.19. When call centre operators receive complaints through the CFM, they log them in the WFP online case management system thus forming a 'case'. All information related to a case is recorded in the online system, including: case description, complainant information (name, gender and phone where the person can be called back), date, activity, CP. Operators classify the cases according to their risk level (high, medium, low and residual risk).

9.20. Cases are assigned to specific WFP staff, who receive an automatic notification by email for follow up – for instance the Head of Programme in a specific WFP office. The staff responsible for taking action records his/her actions in that same system to close the loop, after which the call operators call back the complainants and inform them of the resolution of their issue.

9.21. Different risk levels have different process flows and time limits for action, with high risk cases (suspicion of fraud for instance having a shorter timeline for action). WFP's monitoring unit monitors case resolution closely, to ensure that cases are addressed within the defined timeframes. Cases can be closed in the system only after the complainant has confirmed that the issue was actually solved.

9.22. In case of reports of conflict of interest, abuse of power or harassment by WFP or WFP CP staff, the operators escalate the cases through the Risk Management and Compliance officer. Reports of sexual exploitation and sexual harassment by project staff will be referred to WFP PSEA focal points, and onward to WFP' Investigation Office at Headquarters. Reports of alleged SEA as well as other GBV incidents can

also be received from anonymous letters, incident reports, emails, or through the call centre and regular monitoring. WFP has developed a GBV referral and programming protocol to support all staff (including WFP's call centre staff) in reporting and referring cases of domestic abuse or sexual assault to trained service providers who would be able to offer the specialized assistance. Cooperating partners will use the referral pathway to refer GBV survivors to available services in coordination with protection actors. Call centre operators have already received refresher training on how to handle GBV/SEA cases, support survivors and refer them to the appropriate services. WFP will ensure that all staff in the field offices as well as call centre operators and CPs are informed and have an updated list of GBV/Protection actors working in each area. Details of the referral protocol are discussed in GBV Action Plan. (Annex –2).

9.23. In addition, contingent on resource availability, WFP will request its partners to have their own complaints and feedback mechanisms, particularly to handle minor on-site operational issues to allow for a smooth assistance process. It is in the interest of WFP and its beneficiaries that all issues are solved as quickly and thoroughly as possible, and sometimes the most effective way is to address issues directly at the site by the implementing partner. To increase the channels and safe spaces available for people to report SEA and GBV incidents related to the SNLRP/SNHCP project, WFP will partner with the service providers that are recommended as most reliable by protection actors operating in the targeted locations (such as UNICEF), to ensure that GBV support services are available for each targeted community and that cases related to the project can be tracked. WFP will also collect information from its CPs on the incidents reported directly to them and referred to identified service providers.

Selection bias and elite/ clan capture:

Identified risk: The project targets poor and vulnerable households who are affected by the loss of income, livelihood or are at risk of severe food insecurity due to the locust infestation. As such political, social and cultural dynamics will need to be managed to ensure that the cash transferred is not being captured by spouses, family, nominated caregivers, community leaders or armed groups, but that it instead reaches the intended beneficiaries.

Mitigation: Payments will be made through a mobile money platform whereby cash will be transferred only to those phone numbers whose owner's ID / name in the mobile provider's records match the name registered in SCOPE. In case there is a discrepancy between the ID information name of the beneficiary and the data of the mobile payment provider, the mobile payment provider will issue a new SIM card (free of charge). The recipient will then be able to receive transfers only to the account linked to that SIM card with the matched named between registration and SIM card. Baxnaano relies on the GRM mechanisms established by the SCOPE for handing of grievances. On the program side, the Baxnaano PIU has a GRM Officer who will coordinate GRM activities with SCOPE's GRM staff. All grievances related to the ECT will be handled through the same GRM mechanism.

Mobile Money Transfer (MMT) system

9.24. Under the mobile money option, WFP will transfer monetary entitlements to the beneficiaries through their mobile money wallets. WFP has identified a potential service provider and successfully conducted a capacity assessment for them, and also signed a contract with them in April 2020. These parameters are set by WFP procurement standards for capacity assessment which include coverage (geographic and subscription clientele), quality of services and rigorous background reference checks. The selected service provider (Hormuud) has countrywide coverage as well as the service is interoperable with Telesom and Golis in Somaliland.

9.25. WFP typically implements mobile money transfers through biometric authentication, where beneficiaries must first authenticate before the transfers are processed into their mobile money accounts. This is done for security purposes in a context where most beneficiaries do not have identity documents, and hence the Know your Customer Principles are not well developed thereby posing a challenge in maintaining effective beneficiary management controls and in verifying whether the funds are transferred to the targeted beneficiary. The process of biometric authentication normally requires beneficiaries to travel to cooperating partner (CP) distribution locations for top up and biometric authentication for transfer.

9.26. Due to the current COVID-19 pandemic, where the current process of biometric authentication is not possible to conduct safely, WFP Somalia will temporarily suspend/ waive the biometric authentication

requirement at the payment delivery phase, to minimize the risk of transmission among beneficiaries due to gatherings for the authentication process, and also through sharing the MPOS equipment for scanning the Fingerprints. Upon investigation of any malpractice, CPs will be held accountable and face WFP sanctions as per rules and regulations as well as return all losses, financial or otherwise suffered by WFP.

9.27. To mitigate risks of temporarily waiving this biometric authentication process, WFP Somalia has put in place some measures to verify the identity of the beneficiaries in the processes, including biometric registration, before they receive the transfers, and also ensure that the transfers are still done in a secure manner, as described below.

9.28. **Risk-informed process management**

9.29. WFP has registered the beneficiaries of this programme in SCOPE, recording their details e.g. name, telephone numbers and also captured their biometrics. During the registration process, all beneficiaries were sensitized to register a phone number that matches with the Principal household's name.

9.30. Before any transfers are affected, WFP will engage the Mobile Network Operator (MNO) in validating beneficiary phone numbers to ensure that they match the names of the principal household recipients as registered in SCOPE. No transfers will be affected to phone numbers that have names not matching with what is recorded in SCOPE. Through this validation process, WFP will compile a list of those households that have non matching records, and those that do not have SIM cards at all and request the MNO to issue new sim cards (free of charge) to the households' principal recipients accordingly. These sim cards will be issued through the support of WFP CPs

9.31. WFP will maintain the list of SIM cards issued to each CP and will conduct some verification by randomly calling the phone numbers to ascertain if indeed the SIM cards have been issued to the rightful recipients.

9.32. WFP will transfer the mobile money directly to the beneficiaries, using a platform (portal) provided by the MNO to reduce opportunities for fraud and corruption, including editing of phone numbers. The portal will only be accessed by authorised WFP staff, who will be provided with usernames and passwords to use the system. The system also allows segregation of duties of designated staff, minimizing opportunities for human error, and ensuring that all functional and managerial reviews are executed.

9.33. After the transfers are completed, WFP, through its call centre, will also randomly carry out post distribution monitoring calls to assisted beneficiaries, to confirm receipt of transfers, cross-check the identity of the beneficiaries against registered mobile numbers, and to verify additional HH details in SCOPE.

9.34. WFP will also continue to print the Baxnaano/SNHCP cards for the beneficiaries and distribute these to the beneficiaries. The back of these cards contains WFP call centre numbers that beneficiaries can also call to report any challenges that they face. Upon receipt of such feedback/complaints from the beneficiaries, WFP will resolve the cases through its established call centre procedures.

9.35. **Detailed Step by Step process under Mobile Money Transfer system**

9.36. Validation of beneficiary phone numbers. The process for this mobile money option will start with a validation of the phone numbers for the registered households with the mobile network operator, so as to ensure that all the enrolled beneficiaries have a valid telephone number that is matching with the name for the Principal household recipient registered in SCOPE and have activated the mobile money service on their phones. This process of validation will be done by WFP and the mobile money service provider. WFP will extract the registered households phone numbers from SCOPE and House Hold ID, without names or any other details, and share them with the service provider, who will then match the numbers with the names registered in the MNO system/database, and also confirm if mobile money account is active or not and provide feedback to WFP. WFP will crosscheck and flag any phone numbers that are not registered in the beneficiaries' name, or do not have an active mobile money account (s). WFP will then coordinate with the relevant CPs to contact the beneficiaries and correct all anomalies/ update information accordingly. Once this is done, another validation of the updated information is done until everything is confirmed as correct.

9.37. For any households that do not have SIM cards, discussions have been held with FSP to issue the sim cards on free-of-cost basis. For this process, WFP will send an official request to FSP to issue the SIM cards packed with PIN code accordingly. Once issued, the validation process is also going to be conducted for these sim cards to confirm that they match with the beneficiary details. As a safeguard measure, WFP will obtain the SIM cards from the service provider and hand them over to the CP for onwards distribution to households without a SIM card. The SIM card will accompany a contract agreement which will signed by the recipient beneficiary. During this process, the CP will sensitize the beneficiaries on how to use the SIM card and PIN code. Once done, the information will be shared with the mobile service providers to update their registration record.

9.38. As a safeguarding measure, the switch to mobile money will be adequately communicated to the beneficiaries alongside the necessary instruction on the process while also clarifying that this switch does not constitute any financial obligation on part of the recipient – SIM cards will be provided free-of-cost and there is no need for beneficiaries to travel to CP locations for top up/authentication. All key stakeholders, including beneficiaries will be informed of the 'Complaints and Feedback Mechanism' (CFM). Any transgression on the rights of the beneficiary can be reported immediately to WFP and this will be closely followed through the M & E tracking system.

Information technology solution SCOPE

9.39. **Biometric registration:** WFP will guarantee, through its SCOPE registration and payment modality, that the actual recipients of the assistance are the intended ones. Once the beneficiaries are selected through the community-based selection targeting criteria, the CP will register them in SCOPE and enrol them under the SNLRP intervention. The biometric data (ten fingerprints and well as picture) of the principal recipient and two alternates will be recorded in SCOPE and on the Scope card. Only the household principal or alternate recipients, whose biometrics are collected during the SCOPE registration, will be able to receive the cash assistance. The SCOPE card itself stores the biometric information of the registered recipients. This process eliminates the risk of a non-intended person capturing the assistance meant for the beneficiary. For mobile money, transfers will be sent only to the principal recipient, whose details would have been validated to be in conformity with the mobile money service provider's data.

The following are detailed steps are undertaken in the SCOPE registrations process:

9.40. **Distribution Cycle Creation:** At the beginning of each quarter, WFP will create a distribution cycle in SCOPE, under each intervention. The distribution cycle defines the transfer value, transfer validity period (start and end dates), and the beneficiaries entitled to receive the transfer by location, as well as associated responsible Mobile Service Provider/ Financial Service Provider information.

9.41. **Verification of Distribution Lists Created.** In each distribution cycle, SCOPE generates a distribution list, which shows the number and exact details of the beneficiary households to be included for the payment period. Once the list is generated, it is verified by a WFP senior-level programme officer. The distribution list includes enrolled households and maps their validated phone number as the household 'Account'/ token number, to which the mobile money will be transferred to.

9.42. **Creation and verification of Payment list:** After the WFP programme staff verifies the distribution list, WFP finance creates and verifies a payment list. A payment list commits funds to the beneficiaries and links each enrolled beneficiary household's unique phone number to the amount set in the cycle. The payment list is verified by a WFP senior finance officer, who ensures that the amounts set in the intervention are correct, and that appropriate resources are available.

9.43. **Approval of payment list:** Head of WFP Area Office performs a final check, to ensure accuracy of the above-mentioned processes, and approves the payment list. The amount created in the cycle is then available to the enrolled beneficiaries included in the payment list.

9.44. **Sending of money to beneficiaries through mobile money:** The approved payment lists are then downloaded from SCOPE and uploaded by WFP finance into a portal provided by the Mobile Network Operator (MNO). The process of approval of transferring the mobile money to the beneficiaries will be a two-step process, that will involve a first and second level authorization by WFP signatories. Upon second level authorization, the money will be automatically sent to the beneficiary phone numbers in the uploaded payment list on the portal.

