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ANNEX 4

to the Commission Implementing Decision on the financing of the multiannual action plan in favour of the Federal Republic of Somalia for 2023-2024

Action Document for Women's Economic and Social Empowerment

MULTIANNUAL PLAN

This document constitutes the multiannual work programme within the meaning of Article 110(2) of the Financial Regulation, within the meaning of Article 23 of the NDICI-Global Europe Regulation.

1 SYNOPSIS

1.1 Action Summary Table

1. Title CRIS/OPSYS business reference Basic Act	Women's Economic and Social Empowerment OPSYS number: ACT-61907 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)
2. Team Europe Initiative	No
3. Zone benefiting from the action	The action shall be carried out in the Federal Republic of Somalia (country-wide)
4. Programming document	Multi-annual indicative programme for Somalia 2021-2027
5. Link with relevant MIP(s) objectives / expected results	<p>MIP Priority Area 2 – Inclusive and green economic growth, Specific objective 3: <i>To promote green, low-carbon, climate-resilient economic development and regional integration</i>. Expected results under SO3: Increased economic activity in a wider range of sectors, with a focus on sustainable agri-food systems including nutrition, green, blue and circular economy value chains linking rural production with urban and foreign markets.</p> <p>MIP Priority Area 3 – Resilience building and social inclusion, Specific objective 2: <i>To enhance durable solutions to displacement; improve migration management; promote inclusive, disaster-resilient and sustainable urban development; and expand access to basic services and social protection</i>. Expected results under SO2: Sustainable disaster-resilient and inclusive urban development is supported.</p>
PRIORITY AREAS AND SECTOR INFORMATION	
6. Priority Area(s), sectors	This action will be financed under Priority Area 2 (Inclusive and green economic growth) of the MIP, Sector 2.3 Economic development, and Priority Area 3 (Resilience building and social inclusion) of the MIP, Sector 3.2 Migration, displacement and basic services.

7. Sustainable Development Goals (SDGs)	Main SDG (1 only): Achieve gender equality and empower all women and girls (SDG 5). Other significant SDGs (up to 9) and where appropriate, targets: no poverty (SDG 1) decent work and economic growth (SDG 8); reduced inequalities (SDG 10).			
8 a) DAC code(s)	Business development services (25030) – 30% Employment creation (16020) – 30% Women’s rights organisations and movements, and government institutions (15170) – 15% Media and free flow of information (15153) – 25%			
8 b) Main Delivery Channel	21000 – Non-Governmental Organisations 41100 – UN entities			
9. Targets	<input type="checkbox"/> Migration <input type="checkbox"/> Climate <input checked="" type="checkbox"/> Social inclusion and Human Development <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input type="checkbox"/> Education <input checked="" type="checkbox"/> Human Rights, Democracy and Governance			
10. Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Aid to environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women’s and girl’s empowerment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers	Not targeted	Significant objective	Principal objective
	Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	11. Internal markers and Tags:	Policy objectives	Not targeted	Significant objective
Digitalisation		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
digital connectivity		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	

	digital governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	/
	digital entrepreneurship	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	digital skills/literacy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	digital services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	digital connectivity	YES	NO	/
	energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	education and research	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Migration	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Reduction of Inequalities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Covid-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

BUDGET INFORMATION

12. Amounts concerned	Budget line(s) (article, item): BGUE-B2023-14.020121 Total estimated cost: EUR 10 000 000 Total amount of EU budget contribution EUR 10 000 000
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MANAGEMENT AND IMPLEMENTATION

13. Type of financing	Direct management through grants Indirect management through the entity(ies) to be selected in accordance with the criteria set out in section 4.4.2
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1.2 Summary of the Action

Somalia is consistently ranked as one of the bottom five countries in terms of gender inequality and has some of the world's worst indicators for women's access to healthcare, prevalence of harmful practices, and limited economic and political participation. Traditional gender roles are strong: men traditionally hold authority and decision-making power and women are responsible for food, raising children and household chores. At the same time, women-owned businesses are increasing in almost all regions of Somalia and women are a growing force in the local economy in terms of numbers, potential employment opportunities and diversification of economic activity. However, and largely due to patriarchal structures, many of the women-led businesses are small-scale and/or informal, they suffer from pressure to adhere to traditional gender roles and lack social and institutional support. While access to finance is a challenge for all businesses in Somalia, the problem is particularly acute for women-owned businesses.

