



State of Palestine
Ministry of Social Development

The Second Social Protection Enhancement Project
(SPEP II, P5072)

Social Impact Assessment and Social Management Plan

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Acronyms

CBO	Community-Based Organization
CERC	Contingent Emergency Response Component
CMS	Case Management System
CSO	Civil Society Organization
CWG	Cash Working Group
DG	Director General
ESF	Environmental and Social Framework
EU	European Union
FCV	Fragility, Conflict, and Vulnerability
FHH(s)	Female-Headed Household(s)
FSP	Financial Services Provider
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GM	Grievance Management
GRM	Grievance Redress Mechanisms
HR	Human Resources
IDP(s)	Internally Displaced Person(s)
IT	Information Technology
M&E	Monitoring and Evaluation
MoE	Ministry of Education
MoF	Ministry of Finance
MoH	Ministry of Health
MoI	Ministry of Interior
MoPIC	Ministry of Planning and International Cooperation
MoSD	Ministry of Social Development
MoWA	Ministry of Women Affairs
MPCA	<i>Multipurpose Cash Assistance</i>
NCTP	National Cash Transfer Program
NGO	Non-Governmental Organization
PA	Palestinian Authority
PAD	Project Appraisal Document
PCBS	Palestinian Central Bureau of Statistics
PMU	Project Management Unit
PNEEI	Palestinian National Economic Empowerment Institution
POM	Project Operations Manual
PPE	Personal Protection Equipment
PwD	Persons with Disability
SDS	Social Development Specialist

SEA/SH	Sexual Exploitation and Abuse/Harassment
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SMP	Social Management Plan
SOP	Standard Operating Procedures
SPEP II	Second Social Protection Enhancement Project
SR	Social Registry
SRM-WG	Social Risk Management Working Group
TPM	Third-Party Monitoring
UN	United Nations
UNFPA	United Nations Population Fund
UNICEF	United Nations Children Fund
UNRWA	United Nations Relief and Works Agency
WFP	World Food Programme
WGM	Workers' Grievance Mechanism

1. Introduction and Purpose

The Second Social Protection Enhancement Project (SPEP II, P5072) is a World Bank–financed operation implemented by the Ministry of Social Development (MoSD) in the West Bank. It aims to strengthen the provision of **integrated social services to poor and vulnerable households** and to enhance the **adaptive capacity of the Palestinian social protection system**, particularly through the Social Registry (SR) and the Case Management System (CMS). SPEP II **design focuses on social services and systems strengthening only**, with no direct project financing for the National Cash Transfer Program (NCTP).

The project unfolds in a context of acute fragility, conflict, and economic crisis. Prolonged fiscal stress on the Palestinian Authority (PA), recurrent conflict episodes, restrictions on movement and access, and rising poverty have stretched public institutions and household coping capacities to their limits. Within this environment, SPEP II is intended both as an immediate response to worsening vulnerability—by improving access to social services—and as a longer-term investment in institutional resilience, particularly through robust social information systems and coordinated case management.

Subsequent to discussions between The Bank and MoSAD around the design of the project, MoSD has proposed to **activate the Contingent Emergency Response Component (CERC)** under SPEP II. The CERC concept note sets out a plan to channel **time-bound, emergency multipurpose cash assistance** to internally displaced persons (IDPs) and highly vulnerable households in specific West Bank locations (notably Jenin, Tulkarem, Nablus and their camps, as well as selected communities in Masafer Yatta and the Jordan Valley). This emergency cash would be implemented through a **UN agency (e.g. UNICEF or WFP)** using digital transfer modalities and their own humanitarian cash-assistance systems, while MoSD retains a central role in targeting, verification, and oversight.

In practice, therefore, SPEP II now has **two closely related but distinct operational layers**:

1. A **core project layer**, which focuses on:
 - Expanding and strengthening the **social services package** delivered through MoSD and NGO partners, and
 - Enhancing the **SR and CMS** as the backbone of an adaptive social protection system in the West Bank.
2. A **contingent emergency layer**, activated through the **CERC**, which would—one approved and activated—finance **short-term emergency cash assistance** to conflict-affected and highly vulnerable households via a UN partner, while drawing on MoSD’s systems for targeting and verification.

This Social Impact Assessment (SIA) is prepared under the World Bank’s **Environmental and Social Framework (ESF)**, with a primary focus on **ESS1 (Assessment and Management of Environmental and Social Risks and Impacts)**. It also reflects the requirements of **ESS2 (Labor and Working Conditions)**, **ESS4 (Community Health and Safety, including SEA/SH risks)**, and **ESS10 (Stakeholder Engagement and Information Disclosure)**. The SIA is closely aligned with the project’s **Stakeholder Engagement Plan (SEP)** and is intended to be a **living document**,

capable of accommodating adjustments to project design (including CERC activation) as they are formally agreed between MoSD, the Ministry of Planning and International Cooperation (MoPIC), and the World Bank.

The purpose of this SIA is threefold:

1. **To contextualize the project within Palestine’s current social, political, and institutional landscape**, including the FCV context, evolving institutional arrangements for social protection (notably the shift of NCTP administration to the Palestinian National Economic Empowerment Institution (PNEEI)), and the specific vulnerabilities of poor, displaced, and marginalized households in the West Bank.
2. **To identify, analyze, and assess social risks and impacts associated with both the core SPEP II design and the proposed CERC activation**, with particular attention to:
 - Access and inclusion/exclusion in social services and emergency assistance,
 - Targeting, verification, and perceptions of fairness,
 - Worker protections and labor conditions for MoSD staff, temporary social workers, and NGO personnel,
 - Risks of gender-based violence (GBV), sexual exploitation and abuse/harassment (SEA/SH),
 - Data protection and confidentiality in SR, CMS, and digital payment systems, and
 - Implications for social cohesion and trust in public institutions.
3. **To propose mitigation and enhancement measures, and to translate them into a realistic implementation, budgeting, and monitoring framework**, so that the project’s benefits are maximized and its risks are managed in line with ESF requirements and national priorities. These measures will distinguish, where relevant, between:
 - Risks intrinsic to the **core service- and systems-focused project design**, and
 - Risks specifically associated with the **CERC-financed emergency cash operation**, recognizing that the latter relies heavily on UN agency procedures while still engaging MoSD systems and frontline workers.

Ultimately, the SIA a compliance instrument and a strategic management tool. It is intended to help MoSD and its partners **navigate a rapidly evolving context**, ensure that SPEP II’s (including the CERC) activation are socially sound, and strengthen the legitimacy and responsiveness of social protection institutions at a moment of profound crisis and uncertainty.

2. Methodology

The methodology for this SIA combines structured document review, qualitative field-based inquiry, and iterative analysis against the World Bank’s ESF. The starting point for the analysis was a comprehensive review of project documentation. This included the original SPEP II Project Appraisal Document (PAD), the revised PAD of March 2025, and the SEP prepared in January 2025. These documents provided the core understanding of the project’s development objective, components, activities, institutional arrangements, and stakeholder engagement commitments. The review focused on identifying changes in scope and emphasis between the original and revised PADs—most notably the removal of direct financing for NCTP cash transfers, the explicit

limitation of core project activities to the West Bank, and the continued focus on strengthening the SR and CMS.

Once the revised PAD was obtained, the SIA was reoriented to ensure that all analysis reflected the current design. Particular attention was paid to the articulation of Component 1 around social services delivered through MoSD and NGO partners, the systems-strengthening activities under Component 2, and the institutional narrative regarding the transfer of NCTP administration to PNEEI. Where earlier drafts of the SIA referred to NCTP support, these were revisited, and the risk analysis was reframed around the actual project-financed activities and their interfaces with broader social protection instruments that fall outside the project's direct scope.

In parallel, the SIA incorporated the MoSD's concept note for activation of the CERC, which proposes the use of SPEP II resources to finance time-bound emergency multipurpose cash assistance for IDPs and highly vulnerable households in specific West Bank locations. The concept note was reviewed in detail to understand its objective, targeting criteria, implementation arrangements through a UN agency, digital payment modality, and the verification and monitoring mechanisms envisaged. This allowed the SIA to differentiate clearly between risks and impacts associated with the core, services-focused design and those arising specifically from the proposed CERC-financed cash operation, while recognizing that both layers rely on the same institutional ecosystem and many of the same frontline actors.

Document review was complemented by qualitative inquiry, drawing on in-depth interviews with 22 key stakeholders. These included senior and mid-level MoSD staff at central (6) and directorate levels (2), MoSD case managers and social workers (3), representatives of NGO service providers (4), local government officials in selected West Bank municipalities (3), and development partners engaged in social protection and humanitarian response (4). Interviews explored perceptions of existing social protection instruments, operational bottlenecks in SR and CMS, experiences with targeting and verification, views on the quality and relevance of services, worker conditions and burnout, and concerns regarding grievance redress and accountability. Particular effort was made to elicit reflections on gender dynamics—such as women's control over resources, mobility constraints, and exposure to gender-based violence—as well as the specific vulnerabilities of persons with disabilities, the elderly, and youth.

In addition to institutional stakeholders, the SIA draws on qualitative insights from affected and at-risk groups themselves. In-depth interviews were conducted with a purposive selection of beneficiary and non-beneficiary households, including female-headed households, households with members with disabilities, elderly caregivers, unemployed youth, and residents of communities that have experienced displacement or repeated shocks. These interviews focused on lived experiences of accessing (or failing to access) social services, perceptions of fairness in targeting, barriers related to digital payments and bureaucratic procedures, and expectations and worries related to emergency assistance. For the purposes of confidentiality and safety, all individual testimonies are anonymized in the SIA, and no personally identifiable information is reported.

Analytically, the SIA is grounded in the ESF, with ESS1 providing the overarching framework for identifying and assessing risks and impacts, and ESS2, ESS4, and ESS10 guiding the specific lines

of inquiry. ESS2 informed the examination of labor and working conditions of MoSD staff, temporary social workers, and NGO personnel, including recruitment fairness, workload, job security, psychosocial strain, and exposure to harassment. ESS4 shaped the analysis of community health and safety, particularly risks of GBV, and SEA/SH, and data privacy concerns emerging from the use of digital systems and home visits. ESS10 framed the assessment of stakeholder engagement, information disclosure, grievance mechanisms, and perceptions of accountability. Throughout, a gender lens and an inclusion lens were applied systematically, asking in each area how risks and benefits might differ for women and men, youth and older persons, people with and without disabilities, and those living in more or less accessible locations.

There are, inevitably, methodological limitations. Access constraints and security conditions limit the ability to conduct direct fieldwork in some locations, particularly areas affected by recent violence or displacement, and the SIA relies in part on secondary reporting from humanitarian actors in these areas. Data on certain vulnerable groups, especially persons with disabilities and GBV survivors, remain incomplete, reflecting broader system constraints. Finally, the evolving nature of the project design means that some assumptions may need to be revisited once MoSD's requested changes to the project are formally agreed with the World Bank. These limitations are acknowledged explicitly, and the SIA should be read as a best-effort, evidence-based assessment at this point in time, to be refined and deepened as additional information becomes available.

3. Social Context

The social context in which SPEP II operates is shaped by overlapping crises, chronic institutional fragility, territorial fragmentation, and deepening vulnerability among households across the West Bank. These structural and acute pressures combine to influence who is poor and vulnerable, how people access public services, how shocks reverberate through households and communities, and what risks arise during project implementation. Understanding this context is essential for anticipating social risks in both the **core service-delivery and systems-strengthening components** of SPEP II and the **proposed CERC-financed emergency cash assistance**.

Socioeconomic Context: World Bank Evidence on Poverty, Growth, and Fragility

The **Palestinian economy** has undergone *unprecedented contraction and social hardship* in the context of protracted conflict, fiscal distress, and restricted movement — trends that frame the environment in which SPEP II is being implemented. According to the World Bank's most recent poverty and economic assessments:

- **Real GDP has sharply declined** across the Palestinian territories due to ongoing hostilities and restrictions. For example, in the first half of 2024, real GDP in the West Bank fell by an estimated **23 percent** year-on-year, while Gaza's output collapsed by **86 percent** in the same period; for the territories overall, real GDP is estimated to have declined by roughly **26 percent in 2024** relative to the previous year.¹

¹ World Bank. *Impacts of the Conflict in the Middle East on the Palestinian Economy – December 2024 Update*. Washington, DC: World Bank, December 2024.