9.45. **Receiving/downloading Transfer report:** The FSP portal will provide a report of successful/unsuccessful transfers to the beneficiaries, and the reasons for being unsuccessful if applicable. WFP can then follow up for the unsuccessful ones and redo the process within the specified distribution period. The common reasons for a failed transfer may vary either as a wrong number, inactive mobile number/ SIM card or if the phone number is repeated. This will allow WFP to follow up with specific cases, until this is resolved to complete payment to the authenticated beneficiary.

9.46. **Reconciliation:** After each distribution period, a reconciliation is done to match the funds that were made available in SCOPE as per the approved payment lists versus what was successfully sent to the beneficiaries as per the transfers report from the Portal. The report from the MNO portal is uploaded into SCOPE to reflect the successful transfers as "redemptions" for reconciliation purposes. WFP Finance Unit also does a bank reconciliation to track all advances paid to the MNO. On a monthly basis, the Finance Unit also receives a statement for the MNO Benefit Cash Account and reconciles the Benefit Cash Account against WFP records. Follow-up is made with the MNO for any discrepancies.

GRM systems:

9.47. All grievances related to the ECT will be handled through the same GRM mechanism or the WFP CFM system elaborated under section 10.10 (pg.30) of this document.

Gender based violence (GBV) and Protection against Sexual Exploitation and Abuse (PSEA):

Identified risk: Closely associated to the selection risks, the project design necessitates effective management of GBV risks. The exchange of sexual favors for registration or transfer of funds is a key GBV risk for the project.

Mitigation: The PIU will develop and implement measures and actions to assess and manage the risks of GBV (within households or at payment points) and sexual exploitation and abuse risks, such as sexual favors for registration or release of funds. The Baxnaano GBV action plan will be expanded to cover the SNLRP activities, and will include measures for minimizing GBV risks, including outreach to local communities. This will include a code of conduct for partners responsible for registration and beneficiary authentication.

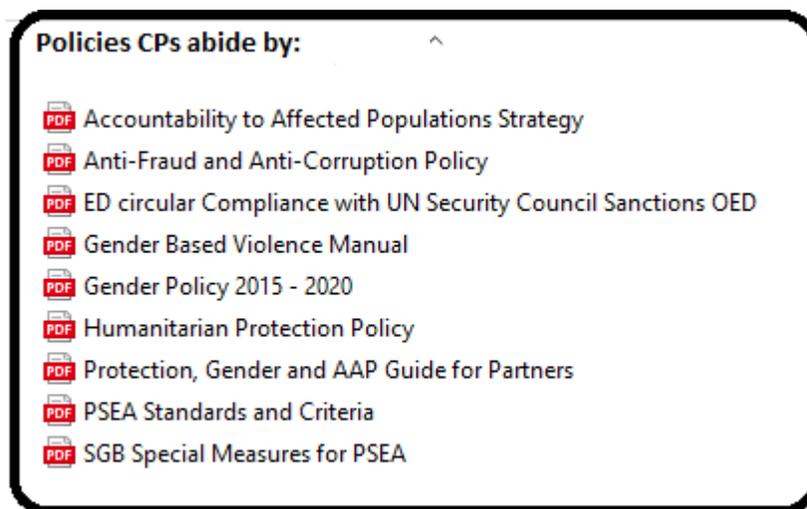
WFP has multiple channels to mitigate against any risk arising out of the project that may exacerbate any underlying GBV incidences or contribute towards it. The measures will include **WFP Corporate policy on SEA** defining protocol for recognizing, inhibiting and dealing with SEA; **WFP referral protocol** will enable beneficiaries to access the professional support services; **Complaints and Feedback mechanism** will help receive any complaints and direct the victim to seek specialized services; **Training and capacity building** gaps will be identified among all key stakeholders and trainings undertaken ; **Protection protocol** will be followed in all stages of the project cycle. For further detail refer to Annex 2 of this document on **GBV Action Plan**.

9.48. WFP will institute a very clear beneficiary selection procedures to ensure that any ambiguity in this process is not exploited to unfairly favour non- eligible beneficiaries. In addition, the following is a summary of the mitigation measures put in place by WFP:-

9.49. **WFP Corporate Policies on SEA:** WFP has a zero-tolerance policy on SEA which focuses on acts committed against the people it serves, by WFP employees or others associated with its work. WFP adopted the Secretary-General’s Bulletin on “Special Measures for Protection from Sexual Exploitation and Sexual Abuse” (ST/SGC/2003/13) in 2004 and has continued to reaffirm its commitment to protection from SEA with four Executive Director Circulars issued since then, the latest in 2014. Any acts of SEA constitute serious misconduct and is grounds for disciplinary measures, including summary dismissal and referral to enforcement authorities for criminal prosecution, where appropriate. WFP’s policy on SEA covers acts which occur at or away from the workplace, during or outside working hours, including sexual activity with children (under the age of 18), exchange of money, employment, goods, assistance or services for sex, including sexual activity with prostitutes.

9.50. **WFP Corporate SEA policies for Cooperating Partners:** WFP’s cooperating partners (CPs) are required to abide by WFP’s regulations and to adhere to its commitments. By entering into an agreement with WFP, cooperating partners undertake to adhere to: (i) the standards set out in the Secretary-General’s Bulletin Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13); (ii) any minimum operating standards adopted as a result of the Statement of

Commitment on Eliminating Sexual Abuse and Abuse by UN and Non-UN Personnel of 4 December 2006; and (iii) any other Protection from Sexual Exploitation and Abuse (PSEA) policy or guideline as may be adopted by WFP, and notified to the implementing partner by WFP from time to time. In addition, CPs need to ensure that their personnel, agents, contractors and subcontractors conform to the highest standards of moral and ethical conduct.



9.51. **Training and capacity building of WFP staff:** WFP provides mandatory training on prevention of harassment, SEA, ethics and standards of conduct to all its staff. WFP has designated PSEA focal points in all country offices to support senior managers to create an environment that prevents SEA, undertake awareness raising of WFP employees and partners, participate in in-country PSEA networks, and receive complaints and submit reports of SEA to the Office of Inspections and Investigations (OIGI).

9.52. **Follow up training and capacity building of WFP Cooperating Partners & CFM operators:** WFP and the Somalia Food Security Cluster (co-chaired by WFP) has provided training to its partners on gender and protection mainstreaming including the principles of humanitarian protection, and prevention of GBV and SEA. In addition, WFP will review any gaps and provide refreshers to the CFM operators as the primary interface with the communities recording and referring any GBV & SEA cases.

9.53. **WFP Somalia GBV Referral Protocol:** WFP, in collaboration with the GBV sub-cluster in Somalia, has developed a GBV referral and programming protocol that outlines WFP's corporate strategy on GBV, particularly on reporting and referring cases for medical, legal or psychosocial assistance, as well as working with GBV survivors. This will be followed in the SNLRP project too as an extension of the SNHC project.

9.54. **Community consultations and sensitization:** As elaborated in the earlier section on Community based Participatory Approach, special mention is being provided under this section owing to the seriousness assigned to Protection, GBV, PSEA and Accountability to Affected Population (AAP) by WFP. In identifying risks related to sexual exploitation and abuse (SEA) and gender-based violence to the community, local leadership and partners, every precaution and sensitivity will be adhered in use of language, presentation of the case to identify any GBV risks and immediate referral of any cases that may arise from participants, voluntarily sharing issues, during this initial stage of consultations. These identified risks will be noted during the community consultations and factored into the project delivery.

With keeping to the principles of 'do no harm' the confidentiality and welfare of the affected person will be of utmost priority for WFP.

9.55. **Safety, access and security at each stage of the project:** Security and safety to access the project services such as access to payment points, access to CPs/ CFM will be considered to ensure that no one is put in harm's way when participating in the project. For example, ECT will take place twice only and requires beneficiaries to visit these payment sites spaced across three-month intervals.

9.56. **Communication with beneficiaries throughout the project cycle:** WFP will ensure that all community members, including non-beneficiaries, are aware of the project design, ability to participate and channels of complaints so that there is transparency and accountability at each step of the project.

9.57. **SEA monitoring in cash-based transfers:** WFP will undertake referrals of GBV cases as per established protocol and follow up these cases. Please refer to 10.16 (pg.29) under the [Complaints and Feedback system](#) of this document.

Systemic Weakness

Identified risk: As noted below, the Borrower's capacity for the preventing adverse social impacts on the project is limited, as is the borrower's capacity for redressing the impacts of social harm where it has occurred.

Mitigation: The project has two primary approaches to overcoming the low capacity of the Borrower. The first is the use of WFP as the implementing agent for the cash transfer system. WFP has a proven track record for delivering unconditional cash transfers in rural Somalia. It also noteworthy that the project will work with regional and district governments as well, where the capacity is significantly higher than in the FGS.

In order to circumvent systemic weaknesses, the project will be implemented by WFP until the Government of Somalia has developed its own systems and policies to take over implementation in the future. The **security of payment modality** will be addressed though adhered to the WFP security standards. The contracting of the NGO partners will be done through WFP's standard procedures, including **selection and vetting of all CPs**, as well as their **periodic performance evaluation**. Financial service provider and mobile money agents, if applicable, will be contracted as per corporate policies. WFP will ensure that **Financial due diligence** in payment system is adhered to in the project.

Security of Payment modality

9.58. WFP exercises an overall duty of care obligation in line with the Saving Lives Together Framework (SLT). NGO partners must consult on security coordination with host country authorities and other local actors with a view to achieving a coordinated and/or common approach where appropriate. Further

security information sharing and coordination will be enabled through established mechanism including INSO, UNDSS and the OCHA Access Task Force to facilitate effective NGO/UN cooperation under the Saving Lives Together framework. These mechanism provide for enhanced security coordination arrangements, strengthen operational practices, sharing of relevant security information, enable humanitarian access and provide a forum to consult on common ground rules for humanitarian action between the United Nations and NGOs. Furthermore, the WFP has developed a safe distribution guideline, and an accompanying checklist, that are provided to NGOs establish the basic mechanism for WFP to perform its oversight role. The checklist is designed to document the NGO's consistency and completeness, or the lack of it, in implementing the guidelines. It also provides evidence to WFP of a minimum risk management system being put in place at distribution sites, which could then be measured or verified. The current model adopted by WFP for safe distributions is designed to ensure the safety and security of the beneficiaries. The model respects and represents the right of the beneficiary to humanitarian assistance in a manner which preserves their dignity and wellbeing in an environment which is safe and free from harassment. The guidelines are not an exhaustive examination of all safety, security and risk management systems that can be developed or implemented by partner organisations in Somalia. Instead, the document is intended to give guidance on the key needs that must be addressed at distribution and or registration sites. This guide uses checklists and step-by-step tools to ensure important duty of care needs are identified and managed as follows:

- Principles of Safe Distribution.
- Safe Distribution Model.
- Distribution Point.
- Site Selection.
- Security Planning.
- Ideal Model.
- Generic Security Measures.
- Pre-Distribution Measures.
- Post-Distribution Measures.
- Training.
- Key Security Equipment.
- Safe Distribution Measures for Helicopter Food Deliveries.
- Coordination with the host government.

9.59. Once a Cooperating Partner NGO receives training on safe distribution, it effectively becomes responsible for ensuring that appropriate mitigation measures and support are in place to prevent and respond to incidents and that all its staff are adequately informed of the risks and the corresponding mitigating measures. With this, an NGO must also have appropriate support and insurance in place to assist staff affected by an incident, which WFP cannot be held liable or expected to provide. On WFP's part, the guidelines and the accompanying checklist provided to NGOs establish the basic mechanism for WFP to perform its oversight role. In particular, the checklist is designed to document the NGO's consistency and completeness, or lack thereof, in implementing the guidelines. It also provides evidence to WFP of a minimum risk management system being put in place at distribution sites, which could then be measured or verified. A copy of the completed checklist received from each NGO partner is then kept on file with WFP, as a record to be used to undertake periodic oversight reviews to ensure responsible practices and that security risks are adequately managed by the NGO to enable access and programme implementation.