In line with the EU's Gender Action Plan III and complementing Priority Areas 2 (Inclusive and green economic growth) and 3 (Resilience building and social inclusion) of the EU's Multiannual Indicative Programme (MIP) for Somalia 2021 - 2027, this G2¹ Action will focus on supporting women's economic and social empowerment in

¹ In line with the OECD-DAC Gender Equality Policy Marker, this action is marked as G-2, i.e. gender equality is the main objective of the programme and is fundamental in its design and results, The programme would not have been undertaken without this gender equality objective.

Somalia. This Action will implement a two-tier approach to empowerment: it will work on including women's perspectives in business dialogue and facilitate access to finance for women entrepreneurs and, in complementarity, challenge the root causes of inequality by addressing underlying gender biases. The underlying logic of the Action is that economic empowerment of women in Somalia will contribute directly to greater gender equality and inclusive economic growth. The Action contributes to SDG 5 on gender equality and empowerment of women and girls and has no poverty, decent work and economic growth and reduced inequalities as significant objectives. The Action is fully in line with the Somalia National Development Plan (NDP-9), which targets inclusive economic growth.

The Overall Objective (Impact) of this Action is women's economic and social empowerment.

SO1 and SO2 will focus on a few selected economic sectors, paying particular attention to not reinforce the already strong gender stereotypes. SO3 will support the existing team in Mogadishu and explore expansion in the Federal Member States/Somaliland. It aims to address structural causes of gender inequality and gender-based discrimination, including by actively engaging men and boys in challenging gender norms and stereotypes.

2 RATIONALE

2.1 Context

Women and girls in Somalia form roughly half of the estimated population of 17 million. While Islam, the dominant religion in Somalia, guarantees women and girls' right to life, education, ownership and inheritance of property, and the right to give consent to be married, Somali culture is traditionally male-dominated and a limited number of protections exist for women and girls under Somalia's domestic law. The provisional Constitution of 2012 contains progressive protections of women's rights, such as a ban on Female Genital Mutilation (FGM) and prohibition of child marriages, but there is little guidance as to how to ensure their enforcement. In practice, gender roles are clearly defined: men traditionally hold authority and decision-making power and women are responsible for food, raising children and household chores. Negative perceptions about women's roles and abilities are prevalent.

Somalia is consistently ranked as one of the bottom five countries in terms of gender inequality. It is one of the few countries to not yet have ratified the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), which contains comprehensive rights and freedoms for women in political, economic, social and cultural fields. Somalia has also not ratified the Protocol to the African Charter on Human and People's Rights on the Rights of Women in Africa (Maputo Protocol, 2003), the Solemn Declaration on Gender Equity in Africa (SDGEA), the Protocol on the Prevention and Suppression of Sexual Violence against Women and Children, the Beijing Platform for Action, UN Resolutions 1325 and 1820, and other pertinent gender-specific international and territorial Resolutions. The 2018 draft Sexual Offences Bill addresses child marriage and sexual and gender based violence (SGBV), but it has not been passed. However, the National Development Plan 2020-2024 makes commitments towards women's empowerment, and a 2016 National Gender Policy highlights the government's priorities for gender equality and women's empowerment. Nevertheless, differences can be observed across different zones: South Central Somalia does not have a gender policy, in Puntland a gender policy (based on Sharia law) was drafted in 2008 but not yet approved, while Somaliland adopted a comprehensive gender policy in 2009.

Somalia does not have a centralised gender machinery. Some efforts have been made to coordinate gender issues by the different Ministries responsible for gender across administrative zones (i.e. Ministry of Women and Human Rights Development in South Central Somalia, Ministry of Family Affairs in Puntland, Ministry of Social Affairs and Labour in Somaliland). By and large, there is limited collaboration between these three Ministries and even less collaboration with other Ministries (e.g. Ministries of Education, Ministries of Agriculture, etc.) which makes it more complicated to integrate gender in non-gender related sectors.

Deeply patriarchal cultural norms, including *xeer* principles (customary law applied in Somalia, Somaliland and some neighbouring countries and regions) and patrilineal clan systems limit progress towards gender equality. Politics and community leadership are considered male domains and women are not seen as capable as promoting

the interests of clans effectively. Customary law is applied on ‘women issues’, including rape, if and when cases are brought to attention – these issues are not openly discussed in traditional Somali society. Early marriage is common (some 45% of girls are married by age 18) and Female Genital Mutilation (FGM) is almost universal, with an estimate of 98% of women and girls have undergone the harmful procedure. Somalia has one of the highest maternal mortality rates (MMR) in the world, with 692 per 100,000 live births, largely due to poor health care infrastructure and lack of access to adequate services.