• **Poverty rates have risen**, with total poverty in the Palestinian territories at approximately **29 percent** as of late 2025.² There are stark regional disparities: World Bank analysis indicates poverty in **Gaza near 64 percent**, compared with **about 12 percent in the West Bank**.³

• **Unemployment is elevated and rising**, particularly among youth and in the context of shrinking labor opportunities; recent estimates indicate unemployment near **29 percent in the West Bank** and even higher in Gaza.⁴

Overall, the Palestinian economy is classified as *severely constrained and fragile*, with these poverty and growth outcomes reflecting the compounding impact of conflict-related destruction, restricted access to employment (notably in Israel and Israeli settlements), and fiscal pressures on the Palestinian Authority.¹⁻⁴

These trends demonstrate the magnitude of socioeconomic challenges SPEP II seeks to address. The contraction of economic activity and rise in poverty and unemployment intensify vulnerabilities among households, increasing demand for social services and highlighting the importance of adaptive and resilient social protection systems. Enhanced targeting, service delivery, and institutional capacity remain priorities in light of these structural constraints.

3.1 Macroeconomic and Fiscal Pressures

The Palestinian economy has been subjected to prolonged stagnation, recurrent conflict, tight movement and access restrictions, and chronic fiscal volatility. Public revenues are unstable, and the PA frequently experiences liquidity crises, leading to **salary arrears**, delays in transfers, and reduced ability to sustain social protection programs. Budget constraints have severely limited the PA's capacity to finance the NCTP, compelling MoSD to rely heavily on donor funding for service delivery and administrative capacity. These fiscal pressures shape the operating environment for SPEP II in several ways:

- **Unpredictable financing** undermines service continuity and consistency, with NGOs and MoSD staff facing periodic disruptions.
- Growing demands for social assistance outpace available resources, intensifying **targeting pressures** and public frustration.
- Households accumulate debt, reduce food intake, and rely on negative coping strategies, which heightens their vulnerability and need for psychosocial and social services.

3.2 Social Vulnerability and Household Deprivations

Poverty in the West Bank is increasingly **multidimensional**, driven not only by low and unstable incomes but also by limited access to essential services, high dependency ratios, gendered labor-market exclusion, disabilities within the household, and exposure to violence. The integrated

² World Bank. *West Bank and Gaza – Poverty and Equity Brief*. Washington, DC: World Bank, October 2025

³ World Bank. "World Bank Issues New Update on the Palestinian Economy." Press Release, May 23, 2024. Washington, DC: World Bank

⁴ World Bank. *Economic Monitoring Report to the Ad Hoc Liaison Committee (AHLIC)*. Washington, DC: World Bank, late 2024/early 2025 edition (covering unemployment trends in the West Bank and Gaza).

nature of SPEP II is therefore well suited to addressing layered vulnerabilities. Several categories of households are particularly at risk:

- **Female-headed households**, many of whom face employment barriers, unequal access to assets, dependency on remittances, and heightened exposure to GBV.
- **Households with persons with disabilities**, who face structural barriers to education, employment, public services, and mobility, exacerbated by fragmented institutional support.
- **Elderly individuals and caregiving households**, often living on limited pensions or irregular assistance, with limited access to social or community-based support.
- **Youth**, particularly young men and women facing unemployment, underemployment, and social exclusion, with limited pathways to economic participation.
- **Households affected by violence or displacement**, which are increasingly common given recent military incursions and settlers' attacks in the West Bank.

For these households, access to quality social services—psychosocial support, disability services, GBV services, child protection, family counseling—is both an essential form of relief and a precondition for rebuilding resilience.

3.3 Conflict Dynamics and Internal Displacement

During 2023–2025, the northern West Bank—particularly **Jenin, Tulkarem, Nablus**, and surrounding camps—experienced intensified military incursions, arrests, infrastructure destruction, and movement restrictions. These operations resulted in **large-scale internal displacement**, with families forced to relocate repeatedly, often without access to adequate shelter, income, or services. Displacement has created several layers of vulnerability:

- IDPs are often **invisible** to standard social protection systems because displacement is sudden, unregistered, and highly fluid.
- Many IDPs lack documentation or proof of residence at the time of verification.
- Host communities and extended family networks are increasingly strained.
- Displacement often disrupts children's schooling and increases the risk of child labor.
- GBV risks rise significantly during displacement due to overcrowding, breakdown of protective networks, and economic stress.

The **CERC-concept note** reflects this reality. MoSD seeks to provide *unconditional multipurpose cash assistance (MPCA)* to approximately **8,071 IDP households** and an additional **150 highly vulnerable households** in areas such as Masafer Yatta and the Jordan Valley—areas characterized by exposure to settler violence, demolitions, forced displacement, and severe service restrictions.

The conditions of displacement also heighten social risks associated with SPEP II, particularly related to:

- exclusion or mis-targeting of displaced families,
- dependence on local committees and social workers to validate IDP status,
- SEA/SH risks in contexts of high vulnerability and power asymmetry, and

- digital barriers where displaced households lack SIM cards, phones, or financial accounts.

3.4 Fragmented Institutional Landscape

The Palestinian social protection system is institutionally fragmented. While MoSD is the lead ministry for social assistance and social services, other ministries (MoH, MoE, MoWA), UN agencies (UNRWA, UNICEF, UNFPA, WFP), and NGOs operate overlapping programs. In early 2025, the administration of the **NCTP was shifted to PNEEI**, while MoSD remained responsible for social services, case management, and the broader adaptive system. This fragmentation contributes to: **inconsistent targeting practices**, **parallel databases** that are not fully harmonized, overlapping mandates and **coordination bottlenecks**, uneven quality of services across governorates, and difficulties integrating humanitarian cash programming with national systems.

SPEP II’s emphasis on strengthening the **SR** and **CMS** directly responds to these gaps by centralizing data, standardizing case management, and creating a single entry point for identifying households’ needs and referring them to services.

3.5 Gender Inequalities and GBV Risks

Gender dynamics shape vulnerability and access to services in multiple ways. Women’s labor-force participation remains among the lowest globally; mobility constraints, care burdens, and gender norms limit women’s ability to access services, employment, and digital resources. GBV prevalence remains high, and demand for psychosocial and protection services continues to increase, especially in communities exposed to violence and displacement.

From a social risk perspective, women disproportionately face **digital exclusion**, including limited access to smartphones, internet, or mobile money accounts. Female-headed households often rely on informal social support and face greater risk of being excluded during crisis-response targeting. SEA/SH risks rise in interactions with frontline workers, especially during home visits or verification procedures. GBV services provided by NGOs are unevenly available across the West Bank, with significant gaps in rural and conservative communities. These dynamics make gender a cross-cutting risk domain that affects social services uptake and the safety and effectiveness of CERC-financed emergency assistance.

3.6 Digital and Financial Inclusion

Both the revised SPEP II design and the CERC concept note emphasize **digital-first delivery systems**—the CMS for service coordination, and digital payments (e-wallets/mobile money) for emergency cash. While digitalization brings efficiency and transparency, it also introduces barriers:

- Many poor households lack smartphones, valid SIM cards, or digital literacy.
- Elderly individuals often depend on intermediaries, raising risks of loss, coercion, or misappropriation.
- Women may not have sole access to or control over phones or digital wallets.

- Digital identity verification systems may not capture displaced individuals or those lacking updated documentation.

These constraints directly shape exclusion risks and must be reflected in the project’s risk mitigation and communication strategies.

3.7 Social Cohesion and Trust in Institutions

Public trust in institutions is fragile. Communities often perceive targeting of assistance as politicized or inequitable, particularly in contexts of displacement or intense socio-economic pressure. Localized tensions may arise between long-term poor households and newly displaced IDPs, beneficiaries of international humanitarian aid and those receiving government support, rural and urban areas receiving unequal service coverage, and youth cohorts who feel excluded from opportunities.

Perceptions of fairness, transparency, and accountability—particularly in emergency cash distribution under the CERC—are crucial to maintaining social cohesion. Grievance mechanisms, communication strategies, and participation processes must therefore be adapted to this context.

4. Stakeholder Analysis

The successful implementation of SPEP II—both in its revised core design focused on social services and systems strengthening, and in the proposed activation of the CERC for emergency multipurpose cash assistance—depends on a clear understanding of the diverse actors who influence, participate in, or are affected by the project. As discussed in the preceding section, stakeholders in the Palestinian social protection landscape operate within a highly constrained and rapidly changing environment marked by fiscal instability, fragmented institutional mandates, and escalating needs driven by conflict and displacement. These conditions shape not only the roles and interests of stakeholders, but also their exposure to social risks, their capacities to engage with project systems such as the SR and CMS, and their ability to claim or influence entitlements. This section therefore maps stakeholders comprehensively, identifying their responsibilities, expectations, influence, vulnerabilities, and relevance under the World Bank’s ESF. It also distinguishes between common stakeholders whose roles span the entirety of SPEP II, and those whose involvement becomes particularly significant under the CERC emergency cash component, thereby laying the foundation for the risk assessment and mitigation strategies presented in subsequent sections.

4.1 Common Stakeholders – Summary Table

To provide a clear and systematic understanding of the actors involved in SPEP II, the table below maps all core stakeholders across the revised PAD’s service-delivery and systems-strengthening components. It summarizes their roles, interests, levels of influence, and vulnerability to social risks, while also indicating the relevant ESF dimensions. This structured overview forms the foundation for the deeper narrative analysis that follows, including cross-cutting themes and the additional dynamics introduced by the proposed CERC activation.

Table 4.1 – Core Stakeholders, Roles, Interests, Influence and ESF Relevance

#	Stakeholder / Sub-group	Role in Main SPEP II (Core & Systems)	Interests / Expectations	Influence	Vulnerability / Risk Profile	ESF Relevance
1	Poor & vulnerable households in the WB (incl. FHHs, PwD households, elderly, GBV-affected)	Primary beneficiaries of MoSD/NGO social services via CMS referrals	Accessible, relevant, respectful services; fair inclusion in SR/CMS; confidentiality	Low individually; moderate collectively	High exposure to poverty, shocks, GBV, disability-related exclusion; risk of exclusion/inclusion errors; stigma	ESS1, ESS4, ESS10
2	Household members of direct beneficiaries (children, dependents)	Indirect beneficiaries of improved services to caregivers or family members	Improved care, stability, reduced negative coping (e.g. child labor, early marriage)	Very low	Vulnerable to intergenerational effects of poverty and violence; often invisible in targeting	ESS1, ESS4
3	MoSD leadership (Minister, DGs)	Owner of social services mandate, SR/CMS, and SPEP II; responsible for ESF compliance	Strengthened credibility, functioning systems, visible results; coordination with donors	High	Political accountability if performance is perceived as poor or biased	ESS1, ESS10
4	MoSD PMU (central + social dev., FM, procurement, M&E staff)	Day-to-day project management; ESF instruments (SIA, SEP, LMP, GM) implementation	Clear procedures, adequate staffing and budget, strong Bank support	High in project scope	High workload; reputational risk; pressure from multiple directions (ministry, Bank, beneficiaries, partners)	ESS1, ESS2, ESS10
5	MoSD directorates & local	Frontline case management,	Manageable caseloads; safety;	Medium (local)	Burnout, stress, security risks; SEA/SH	ESS2, ESS4

	offices (social workers, case managers)	home visits, CMS use, referrals; local implementation of SEP & GM	recognition; clarity on roles; supportive supervision		accusations if boundaries unclear; moral distress when unable to respond to needs	
6	NGO service providers (psychosocial, disability, GBV/CP, family counseling, etc.)	Deliver specialized services under Component 1 contracts; coordinate via CMS	Predictable contracts; professional autonomy; clear referral protocols; protection from undue pressure	Medium	Over-stretch; uneven service coverage; safety risks in volatile areas; exposure to distressing cases	ESS1, ESS2, ESS4
7	PNEEI (NCTP administrator)	Manages cash transfers outside SPEP II; interacts indirectly with MoSD's systems and beneficiaries	Clarity of roles with MoSD; harmonized targeting and messaging	Medium (policy level)	Confusion among households about who is responsible for what; reputational risk if NCTP falters	ESS1, ESS10 (indirect)
8	Ministry of Finance (MoF)	Provides fiscal oversight; data for verification (e.g. salary, public employment); budget context	Predictable use of funds; coherent social protection spending	High macro influence, medium on SPEP II	Fiscal crisis constraints; may be blamed when funding is insufficient	ESS1
9	Ministry of Interior (MoI)	Population registry data for SR/CMS and CERC verification	Data integrity; accurate registry use	Medium	Registry may not reflect displacement; risk of exclusion if data are outdated	ESS1, ESS4 (data)
10	PCBS & other data agencies	Provide poverty, demographic, and survey data to	Data used appropriately; recognition of their role	Medium	Limited if SPEP II under-uses available data	ESS1

		calibrate SR and targeting				
11	Municipalities & local governments	Support outreach, referrals, and coordination with local actors	Responsiveness to local demands; recognition as key actors	Medium local influence	Community pressure when needs are unmet; caught between citizens and central authorities	ESS10
12	Development partners (EU, other donors)	Co-fund or parallel fund SP and social services; influence policy dialogue	Coherence with their strategies; visibility; effective use of funds	High (financing leverage)	Risk of fragmentation or duplication if coordination is weak	ESS1, ESS10
13	Financial Service Providers & digital platforms (e-wallets, banks, agents)	Provide payment channels (core: limited; CERC: central to digital cash)	Reliable fee structures; risk-managed operations; high transaction volumes	Medium (technical gatekeepers)	Operational bottlenecks; reputational risk from fraud or exclusion; rural agent shortages	ESS1, ESS4 (access), data/privacy under ESS1/4
14	Community structures (CBOs, women's committees, informal leaders)	Intermediaries for information dissemination, referrals, sometimes advocacy	Recognition; ability to influence local outcomes; access to information	Medium at community level	Risk of elite capture, favoritism, or politicization; pressured by neighbors	ESS10, ESS4 (SEA/SH if power abused)
15	Children & youth (as a distinct group)	Indirect beneficiaries via improved household welfare; some may receive direct services	Safety, education continuity, opportunities; psychosocial support	Low	High vulnerability to shocks, violence, recruitment into negative coping strategies	ESS1, ESS4
16	GBV survivors & at-risk women/girls	Key service users for GBV/CP services; often invisible in	Confidential, survivor-centered services; safety from retaliation;	Very low	High SEA/SH risk; stigma; fear of disclosure; risk of harmful disclosure of data	ESS1, ESS4, ESS10

		public discourse	trust in institutions			
17	Persons with disabilities (PwDs) & caregivers	Service users for disability support; need accessible referrals and spaces	Accessible services; recognition of rights; tailored support	Low	High risk of exclusion from systems; physical, informational, digital, and attitudinal barriers	ESS1, ESS4, ESS10