Security Incident Response and Reporting

9.60. In general, NGOs are responsible for responding to and reporting security incidents that involve their staff, assets and activities. The basic process for responding to an incident begins with the security guards hired by the NGO. They are typically the first responders, followed by the local police force. WFP does not directly respond to an incident at the behest of an NGO. However, upon receiving information of an incident involving either the NGO itself or beneficiaries during a distribution, WFP may provide, if required, assistance on determining the cause of the incident. Once the cause of the incident is established, WFP may further assist the NGO in coordinating with the local authorities or the local community leadership the identification of additional measures or resources to be implemented or deployed, if feasible, to prevent the reoccurrence of an incident.

9.61. WFP Security follows an internal reporting process that records all NGO/beneficiaries security related incidents and additional measures to be implemented, if any, through a corporate security information management and reporting platform. All incidents involving NGO partners or beneficiaries are also reflected annually in WFP's global security trends reporting to the Executive Board. The data in the report are compiled by the WFP Field Security Division.

9.62. With regards to mobile money outlets, the overall security arrangements are determined and implemented by the mobile money service outlet in coordination with the NGO implementing the program in a manner that is required and consistent with the do no harm policies.

SCOPE and Data protection policy of WFP

9.63. WFP will ensure that the projects systems and procedures used under this project are robust. The project will help put in place the initial building blocks of a national single social registry which will maintain the database of the project beneficiaries as long as it implements this component. Once the Government's capacity to manage the database is in place, and upon formal consent from the beneficiaries, data will be migrated to the government database. While maintaining the database on behalf of the FGS, WFP will apply its established personal data protection and privacy processes that are aligned with the 2017 WFP corporate guideline.

9.64. WFP Data Protection and Privacy Handbook sets standards on handling and processing a large amount of information, including personal data of its beneficiaries and prospective beneficiaries, to achieve its mandate. Protecting this information is a fundamental part of WFP's duty of care to those it serves. Breaches its confidentiality could have dire consequences for individual beneficiaries or beneficiary communities, ranging from abuse and ostracization, to death. The Handbook sets out five Principles: 1: Lawful and Fair Collection and Processing of data, 2: Specified and Legitimate Purpose for data collection, 3: Required Data Quality, 4: Participation and Accountability to beneficiaries and all key stakeholders, 5: Security. Further, the handbook elaborates on operationalization of these principles through Informed Consent, b) Third-party Data Sharing, c) Media, d) Data Controller or Data Processor and e) Retention and Disposal.

9.65. During the period of programme implementation, WFP will assess that all data usage is compliant to its data protection principles. In particular, WFP will verify that the data is only handled by authorized and trained staff; that the beneficiaries have been informed of how the data is used and that they have given their consent; that the data is only used for its intended purpose; and that it is stored, backed up and protected as per corporate policies.

Selection, Vetting and Evaluations process of Cooperating Partners

9.66. WFP selects and contracts all its CPs through a solid set of procedures and checks. The Partnerships unit, hosted within WFP Programmes Department in the Liaison Office, is in charge of ensuring that the protocol for engagement and management of civil society actors is followed.

9.67. Every potential new NGO must go through a vetting process which requires them to submit an updated and signed profile, including copies of national identity cards or passports of board members and key staff, as well as information on the NGO Mission statements, Objectives, structure, geographical coverage, technical competence, Financial status etc. The NGO profiles are first reviewed at the field level by the relevant WFP area office, and then forwarded to the Programme Partnership Unit.

9.68. WFP undertakes Due Diligence Checks on prospective CPs. e.g. if they are legally registered in the country of operation, if they adhere to the Principles of Partnership as endorsed by the Global Humanitarian Platform, if they are vetted against the UN Sanctions List to ensure resources received under the partnership will not be used to provide support to terrorist entities or individuals. The vetting of partners and of its board of directors against the UN sanctions list is performed before signing a new agreement or addendum. WFP doesn't work with partners who have identified fiduciary risks but supports partners with identified medium risks linked to capacity (i.e. monitoring) and together with the partner develop mitigation measures and improvement plans to strengthen their capacity. As part of the WFP corporate fiduciary responsibility, WFP vets all entities and individuals that are party to any contractual commitment entered by WFP Somalia against the latest available consolidated United Nations Sanctions (UNSC) list. This is done to ensure that both vendors and national staff recruited locally, undergo proper due diligence, which is part of WFP's fiduciary responsibility.

9.69. Capacity Assessment is a requirement for all new partners or partners returning after 2 years. This is done by WFP at Area Office, by visiting relevant main offices/ sub-offices of the potential partner; checking on the Organisation vision/strategy, Programme capacity (Project Design, Infrastructure, Implementation and Monitoring / Evaluation), financial management and resource mobilisation, gender, protection. This allows AOs to define the suitability of the partner or identify areas where the capacity of a partner can be improved through the provision of training, equipment or facilities.

9.70. In order to select partner for a specific project, WFP launches a call for proposals through the AOs and all applicants are provided with equal opportunity to apply. Proposals are submitted to the WFP Area office (AO) as per a specified date. The Area Office conducts the initial review, undertakes capacity assessment and recommend projects to undergo further review by Cooperating partners Committee (CPC). The CPC is appointed by the Country Director and is made up of staff members from different functional areas (programme, finance, logistics, budget and programming etc). The Area offices are then required to liaise with the Partner and review the CPC comments and undertake the necessary corrective steps in the project design. Once these have been satisfactorily addressed, the Field Level Agreement is drawn for management approval. During project implementation, partners are closely monitored by WFP Area and Field offices as well as an end of project CP evaluation is undertaken. Please refer to Annex 3 on Partner Process and Flow chart for more details on timeframe / steps of engagement.

Financial due diligence procedures

9.71. WFP has put in place stringent measures to ensure that financial diligence is embedded in the cash transfer project. As part of WFP's fiduciary responsibility, WFP vets all Financial service providers (FSP's) that are party to any contractual commitment entered by WFP Somalia against the latest available consolidated United Nations Sanctions (UNSC) list. The objective is to ensure that the vendors undergo proper due diligence, which is part of WFP's fiduciary responsibility. WFP also monitors its financial service providers to verify that beneficiaries are served correctly and that adequate measures are provided for their protection and safety.

9.72. The UN headquarters carries out a global tendering procedure to acquire FSP's for UN operations. The FSP's undergo a rigorous assessment and vetting process to ensure that they are financially strong and meet global international standards. Standard Chartered Bank (SCB) won the UN tender in the year 2014 after the tender process was concluded by the New York office. As WFP works within the UN framework, WFP Somalia is working with SCB to carry out its financial operations.

9.73. WFP Somalia carries out additional vetting procedures for all Mobile money transfer Service provider. WFP issued a Request for Information inviting potential Mobile transfer agencies in the region to submit proposals regarding their ability to carry out CBT operations. WFP then carries out a Micro financial assessment (MiFA), which is a detailed review of each supplier providing a detailed understanding of his or her financial performance. Key elements assessed include their audited financial statements, geographical coverage, anti-money laundering policies, staffing and technical ability to facilitate CBT operations.

'On the ground' organizational presence

9.74. WFP has a large administrative presence in Somalia through a total of 11 offices. The Country office is located in Mogadishu and is supported by 4 Area offices (Hargeisa, Garowe, Gaalkacyo and Dollow) and 6 sub offices spread across Somalia (Bossasso, Baidoa, Beletweyne, Dohhle, Dushamareb, Kismayo), as well as a Liaison office with support and oversight functions in Nairobi. A total of 332 staff are based in Somalia, ensuring the implementation and monitoring of WFP programmes, as well as day-to-day relationship with NGO partners and government.

Working through Partners

9.75. WFP implements its programmes through contracted local or international NGOs, and currently has around 110 such partners. The rationale for partnerships is multi-fold, enabling WFP to reach the most remote locations effectively and build national capacities of the civil society to deliver services. WFP ensures that partnership is managed in a transparent and accountable manner, as explained below under paragraph 16.3 onwards.

9.76. The large majority (90 percent) of WFP's CP are national, locally based NGOs which are anchored in the communities that they serve. They are in charge of the day-to-day management of the activities and are the direct interface with the beneficiaries.

Working closely with regional and district government

9.77. The extensive network of WFP Area offices and Cooperating partners will work closely with the Regional and District authorities at every level of the project. The Federal MoLSA will inform all the states of the SNLRP project and the design of the ECT which will enable WFP to follow up on these communications. The district selection and the targeting procedures to be followed in close consultation and guidance from the district authorities.

Working and coordinating with other Agencies on emergency response

9.78. WFP has a field presence since 1992 with a well-established relationship with all key players in the emergency and development response through Cash. As WFP has been leading the dialogue with partners in harmonizing the transfer value, it will be faced with the responsibility of communicating the rationale for a deviation from the established MEB rates or the rates set by supra regional transfer value. Strong government support and lobbying with all key stakeholders including beneficiaries will be required to ensure that the logic of the transfer value is well accepted and does not cause confusion among beneficiaries. This intervention as a government response, being supported by WFP needs to be communicated to all agencies and stakeholders. The project design as well as the transfer value needs to be understood as an instrument of National social protection with the future prospect of national financing hence the value will be tied to this ability.

Difficulty monitoring

Difficulty monitoring:

Identified risk: Security concerns and the remoteness of the project target areas combine to provide a significant challenge for monitoring and supervising project implementation. This can include challenges for community and stakeholder engagement, grievance redress and other risk mitigation protocols. COVID-19 restrictions are further likely to exacerbate project monitoring challenges.

Mitigation: With the exception of lifesaving circumstances, partner NGOs may only operate in environments permissible enough to monitor their project activities. WFP will use their already established capability for monitoring their operations. WFP have a multifaceted approach to monitoring involving WFP staff, a contracted company that provides staff for monitoring where WFP staff cannot access, and a complaints hotline. The hotline is also used for proactive verification by making calls to beneficiaries to check how the project is operating. WFP is also monitored by other donors (notably United States Agency for International Development and UK Department for International Development). In addition, the World Bank will be hiring a TPM agency to oversee this operation. Where COVID-19 restrictions limit effective community engagements, traditional channels of communications such as, radio and dedicated phone-lines etc. can be employed.

9.79. WFP Somalia has an established policy of only implementing projects on the condition that it can monitor all activities in all locations. WFP uses different layers of physical and remote monitoring directly or through contracted monitors, as well as through its call centre. WFP considers close programme monitoring as one of its primary responsibility to track inputs, activities, outputs and outcomes and determine whether they are proceeding according to the work plan and overall project design. In areas where WFP staff cannot access, WFP uses monitors hired by a private monitoring company (CTG) with which WFP has a contract.

- i. **Direct Physical Monitoring** by WFP staff or contracted monitors is conducted every month in 20 percent of all active cash distribution points. Locations are rotated to ensure that each location is covered every at least twice a year. WFP will recruit 6 monitors (one per state) who will be dedicated full-time to the monitoring of this specific project. Monitoring checklists are developed by WFP in line with corporate Monitoring and Evaluation guidelines to assess WFP's and its partners' performance for processes, outputs and outcomes.
- ii. Besides, WFP's NGO partners carry out monitoring of their programmes and findings are included in **monthly reports** to WFP.
- iii. To add another layer of monitoring, WFP use **remote monitoring** through the call centre to crosscheck information. Information collected through the call centre is triangulated with information from the physical monitoring.

Annexes:

1. Inclusion Action Plan
2. GBV Action Plan
3. Safe Distribution Programme Checklist
4. Partner Processes and Flow Chart
5. Social Incidence Reporting – WFP Somalia
6. Social Incidence Reporting Flow chart
7. SMP Action Plan

Annex 1: Inclusion Action Plan

Action points	Who is responsible	Benchmark	Q1	Q2
Community consultations				
Recognize excluded segments in community	WFP/ CP	All target villages		
Ensure traditionally marginalized beneficiaries are included	WFP/ CP	All target villages		
Identify barriers to participation	WFP/ CP	Documented & monitored		
Address barriers in implementation	WFP/ CP	Documented & monitored		
Set up accessible complaints systems	WFP/ CP	100%		
Counterpart selection				
CP partners vetting - sensitive to Inclusion; good track record	WFP	FLA process 100% administered		
CP monitoring to ensure excluded groups are tracked for participation	CP	CP monthly reports		
Ensure that optimal no. staff are women	CP	30% women		
CP processes and procedures are women & child friendly	CP	Reports by AO/FO		
Mobile Money Payment system				
Payment system is vetted to be accessible to all including women, disabled & elderly	CP	site monitoring		
Recognize & address any barriers to access to mobile money payments	CP/WFP	Action reports to resolve		
Review and adapt system based on monitoring reports or CFM/ GRM input	CP/WFP	Action reports to resolve		
Monitoring & Evaluation				
Indicators in M & E capture gender disaggregated data	WFP	All beneficiaries		
Hotline, CP reports, AOs / FOs reports, TPM reports are analysed. Action points shared with WFP AO & FO for corrective action.	WFP	Reports		
Regular reports analyse project for barriers to inclusion	WFP	Action reports		
AOs & FOs identify issues and undertake corrective measures with CPs.	CPs/ WFP	Action reports		
Communication outreach				
CPs to provide information to all target beneficiaries	CP	Accessible/ understandable messaging		
Ensure that extension workers and staff are trained in GBV and Protection	WFP	80% trained		
Information on Hotline widely provided	WFP	All sites		
Hotline is well maintained and monitored	WFP			

Annex 2: GBV Action Plan

INTRODUCTION

Conflict and insecurity, as well as drought- and climate-related shocks have made protection and incidences of gender-based violence (GBV) an ongoing concern as movements in search of food, services or livelihoods often threaten the safety of vulnerable groups such as women, girls, children and people living with disability. The separation of many women and girls from community and familial support structures, as well as from traditional livelihoods activities, also contributes to an increased reliance on marginal, inconsistent, and hazardous livelihood strategies, which often increases exposure to violence. Additional protection risks for children include family separation and child recruitment; arbitrary arrest; drop out from or lack of access to education; hazardous child labor; and elevated exposure to GBV, including assault, trafficking, and psychosocial distress.

The SNLRP and SNHCP focuses on providing cash transfers to households affected by the locust invasion in an effort to mitigate and withstand the impact on income and food security throughout its duration. These will also enable vulnerable households, especially those headed by women to avoid taking up negative coping mechanisms that might expose them to various protection risks. The sexual exploitation of vulnerable women in exchange of sexual favors for registration or transfer of funds is a key risk for the project.

This Action Plan details the operational measures to assess and mitigate the risks of gender-based violence, most notably sexual exploitation and abuse (SEA) and how they will be integrated over the life of the project. This includes procedures for reporting, responding and managing grievances related to such abuse.

Definition of GBV and SEA

The Inter-Agency Standing Committee (IASC)²¹ Guidelines for GBV in Humanitarian Settings defines gender-based violence as “an umbrella term for any harmful act that is perpetrated against a person’s will, and that is based on socially ascribed (gender) differences between males and females. GBV broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families and in the community at large. These include sexual violence, domestic or intimate partner violence, trafficking, forced and/or early marriage, and other traditional practices that cause harm such as female genital mutilation, honour killings and widow inheritance²².

The United Nations²³ defines “**sexual exploitation**” as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse on the other hand is “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions²⁴.” SEA is therefore a form of gender-based violence and generally refers to acts perpetrated against beneficiaries of humanitarian programmes by staff, cooperating partners (CPs) and contractors.

²¹ Inter-Agency Standing Committee- the primary mechanism for inter-agency coordination of humanitarian assistance among UN and non-UN humanitarian partners.

²² World Food Programme. 2016. Gender- Based Violence Manual

²³ Secretary-General’s Bulletin on “Special Measures for Protection from Sexual Exploitation and Sexual Abuse” (ST/SGC/2003/13)

²⁴ World Food Programme. 2014. Executive Director’s Circular (OED2014/020): Special Measures for Protection from Sexual Exploitation and Sexual Abuse.

WFP makes a distinction between SEA and sexual harassment. When WFP refers to sexual harassment, it is focused on WFP employees, while with the term SEA focuses on acts against those we serve. In this document we are focusing on acts against the people we serve (beneficiaries). Sexual harassment for WFP staff is covered by the WFP policy on Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination, and therefore is addressed under the Labour Management Plan (LMP) in greater detail. The following is an excerpt from the LMP:

“Protection from Harassment, Sexual Harassment, Abuse of Authority and Discrimination policy. *WFP is committed to working environments that respect the inherent dignity of all persons, affording them the opportunity to reach their fullest potential and empowering them to deliver the best possible results for all the people that WFP serves. WFP is committed to a zero-tolerance approach to abusive conduct. This means that any reports of abusive conduct will be dealt with promptly, justly and effectively in accordance with the applicable regulatory framework and the procedures set out in the Circular. Failure to meet obligations under this Circular may lead to administrative or disciplinary action, up to and including summary dismissal. This policy also describes mechanisms meant to ensure the responsibilities of WFP as an employer and of each WFP employee, of promoting safe and harmonious workplace environments, and taking action when alerted to potential abusive conduct. Finally, this policy provides guidance for WFP employees on how to seek support and raise concerns regarding any abusive conduct they have experienced or witnessed.”*

Contextual GBV Risks

Poverty, hunger, conflict, insecurity and displacement exacerbate some forms of GBV. For example, women and girls who are traditionally tasked with finding fuel to prepare food, may need to venture to unsafe areas to collect firewood, thereby exposing them to the risk of assault. Within households, domestic violence can rise during periods of food scarcity, and may decline as assistance fills the food gap. Conversely, people who have been exposed to GBV may suffer psychosocial or physical harm, stigma and exclusion, and consequently be unable to generate income and care for their dependents.

In many contexts, women’s lack of access to and control of assets, services and income increases their economic dependence as well as their vulnerabilities to abusive and exploitative situations. Women heads of households may engage in transactional sex to be able to meet food needs, and parents may push for early marriage for their daughters in the hope they will have their food needs met elsewhere. Changing gender roles in times of crisis and the increased entry and participation of women into the labour force increases women’s vulnerability as they can be sexually exploited in the workplace or targeted when travelling to or from work²⁵.

Food or cash assistance in itself may also unintentionally contribute to GBV. A food or cash distribution site that is located in an unsafe area, or is far from where people live, may expose women to sexual violence. Cash delivered to women without taking into consideration gender roles and responsibilities may unintentionally increase domestic violence in a society that is strictly opposed to women having control over economic resources. The real or perceived empowerment of women in household decision-making through the enhanced income may trigger or worsen intimate partner violence.

A 2016 GBV survey commissioned by the World Bank and United Nations (UN) partners found that 17 percent of women in Somalia had experienced some form of physical or sexual violence from a non-partner.²⁶ The study further found a link between intimate partner violence and women’s engagement in income-generating activities, affecting 36 percent of women interviewed. Data emerging from the Somalia GBV Information Management System reveals that over 14,000 cases of GBV were reported

²⁵ REACH, “Drought and Protection Concerns in IDP Sites, Joint Partner Assessment”, April 2018.

²⁶ World Bank. 2018. Country Partnership Framework for the Federal Republic of Somalia. Washington, DC: World Bank.

from January 2015 through June 2016²⁷. Men and boys also experience gender-based violence, especially in conflict and post-conflict situations where abduction and forced recruitment may put them at risk of sexual assault and other forms of GBV. However, in Somalia, GBV disproportionately affects women and girls²⁸.

In 2017, the pervasive drought and the related large-scale displacement led to an increase in the numbers of reported cases of gender-based violence (GBV) including sexual assault and intimate partner violence²⁹. Widespread insecurity and the presence of armed non-state actors has had a significant role in the incidence of GBV in the IDP settlements in urban and peri-urban areas.

Despite recent commitments by the Government, the protective environment for the IDPs and civilians affected by the conflict still requires strengthening. Limited access to legal redress, psychosocial and medical services, social stigma, and lack of confidence in a fair trial and fear of reprisals constitute major barriers to the support and protection survivors of GBV and their families. Limited public education on human rights issues is also a key barrier to ending GBV.

EXISTING RISK MANAGEMENT SYSTEMS

Based on its experience in implementing programmes in Somalia, WFP already has developed several measures to ensure the protection of the people and communities it works with, including mechanisms to limit, report and follow up on potential cases of gender-based violence (GBV).

a) WFP Corporate Policies on SEA

WFP has a zero-tolerance policy on SEA which focuses on acts committed against the people it serves by WFP employees or others associated with its work. WFP adopted the Secretary-General's Bulletin on "Special Measures for Protection from Sexual Exploitation and Sexual Abuse" (ST/SGC/2003/13) in 2004 and has continued to reaffirm its commitment to protection from SEA with four Executive Director Circulars issued since then, the latest in 2014. These Circulars outline specific measures WFP staff at both HQ and field levels must take to ensure that protection threats to beneficiaries do not emanate from WFP staff or cooperating partners and external service providers. In situations where there is the absence of a direct report on a GBV case and lack of consent from the affected person, the WFP with other protection actors will try to find practical solutions to the situation. Also refer to the section on SEA and GBV given above.

Any acts of SEA constitute serious misconduct and is grounds for disciplinary measures, including summary dismissal and referral to enforcement authorities for criminal prosecution, where appropriate. WFP's policy on SEA covers acts which occur at or away from the workplace, during or outside working hours, including sexual activity with children (under the age of 18), exchange of money, employment, goods, assistance or services for sex, including sexual activity with prostitutes. WFP provides mandatory training on prevention of harassment and SEA and ethics and standards of conduct to all its staff. WFP has also designated PSEA focal points in all country offices to support senior managers to create an environment that prevents SEA, undertake awareness raising of WFP employees and partners, participate in in-country PSEA networks, and receive complaints and submit reports of SEA to the Office of Inspections and Investigations (OIGI).

WFP's cooperating partners (CPs) are required to abide by WFP's regulations and to adhere to its commitments. By entering into an agreement with WFP, cooperating partners undertake to adhere to: (i) the standards set out in the Secretary-General's Bulletin Special Measures for Protection from Sexual

²⁷ GBV is often under-reported due to issues of stigma, retaliation for the survivor. This data represents cases exclusively reported by GBV services providers in a limited number of locations across Somalia.

²⁸ UNFPA Somalia Bulletin, Issue no. 3, (April -June 2016)

²⁹ UNFPA Somalia Monthly Situation Report, Issue no. 3, (20 March to 3 April 2017)

Exploitation and Sexual Abuse (ST/SGB/2003/13); (ii) any minimum operating standards adopted as a result of the Statement of Commitment on Eliminating Sexual Abuse and Abuse by UN and Non-UN Personnel of 4 December 2006; and (iii) any other Protection from Sexual Exploitation and Abuse (PSEA) policy or guideline as may be adopted by WFP, and notified to the implementing partner by WFP from time to time. In addition, CPs need to ensure that their personnel, agents, contractors and subcontractors conform to the highest standards of moral and ethical conduct. WFP and the Somalia Food Security Cluster (co-chaired by WFP) has provided training to its partners on gender and protection mainstreaming including the principles of humanitarian protection, and prevention of GBV and SEA. Any failure by cooperating partners to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof or to take corrective action, constitutes grounds for termination of the Agreement with WFP.

b) WFP Somalia GBV Referral Protocol

WFP (in collaboration with the GBV sub-cluster in Somalia), has developed a GBV referral and programming protocol that outlines WFP's corporate strategy on GBV, particularly on reporting and referring cases for medical, legal or psychosocial assistance, as well as working with GBV survivors in terms of programming. The guidelines were developed to support all staff (including WFP's call center staff) in reporting and referring cases of domestic abuse or sexual assault to trained service providers who would be able to offer the proper assistance. The guidelines have been disseminated to WFP programme staff at the field level to enable them to protect the identities of the survivors with confidentiality as well as provide appropriate assistance. Details of the referral protocol are discussed in the section on mitigation measures for this project.

c) Complaints and Feedback Mechanism (CFM)