These stakeholders constitute the “**common core**” for the project and any CERC activation, because even when cash is channeled through a UN agency, SR/CMS data, MoSD structures, and community actors are still involved.

4.2 Cross-Cutting Analysis of Common Stakeholders

Several structural patterns emerge across these stakeholders that are central to the SIA and to ESF risk management.

4.2.1 Power Asymmetries and Perceptions of Fairness

There is a clear hierarchy between **high-influence institutions** (MoSD leadership, PMU, MoF, UN agencies, donors), and **low-influence, high-vulnerability groups** (poor households, IDPs, FHHs, PwDs, GBV survivors). This creates a classic ESF risk: decisions about eligibility, referrals, and resource allocation are made by a small number of actors (namely, MoSD, PMU, and the UN implementing agencies), but **lived consequences are concentrated among many vulnerable households**. Where transparent communication and robust grievance mechanisms are lacking, **perceptions of bias, politicization, or favoritism** can quickly erode trust, particularly in a politicized and conflict-affected environment.

4.2.2 Fragmented Responsibilities and Accountability

The separation of NCTP administration (PNEEI) from social services and systems (MoSD) complicates the landscape for beneficiaries who rarely distinguish between institutions. To them, “the Ministry” (and sometimes “the UN”) are a single abstract entity. For the SIA, this fragmentation means:

- Households may **blame MoSD** for failures or delays in cash transfers that are outside the project’s scope.
- Confusion about which institution is responsible for which benefit may drive grievances into the wrong channels, undermining the effectiveness of the SPEP II GRM.
- Coordination failures between MoSD, PNEEI, NGOs, and UN agencies can undermine the very **adaptive capacity** that SPEP II seeks to build.

4.2.2 Gender, GBV, and SEA/SH Risks

The stakeholder table above highlights how gender cuts across all categories. Women appear both as **primary caregivers and service users** (psychosocial, GBV, family support) and as **frontline workers** (social workers, NGO staff). Many FHHs, widows, and divorced women face **structural vulnerabilities**: limited income opportunities, greater care burdens, and weaker bargaining power within households. GBV survivors are a highly specific and highly vulnerable stakeholder group who require **confidential and survivor-centered handling** across CMS, NGO services, and grievance mechanisms.

From an ESF standpoint, this reinforces the need for strong **SEA/SH-sensitive codes of conduct** for MoSD and NGO workers; **confidential GM channels** and clear referral pathways for GBV cases; and services and communication strategies tailored to women's constrained mobility and digital access.

4.2.4 Digital and Financial Inclusion Barriers

Financial service providers (FSPs) and digital platforms are believed to be enablers of access to social and inclusive financial services, but they need to be aware of and work towards mitigating the following risks:

- Low-income households, the elderly, and women often lack secure and private access to smartphones, data, or e-wallets.
- Rural areas may have few cash-out agents, leading to **travel, congestion, and security risks**.
- Households sometimes rely on intermediaries to cash out, introducing risk of **misappropriation or exploitation**.

Even though the project does not directly finance NCTP cash, digitalization is central to SR and CMS, and will be critical for **CERC emergency MPCA**. The SIA therefore treats digital and financial inclusion as cross-cutting risks for all vulnerable stakeholders.

4.2.5 Worker Protection and Well-Being

While MoSD social workers, NGO service providers, and PMU staff are **agents** of the system, they are likely to be exposed to the following risks:

- They face high caseloads, frequent exposure to traumatic stories, and pressure from communities expecting material support.
- In high-risk areas, workers may face **personal security risks** during home visits.
- Female social workers may face harassment and unsafe travel conditions.

ESS2 is therefore centrally relevant, not only as a legal requirement but as a **precondition for effective service delivery**. If worker burnout and insecurity are not addressed, service quality will deteriorate and risks (including SEA/SH and data misuse) may increase.

4.2.6 *Social Cohesion and Horizontal Tensions*

The way stakeholders experience the project will influence **community-level social cohesion**. Tensions may arise between **beneficiaries and non-beneficiaries**, different localities, or between host communities and IDPs. Moreover, local committees and municipalities can become **lightning rods for community frustration** when they are seen as gatekeepers to assistance. This underlines the importance of **ESS10-compliant engagement**: clear communication on criteria and processes, visible grievance channels, and engagement of local structures in a way that **reduces rather than amplifies** tensions.

4.3 CERC-Specific Stakeholders and Dynamics

While many stakeholders are common, the **CERC activation for emergency MPCA** introduces or elevates specific actors, relationships, and risks.

4.3.1 *Internally Displaced Persons (IDPs) and High-Risk Communities*

IDPs and households in CERC-targeted communities are already in the stakeholder table as vulnerable households, but under CERC they become **central, “time-critical” beneficiaries**. Their needs are acute, and their expectations of rapid assistance are high. Many have lost documentation, phones, or stable addresses, complicating digital and administrative verification. Furthermore, they may have lower tolerance for perceived unfairness, leading to heightened **tensions and protests** if targeting is contested.

For the SIA, this requires a more **crisis-oriented risk lens**: issues such as **queue and crowd management during registration and –as relevant- at cash-out points, and SEA/SH risks in emergency conditions** become much more salient.

4.3.2 *UN Implementing Agency (e.g. UNICEF / WFP)*

While UN agencies are already present in the system, under CERC one agency becomes **the operational implementer of MPCA**. It brings its own cash assurance, anti-fraud, and SEA/SH frameworks, which must be **harmonized with ESF expectations** and with MoSD’s SEP and GM arrangements. Also, the UN agency becomes a **key gatekeeper** of who receives cash and when, even if MoSD retains verification and approval authority. **Therefore, it is essential to examine several interlinked issues**. These include how the UN agency’s procedures manage complaints and grievances, including SEA/SH cases; how data are shared and protected between MoSD and the UN agency in line with ESS1 and ESS4; and whether beneficiaries receive clear, coordinated communication about institutional roles and responsibilities. Equally important is assessing how **these processes are implemented in practice to ensure that beneficiaries consistently understand that the project — including the CERC component — is owned and led by MoSD**.

4.3.3 Local Committees and Camp-Based Structures

The CERC concept note envisages **local committees and UNRWA structures** supporting identification and field verification of IDPs. These actors therefore move from being general community stakeholders to **central operational partners** in CERC. They have intimate knowledge of community dynamics and can reach highly vulnerable families quickly. At the same time, the risk of **elite capture, nepotism, and politicization** of beneficiary lists rises significantly when informal actors are central to verification. Given strong power asymmetries, these structures may also be a vector for **SEA/SH risks**, particularly when women, girls, or newly displaced families feel compelled to “please” gatekeepers. Mitigation will need to include **codes of conduct, SEA/SH awareness, and monitoring** focused specifically on these actors.

4.3.4 Humanitarian Clusters and the Cash Working Group (CWG)

Humanitarian actors in the West Bank operate under solid humanitarian principles, but under CERC there is a real risk of **overlap or divergence** between CERC-financed MPCA and other CWG-coordinated cash programs. Moreover, if households perceive that some IDPs receive a higher transfer or more months of support, **horizontal grievances** may arise. Stakeholder engagement under CERC must therefore include **structured coordination** with CWG and key NGOs, to align transfer levels, criteria, and messaging to communities.

4.3.5 Financial Service Providers in Emergency Mode

Finally, FSPs (banks, mobile money providers, agents) who are part of UN cash platforms are placed under **intense pressure** during emergency MPCA deployments agent liquidity and capacity may be insufficient for high, localized demand; there may be long lines, crowding, and **security incidents** at cash-out points; and technical outages or delays can damage trust in both the UN agency and MoSD.

From an ESF perspective, this pushes **community health and safety (ESS4)** to the foreground: ensuring that cash-out sites are safe, that information about payment schedules is clear, and that there are channels to report harassment, extortion, or fraud.

4.4 Implications for SIA Design and Subsequent Sections

This restructured stakeholder analysis has several implications for the later parts of the SIA:

- **Section 5 (Risk Assessment)** explicitly links each major risk domain (exclusion, mis-targeting, SEA/SH, worker protections, digital exclusion, data privacy, social cohesion) to the stakeholder groups most affected.
- **Section 6 (Mitigation Plan)** identifies which duty-bearer (MoSD, PMU, UN agency, NGO, local committee, FSP) is responsible for protecting which stakeholders and through what mechanism.
- **Section 7 (Implementation & Budget)** sets out cost measures that respond to the heightened risks facing CERC-specific stakeholders.

- **Section 8 (M&E Framework)** presents indicators that are disaggregated by key stakeholder group (IDPs, FHHs, PwDs, GBV survivors, youth, etc.) and that track not only service volumes but also **fairness, safety, and accountability** as experienced by different actors.

5. Social Risks and Potential Impacts

The social risks associated with SPEP II arise from the complex interface between vulnerable populations, frontline workers, multiple institutions, and digital and administrative systems operating within a volatile political and economic landscape. These risks are multidimensional, rooted in both structural factors (poverty, gender inequality, disability barriers, displacement, institutional fragmentation) and project-specific features linked to SPEP II's focus on social services and systems, as well as the proposed activation of the CERC for unconditional emergency cash assistance.

This section consolidates and analyzes these risks in detail, drawing on the earlier contextual, stakeholder, and methodological sections. It distinguishes between risks inherent to the **core project design**, those linked to **systemic constraints**, and those that are **CERC-specific**, while emphasizing cross-cutting issues such as gender, GBV/SEA/SH, digital exclusion, worker safety, and social cohesion. Although risks are analyzed distinctly, many interact and reinforce one another, particularly under conditions of crisis or displacement.

5.1 Risks of Exclusion and Inclusion Errors

5.1.1 Exclusion Risks in the Core Project (Social Services and Systems)

The revised design of SPEP II shifts the emphasis of the project from cash transfers toward strengthening social service delivery and improving targeting systems through the SR and CMS. While this reduces certain risks associated with large-scale cash operations, it introduces or heightens others:

- **Incomplete or outdated Social Registry (SR) data**, particularly for households affected by displacement, mobility restrictions, or informal labor dynamics, may result in eligible individuals not being identified or prioritized.
- **Geographical inequities in service availability**—especially for disability services, GBV services, and specialized psychosocial support—may disproportionately exclude rural communities, rural communities designated as remote and/or high risk, and Bedouin villages.
- **Digital barriers** related to CMS-based referral pathways may disadvantage elderly individuals, persons with disabilities, or households with low digital literacy.
- **Gender-related exclusion** may occur when women are unable to access services due to mobility restrictions, caregiving burdens, or social norms that discourage contact with service providers.
- **Stigma-related exclusion**, especially among GBV survivors, persons with mental health conditions, and households affected by substance abuse or legal conflict, may prevent households from seeking help even when services are available.

5.1.2 Inclusion Errors in the Core Project

Inclusion risks arise when individuals who do not meet eligibility criteria gain access to project-supported services or systems:

- **Weak verification processes** in some MoSD directorates may allow individuals with stronger social connections to access services ahead of more vulnerable households.
- **Pressure from influential local actors**, including community leaders or political factions, may distort equitable access to referrals.
- **Overreliance on self-reported data** (e.g., through the SR application interface) may enable misrepresentation by households better able to navigate administrative systems.

Although inclusion errors are less harmful than exclusion in a rights-based service context, they can significantly undermine perceptions of fairness and trust in MoSD institutions.

5.2 CERC-Specific Exclusion and Inclusion Risks

The proposed activation of the CERC introduces **heightened risks of exclusion and inclusion errors** for emergency MPCA, given the fluidity of displacement and the highly compressed timelines typical of crisis response:

5.2.1 CERC Exclusion Risks:

- **Unregistered or recently displaced households** may not appear in official data or may lack any documentation confirming their previous residence, making verification difficult.
- **Households without functional mobile phones**, SIM cards, or digital literacy may be unable to receive payment notifications or access digital wallets.
- **Women and girls** may be excluded if mobile devices are controlled by male family members or if they cannot safely access cash-out points.
- **Households sheltering with extended family**, a common coping strategy, may not be recognized as IDPs if registration systems capture only the host household.
- **Families living in high-risk or militarized zones** may not be reachable by social workers or UN verification teams.

5.2.2 CERC Inclusion Risks

- **Duplicate registration** across humanitarian platforms (e.g., UNRWA, NGOs, Cash Working Group partners) may inadvertently result in households receiving multiple benefits.
- **Local committee influence** may lead to favoritism or elite capture.
- **Verification challenges** may result in households falsely claiming displacement or exaggerating household composition.

These risks have direct implications for social cohesion, fairness, and the legitimacy of MoSD and the UN implementing agency.

5.3 Risks Related to the Provision, Quality, and Relevance of Services

The project's focus on social services under Component 1 brings service quality to the forefront of risk analysis.

5.3.1 Provision of Services Not Consistent with Household Needs

Even with CMS improvements, households may receive referrals that are:

- **Irrelevant** to their most urgent needs (e.g., referred to psychosocial support when the primary issue is disability-related).
- **Insufficiently tailored**, particularly for PwDs requiring specialized interventions.
- **Unavailable** in certain regions, resulting in delays or unmet needs.
- **Perceived as inadequate**, creating frustration and eroding trust in MoSD.

5.3.2 Risks of Harm or Re-traumatization

If services are not delivered with appropriate safeguards:

- GBV survivors may experience **secondary trauma** if confidentiality is not strictly maintained.
- Individuals undergoing psychosocial counseling may feel exposed or judged by inadequately trained workers.
- Persons with disabilities may feel humiliated or dismissed if providers lack disability competency.

5.4 Worker Protection and Labor-Related Risks (ESS2)

5.4.1 Social Workers, Case Managers, and NGO Workers

Frontline workers face significant risks:

- **Excessive workloads** due to high caseloads and crisis-related demands.
- **Security risks** during home visits, especially in displacement-affected areas.
- **Harassment**, particularly for female workers operating in conservative communities.
- **Psychological distress** from repeated exposure to traumatic stories.
- **Burnout and job dissatisfaction**, undermining service quality.

5.4.2 Worker Risks Under CERC

Though the CERC involves unconditional cash and does not introduce new forms of service delivery, MoSD personnel may still face:

- **Stress and community pressure** during registration and verification.
- **Threats from frustrated households**, especially if families believe their exclusion was unjust.
- **Difficult working environments** in IDP areas or contested spaces.

5.5 SEA/SH and GBV-Related Risks (ESS4)

SEA/SH risks span the core project and the CERC:

- Power asymmetries between workers and vulnerable households (especially IDPs, FHHs, GBV survivors).
- Male-dominated committees or gatekeepers influencing access to benefits.
- Inadequate privacy during home visits in crowded or camp settings.
- Lack of female staff in some areas, increasing barriers for women seeking services.
- Digital communication channels being misused for harassment.

Under CERC, the urgency and desperation of displaced households can heighten susceptibility to **coercion or transactional exploitation**, necessitating safeguards, codes of conduct, and clear reporting mechanisms.

5.6 Data Protection and Privacy Risks

Digital systems (SR, CMS, and CERC digital payment mechanisms) rely on sensitive personal data:

- Household composition, disability status, GBV history, and socioeconomic indicators.
- Data sharing between MoSD, MoF, MoI, UN agencies, and payment providers introduces risks of misuse or unauthorized access.
- Lack of digital literacy among beneficiaries may lead to involuntary disclosure.

For GBV and disability-related services, data breaches could have **severe protection consequences**.

5.7 Risks to Social Cohesion and Community Dynamics

5.7.1 Perceived Inequities in Targeting

Perceptions of unfairness—whether justified or not—can lead to:

- Community tensions between beneficiaries and non-beneficiaries.
- Tensions between long-term poor and newly displaced IDPs.
- Distrust in MoSD, NGOs, or the UN agency.

5.7.2 Local Committee Dynamics

Informal leaders may:

- Promote their networks for verification or service prioritization.
- Create resentment if perceived as biased or self-serving.

5.7.3 Interference by Political or Armed Groups

In high-risk areas, armed actors may:

- Influence verification processes.

- Pressure households to share assistance.
- Create unsafe conditions at cash-out points.

5.8 Operational and Implementation Risks

5.8.1 Coordination Failures

The separation of mandates between MoSD and PNEEI, combined with parallel humanitarian systems, may result in:

- Overlaps in targeting.
- Confusion among beneficiaries about roles and functions.
- Fragmentation of accountability.

5.8.2 System Reliability Risks

SR and CMS depend on stable digital infrastructure:

- System downtime, connectivity issues, or data errors could delay referrals and aggravate grievances.
- Under CERC, technical failures in digital wallets or cash-out networks could create **crowding, frustration, and safety risks**.

6. Social Risk Mitigation Measures and Social Management Plan

The mitigation strategy for SPEP II –packaged as implementation plan in the table at the end of this chapter- is designed to respond systematically to the social risks identified in Section 5 and to ensure that both the core project and the CERC operate in a manner that is equitable, safe, and accountable. Given the project’s dual architecture—(1) the revised project focus on social services and systems strengthening, and (2) the proposed activation of the CERC for emergency multipurpose cash assistance—the plan adopts a layered approach. It differentiates between risks that arise across the entire program and those uniquely triggered or intensified by the CERC, where time pressure, scale, and displacement dynamics can heighten the likelihood of exclusion and inclusion errors, SEA/SH risks, worker pressure, data exposure, and social tensions.

Across all components, mitigation measures are guided by the principles of **do-no-harm, inclusion, transparency, survivor-centered response, data responsibility, worker protection, and adaptive management**. The plan prioritizes integration into existing MoSD systems and instruments (SR/CMS workflows, GRM, POM, etc.), avoiding parallel structures where possible, while recognizing that CERC activation requires additional surge mechanisms and formal coordination arrangements with the UN implementing agency and financial service providers.

6.1 Mitigating Exclusion and Inclusion Risks

Reducing exclusion and inclusion errors is a central social risk management priority for SPEP II given the vulnerability of target populations, constraints on mobility and digital access, and the politicized sensitivity of assistance allocation. Under the core project, MoSD will strengthen the quality and accessibility of the **SR** and the effectiveness of the **CMS** to ensure that eligible households can be reached and that services are allocated on the basis of assessed needs rather than convenience or uneven local practices.

For **exclusion risks**, MoSD directorates will conduct periodic **SR updating and outreach campaigns**, including assisted registration days and proactive follow-up for households facing mobility limitations, digital exclusion, or literacy barriers. Flexible entry points will be applied, including telephone verification, home visits, and referrals through trusted service providers or NGOs, particularly for female-headed households, persons with disabilities, older persons, and households in remote or marginalized localities. The project will also apply **service mapping and referral calibration**, using CMS data and local service availability intelligence to reduce geographic disparities and prevent situations where households are technically “eligible” but cannot practically access services.

For **inclusion risks**, MoSD will apply standardized verification procedures across districts to reduce subjective decision-making and unequal treatment. Where local councils, committees, or community structures contribute to outreach or referrals, MoSD will monitor referral patterns to detect anomalies, favoritism, or elite capture dynamics, and will reinforce the rule that service eligibility and case planning are determined through documented assessment and CMS workflows rather than informal brokerage.

The CMS will be used not only as a case-management tool but as an accountability mechanism: workflows will be periodically reviewed to ensure that referrals are aligned with assessed needs and that service availability constraints do not systematically disadvantage specific groups. **Inclusion audits** (including analysis of “who is not being reached,” and “who is being reached disproportionately”) will be undertaken quarterly to identify patterns of geographic, gender, disability-based, or displacement-related exclusion or inappropriate inclusion and to inform corrective action.

CERC-specific measures

Under CERC activation, where time pressure and scale increase the likelihood of targeting and verification errors, additional safeguards will be applied. These include **multi-layered verification** and **duplication checks** coordinated between MoSD and the UN implementing agency, and harmonized as feasible with relevant humanitarian coordination mechanisms (e.g., Cash Working Group registries), while applying data protection rules. Recognizing that IDP households may lack documentation, verification procedures will allow for alternative evidentiary pathways (e.g., neighborhood mapping, relevant agency records, local attestations) subject to **cross-validation** to reduce the risk of manipulation and inclusion errors. Targeted outreach and registration support—potentially through mobile teams—will be deployed to include women,

persons with disabilities, and older persons who may be digitally disconnected or unable to safely access registration points.

6.2 Ensuring Quality, Relevance, Accessibility, and Safety of Social Services

To mitigate risks related to service delivery that is misaligned with beneficiary needs, delivered inconsistently, or causes harm, MoSD will apply minimum quality standards for service provision while preserving case manager discretion to tailor interventions to household-specific needs and to respond to complex vulnerability profiles. This balance is important in the Palestinian context where needs are multidimensional and service ecosystems vary significantly by location, while standardized packages alone may fail to respond to real risks (including protection and psychosocial needs).

Service providers and relevant MoSD staff will receive capacity-building on **disability inclusion, trauma-informed approaches, gender-sensitive service delivery**, and confidentiality. CMS follow-up tools will be used systematically to monitor whether services were actually delivered, whether they were perceived as useful and appropriate, and whether re-referrals are required due to a mismatch between assessed needs and service delivery. These feedback loops will be treated as a core mechanism to detect service gaps, poor quality, and unintended harm early.

The project also anticipates risks of **re-traumatization** or harm when households experiencing distress are engaged by staff or service providers without adequate skill, confidentiality safeguards, or referral pathways. Accordingly, staff engaged in psychosocial and protection-adjacent services will receive training in do-no-harm practice, confidentiality, and safe communication. Where services interact with GBV survivors or sensitive cases, strict confidentiality protocols and confidential GM pathways will be applied, and referral arrangements to specialized services will be maintained and updated.

While the CERC does not involve service delivery beyond cash assistance, it may create expectations that cash recipients should automatically receive services or that services are conditional. MoSD and the UN implementing agency will therefore communicate clearly that emergency cash is **unconditional** and not linked to service uptake, to avoid confusion, unmet expectations, or coercive practices.

6.3 Worker Protection and Labor Risk Mitigation (ESS2)

MoSD recognizes that frontline workers—including MoSD social workers, case managers, outreach staff, contracted personnel, and NGO service-provider staff—are exposed to elevated risks related to workload stress, harassment, threats, and physical insecurity, particularly in high-tension environments and during emergency response surges. These risks affect both worker welfare (duty of care) and service quality: overstretched and unsupported workers face increased likelihood of errors, burnout, and harmful interactions with beneficiaries. In line with **ESS2**, MoSD will ensure that all project workers engaged under SPEP II (including CERC-related activities) are managed under clear labor management arrangements that reflect **applicable Palestinian labor**

law provisions, and that define roles, responsibilities, and accountability across MoSD, contracted NGOs, and any UN implementing partner.

6.3.1 Application of Palestinian Labor Law and ESS2 Commitments

MoSD will apply the relevant provisions of **Palestinian labor law** and related regulations to project workers under its direct management and to contracted workers to the extent applicable through contractual requirements. This includes, at minimum: (i) written terms of employment and clear job descriptions; (ii) transparent recruitment and non-discrimination; (iii) working time and rest arrangements aligned with national provisions; (iv) fair treatment and protection from harassment; (v) occupational health and safety (OHS) measures; and (vi) accessible, confidential mechanisms for raising workplace concerns without fear of retaliation. Contractors and NGO partners will be required—through contractual clauses and monitoring—to apply these requirements and to demonstrate compliance through documented procedures and records.