To complement field monitoring visits and in line with the IASC principles on accountability to affected populations (AAP), WFP Somalia has a complaints and feedback mechanism (CFM) that handles complaints and feedback from all stakeholders involved in the assistance process. The CFM not only aims at strengthening accountability to communities but also to identify a range of protection, fraud and diversion issues as well as other concerns related to delivery of WFP assistance. Complaints can be made through the well-established Somalia-based toll-free hotline, directly (face to face) to WFP monitoring staff and cooperating partner staff at programme implementation sites, through telephone calls and email or short messaging to WFP offices, and through local authorities and local leaders. Information on WFP's hotline numbers is widely available through posters at food and cash distributions points and is also printed on the SCOPE cards. Reports of alleged SEA as well other GBV incidents can be received from anonymous letters, incident reports, emails, or through the call center and regular monitoring. Cases of GBV or SEA received through the call center are (with the consent of the survivor) forwarded to PSEA focal points who report the cases to the Office of Inspections and Investigations (OIGI) for investigation and further action. For greater detail on monitoring the voices of women through their feedback and incorporating design changes to the programme refer to the section below under Action Plan (iii) ([Communication with beneficiaries throughout the project cycle](#))

ACTION PLAN

This section details the specific measures for mitigating GBV and SEA risks under the SNLRP project as an extension of the SNHCP project. These include the prevention measures already in place as well as steps to be undertaken in case of reports of alleged SEA committed by WFP staff or cooperating staff or contractors, as well as GBV cases related to the project.

a) PREVENTATIVE MEASURES

i) Community consultations and sensitization

Before the onset of the project, WFP will carry out consultations with the target communities, local authorities, and partners to discuss the overall objectives, duration and mode of implementation of the project. WFP will use the consultations to introduce the issue of sexual exploitation and abuse (SEA) and gender-based violence to the community, local leadership and partners and to identify the potential protection risks and needs specific to each location and the prevention and mitigation measures for all stakeholders including the community members and beneficiaries. During the consultations, WFP will reiterate the expectations governing the implementation of the project, including the expected code of conduct and relevant disciplinary sanctions for all actors (WFP staff, partners, local authorities, and service providers), and inform them about the available reporting and redress mechanisms such as the WFP hotline, post-distribution monitoring, the referral system for addressing GBV cases, and a list of GBV support services nearest to them.

ii) Safety, access and security

The use of mobile money transfers under this project reduces the risk associated with the visibility of cash transactions. This modality will allow beneficiaries even greater convenience by reducing the steps in the redemption process (by eliminating the visit to the bank for example). In addition, the disbursement of the transfers in quarterly tranches will also reduce the number of times beneficiaries will have to travel to redeem their entitlements.

iii) Communication with beneficiaries throughout the project cycle

To reduce the exposure of the beneficiaries to fraud and abuse (e.g. exploitation by service providers), WFP will continuously engage in beneficiary sensitization and communication to increase people's understanding and ownership of the entitlement, the payment instrument (how to access and use it) and the complaints and feedback mechanism (CFM). Beneficiaries can then use the CFM to ask questions or voice concerns, including reporting incidents of SEA or GBV. On average, about 50 percent of the calls received on the WFP hotline are made by women, indicating that there are no major social barriers preventing female beneficiaries from contacting WFP. Call center operators are trained on how to handle calls on GBV or SEA and received refresher training prior to the roll-out of the Baxnaano project. As part of WFP's regular monitoring process, beneficiaries will receive phone calls or voice/text messaging with questions or information regarding including their experience of the entire process and any problems they may have encountered. A list of GBV service providers that are available and preferred/recommended in each location will also be displayed in posters (in the local language) and communicated by partners in all registration centres. WFP's monitoring process throughout the lifecycle of the project will also provide opportunities for community members (especially women and girls), to participate freely and provide feedback on project implementation and any risks or barriers they may be face as a result of the project.

iv) Sensitization and training of WFP staff and partners

Community sensitization and engagement throughout the project duration will be conducted in person by cooperating partners and field monitors, and through text and voice messaging to ensure that those who are illiterate are not left out. WFP provides training to its cooperating partners on the expected standards of behaviour and consequences for breach of conduct. In addition, in 2018, WFP provided training on gender, protection and accountability to 113 cooperating partners and staff in all the Area Offices and in Nairobi. In September 2019, the Food Security Cluster (which WFP co-leads with FAO) provided additional training on gender and protection in Hargeisa and Mogadishu, prioritising cooperating partners who had not received the training. All the cooperating partners (CPs) implementing this project will receive refresher training and briefing on how to ethically and effectively

communicate and engage with the community. Call center operators and CPs have also received training on how to receive and appropriately refer and report on cases of GBV or PSEA, including providing psychological first aid. All WFP partners will be required to sign and adhere to the WFP Code of Conduct and other relevant policies and standards of ethical conduct mentioned in the section on existing risk management systems.

v) Effects of cash-based transfers on social relations

In general, studies are yet to find sufficient evidence of a direct link between cash-based transfers and a significant change in gender relations, given the complex socio-cultural norms and dynamics that undergird these relations. In fact, some studies³⁰ in the humanitarian context have increasingly found that cash-based transfers help to decrease intimate partner violence by decreasing tensions and stressors within households. In addition, there are indications that cash injections to communities can strengthen community mechanisms for child support- especially orphaned or abandoned/unaccompanied children. Rather than exacerbate social relations, the planned transfers in this project are more likely to help reduce tensions within households and help strengthen community care for vulnerable children.

In its implementation of cash-based transfer operations in Somalia, WFP has not observed an increase in intrahousehold abuse of the system including among spouses, family members or caregivers. However, as this always remains a potential concern, WFP will continue to monitor the effects of its cash programs on intra-house dynamics through qualitative post-distribution monitoring (PDMs).

Among the aggravating factors for gender-based violence in Somalia is the increased vulnerability of women and children as a result of poverty and limited access to economic opportunities, conflict, displacement and food and nutrition insecurity. These factors often compel women to adopt negative coping mechanisms for survival that expose them to various protection risks. Disbursing the designated safety net transfer in a quarterly tranche of \$180 is likely to help the recipients meet their most urgent household needs and thereby reduce the financial pressure on households (that sometimes leads to increased tensions and intimate partner violence) and negative coping mechanisms that might expose women and girls in affected communities to physical harm, sexual exploitation and other forms of gender-based violence. The transfers also provide the potential for the recipients to accumulate savings or invest in small businesses thereby helping to reduce their economic vulnerability over the medium or longer term.

b) REPORTING AND MANAGING INCIDENTS OF SEA AND GBV

i) Sexual Exploitation and Abuse

WFP's policy for prevention of SEA applies to allegations of acts committed by WFP employees including consultants and interns, cooperating partners, contract workers, and external service providers. Reports of alleged cases of sexual exploitation and harassment can be received from anonymous letters, incident reports, emails, or through the call center and regular monitoring. In situations involving third party reporting of GBV or SEA, the balance between the survivor centre approach (where consent is mandatory) and the obligation to report presents a real challenge. WFP will work with other protection actors over the course of the project to determine the most appropriate actions to take in such a scenario. Any acts of SEA constitute serious misconduct and is grounds for disciplinary measures,

³⁰ Buller, Ana Maria; Peterman, Amber; Ranganathan, Meghna; Bleile, Alexandra; Hidrobo, Melissa; Heise, Lori. 2018. A mixed-method review of cash transfers and intimate partner violence in low- and middle-income countries. *The World Bank Research Observer* 33(2): 218-258. <https://doi.org/10.1093/wbro/lky002>

including summary dismissal for WFP staff and referral to enforcement authorities for criminal prosecution, where appropriate.

ii) Referral Pathway

- a) Staff who receive and/or report allegations who are not a designated SEA focal point (including call center operators) must:
- Upon consent of the affected person, inform a designated WFP PSEA Focal Point at the field or country level as soon as possible.
 - Provide accurate information about where to receive assistance e.g. medical/clinical, legal, psychosocial support (address, phone number).
- b) Upon receipt of a complaint or referral, the PSEA Focal Point will ensure that consent has been obtained before reporting the incident to OIGI- WFP's Office of Inspections and Investigations. All employees and SEA Focal Points/Alternates are bound to maintain confidentiality of all reported allegations, including the identity of complainant/s and subject/s. Personnel who report misconduct in good faith have the right to be protected against reprisals and retaliation. Procedures for this are found in the WFP "Whistle-blower" Protection Policy. OIGI will launch an independent assessment of the cases and conduct investigations as required. WFP will notify the World Bank of any project related GBV/SEA case occurring within 24 hours of being reported. During the investigation process, all efforts will be made to keep the identity of personnel and others involved in the investigation confidential. The requirement for confidentiality extends equally to all those involved in, or with knowledge of, the investigation.

If requested, the staff/call operator that received the complaint can act as a liaison between the complainant (including his/her family) and those persons conducting any subsequent investigation, ensuring at all stages that the safety, health and legal needs of the complainant are taken into consideration and that he or she is not subject to intimidation as a result of lodging the complaint.

- c) **If the complaint implicates a staff member of a different organisation** such as the cooperating partner, a copy of the incident report will be forwarded to the SEA Focal Point in the organisation subject to an allegation, and the World Bank. WFP will discuss and agree with the Focal Point on the responsibilities for follow up on the safety, security, health and legal needs.
- d) **If the complaint is a rumour or the alleged perpetrator (s) affliction is unknown**, a copy of the incident report will be forwarded to the RC/HC and the World Bank. The RC/HC will call for a meeting of the PSEA Taskforce that consists of designated PSEA Focal Points from UN agencies in the country, as well as the Red Cross/Red Crescent Movement and relevant International and local non-governmental organisations (NGOs). The PSEA Taskforce will be asked to develop a strategy for assessing the veracity of the rumours or allegations. The RC/HC will then pursue the issue through the appropriate channels. If an investigation is deemed to be warranted and WFP personnel are suspected to be involved, the RC/HC will inform the referring Focal Point and refer the matter to WFP's OIGI.
- e) **Sanctions:** Any acts of SEA constitute serious misconduct and is grounds for disciplinary measures, including summary dismissal for WFP staff and referral to enforcement authorities for criminal prosecution, where appropriate. For cooperating partners and contractors, any failure to take preventive measures against sexual exploitation or abuse, to investigate

allegations thereof or to take corrective action, constitutes grounds for termination of the Agreement or Contract with WFP.

iii) Gender-Based Violence

Whilst WFP is not mandated or qualified to assist survivors of gender-based violence directly with the services they need, WFP does have an obligation to treat survivors with dignity and respect when approached. Furthermore, WFP will use the existing referral pathway to refer survivors to available services in coordination with protection actors. Alternative mechanisms for ensuring that survivors access support services will be explored with other partners during the course of the project. WFP can inform survivors or people at risk of GBV about potential services, but it is up to the survivor whether they choose to access those services. Where protection incidents are linked to a WFP programme, general information regarding the problem is passed on to the relevant technical units for their evaluation and adjustments to the programme if needed, to avoid further protection problems. WFP will explore alternative means of ensuring that transport cost are supported through partners and other key actors.

Responding to a Call or Report of a GBV incident

It takes a great deal of courage for a survivor of GBV to reach out and ask for help. In most cases, social stigma, shame, and personal trauma prevent survivors from attempting to find assistance. If they do reach out and do not receive a positive and respectful response, they may never ask for help again; or they could be even further traumatised.

Survivors have the right to decide whether to access services and which services they would like to receive. Referrals should always be safe, confidential and respectful, taking the following into account:

- a) **Safety:** Individuals who disclose an incident of gender-based violence or a history of abuse may be at risk of further violence from the perpetrator(s) or from others in the community. Strategies for ensuring safety include:
 - Making sure that survivors can access systems of care that are private and respectful
 - Maintaining confidentiality always
 - Never acting without the informed consent of the survivor

- b) **Confidentiality:** Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the survivor. Strategies for ensuring confidentiality include:
 - Only sharing relevant information with others at the request of the survivor and after obtaining informed consent
 - Even if individual names are not used, it is important not to share general characteristics about the survivor (ethnicity, age, family situation) that may identify them.