Where CERC activation relies on a UN agency for cash delivery, MoSD will require the UN partner to apply its own internal staff rules and safeguarding systems **at a standard consistent with ESS2** for all workers under the UN agency’s control, and to align operationally with MoSD on coordination, incident reporting, and referral pathways for SEA/SH and security incidents (see below). MoSD will ensure that expectations regarding labor conditions, worker safety, and grievance handling are reflected in relevant agreements and operational protocols with partners.

6.3.2 Worker Grievance Mechanism (WGM): Flow, Confidentiality, and Protection Against Retaliation

MoSD will maintain and operationalize a **Worker Grievance Mechanism (WGM)** for all MoSD project workers, and will require contracted NGOs/service providers to establish compatible mechanisms for their staff. The WGM will be accessible, confidential, and responsive, with clear escalation routes and explicit protections against retaliation. At a minimum, the WGM will include:

- **Entry points:** (i) direct supervisor channel; (ii) designated MoSD focal point at directorate/central level; (iii) confidential phone/WhatsApp line where feasible; and (iv) written submission option.
- **Core flow:** receipt and registration (with anonymized coding where needed) → preliminary assessment and risk screening → assignment to responsible unit → investigation/management action → written/recorded outcome communicated to complainant → appeal option → closure and documentation.
- **Time standards:** acknowledgement within a defined short period; resolution within an agreed timeframe proportionate to the severity and complexity of the issue.
- **No retaliation:** MoSD will institute an explicit **non-retaliation policy**, communicated to all workers and managers, prohibiting any adverse action for filing a complaint or participating in an investigation. Allegations of retaliation will be treated as serious misconduct and handled through disciplinary procedures.
- **SEA/SH-sensitive handling:** any worker complaint involving SEA/SH, sexual harassment, or exploitation will be managed through **confidential survivor-centered**

protocols (see 6.3.4), with restricted access to information and referral to specialized services as appropriate. Investigation will be conducted only by trained personnel, and only with informed consent where relevant.

For CERC-related work, MoSD will establish a **coordination interface** between its WGM and the UN partner's internal staff grievance channels to ensure that worker complaints connected to joint operations (e.g., field verification pressures, threats, or safeguarding concerns) are directed quickly to the responsible entity, while preserving confidentiality and non-retaliation protections.

6.3.3 OHS Measures, Security Protocols, and PPE

MoSD will strengthen OHS and security measures for project workers, particularly those engaged in community outreach, home visits, and verification activities. Key measures include:

- **OHS risk assessment and mitigation:** routine identification of field risks by location and activity type, with updated mitigation measures during periods of heightened tension.
- **Home-visit safety protocols:** risk screening prior to visits; visits conducted in pairs in higher-risk settings; clear check-in/check-out procedures; and a defined escalation protocol for security incidents.
- **Right to refuse unsafe work:** workers will retain the right to decline or stop a visit deemed unsafe **without penalty**, with supervisory support for alternative arrangements.
- **PPE and safety equipment:** provision of appropriate PPE and safety items as relevant to field conditions (e.g., identification badges/vests, basic first-aid kits, communication credit/means, and any context-specific protective items identified through risk assessments).
- **Secure transport and movement planning:** arrangements prioritizing worker safety, including safe transport options for female staff where needed, avoidance of unnecessary travel in high-risk hours/areas, and coordination with local authorities only where appropriate and non-coercive.
- **Incident documentation:** standardized tools and reporting lines for security incidents, threats, and harassment, enabling trend analysis and management response.

Under CERC activation, MoSD and the UN partner will apply harmonized field security arrangements to avoid inconsistent practices. Where the UN partner has more stringent security protocols (e.g., movement clearance, security briefings), these will be adopted for joint activities to the extent feasible and appropriate.

6.3.4 SEA/SH-Sensitive Protocols and Reporting Responsibilities Across MoSD/UN Partners

MoSD will apply SEA/SH prevention and response measures consistent with ESS2/ESS4 and good practice, recognizing elevated risks during home visits, verification, and cash-related interactions. Measures include:

- **Codes of Conduct:** mandatory signing and enforcement for MoSD project workers and contracted workers; partner contracts will require equivalent codes for NGO staff.

- **SEA/SH-safe reporting channels:** confidential reporting options for workers and beneficiaries; workers will be trained on safe intake of disclosures and “need-to-know” information handling.
- **Clear reporting responsibilities:**
 - MoSD will designate a central safeguarding/SEA/SH focal point and directorate focal points responsible for intake, referral, and coordination.
 - The UN partner will retain responsibility for SEA/SH reporting and case management within its operational footprint and internal systems, while coordinating with MoSD on non-identifying information needed for risk management and corrective actions.
 - Serious incidents will be reported through agreed channels consistent with ESF incident reporting expectations, with strict confidentiality safeguards.
- **Survivor-centered response:** referral pathways to qualified GBV/psychosocial service providers; no requirement for survivors to provide proof; and no investigation steps that could re-traumatize or expose survivors.
- **Protection against retaliation and stigma:** explicit messaging and management practices to protect complainants and whistleblowers, including workers, from reprisal.

6.3.5 Training, Supervision, and Psychosocial Support

MoSD will implement a structured capacity-building and support package for project workers, recognizing the high emotional burden of working with distressed households and the elevated risk environment. This includes:

- **Mandatory training** for all relevant workers on: (i) ESS2 labor principles and worker rights; (ii) workplace conduct and anti-harassment; (iii) SEA/SH prevention, safe reporting, and referral; (iv) de-escalation and conflict-sensitive communication; (v) data confidentiality during fieldwork; and (vi) field safety and incident reporting.
- **Supervision and workload management:** caseload monitoring, redistribution where feasible, routine team debriefings, and supportive supervision to reduce burnout and errors.
- **Psychosocial support:** access to peer support structures and confidential counseling options, with referral mechanisms for staff experiencing secondary trauma, harassment, or acute stress.
- **Special measures for female workers:** safe transport arrangements where needed, gender-sensitive scheduling, and reinforced supervisory accountability for responding to harassment and threats.

6.3.6 Budgeting and Implementation Accountability

The Worker Protection and Labor Risk Mitigation measures will be supported by a dedicated budget line within the project’s implementation planning and the Social Mitigation and Management Plan. At minimum, this budget will cover: (i) training delivery (including safeguarding and OHS); (ii) PPE and basic safety equipment for fieldwork; (iii) communication and reporting tools for incident management; and (iv) psychosocial support/counseling arrangements. MoSD will assign clear internal responsibilities for

implementation and monitoring, and will include compliance checks for NGO partners and coordination arrangements with the UN agency under CERC activation.

6.4 Mitigating SEA/SH and Gender-Based Risks (ESS1, ESS4, ESS10)

Sexual exploitation, abuse, and harassment (SEA/SH) constitute a critical social risk within SPEP II, particularly given the project’s engagement with highly vulnerable households, frontline outreach, home visits, and—under CERC activation—emergency cash assistance in displacement-affected contexts. In line with **ESS1**, SEA/SH risks are treated as a core social risk requiring proactive identification, mitigation, and monitoring across all project components. **ESS4** guides the project’s community health and safety measures related to GBV prevention and response, while **ESS10** frames requirements for information disclosure, stakeholder engagement, and accessible grievance mechanisms.

MoSD applies a **zero-tolerance approach** to SEA/SH across all project activities. All MoSD staff, contracted workers, NGO service providers, and third parties engaged under SPEP II will be bound by enforceable **codes of conduct** explicitly prohibiting SEA/SH, transactional exchanges linked to services or assistance, and any abuse of power. These requirements will be embedded in employment arrangements and contractual agreements with implementing partners.

Core mitigation measures include:

- **Mandatory training and induction** for all project workers on SEA/SH prevention, survivor-centered response, and safe handling of disclosures;
- **Clear behavioral standards and sanctions**, communicated to all workers and partners;
- **Accessible, confidential reporting channels** for beneficiaries and workers, integrated within the project’s grievance mechanisms;
- **Survivor-centered referral pathways** linking complainants to qualified GBV, psychosocial, legal, and health service providers; and
- **Proactive information disclosure**, ensuring beneficiaries are informed—through culturally appropriate and safe communication formats—about their rights, the prohibition of any demands linked to project benefits, available complaint mechanisms, and protections against retaliation.

Consistent with **ESS10**, SEA/SH risk communication and consultation will be incorporated into broader stakeholder engagement activities, including community meetings (where safe), outreach materials, and targeted engagement with women’s groups, persons with disabilities, and displacement-affected households. This will support awareness, trust, and early reporting of concerns.

Coordination and “No Wrong Door” Protocols under CERC Activation

During CERC activation, SEA/SH risks are heightened due to displacement, economic stress, and the presence of multiple implementing actors involved in cash delivery. To address this, MoSD and the UN implementing agency will apply **harmonized SEA/SH prevention and response protocols**, while maintaining clear institutional responsibilities.

Key principles include:

- **Differentiated accountability:**
 - SEA/SH cases involving **MoSD staff or contracted NGO workers** will be managed through MoSD’s safeguarding and grievance systems, in line with national procedures and ESS requirements.
 - SEA/SH cases involving **UN agency personnel, payment agents, or FSP staff** will be handled through the UN agency’s internal safeguarding mechanisms, consistent with its policies and standards.
- **“No wrong door” referral approach:** Any SEA/SH complaint—regardless of where it is first reported (MoSD channels, UN agency channels, community focal points, or NGO partners)—will be immediately received, treated confidentially, and referred through agreed pathways to the responsible institution, while ensuring survivor consent, safety, and access to services.
- **Coordinated information flow:** Non-identifying information on SEA/SH incidents, trends, and corrective actions will be shared between MoSD and the UN agency to support risk monitoring and systemic improvements, while strictly protecting confidentiality.
- **Safe cash delivery environments:** Where physical cash-out points are used, minimum protection standards will be applied, including crowd management measures, safe and dignified access (particularly for women, elderly persons, and persons with disabilities), and, where appropriate, deployment of trained protection focal points or monitors in higher-risk locations.

SPEP II, through these combined measures, seeks to minimize SEA/SH risks, ensure rapid and survivor-centered response to incidents, and reinforce accountability across all implementing actors, in alignment with ESS1, ESS4, and ESS10

6.5 Data Protection and Confidentiality

MoSD will apply data minimization, role-based access controls, and secure storage and transmission protocols for all personal and sensitive data managed through the SR and CMS, with particular controls for sensitive case information (e.g., GBV, disability, protection risk markers). Beneficiaries will be informed of what data are collected, how they are used, and how concerns may be raised through the GM.

Under CERC activation, and using MoSD existing protocols, data-sharing and minimization arrangements with the UN implementing agency will be governed by formal agreements specifying the purpose of data sharing, permitted use, retention and deletion rules, secure transfer protocols, breach notification procedures, and restrictions on onward sharing. Particular care will be taken to protect phone numbers and payment identifiers used for digital wallet enrollment. Mechanisms for reporting and addressing digital fraud, unauthorized withdrawals, or wallet misuse will be accessible to beneficiaries and integrated with the complaint system.

6.6 Social Cohesion and Community Relations

To mitigate risks of social tension, resentment, or conflict triggered by perceived unfairness or misinformation, MoSD will ensure transparent communication about eligibility criteria, project scope, and institutional roles—particularly clarifying the distinction between MoSD services, PNEEI cash programs, and CERC emergency assistance. This includes harmonized messaging with relevant institutions where feasible to reduce confusion and grievance escalation.

Community-level monitoring and grievance trend analysis will be used to identify tension hotspots, with corrective communication, outreach, and engagement deployed as needed. Under CERC, coordination with humanitarian actors and cash coordination platforms will help harmonize transfer values, eligibility logic (where feasible), and public messaging to reduce perceptions that some households receive disproportionate support and to prevent rumor-driven tensions.

6.7 Operational Coordination and System Reliability

Because many social risks are amplified by fragmentation, unclear roles, and system failures, the project will strengthen operational coordination and system reliability as part of social risk mitigation. Institutional coordination measures will include a MoSD–PNEEI communication framework for public messaging and complaint interpretation (without blurring mandates), as well as structured coordination with NGOs to ensure equitable referral flows and consistent quality standards.

System reliability will be strengthened through continuous CMS/SR technical support to reduce downtime, frustration, and reliance on informal workarounds that increase error and elite capture risks. Contingency planning will include offline tools or procedures for continuity when digital systems temporarily fail. Under CERC, payment system monitoring—through the UN implementing agency and FSP oversight—will include liquidity tracking and agent availability management to prevent disruptions that can trigger crowding, tension, and coercive practices.

6.8 Grievance Redress Mechanism and Accountability

The project’s Grievance Redress Mechanism (GRM), as defined in the SEP, serves as the primary accountability channel for SPEP II. The GRM is designed to be accessible, confidential, and responsive, and to handle grievances related to targeting, service quality, staff conduct, data protection, and SEA/SH. It will be structured to ensure that affected people can complain safely and that complaints are resolved within predictable service standards, with feedback provided to complainants.

For CERC implementation, the GRM will be expanded to include CERC-specific intake channels operated by the UN implementing agency (often referred to as a feedback and complaints mechanism), with clear protocols for coordination and escalation between MoSD and the agency. Beneficiaries will be informed clearly which institution is responsible for addressing different types of grievances (services vs. emergency cash vs. agent conduct), and **no grievance will be dismissed solely because it was submitted through the “wrong” channel**. Instead, misdirected grievances will be referred internally through agreed pathways, and complainants will receive confirmation that their concern has been routed appropriately. Importantly, this will be done in a

manner that **reiterates MoSD's leadership and ownership of the CERC**, including through clear messaging and visibility.

SEA/SH-related complaints will be handled through confidential, survivor-centered pathways with restricted access to case information, informed consent, and safe referrals to appropriate services. Aggregated grievance data and trends will be shared between MoSD and the UN implementing agency to support adaptive risk management, while preserving confidentiality and avoiding publication of sensitive details.

Table 6.1 – Social Management Plan

Risk / Likelihood and Potential Impact (from Section 5)	ESF Standard(s)	Operational Package (clear, budgetable actions)	Mitigation (clear, budgetable)	Implementation Instruments / Deliverables	Responsible Entity	Timing / Frequency	Monitoring / Verification	Budget (budget lines to cost)
Exclusion due to incomplete/outdated SR data (incl. displacement, mobility limits, informal labor) Likelihood: H Impact: H	ESS1, ESS10	SR Data Quality & Outreach Package: periodic SR updating drives; assisted registration; proactive follow-up for hard-to-reach households		SR update plan; assisted registration events; outreach scripts; telephone/home-visit verification SOPs	MoSD Central + Directorates; NGO outreach partners	Quarterly review + targeted campaigns	# updates; % records updated; # assisted registrations; % cases verified via assisted pathways	Outreach campaign costs; staff time; transport for field teams; printing/accessible materials; phone/hotline credit
Geographic inequity in services (disability/GBV/psychosocial), excluding rural/remote/high-risk/Bedouin localities Likelihood: M Impact: H	ESS1, ESS10	Service Mapping & Referral Calibration Package: map services; adjust CMS referral logic based on availability; targeted outreach where gaps exist		Service map by locality; CMS referral directory update; referral calibration notes	MoSD Directorates; NGO providers	Initial + update semi-annually / as needed	Service map produced/updated; referral failure rates; % referrals matched to available services	Service mapping costs; CMS directory update support; local outreach travel
Digital barriers to CMS-based referral pathways (elderly, PwDs, low digital literacy) Likelihood: M Impact: H	ESS1, ESS10	Assisted Access Package: multiple entry points (assisted registration, phone verification, home visits); simplified instructions		Assisted access protocol; helpdesk/phone support procedure; accessible format materials	MoSD Directorates; NGO partners	Continuous	# assisted cases; complaint trends on digital barriers; beneficiary feedback	Helpdesk/hotline costs; field support; accessible materials (large print, audio where feasible)
Gender-related exclusion (mobility constraints, caregiving burdens, restrictive norms) Likelihood: M Impact: H	ESS1, ESS10	Gender-Responsive Outreach Package: targeted outreach for women; safe engagement modalities; scheduling flexibility		Targeted outreach plan; engagement plan with women's groups/partners; safe communications guidance	MoSD + NGOs	Continuous; intensified during CERC	% women accessing services; documented outreach sessions; grievance themes	Targeted outreach costs; safe transport/field logistics for outreach
Stigma-related exclusion (GBV survivors, mental health, substance use, legal conflict) Likelihood: M Impact: H	ESS1, ESS4, ESS10	Confidentiality & Safe Access Package: confidential pathways; stigma-sensitive engagement; trauma-informed interactions		Confidential case-handling SOP; staff guidance note; referral directory to specialized services	MoSD + NGOs	Continuous; training refreshers	Protocols in use; # staff trained; qualitative feedback on confidentiality/safety	Training; protocol development; referral coordination costs
Inclusion errors: weak verification enabling advantage by connected actors; political/community pressure distorting access Likelihood: H Impact: H	ESS1, ESS10	Standardized Verification & Integrity Package: uniform verification SOPs; supervisory checks; monitoring of referral anomalies		Verification SOP; oversight checklist; anomaly detection review notes	MoSD Central + Directorates	Continuous + quarterly review	# anomaly reviews; corrective actions logged; grievance trends about favoritism	Staff supervision time; monitoring visits; CMS analytics support
Overreliance on self-reported SR data enabling misrepresentation Likelihood: M Impact: H	ESS1, ESS10	Cross-Validation Package: targeted verification of high-risk cases; documentation requirements proportionate to context		Risk-based verification protocol; cross-check templates	MoSD Directorates	Continuous	% cases cross-validated; mismatch rates; audit findings	Verification workload costs; field visit costs; phone verification costs
CERC exclusion: unregistered/recent IDPs missing documentation; verification constraints	ESS1, ESS10	CERC Alternative Evidence & Cross-Validation Package: accept alternative evidence		CERC verification protocol; alternative evidence matrix; cross-validation logs	UN implementing agency (operational) + MoSD	During CERC	# verified via alternative evidence; % cross-validated; audit spot checks	CERC surge verification teams; transport; field tools; coordination costs

Likelihood: M Impact: H		(mapping/records/attestations) with cross-checking		(oversight/verification role)			
CERC exclusion: no phones/SIMs/low digital literacy; inability to receive notifications or use e-wallets	ESS1, ESS10	Digital Inclusion Support Package (CERC): assisted enrollment; troubleshooting; alternative notification methods where feasible	Assisted enrollment SOP; helpdesk function; guidance materials	UN agency + FSP; MoSD coordination	During CERC	# assisted enrollments; complaint trends (SIM/phone); payment completion rates	Helpdesk; field support; communications; FSP troubleshooting support
Likelihood: L Impact: H							
CERC gender exclusion: phones controlled by male relatives; unsafe access to cash-out points	ESS1, ESS10, ESS4	Safe Access for Women Package: safe communications; access options; monitoring of women's barriers	Safe access guidance; monitoring checklist at cash-out points; targeted follow-up	UN agency + FSP; MoSD oversight	During CERC	% women receiving without reported coercion; GBV/SEA-related grievance patterns	Monitoring/field staff; safe access measures at points; targeted follow-ups
Likelihood: M Impact: H							
CERC exclusion: households sheltering with extended family not recognized as IDPs	ESS1, ESS10	Household Structure & Shelter Arrangement Verification Package: verification protocol recognizes "hosted IDPs"	Verification form fields updated; guidance note for hosted displacement	UN agency + MoSD	During CERC	# hosted IDPs recognized; grievances about non-recognition	Verification adaptation and staff briefing costs
Likelihood: M Impact: M							
CERC exclusion: households in high-risk/militarized zones unreachable by teams	ESS1, ESS10	Remote Verification & Access Strategy Package: remote verification options; phased outreach using safer modalities	Remote verification workflow; phased outreach plan by risk	UN agency + MoSD	During CERC	Coverage rate of high-risk areas; documentation of deferred verification and follow-up	Remote verification costs; contingency logistics; security coordination
Likelihood: L Impact: H							
CERC inclusion: duplicate registration across platforms leading to double benefits	ESS1, ESS10	Duplication Prevention Package: duplication checks and harmonization with humanitarian registries where feasible (with data protection)	Duplication check protocol; reconciliation logs; secure data matching procedure	UN agency + MoSD	During CERC	# duplicates detected/prevented; reconciliation records	Data matching tools; staff time; secure transfer mechanisms
Likelihood: L Impact: L							
CERC inclusion: local committee favoritism/elite capture	ESS1, ESS10	Referral Pattern Monitoring & Safeguards Package: monitor committee influence; investigate anomalies; corrective communication	Pattern monitoring notes; corrective action log; staff guidance on committee role limits	MoSD + UN agency	During CERC	Complaints alleging favoritism; anomalies detected and addressed	Monitoring visits; supervision; communications
Likelihood: H Impact: H							
CERC inclusion: false displacement claims/household size exaggeration	ESS1, ESS10	Fraud/Integrity Controls Package: cross-check household composition; targeted audits; standardized verification	Household verification checklist; spot audit plan; discrepancy log	UN agency + MoSD	During CERC	# spot checks; discrepancy rates; corrective actions	Spot audit field costs; staff time; verification support
Likelihood: M Impact: H							
Service mismatch: referrals not aligned with urgent needs; not tailored for PwDs; unavailable services	ESS1, ESS10	Quality & Appropriateness Package: minimum service standards; case manager discretion; CMS follow-up and re-referral	Service standards note; CMS follow-up tool; re-referral workflow	MoSD + NGOs	Continuous	Beneficiary feedback on usefulness; % completed referrals; # re-referrals	Training; supervision; CMS follow-up implementation
Likelihood: M Impact: H							
Harm/re-traumatization: confidentiality failures, poorly trained staff, disability incompetency	ESS1, ESS4, ESS10	Do-No-Harm & Competency Package: trauma-informed training; disability inclusion training; confidentiality protocols	Training modules; confidentiality SOP; provider competency guidance	MoSD + NGOs	Training periodic; continuous enforcement	# trained; protocol compliance checks; incident logs (confidential)	Training; protocol printing; supervisory checks

Likelihood: L Impact: H							
CERC confusion/coercion risk: perception that cash is conditional on services Likelihood: L Impact: H	ESS10	Clear Messaging Package: consistent beneficiary-facing messages that cash is unconditional	Harmonized messaging sheet; scripts for frontline staff; outreach materials	MoSD + UN agency	Prior to and throughout CERC	Beneficiary understanding spot checks; related complaints	Communications materials; outreach sessions
Worker overload, burnout, security risks during home visits; harassment of female workers Likelihood: L Impact: H	ESS2, ESS1	Worker Safety & Wellbeing Package: caseload management; paired visits; risk screening; safe transport; counseling support	Caseload monitoring tool; home-visit safety SOP; incident reporting tool; psychosocial support referral	MoSD + NGOs	Continuous; surge strengthening	Incident logs; staff satisfaction/burnout feedback; # debriefings; # counseling referrals	Worker safety budget line; PPE, transport, comms; psychosocial support; supervision
Worker pressure/threats under CERC during registration/verification Likelihood: L Impact: H	ESS2, ESS1	CERC Worker Surge Support Package: de-escalation training; reinforced supervision; avoid gatekeeping role	De-escalation training; supervision plan; role-clarification guidance	MoSD + UN agency	During CERC	Incident trends; # trained workers; documented corrective actions	Training; supervision time; incident management tools
SEA/SH risks: power asymmetry; gatekeepers; lack of privacy in home visits/camps; digital harassment Likelihood: M Impact: H	ESS1, ESS4, ESS10	SEA/SH Prevention & Response Package: codes of conduct; training; confidential reporting; survivor-centered referral	CoC signed; training records; confidential channels; referral pathway map	MoSD + NGOs + UN agency (CERC)	Continuous	% staff trained; CoC coverage; # complaints handled via survivor-centered protocols	Safeguarding budget: training, awareness, confidential channels, referral coordination
CERC SEA/SH risks heightened by desperation and cash processes; unsafe cash-out points Likelihood: L Impact: H	ESS1, ESS4, ESS10	Safe Cash Delivery & Monitoring Package: apply minimum site standards; crowd management; protection focal points/monitors	Site safety checklist; monitor deployment plan; corrective action log	UN agency + FSP; MoSD oversight	During CERC	Site monitoring reports; complaint trends; corrective actions documented	CERC operations: site safety, monitors, crowd management logistics
Data privacy risks: SR/CMS sensitive data (GBV, disability); data sharing between MoSD–MoF–MoI–UN–FSPs Likelihood: L Impact: H	ESS1, ESS4, ESS10	Data Governance Package: data minimization; access controls; secure transfer; beneficiary notice	Data access matrix; secure transfer SOP; beneficiary data notice materials	MoSD (system owner); UN agency/FSP (CERC)	Continuous	Access logs; training records; documented data-sharing controls	ICT/security measures; training; beneficiary information materials
CERC data sharing risks: unclear permitted use, retention, onward sharing; breach risks Likelihood: L Impact: H	ESS1, ESS10	Formal Data-Sharing Agreement Package: agreements specifying purpose, retention, deletion, breach notification, onward sharing restrictions	Signed data-sharing agreement; breach response protocol	MoSD + UN agency	Before CERC activation	Agreements signed; compliance checks; breach logs and actions	Legal/agreements support; secure transfer tools; compliance monitoring
Digital fraud/unauthorized withdrawals/wallet misuse; beneficiaries lacking literacy Likelihood: L Impact: H	ESS1, ESS10	Fraud Reporting & Response Package: accessible reporting; escalation with UN/FSP; beneficiary guidance	Fraud reporting channel; response SOP; beneficiary guidance	UN agency + FSP; MoSD coordination	During CERC	# fraud cases reported/resolved; resolution time; beneficiary awareness	GM enhancement; communications; FSP support costs