- c) **Respect:** Respect for the survivor includes showing kindness and courtesy, with consideration for their feelings. Strategies to ensure you are being respectful include:
 - Ensuring non-judgmental and sensitive behaviour
 - Maintaining confidentiality
 - Placing the survivor at the centre of decision-making and informing/involving her at every stage of the process
 - Allowing the survivor to speak to someone they are comfortable with (e.g. female staff)

- Minimizing the number of times, a survivor needs to tell his or her story

In cases where a beneficiary is in distress, it is important to deliver basic psychological first-aid, until he or she can be referred to professionals. There are five basic elements to psychological first aid drawn from research and expert agreement: promote a feeling of safety, a sense of calm, connectedness to others, self-sufficiency, and a sense of hope. Please refer to page 48 which provides more detailed description of the five principles.

The following table summarises appropriate and inappropriate actions for WFP staff or partners to undertake when approached for assistance by a survivor of gender-based violence, or when they become aware of a case of gender-based violence. Emphasis is placed on the need to assist survivors in getting the help they need, from those qualified and capable of providing it.

WFP staff/CP staff should	WFP staff / CP staff should not
<ul style="list-style-type: none"> • Ensure their own safety 	<ul style="list-style-type: none"> • Interview the affected person(s)
<ul style="list-style-type: none"> • Ask if the affected person(s) are safe 	<ul style="list-style-type: none"> • Interview witnesses or others implicated in the incident
<ul style="list-style-type: none"> • Alert medical services if immediate assistance is required 	<ul style="list-style-type: none"> • Provide counselling to the affected person(s)
<ul style="list-style-type: none"> • Be supportive and show empathy 	<ul style="list-style-type: none"> • Cut off or send away the person(s) seeking to share their experience
<ul style="list-style-type: none"> • Provide accurate information about where to receive assistance: address, phone number 	<ul style="list-style-type: none"> • Document, monitor, or otherwise record details of the incident
<ul style="list-style-type: none"> • If immediate assistance is necessary (e.g. medical care), facilitate by requesting others to find transport or making phone calls on their behalf 	<ul style="list-style-type: none"> • Encourage the affected person(s) to report the abuse to the authorities
<ul style="list-style-type: none"> • Inform their manager 	<ul style="list-style-type: none"> • Encourage the person to return to the source of abuse e.g. family member

iv) Referral Pathway

There are three scenarios in which WFP Somalia staff or CP staff can make a referral. In all the three scenarios, referrals should only be done with the informed consent of the survivor, and confidentiality maintained throughout the process.

a) Scenario 1: Presence of protection actors in affected areas

WFP staff and CPs will direct the affected person to the appropriate agency/actor for services in their area of operation, e.g. sharing contact details for GBV/Protection Officers in the area or advising of the location of specific support services. WFP staff making a GBV referral will contact the WFP Protection Officer to make them aware a referral has taken place, without sharing specific details. WFP will ensure that all staff in the field offices as well as call centre operators and CPs are informed and have an updated list of GBV/Protection actors working in each area.

b) Scenario 2: Protection actors with established information management systems exist only at central level, or with irregular or limited access to affected areas

In this case, WFP staff, call centre operators and CP staff will forward basic, essential information of the GBV incident to the relevant actor (e.g. the central GBV hotline) on behalf of the affected person, e.g. incident type, date of event, location; include the name or contact information of the person only when confidentiality can be ensured and consent has been obtained from the complainant. The WFP

Protection Officer will be informed to let them know a referral is in process but without sharing details outside of the established CFM system.

c) Scenario 3: Complete absence of protection actors in affected areas

There are very few effective GBV services in Somalia and much less so in the rural areas where this project is targeting. This was confirmed by a mapping of GBV service providers in the targeted project locations. In cases where there is no protection actor or GBV services, it must be made clear to the affected person that WFP is not equipped to handle the case itself. WFP will work with other protection actors over the course of the project to determine the most appropriate actions to take in such a scenario. WFP partners will still provide information on the nearest protection and GBV services providers even if they are located further from the affected person's location.

v) SEA Incidents Reported to Other Protection Actors and Service Providers

To increase the channels and safe spaces available for people to report SEA and GBV incidents related to the SNLRP/SNHCP project, where feasible, WFP will partner (establish agreements) with the available and recommended/preferred service providers in the targeted communities so appropriate support can be provided and cases related to the project tracked. WFP will also collect information from its CPs on the incidents reported directly to them and referred to identified service providers. WFP has established protocols for handling of data from the complaints and feedback mechanism. Before any data is shared with or received from others (e.g. GBV service providers, World Bank), WFP will establish agreements to determine how data will be shared, protected and used (for what purpose).

In addition, as part of the community consultations, WFP partners will ask the communities to identify local channels for safe reporting of GBV incidents (e.g. respected village leaders or prominent women's organizations) and through which referrals can be made. Referral pathways will then be established between WFP, the channels identified by the communities and available service providers to ensure that affected persons get the services they need, and perpetrators are held accountable. WFP will notify the World Bank of any project related GBV/SEA case occurring within 24 hours of being reported. This will apply to all cases received by WFP directly (including through the hotline) and those received through partners.

Sharing of information on GBV/SEA incidents will be guided by WHO Ethical and Safety Recommendations for Researching, Documenting and Monitoring Sexual Violence in Emergencies and other best practices. These include ensuring that survivor/incident data is non-identifiable (no names, contact info, or other identifiers), only sharing survivor/incident data with the informed consent of the client, sharing a survivor's information only within the context of a referral and with the informed consent of the survivor, protecting client data at all times and only sharing with those who are authorized. Details of the incident reports to be shared with the World Bank are listed in the section below.

Five Elements of Psychological First Aid

Adapted from Psychological First Aid: An Australian guide to supporting people affected by disaster, Australian Red Cross and Australian Psychological Association, 2013.

There are five basic elements to psychological first aid that have been drawn from research on risk and resilience, field experience and expert agreement.

1. Promote safety

- Remove from, or reduce exposure to, threat of harm.
- Help people meet basic needs for food, water, shelter, financial and material assistance.
- Help people obtain emergency medical attention.
- Provide physical and emotional comfort.
- Provide repeated, simple and accurate information, in a range of methods, on how to get these basic needs met.

2. Promote calm

- Stabilise people who are overwhelmed or disoriented.
- Provide an environment, as far as practical, removed from stressful situations or exposure to sights, sounds and smells of the emergency.
- Listen to people who wish to share their stories and emotions, without forcing them to talk.
- Remember that there is no right or wrong way to feel.
- Be friendly and compassionate even if people are being difficult.
- Offer accurate information about the disaster or trauma and the relief efforts underway to help survivors understand the situation.
- Provide information on stress and coping.
- When they express fear or worry, remind people (if you know) that more help and services are on the way.

3. Promote connectedness

- Help people contact friends and loved ones.
- Keep families together. Keep children with parents or other close relatives whenever possible.
- Help establish contacts with support people (friends, family or community helping resources).
- Respect cultural norms regarding gender, age and family structures.
- Offer practical help to people to address immediate needs and concerns.
- Provide information and direct people to those services that are available.
- Link people with available services.
- Respect cultural norms regarding gender, age, family structures and religion.

4. Promote self-sufficiency

- Engage people in meeting their own needs.
 - Assist with decision making, help them to prioritise problems and solve them.
- ### 5. Promote hope
- Convey expectancy that people will recover.
 - Be there/be willing to help.
 - Reassure people that their feelings are normal.

GBV/SEA Incident Reporting Format

INCIDENT DETAILS		Guiding Notes
1	Case Category	SEA (by WFP or CP staff)
		GBV (by third party)
2	Nature of the incident reported	Basic facts of the incident. What was reported by the complainant (in his or her own words). Is the incident related to the project?
3	Source of information	Hotline, CP, other (specify)
4	Where did the incident occur	District
		Region
5	When did the incident occur	Date
6	Additional information (if available)	Sex, Age
<p>The identity and safety of a survivor must be protected at all times. No personal data or identifying information about a survivor or their experience can be shared through this document. Personal/identifying information includes the survivor's name, perpetrator(s) name, date of birth, home address, the exact time and place the incident took place, visible disability, residence status e.g. minority clan or IDP, which can be identified in small village/community settings.</p>		

GBV Service Providers in Somalia

SNHCP and SNLRP targeted locations

State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name and contact of focal person (email address and telephone)
Somaliland	W/Galbeed	Gabiley	Gabiley General Hospital	Clinical care, Referral	Gabiley	Dr. Deka Hassan Abdi, Tel: 0634466587
Somaliland	Awdal	Borama	Baahi-Koob Center, Borama Hospital	ONE STOP CENTER: Psychosocial Counselling, Clinical care, Referral	Borama	Faisa Abdi Hadi, Tel. 0634450934
Somaliland	Togdheer	Burao	Baahi-Koob Center, Burao Hospital	ONE STOP CENTER: Clinical Care, psychosocial counselling, Referral	Burao	Khadra Nouh, Tel. 0634321277
Somaliland	Sanaag	Ceel Afweyn, Cerigabo, Lasqoray	Agency for Peace and Development (APD)	21 MCH In Lasqoray dealing with GBV and Protection issues	Ceel Afweyn, Cerigabo, Lasqoray	Siyad Mohamed Abdi, Tel. 0711117773
Somaliland	W/Galbeed	Hargeisa	SOFHA Health Center	Psychosocial counselling, Referral	Hargeisa	Amal Ahmed Mohamed, Tel: 0634008320, Ahmed Dhagax
Somaliland	W/Galbeed	Hargeisa	WAAPO Center	Psychosocial counselling, Temporary shelter, Material assistance, Referral	Hargeisa	Abdalle Mo, Tel: 0633613609
Somaliland	W/Galbeed	Hargeisa	CCBRS Office, Sha'ab area	Psychosocial counselling, Temporary shelter, Material assistance, Referral	Hargeisa	Saxardiid Mohamed, Tel: 0634404023
Somaliland	W/Galbeed	Hargeisa	SWLA	Psychosocial counselling, Legal support, Referral	Hargeisa	Fatuma Muse, Tel 0634432133
Somaliland	Sanaag	Ceel Afweyn, Cerigabo, Lasqoray	NAGAAD	Legal Service: Trained paralegals will guide GBV victims to seek justice.	Ceel Afweyn, Cerigabo, Lasqoray	Mustafe Ahmed Hassan, Mustafeh2@gmail.com. Tel +252634424873
Somaliland	Sool	Caynabo, Laascanod, Taleex, Xudun	NAGAAD	Legal Service: Trained paralegals will guide GBV victims to seek justice.	Caynabo, Laascanod, Taleex, Xudun	
State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name and contact of focal person (email address and telephone)