Social cohesion tensions from perceived inequity: beneficiary vs non-beneficiary; long-term poor vs IDPs Likelihood: L Impact: H	ESS1, ESS10	Community Communication & Hotspot Management Package: transparent eligibility communication; GRM trend analysis; targeted engagement where tensions rise	Communication plan; GRM trend dashboard; hotspot outreach plan	MoSD + UN agency	Continuous; hotspot response as needed	GRM trend reports; evidence of hotspot action; reduction in repeat misinformation complaints	Community outreach budget; communications; monitoring visits
Local committee dynamics: biased verification/priority setting; resentment Likelihood: L Impact: H	ESS1, ESS10	Governance Safeguards Package: limit committee role to outreach; monitor patterns; corrective action when bias detected	Guidance note on committee role; pattern review notes; corrective action log	MoSD + UN agency	Quarterly; during CERC	Complaints about bias; anomaly reports; corrective actions	Monitoring and supervision costs
Interference by political/armed groups: influence verification; pressure to share assistance; unsafe cash-out points Likelihood: L Impact: H	ESS1, ESS4	Security Adaptation Package: adjust verification/delivery methods based on risk; safe point standards	Risk screening; delivery modality adjustment notes; safety checklist	UN agency + FSP; MoSD oversight	During CERC	Security incident logs; documented changes; reduced crowding incidents	Security/logistics budget; monitoring
Coordination failures: MoSD–PNEEI separation; parallel humanitarian systems; beneficiary confusion Likelihood: L Impact: H	ESS1, ESS10	Institutional Coordination & Role Clarity Package: clear public messaging; structured coordination protocols	MoSD–PNEEI communication framework; MoSD–UN coordination SOP; harmonized messaging	MoSD lead + partners	Continuous; pre-CERC critical	Coordination minutes; beneficiary role understanding checks; reduced “confusion” grievances	Coordination/communications line; staff time
System reliability risks: SR/CMS downtime; data errors; wallet/network failures causing crowding and frustration Likelihood: L Impact: H	ESS1, ESS10	System Continuity Package: technical support; offline contingency procedures; payment network monitoring	Tech support plan; offline tools; payment monitoring (agent liquidity/availability)	MoSD ICT; UN agency + FSP	Continuous; during CERC intensified	Downtime logs; time-to-restore; # offline transactions; payment disruption reports	ICT O&M budget; contingency tools; payment monitoring costs
GRM/accountability risks: inaccessible channels; weak response times; misdirected cases; SEA/SH confidentiality Likelihood: L Impact: H	ESS10, ESS1, ESS4	GRM Strengthening & No-Wrong-Door Package: multi-channel intake; predictable service standards; routing MoSD↔UN; confidential SEA/SH pathways	GRM SOP; routing protocol; SEA/SH confidential handling SOP; trend reporting				

7. Implementation Arrangements, Institutional Capacity, and Resourcing

The social risk management measures outlined in Section 6 will only be effective if they are institutionalized, adequately resourced, and monitored through clear implementation arrangements. This section describes: (i) who is responsible for implementing mitigation measures; (ii) how these responsibilities will be operationalized within MoSD, its contracted service providers, and—if activated—the UN implementing agency under the CERC; and (iii) how capacity gaps will be identified and addressed through a targeted capacity-building plan. Weak capacity to implement the ESF constitutes a project risk in itself; accordingly, the project will treat capacity strengthening as a core management measure under ESS1 and ESS10.

7.1 Overall Approach and Principles

Implementation of the SIA and associated Social Management Plan (SMP) is governed by six principles: **institutional ownership** (MoSD remains the duty-bearer for ESF compliance even where delivery functions are delegated); **integration** (risk management embedded in SR/CMS workflows and core instruments—SEP, LMP, POM and GRM—rather than operating as a parallel track); **subsidiarity with safeguards** (delegation to directorates and partners with controls to prevent elite capture, exclusion, and SEA/SH); **differentiated CERC responsibilities** (formalized through CERC operational arrangements aligning UN systems and delivery practices with project ESF requirements); **adaptive management** (arrangements revisited as risks evolve, including during shocks); and **resourcing realism** (mitigation measures costed and linked to project components or CERC envelope to avoid unfunded commitments).

7.2 Institutional Roles and Responsibilities

Central level (MoSD PMU). The PMU holds overall responsibility for ESF compliance and coordination of social risk management. Key functions include:

- The **Social Development Specialist (SDS)** leads SIA/SMP implementation; oversees ESS1/ESS10 compliance; coordinates SEP implementation; and consolidates reporting, including risk trend analysis and corrective actions.
- The **Labor/HR focal point** oversees LMP implementation and worker protection measures (ESS2), including the Worker Grievance Mechanism (WGM), OHS and field safety protocols, training, and protections against retaliation.
- The **GBV/SEA/SH focal point** coordinates prevention, safe reporting, and survivor-centered pathways (ESS4), including “no wrong door” referral arrangements with partners during CERC activation.
- The **M&E specialist** integrates social risk indicators into results and monitoring tools, including inclusion audits and grievance trend tracking.
- The **Data Protection/IT focal point** ensures data safeguards are operationalized within SR/CMS and implemented through CERC data-sharing arrangements.

Directorate level (MoSD). MoSD directorates are responsible for implementing key field-facing mitigation measures, including SR updating campaigns and assisted registration; flexible verification; CMS-based referrals and follow-up; do-no-harm case planning; and first-line GRM intake, including routing of sensitive complaints to confidential channels. Directorate managers will designate **social risk monitoring focal points** to liaise with the PMU and support routine reporting on service barriers, exclusion patterns, worker safety issues, and local tensions.

Contracted NGO/CSO service providers. Service providers contracted under Component 1 are responsible for implementing service quality and accessibility measures; applying codes of conduct and SEA/SH safeguards; maintaining confidentiality and responsible data handling; and reporting on utilization, barriers, and emerging protection concerns. ESF obligations will be embedded contractually and reinforced through supervision and learning forums convened by MoSD.

Other institutional interfaces. Although PNEEI administers cash transfers outside this project's scope, coordination is relevant for harmonized public messaging and grievance interpretation to reduce confusion. Other institutions (e.g., MoF, MoI) may contribute to data sharing under strict data protection rules. Municipalities/local councils may support outreach under SEP-guided engagement, with safeguards against politicization and elite capture.

CERC roles (UN implementing agency and FSPs). Under CERC activation, the UN implementing agency is responsible for operational delivery of emergency MPCA (payment execution, FSP management, feedback channels, and monitoring). It must implement targeting, verification, risk mitigation, reporting, and referral arrangements consistent with the project's SMP and agreed CERC operational arrangements. Financial service providers and digital platforms must meet minimum safety and accessibility standards at payment sites; cooperate on scheduling to reduce crowding; support fraud detection and redress; and comply with consumer protection, data privacy, and cooperation protocols on harassment/SEA/SH concerns.

Local committees/community structures. Where used (particularly for outreach or limited verification support), their roles must be bounded and supervised; they must receive simple orientation on non-discrimination, inclusion, and accountability; and operate under a basic code of conduct to reduce elite capture, coercion, or politicization risks.

7.3 Capacity Assessment Against ESF Requirements

Recognizing that MoSD and partners operate in a highly constrained environment, the project will undertake a **targeted capacity assessment** of MoSD (PMU and directorates) and key implementing partners (NGOs and, under CERC, the UN implementing agency/FSP interfaces) against the practical requirements of ESS1, ESS2, ESS4 and ESS10 as they apply to the SMP. The objective is not a generic institutional assessment, but a **risk-focused assessment** anchored in the mitigation packages set out in Section 6 and operationalized in the SMP matrix (e.g., SR updating and assisted access, standardized verification, service quality safeguards, worker safety, SEA/SH protocols, data protection, communications, GRM performance, and coordination).

The assessment will review, at minimum:

- **Staffing and role clarity:** availability and functional mandate of ESF focal points at central and directorate levels; capacity to conduct inclusion audits, supervise partners, and follow up on mitigation actions.
- **Procedures and tools:** existence and practical use of written SOPs for verification, assisted registration, confidentiality and do-no-harm case handling, incident reporting, and referral pathways.
- **GRM and WGM functionality:** accessibility, confidentiality, routing (“no wrong door”), response standards, and protection against retaliation; capacity to manage sensitive SEA/SH cases with restricted access and survivor-centered referrals.
- **SEA/SH prevention and response readiness:** trained personnel, codes of conduct coverage, safe reporting channels, and referral mapping to specialized services; clarity on differentiated responsibilities across MoSD/UN/FSP actors under CERC.
- **Worker protection systems:** caseload management practices, supervision and debriefing routines, home-visit safety protocols, PPE/security arrangements, and psychosocial support availability.
- **Data protection and system controls:** role-based access, secure storage and transfer practices, and readiness to operationalize formal data-sharing agreements (purpose limitation, retention/deletion, breach notification, onward sharing restrictions).
- **Communications and stakeholder engagement:** capacity to deliver clear, consistent and accessible information on eligibility, roles/responsibilities, and unconditionality (CERC), including in remote or high-risk localities.
- **Monitoring and adaptive management:** ability to generate and use routine data (CMS follow-up, grievance trends, inclusion audits, service mapping updates) to trigger corrective actions.

Method and timing. The capacity assessment will be conducted early in implementation (and prior to CERC rollout if activation proceeds), using structured interviews with focal points, rapid review of available SOPs and tools, and a practical scoring of “functionality” (e.g., available / partially in place / operational) to identify priority gaps. Findings will inform a targeted training plan and technical support actions.

7.4 Targeted Training and Technical Support Plan

Based on the capacity assessment, the project will implement a **targeted training and support plan** linked directly to the SMP mitigation packages. Training will be delivered in modular form and refreshed periodically, with intensified delivery prior to and during CERC activation. At minimum, modules will include:

1. **ESF Core Orientation (ESS1/ESS10 focus):** ESF responsibilities, do-no-harm, inclusion principles, and incident/grievance escalation expectations for PMU and directorate leadership.
2. **Targeting, Verification and Inclusion Controls:** SR updating methods; assisted registration; alternative evidence and cross-validation approaches (including CERC contexts); integrity safeguards against elite capture and duplication.
3. **CMS Service Quality and Follow-up:** needs-based referrals, service mapping use, case follow-up tools, and mechanisms to detect mismatch, non-delivery, or harm.
4. **SEA/SH Prevention and Survivor-Centered Response (ESS4):** codes of conduct; safe intake; confidentiality and restricted access; referral pathways; and operational “no wrong door” routing across MoSD and UN agency channels under CERC.
5. **GRM/WGM Operations (ESS10/ESS2):** multi-channel intake, response standards, case routing, protection against retaliation, sensitive case handling, and trend analysis for adaptive management.
6. **Worker Safety, OHS and Field Security (ESS2):** home-visit risk screening, paired visit protocols, incident reporting, PPE and security arrangements, de-escalation techniques, and psychosocial support/referral for staff.
7. **Data Protection and Confidentiality (ESS1/ESS4):** data minimization, role-based access, secure transfer procedures, handling of GBV/disability data, and procedures for suspected breaches.

Training will cover MoSD PMU and directorate staff, contracted NGO service providers, and—under CERC—relevant UN and FSP interface points. Where feasible, training will be complemented by **job aids** (checklists, scripts, flowcharts, referral maps) and coaching/supervision.

7.5 Internal Coordination and Decision-Making

To ensure coherence across multiple actors and risk domains, MoSD will operationalize an **ESF/Social Risk Management Working Group (SRM-WG)** chaired by the PMU SDS, meeting quarterly and more frequently during CERC activation. The SRM-WG will review emerging risks, incidents, and grievance trends; agree corrective actions; and track SMP implementation progress. A **SR/CMS Technical Group** will focus on system reliability, data quality, integration, and privacy controls. A **CERC Coordination Platform**, activated during emergencies, will align verification approaches and messaging, coordinate field presence at payment sites, monitor inclusion and tension indicators in real time, and trigger rapid corrective actions.