Puntland	Mudug	Galkayo	CESVI	Medical, psychosocial support and provision of dignity kits for GBV survivors.	Docol, Bandiradley, Wargalo and Galkayo IDPs (Alanley, Arafat and Hiran)	Habiba Abass Maalim Galinsor, habib.cesvi@gmail.com. Tel. 616662936
Puntland	Mudug	Galkayo	SBACO	Transportation, Case referral & emergency grant fund	Galkayo	Mahamed Abdi 0907712682
Puntland	Mudug	Galkayo	TASS	Transportation, Case referral & emergency grant fund	Galkayo	Jamaludin Cawke 0907790098
Puntland	Mudug	Galkayo	Hope foundation	Transportation, Case referral & emergency grant fund	Galkayo	Mohamed Farah Olad 0907751123
Puntland	Mudug	Galkayo	SORDA	Transportation, Case referral & emergency grant fund	Galkayo	Mohamed Mohamoud Ereg 0907611612
Puntland	Mudug	Galkayo	Mudug Regional Hospital	PEP, STI Antibiotics, Emergency Contraception, HIV Testing and Counselling	Galkayo	Dr. Mohamed Hussein 0907795651
Puntland	Mudug	Galkayo	IRC/ South Galkayo Hospital,	PEP, STI Antibiotics, Emergency Contraception, HIV Testing and Counselling.	Galkayo	Abdikadir
Puntland	Mudug	Galkayo	GMC	PEP, STI Antibiotics, Emergency Contraception, HIV Testing and Counselling	Galkayo	Dr. Abdulqadir Dhagade 090779009
Puntland	Mudug	Galkayo	CESVI	Medical (South Galkayo Health posts	Galkayo	Habiba Abass Malin- 0906181775
Puntland	Mudug	Galkayo	VCT Center MRH/Merlin	HIV service /screening /ART	North Galkayo	Dr Mohamed Hussein 0907795651
Puntland	Mudug	Galkayo	GMC	HIV service /screening /ART	North Galkayo	Dr. Abdulqadir Dhagade 090779009
Puntland	Mudug	Galkayo	GECPD	Child Friendly Spaces	Halaboqad and Buula Ba'aley	Zamzam Abshir 0907705368, Abdulkhani Hassan 0907755346
Puntland	Mudug	Galkayo	GECPD	Psychosocial support including counselling, subsistence support	Galkayo	Mama Hawa Aden 0907795111
Puntland	Mudug	Galkayo	CESVI	Psychosocial support	Galkayo South	Habiba Abass malin- 0906181775
Puntland	Mudug	Galkayo	IRC/MPHDO	Psychosocial support including counselling,	Galkayo South	Ahmed Yusuf Hussein 0907307307396
Puntland	Mudug	Galkayo	PMWDO	Psychosocial support including counselling,	Galkayo	Dr Maymun Farah Samatar 0907795960
Puntland	Mudug	Galkayo	DRC	GBV support kit	Galkayo	Mohamoud Abdirahman 0907793948
Puntland	Mudug	Galkayo	Galkayo Main Police station	Security assistance	North Galkayo	Zakariye Mohamed 090775669
Puntland	Mudug	Galkayo	Warshad Galey Police Station	Security assistance	North Galkayo	Hassan Kaafi 0907750174

Puntland	Mudug	Galkayo	Tawakal Police Station	Security assistance	Tawakal IDP Camp	Qalinle 0907757387
Puntland	Mudug	Galkayo	Police Station	Security assistance	Galkayo South	Mohamed Ilmi Gulafe, 0907707555,
Puntland	Mudug	Galkayo	Alanley Police station (Eastern Police Station)	Security assistance	Galkayo South	Mohamed Ilmi Gulafe, 0907707555
Puntland	Mudug	Galkayo	Puntland Legal Aid Centre	Legal Aid Services	North Galkayo	Mubarak Abdi Ali 0907708463
Puntland	Nugaal	Garowe	UNDP, PL Police Force (Community Policing Unit)	Community policing female volunteers to bridge the gap in the process of reporting and following up on SGBV cases	Garowe	Gladys Mpere, mpere@un.org
Puntland	Nugaal, Mudug, Bari, Karkaar	Garowe, Galkayo, Bosasso, Gardo	Puntland Legal Aid Center (PLAC), Puntland State University (PSU)	Provision of legal aid services using legal aid lawyers, paralegals and interns. Mediation services are also provided by paralegals.	Garowe, Galkayo, Bosasso, Gardo	Hawo Omar, hawo.mahmoud@undp.org,
Puntland	Bari	Bosasso	Care International	Administration of PEP: Examination, Referral, Treatment of physical injuries, transport to hospital	Bosasso	Dr. Sundus Mohamed, Tel. 090-7728349
Puntland	Bari	Bosasso	Care International	Counselling, case management/emotional support, transportation	Bosasso	Fadumo Ahmed, Tel. 090-7080404
State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name and contact of focal person (email address and telephone)
Galmudug	Galgaduud	Dhusamareeb	Swiss- Karmo / IRC	PEP, HIV test, ECP, Pregnancy test, STI treatment, Tetanus vaccination, Wound treatment	Dhusamareeb	Dr. Abdirahman Beerey, Tel. +252 619999988. Sumaya Abdirazak Tel. +252 616395494, Ibrahim Mohamed Abdullahi +252 619809161
Galmudug	Galgaduud	Dhusamareeb	SWACEDA	Counselling	Dhusamareeb	Abdirahman Ali Abdi, Tel. +252 615233940
Galmudug	Galgaduud	Dhusamareeb	SWC	Counselling	Dhusamareeb	Abdi Hoshi Adan, Tel. +252 615600033
Galmudug	Galgaduud	Dhusamareeb	District Police	Arrests of perpetrators	Dhusamareeb	Hassan Mohamed Abdi, Tel. +252 617141472, Fardowsa Abdi

Galmudug	Galgaduud	Dhusamareeb	IRC	Medical support for GBV survivors including provision of PEP treatment to rape survivors. Case management and Psychosocial support to GBV survivors	Dhusamareeb	Ibrahim, GBV/Protection Manager +2520612621770
Galmudug	Galgaduud	Dhusamareeb	SWACEDA	Provision of dignity kits, psychosocial support and sensitization program, provide hotline services, safe house for survivors, follow up and referral.	Dhusamareeb	Abdirahman Ali Abdi +2520615233940
Galmudug	Galgaduud	Dhusamareeb	Swiss-Kalmo	Provide medical services.	Dhusamareeb	Berrey Omar +2520619144466
Galmudug	Galgaduud	Dhusamareeb	SRCS	Provide health care services	Dhusamareeb	Abdulkadir Jimaale, +252 61 5275823
Galmudug	Galgaduud	Dhusamareeb	Dhusamareeb Police	Arrests of perpetrators	Dhusamareeb	Hassan Mohamed Ali, +252 61 7141472
Galmudug	Galgaduud	Dhusamareeb	Dhusamareeb district court	Hearing cases, Refer to Heer Berg (traditional court	Dhusamareeb	Ali Warsame Farah +252616345423

State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name and contact of focal person (email address and telephone)
Hirshabelle	Hiraan	Beletweyne	HIWDO Family Care (Hiiran Women Development Organization)	Medical assistance	Haweyo	Dahir Dhi'isow Tel. 0615109151; E-mail: hwdfamilycare@gmail.com
Hirshabelle	Hiraan	Beletweyne	Salama Hospital	Medical assistance	Beletweyne	Awale Abdi Farah, Tel. 0616666605; E-mail cawaale500@gmail.com
Hirshabelle	Hiraan	Beletweyne	Rajo Relief and Development Organization	Medical assistance	Beletweyne	Farah Hassan Mohamed Tel. 0615536247 E-mail: rrdo99@gmail.com
Hirshabelle	Hiraan	Beletweyne	Doyale Relief and Development Organization	Medical assistance	Beletweyne	Mohamed Abukar, Tel. 0615597789, E-mail: Doyaley@yahoo.com Ahmed Dhubow Abdi, Tel. 0615571506, Email: Doyaley@yahoo.com
Hirshabelle	Hiraan	Beletweyne	HIWA (Humanitarian Integrity for Women Action)	Medical assistance	Beletweyne	Aliya Adan Abdi, Tel. 0615209999 E-mail: Hiwa.Hiran@gmail.com
Hirshabelle	Hiraan	Beletweyne	WARDI	Medical assistance	Beletweyne	GBV/CP Head of the officer Hussein Abdi Issak, Tel. 0615501688, E-mail: wardi.hiran@hotmail.com; wardiorg@yahoo.com

Hirshabelle	Middle Shabelle	Balcad	SHARDO	Provision of dignity kits	Balcad health centre	Hassan Shariff, Tel. +252615563994
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State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name and contact of focal person (email address and telephone)
South West	Gedo	Bardera	SORDES	Psychosocial Support	Bardera	Farhan Hassan Mohamed. Tel. 0616384444
South West	Gedo	Garbaharay	SORDES	Psychosocial Support	Garbaharay	Mahad Qassim Olad Tel. 0615818272
South West	Bakool	Wajid, Xudur, Tayeglow	DREDO	Psychosocial support, medical referrals and GBV services	Wajid, Xudur, Tayeglow	Dahir Mayow Muktar, Tel 0615010005
South West	Bakool	Wajid, Xudur, Tayeglow	SCWRD	Psychosocial support, medical referrals and GBV services	Wajid, Xudur, Tayeglow	Adan Ali Tel 0615928661

State	Region	District	Organization	Services Available	Village, town or IDP Settlements	Name and contact of focal person (email address and telephone)
Jubaland	Lower Juba	Kismayo	ARC	Provision of PEP treatment to rape survivors. Case management and Psychosocial support, provision of dignity kits and follow-up and referral.	Kismayo	Fatima Ahmed Ali: +252619840899 Shair Ibrahim, GBV/Protection Manager: +252619840865
Jubbaland	Lower Juba	Kismayo	SEDHURO	Medical support, Provision of dignity kits and psychosocial support. IDTR for children and a day care. Support foster mothering for un-accompanied minors. Legal Aid Assistance for GBV Survivors.	Kismayo	Hassan Abdi Ali, GBV Focal Point/ Protection Officer
Jubbaland	Lower Juba	Kismayo	SWACEDA	Medical support to GBV cases, psychosocial support	Fanoole Village	Abdirahman, Tel. 061683796
Jubbaland	Lower Juba	Kismayo	SRCS	Medical response including provision of PEP kits to Rape survivors.	Kismayo	Hassan Weheliye, Tel. 0615836501
Jubbaland	Lower Juba	Kismayo	CEDA	Psychosocial first aid for child rape survivors .	Kismayo	Mohamed.Qadar +252617439441
Jubbaland	Lower Juba	Kismayo	Motherland Somalia	Legal assistance and advocacy	Kismayo	Abubakar Mohamed Tel. 0616513311

Jubbaland	Lower Juba	Kismayo	WRR	Counselling to GBV survivors, provision of medical treatment and dignity kits to the survivor.	Kismayo	Dekow Yussuf Maalim Tel. 0615924990
Jubbaland	Lower Juba	Hagar	SORDES	Medical assistance at MCH/OPD	Hagar	Omar Dagalyahan, Tel. 0615356478
Jubbaland	Lower Juba	Kismayo	Ministry of Health	Medical assistance	Kismayo General Hospital	Hussein Kassim Maalim, Tel. 0615877836, Email: husseinkassimali@gmail.com
Jubbaland	Lower Juba	Kismayo	ICRC	Medical assistance	Kismayo General Hospital	Dr. Abdulqani Mohamed Mohamud, Tel. 0617495262
Jubbaland	Lower Juba	Kismayo	SRC	Medical assistance	Kismayo	Dr. Hassan Wehliye, Tel. 0615836501
Jubbaland	Lower Juba	Kismayo	ARC	Medical assistance	Kismayo	Nurse, Hamdi Hassan, Tel. 0619840899/618908882
Jubbaland	Lower Juba	Kismayo	ARC	Medical assistance	Kismayo	ARC Bula Abliko, Nurse, Shukri Sulub, Tel. 0619840899/616683470
Jubbaland	Lower Juba	Kismayo	SWACEDA	Medical assistance	Kismayo	Abdirahman Mohamed Guraa, e-mail: swaceda.org@gmail.com/ sirmed6@gmail.com, Tel. 0612566528
Jubbaland	Lower Juba	Kismayo	SEDHURO	Medical assistance	Kismayo	Ali Abshir, Email- a.abshir@sedhuro.org, Tel. 0616524559
Jubbaland	Lower Juba	Kismayo	WRRS	Medical assistance	Dalhiska MCH	Abdisamad Mohamed Abdille, Medical Doctor, Tel. 0615250816
Jubbaland	Lower Juba	Kismayo	ARC	Psychosocial support	Kismayo	Psychosocial Counsellor, Fatima Ahmed, E-mail: FatimaAA@arcrelief.org, Tel. 0619840899
Jubbaland	Lower Juba	Kismayo	SEDHURO	Psychosocial support	Kismayo	Ali Abshir, Email: a.abshir@seduro.org, Tel. 0616524559
Jubbaland	Lower Juba	Kismayo	CEDA	Psychosocial support	Kismayo	Mohamed Qadar, Email- qadar12311@gmail.com, Tel. 0617439441
Jubbaland	Lower Juba	Kismayo	SWACEDA	Psychosocial support	Kismayo	Abdirahman Mohamed Guraa, Email: swaceda.org@gmail.com/ sirmed6@gmail.com, Tel. 0617787039
Jubbaland	Lower Juba	Kismayo	WRRS	Psychosocial support	Kismayo	Nuney Dekow Kalba, E-mail: wrrskismayo@gmail.com, Tel. 0612665787

Annex – 3 Safe Distribution Programme Checklist

Action points	Who is responsible	Benchmark	Q1	Q2	Q3	Q4
Cash distribution						
Principles of Safe Cash Distribution shared with CPs	WFP	WFP/ CPs trained				
Safe Distribution Model developed & disseminated	WFP	WFP/ CPs trained				
Security Planning & evacuation advice shared	WFP	All CPs informed				
Ideal Model for commodity distribution developed and communicated	WFP	All WFP/ CPs informed				
Generic Security Measures in place	WFP	All WFP/ CPs informed				
Pre-Distribution Security measures in place	WFP	All WFP/ CPs informed				
Post-Distribution monitoring measures.	WFP	All WFP/ CPs informed				
Training on Security	WFP/ CP	All relevant WFP/ CPs trained				
Coordination with the Host Government.	WFP/ CP	Key stakeholders informed and aware				

Annex 4: Partner Processes and Flow Chart

Activities	No of days
1.NGO profiling, due diligence checks and capacity assessment for new partners or those returning after 2 years	2 weeks before project commences
2) Call for proposals shared with Area Offices (AOs) by Head of Programmes/Tech units and the AOs disseminating to the call for proposals to their potential CPs	1-2 days
3) Proposals to be received by AOs	Within 10 days
4) initial review and comparative analysis of the proposals by the AOs in collaboration with the relevant technical teams.	Within five (5) days
5) Review and clearance of the proposals by technical team; submission for Cooperating Partner Committee (CPC) review	Within five (5) days
6) Receipt of proposals by Partnership Unit and CPC scheduling	2 working days
7) CPC review	Within three (3) days after receipt by Partnership unit
8) FLA preparation/ signatures/Partner Accounts creation in COMET <ul style="list-style-type: none"> • If approved by CPC with no comments • If not approved by CPC as it requires amendments/corrective measure by the AO and CP: 	Five (5) days 10 (5 days for AOs to address comments; 5 days for FLA preparation and signatures)
9) CP signing FLAs and sending back to WFP	Five (5) days
10.CP performance evaluation	2 months before the end of the Field Level Agreement (FLA)

Annex 5: Social Incidence Reporting – WFP Somalia

Incidence classification

- **Indicative:** Small or contained incident which is handled by A) /FO. Example: delay of cash distribution timing.
- **Serious:** Ineligible beneficiary who is not affected by Locust.
- **Severe:** Attempt by staff to seek kickback

Guidance and Proportional response

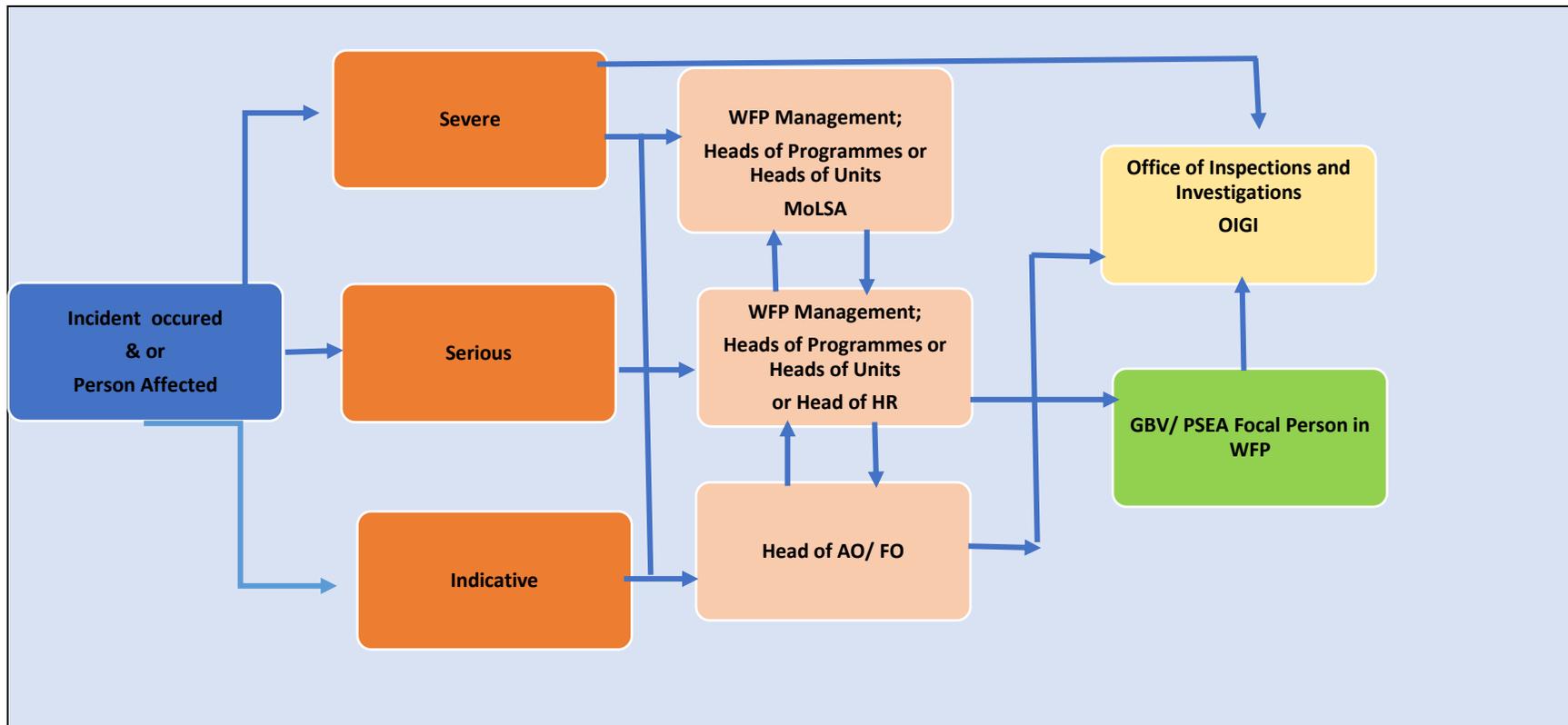
- **Indicative:** Dealt by the AO/ FO. Reported in the WFP
- **Serious:** Dealt in coordination between FO, AO and CO with Heads of departments.
- **Severe:** Reported to Senior management and dealt in coordination between FO, AO and CO with Heads of relevant departments. Immediate reporting required.

Classification of Responsibilities

- **Indicative:** Once appropriately classified, action is taken by WFP or partner as appropriate
- **Serious:** WFP and mngement
- **Severe:** WFP, Management and MoLSA

Templates

- **Indicative:** Dealt by the AO/ FO. Reported on a weekly basis to respective departments
- **Serious:** Immediate report by email to supervisor - Incidence, time, persons involved, measures suggested or taken.
- **Severe:** Incidence Report - Incidence described in detail, time period of occurrence, persons involved, mitigation measures in place, timeliness of report, Management action- if needed.



SMP risks	Description	Method used	Timetable: Location and dates	Target stakeholders	Responsibility	Tentative budget
Exclusion	The security issues and exclusion in effective stakeholder engagement and community participation can be very challenging. The project must ensure it reaches vulnerable community members.	Objective targeting; Clan dynamics and equity across geographical areas; Community Inclusive Targeting; Complaints and Feedback mechanism;	June – July 2020	Communities, community leaders, CPs, District officials	MoLSA through WFP	Security aspects will be taken care in the implementation of the project. Additional budget requested for Community consultations. Budget breakdown presented below. Total USD. 220,000
Selection	Gender and other cultural dynamics will need to be managed to ensure transferred cash is not captured by unintended beneficiaries.	Information technology solution SCOPE; Hybrid approach	June – July 2020; Monitoring through the project cycle till completion	Communities, community leaders, CPs, District officials	MoLSA through WFP	Covered in the original budget
Elite or Clan capture of project	There is a risk that local community dynamics may result in attempts to capture the benefits of the project for a particular group.	Community consultation, Objective selection criteria; wide stakeholder consultations; Information technology solution SCOPE; Monitoring systems	Monitoring through the project cycle till completion	Communities, community leaders, CPs, District officials	MoLSA through WFP	Covered in the original budget
Remoteness	The cash transfer methodology to be implemented in rural areas of Somalia, cognizant of the cultural differences between rural areas creates a	‘On the ground’ organizational presence; Working through partners;	Monitoring through the project cycle till completion	WFP & CPs	MoLSA through WFP	Covered in the original budget. All monitoring and Incidence reporting are

	different set of challenges which if not managed could complicate project implementation.					taken into consideration in the original budget.
SMP risks	Description	Method used	Timetable: Location and dates	Target stakeholders	Responsibility	
Systemic Weakness	The borrower capacity for preventing adverse social impacts on the project is limited, as is the borrower's capacity for redressing the impacts of social harm where it has occurred.	Security of Payment modality; Financial due diligence procedures; Scope and Data protection policy of WFP;	Payment modality followed. Vetting and due diligence checks in place. Monitoring through the project cycle till completion	WFP & CPs	MoLSA through WFP	Covered in the original budget.
Difficulty monitoring	Security concerns and the remoteness of the project target areas combine to provide a significant challenge for monitoring and supervising project implementation. This can include challenges for community and stakeholder engagement, grievance redress and other risk mitigation protocols.	Multi layered monitoring system: Direct WFP monitoring Third Party monitoring CP monitoring	Through the project cycle.	WFP & CPs	MoLSA through WFP	Covered in the original budget
Inward migration	People from neighboring districts will seek to migrate to the project areas to benefit from the project. This runs the risk of upsetting the clan balance in remote regions and exacerbating social and	One-time enrolment; Small transfer amount to beneficiaries.	Through the project cycle.	WFP & CPs	MoLSA through WFP	No additional budget required.

	environmental fragility through associated population.					
Gender Based Violence	There is the possibility of increased risk of gender-based violence and abuse of women and children in situations of poverty, hunger, conflict, insecurity and displacement. Women's lack of access to and control of assets, services and income increases their economic dependence as well as their vulnerabilities to abusive and exploitative situations. Food or cash assistance may also unintentionally contribute to GBV. Special safeguards need to be put in place to ensure that these risks are averted and or mitigated and redressal mechanisms put in place.	GBV plan: Sharing GBV policies and redress system to communities; Ensuring CP abide by WFP policies; Sensitization of government counterparts and CPs with GBV; Expansion of GBV services, reporting and awareness raising; Safety, access and security of cash transfers; Communication to beneficiaries throughout the project cycle. Well established GBV referral system	Community meeting, trainings, communication outreach- 1 st quarter of the project. Continuous monitoring and follow up.	WFP, CPs, GBV service providers and targeted communities.	MoLSA through WFP	Additional budget requested for GBV. Budget breakdown presented below. Total USD 289,600

Additional budget request for SMP

GBV Prevention and Mitigation Activities	Qty	Unit Cost (USD)	Total cost (USD)
Agreements with at least 2 preferred service providers in each SNLRP location (Awareness raising, service provision and reporting) \$ 250 per month per district x 2 service providers for 6 months	43	3,000	129,000
Communication materials and events (SMS bulk messaging, posters, banners, awareness raising events, radio program)	1	146,810	146,810
Sub-total			275,810
Contingency	5%		13,790
Grand total			289,600

Community Consultations	Qty	Unit Cost (USD)	Total cost (USD)
Additional sessions of consultations with communities, during the initial (verification, validation & implementation) phase of the project as per CC plan. (Additional districts / Horizontal expansion)	29	5,000	145,000
Hold consultation with communities / key decision makers planning the exit or hand over or extension of project during the final months of the project. (Additional districts / Horizontal expansion)	29	5,000	145,000
Sub-total			290,000
Contingency	NA		-
Grand total			290,000

Total budget for SMP

\$ 579,600