7.6 Integration with Project Instruments

SIA implementation will be embedded within the Project Operations Manual (SR updating, referral pathways, worker safety, SEA/SH reporting, GM operations); the SEP (stakeholder

engagement and disclosure commitments); the LMP (worker protections and WGM); the GRM (including CERC-specific routing and no-wrong-door provisions); and legal/contractual instruments (including ESCP commitments and CERC arrangements). This integration reduces fragmentation and anchors social risk management in routine project practice.

7.7 Budgeting for Social Risk Management and Capacity Strengthening

Social risk management costs—including capacity strengthening—will be integrated primarily under Component 3 (Program Management and Monitoring) and Component 2 (systems strengthening), with CERC-related costs financed through the CERC envelope and the UN implementing agency’s operational budget. Cost categories will include: ESF focal points and surge staffing; capacity assessment and targeted training; SR/CMS outreach and assisted access; GRM/WGM operations (including confidential channels and case handling tools); SEA/SH prevention (codes of conduct dissemination, training, referral mapping, and safe reporting); data protection and IT security measures; monitoring and inclusion audits; and CERC-specific additions such as surge outreach, safe access measures, crowd management and tension monitoring at cash-out points, and enhanced feedback/complaints capacity. Annual work plans will earmark resources against these categories; if CERC activation proceeds, a CERC-specific budget note will clarify cost responsibilities, surge requirements, and which mitigation packages are financed by the UN partner versus MoSD.

8. Monitoring, Evaluation, and Adaptive Learning Framework

To ensure effective implementation of the SMP and continuous compliance with the ESF, MoSD will establish an integrated monitoring, reporting, and adaptive learning system for SPEP II. The monitoring framework is designed not only to track compliance, but to function as a practical management tool that enables the PMU to detect emerging social risks, verify that mitigation measures are working as intended, and trigger corrective actions—particularly under the rapid-response and heightened risk conditions that would accompany CERC activation.

Monitoring will be structured around (i) **routine internal monitoring** led by MoSD and implementing partners, (ii) **CERC surge monitoring** led by the UN implementing agency (if activated), and (iii) **targeted independent monitoring** where access constraints, sensitivity, or verification needs require an additional layer of assurance. Monitoring priorities and indicators are aligned with the mitigation packages set out in Section 6 and operationalized in the SMP matrix (including SR updating and assisted access, standardized verification and duplication controls, service quality safeguards, worker protection, SEA/SH protocols, data protection, communications, coordination, system reliability, and GRM performance).

8.1 Institutional Arrangements for Monitoring

Monitoring responsibilities are distributed across the project implementation structure, with clearly defined consolidation and escalation roles:

- **MoSD PMU (lead for ESF monitoring and reporting).** The PMU Social Development Specialist (SDS) holds primary responsibility for consolidating social risk monitoring data, including data from SR/CMS, GRM trends, inclusion audits, and partner reports. The SDS coordinates with the Labor/HR focal point (ESS2), GBV/SEA/SH focal point (ESS4), SEP/communications functions (ESS10), and the Data Protection/IT focal point (ESS1/ESS4) to ensure that monitoring is comprehensive and that corrective actions are tracked to closure.
- **MoSD Directorates (frontline monitoring and issue detection).** Directorates are responsible for routine monitoring of SR updating and assisted registration activities, referral performance and follow-up through the CMS, service accessibility constraints, community tension signals, and operational barriers (including digital access constraints). Directorate focal points provide structured inputs to PMU reporting and support follow-up on grievance hotspots, exclusion patterns, and service gaps.
- **Contracted NGO/CSO service providers (service delivery monitoring).** NGOs provide routine reporting on service utilization, accessibility barriers, adherence to confidentiality and do-no-harm practice, and service quality concerns (including mismatch, gaps, or referrals). They also contribute to monitoring of inclusion outcomes for key vulnerable groups (women, persons with disabilities, older persons, remote communities) where data and ethical safeguards permit.
- **UN implementing agency (CERC monitoring, if activated).** During CERC activation, the UN implementing agency is responsible for high-frequency monitoring of targeting and verification performance (including alternative evidence use and duplication checks), payment execution and disruptions, feedback/complaints handling, and protection risk signals (including crowding, harassment risks, and SEA/SH referral activation). Monitoring outputs must be shared with the MoSD PMU at an agreed frequency and in an agreed format to enable real-time corrective action.
- **Financial Service Providers (FSPs) and payment agents (CERC operations monitoring, if activated).** FSPs provide operational data on payment success, agent liquidity/availability, transaction failures, and complaint patterns related to payment access, fraud, or wallet issues, consistent with data protection arrangements.
- **Independent monitoring / Third-Party Monitoring (TPM) (as needed).** Where access constraints, volatility, or the sensitivity of the operating environment warrant, MoSD may deploy independent monitoring (subject to Bank agreement) to verify inclusion/exclusion outcomes, assess beneficiary experience and perceptions of fairness, confirm adherence to safe delivery arrangements, and provide additional assurance in hard-to-reach areas.

8.2 Monitoring Framework and Key Indicators

Monitoring will track both (i) **results-level outcomes** (e.g., improved inclusion, fewer access barriers, reduced grievances, improved service relevance) and (ii) **implementation fidelity** (e.g., whether the mitigation packages in the SMP are actually being executed: SR outreach, assisted

access, verification SOPs, codes of conduct, confidentiality safeguards, system continuity arrangements). Indicators will be disaggregated by **gender, disability status, age, and location** to the extent permitted by available data and ethical safeguards.

Table 8.1. SMP Monitoring Indicators

Monitoring Domain	Key Indicators (aligned to SMP mitigation packages)	Data Source	Frequency
1. Inclusion and exclusion risks (core + CERC)	- # and % of SR records updated through outreach campaigns \n- # assisted registrations / assisted access cases (phone verification, home visits, supported enrollment) \n- Quarterly inclusion audit completed and # corrective actions implemented \n- Under CERC: # verified IDPs using alternative evidence pathways and % cross-validated	SR reports; directorate outreach logs; inclusion audit reports; CERC verification logs	Quarterly (core); Monthly during CERC
2. Inclusion integrity / prevention of inappropriate inclusion	- Evidence of standardized verification SOP use across directorates \n- # anomalies detected in referral/verification patterns and # addressed \n- Under CERC: # duplication checks conducted and # duplicates prevented	Verification checklists; CMS pattern reviews; anomaly logs; UN duplication reconciliation logs	Quarterly; Monthly during CERC
3. Service quality, relevance and do-no-harm	- % of cases with documented CMS follow-up confirming service delivered \n- # re-referrals triggered due to mismatch/unavailability \n- Beneficiary-reported satisfaction with relevance/quality (sample-based) \n- Reported incidents of harm/complaints related to confidentiality or retraumatization (tracked safely)	CMS follow-up tools; NGO reporting; beneficiary feedback (sample); GRM (non-identifying trend data)	Semi-annual (core); Post-CERC cycle where applicable
4. GRM performance and accountability	- # grievances received, disaggregated by type (targeting/access, service quality, data/privacy, staff conduct, fraud, SEA/SH) \n- % acknowledged and	GRM database/logs; UN feedback mechanism logs (CERC);	Monthly internal monitoring; Quarterly

	% resolved within service standards \n- Evidence of routing of misdirected complaints (no wrong door) \n- Hotspot analysis completed and corrective actions taken	resolution tracking	consolidated reporting
5. Worker safety and labor risks (ESS2)	- % relevant staff completing safety/de-escalation training \n- # security/OHS incidents during home visits/fieldwork and % followed by corrective actions \n- # staff utilizing psychosocial support (tracked non-identifiably) \n- WGM operational: # worker grievances received/resolved and any retaliation allegations	Incident logs; training registers; HR/WGM logs; supervision records	Quarterly; Monthly during CERC where workload peaks
6. SEA/SH risk prevention and response (ESS4)	- % project workers/partners signing Codes of Conduct \n- # SEA/SH reports received (tracked confidentially and separately) \n- % SEA/SH reports resulting in referral activation within agreed timeframe (where consent allows) \n- Evidence of functioning “no wrong door” referral routing across MoSD and UN channels (CERC)	HR/partner records; confidential safeguarding logs; referral confirmation (non-identifying)	Quarterly; higher-frequency internal review during CERC
7. Data protection, privacy, and digital risks	- Role-based access controls operational (audit checks) \n- # reported data/privacy complaints and % addressed \n- Under CERC: signed data-sharing agreement in place and compliance checks conducted \n- # fraud/wallet misuse complaints and resolution time	IT/access logs (audit); GRM logs; UN/FSP logs; compliance records	Quarterly; Monthly during CERC
8. Social cohesion and community dynamics	- GRM trend signals indicating community tension hotspots \n- # targeted communication/outreach actions taken in hotspots \n- Under CERC: crowding/harassment risk	GRM trend analysis; directorate monitoring; UN/FSP site	Quarterly; Weekly/Monthly during CERC (depending on intensity)

	incidents at cash-out points and corrective actions	monitoring; outreach records	
9. Coordination and system reliability	- Evidence of MoSD–partner coordination meetings and action tracking \n- SR/CMS downtime incidents and time-to-restore \n- Under CERC: payment disruptions (liquidity/agent availability) and resolution time	SRM-WG minutes; SR/CMS technical logs; UN/FSP operational logs	Quarterly; Monthly during CERC

8.3 Reporting Requirements

To ensure transparency, accountability, and timely corrective action, MoSD will submit structured reports to the World Bank in line with ESF/ESCP expectations.

8.3.1 Quarterly Environmental and Social Progress Reports

The PMU will submit a consolidated Quarterly Environmental and Social Progress Report no later than **30 days after the end of each quarter**. The report will include:

- Summary of SEP implementation and disclosure activities (ESS10);
- SMP implementation status and progress against indicators in Table 8.1;
- GRM performance analysis (volumes, types, hotspots, resolution rates, and no-wrong-door routing evidence);
- Worker protection monitoring (incidents, training progress, WGM status) (ESS2);
- SEA/SH risk management summary (training coverage, functioning reporting and referral pathways, and trend-level safeguards reporting without identifying information) (ESS4);
- Data protection monitoring (complaints, controls, and corrective actions) (ESS1/ESS4);
- Summary of any non-compliance and corrective measures taken, including status of actions tracked to closure.

During CERC activation, the quarterly report will include a **CERC annex** summarizing the emergency cash cycle(s), key inclusion risks, payment performance, complaints trends, and protection risk signals.

8.3.2 Immediate Incident Reporting

MoSD will notify the World Bank within **48 hours** of any severe incident associated with the project, including:

- fatalities or serious injury to workers or beneficiaries;

- credible SEA/SH allegations involving project actors;
- significant data breaches involving personal or sensitive data;
- major security incidents that prevent implementation or create acute community safety risks.

A Root Cause Analysis (RCA) and Corrective Action Plan (CAP) will be submitted within **10 business days** following notification, with follow-up reporting until actions are closed.

8.3.3 CERC Monitoring and Post-Distribution Monitoring (PDM)

Following any CERC disbursement cycle, the UN implementing agency (and/or TPM, if used) will conduct structured monitoring and PDM and submit a report within **45 days** of cycle completion, covering:

- beneficiary experience and satisfaction;
- barriers to access (e.g., agent availability, liquidity issues, distance, phone/SIM problems);
- any reported protection concerns, including harassment risks at cash-out points;
- unintended social impacts (e.g., intra-household tension, community tensions);
- complaint patterns, resolution performance, and corrective actions taken.

8.4 Adaptive Management and Corrective Action Triggers

This monitoring framework is explicitly designed to trigger corrective action. If monitoring identifies recurring or systemic risks—such as persistent exclusion of persons with disabilities, repeated complaints linked to a specific locality or payment agent, rising fraud reports, elevated worker incidents, or GRM bottlenecks—the PMU will activate adaptive management protocols:

1. **Diagnose and verify root cause** using SR/CMS data, GRM trend analysis, field checks, or TPM findings as needed (e.g., barriers driven by inaccessible enrollment, service gaps, or verification bias).
2. **Implement corrective actions** by adjusting operational procedures (e.g., deploy mobile/assisted registration teams, modify verification approaches, change communication formats, recalibrate CMS referral logic, strengthen site safety arrangements).
3. **Reinforce capacity** through targeted retraining, supervision, or partner performance management (including replacement of service providers or payment agents where necessary).
4. **Disclose and communicate changes** to stakeholders in appropriate formats to maintain trust and reduce misinformation, consistent with ESS10.
5. **Track closure** of corrective actions through the SRM-WG, with documented follow-up in quarterly reports.