The overwhelming majority of teachers in Somalia is male, reflecting the cultural norm against women’s leadership and lack of accommodation for female teachers’ maternal and household duties. As a result, Somali women and girls in all demographic groups have lower literacy and education rates compared to males (an average of 26% of women in Somalia can read compared to 36% of men). The primary social role of a woman as a child bearer is reflected in the average of 6.4 births per woman, second-highest globally after Niger (WB, 2020).

While women and girls in Somalia are responsible for all, or most of, domestic burdens and raising children, traditional gendered division of labour is showing signs of change. Poverty, the impact of war and male migration have driven more and more urban and rural women to now also earn an income for their families. According to Somalia National Development Plan 2020-2024 (NDP-9), up to 70% of households today identify as economically “female headed”.

Entrepreneurship is a driving force of the Somali economy – and except for large and/or formal businesses, women play a leading role in this area. According to some estimates, women comprise over 60% of small business owners in Somalia, and 70% operate in the informal sector. About half of the currently employed women are self-employed. At the same time, women are not socialised as independent economic decision makers. Patriarchal structures, both implicit and explicit, are a key constraint for women entrepreneurs in Somalia and hinders their ability to successfully manage their businesses. Lack of financial inclusion, limited access to finance and underrepresentation in business dialogues results in women tending to operate in constrained local markets, their businesses are often small and they are based in sub-optimal locations.

Somalia is a key partner of strategic interest for the EU, with the objectives of achieving lasting stability, security and socio-economic growth. This requires an integrated approach to address deeply rooted gender inequalities that hinder women’s and girls’ socio-economic inclusion. When women are economically secure, they invest in their families and communities, helping to reduce poverty and attain improved standards of living for all. Supporting women’s social and economic empowerment would be fully aligned with the NDP-9, which targets inclusive economic growth.

2.2 Problem Analysis

While the Somali private sector is dominated by Micro, Small and Medium Enterprises (MSMEs), women are the main drivers in the micro-sector across the country. Data on MSMEs and sub-sectors of economic activities in Somalia is scarce, yet it is widely believed that some 2/3 of women business owners are in the micro-enterprise sector. These women often have limited education, lack most basic business skills and enter into the business sector as a coping mechanism. They largely remain trapped in the micro-sector due to lack of access to credit, lack of business development services and restricted mobility.

In rural areas, the numbers of women working in agriculture is high. However, women’s participation in decision-making remains low because community (clan-based) committees and village elders’ committees mainly comprise of men. There is a division of labour in the agriculture and livestock sectors: women are generally responsible for small livestock and milking, as well as time-consuming and labour-intensive crop production tasks such as sowing and weeding. Formal ownership of all livestock rests with the male head of household and land, while legally may be inherited or acquired by women, is largely male-owned under customary law. In the fisheries sector, women are engaged in cleaning, chopping and selling fish at local markets. Most fishermen’s associations are led by men, their membership is male dominated and fisheries exports are managed by men. Across these sectors, very few

women take up economic activity that records high profits through exports and imports. Women in these sectors remain concentrated in the lowest nodes of the value chains and struggle to grow their business in an environment where key positions are held by men, information is shared informally and where having clan connections determine success.

In urban areas, the more educated women entrepreneurs and returning diaspora are slowly breaking into sectors traditionally dominated by men. These women tend to take more risks and tend to be found in a variety of sectors, including the import of clothes, cosmetics and other non-perishable items. Nevertheless, women continue to be discriminated against in formal employment and women rarely feature as employees in the banking and telecoms sectors.

It should be noted positively that the country has recently ratified ILO convention 190 on preventing violence and harassment at work. On the other hand, Somalia is one of the few countries in Africa which has not yet ratified ILO fundamental convention 138 on child labour and ILO fundamental convention 100 on 'equal pay for work of equal value' between women and men – policies to implement these two conventions could enhance opportunities for girls and women significantly.

Somalia has poor financial infrastructure, particularly in the rural areas. In the absence of formal financial institutions, the informal financial system is dominated by hawalas (money transfer companies) which also facilitate the transfer of remittances from the Somali diaspora. The few formal financial institutions that are present in Somalia are not designed to meet women's needs: they require collateral or male guarantors. As land ownership and inheritance laws favour men, it is extremely difficult for women to meet the requirements necessary to secure bank loans. In addition, financial institutions are also affected by gender biases within society regarding women's roles outside the home. Research findings suggest that while half of urban female business owners are aware of the financial services on offer, only 9% have applied for a loan and half of those applications were rejected (Oxfam, 2021). Despite this, financial institutions agree that women's default rates are lower than men's.

Women lack avenues for saving and investing, although many have developed or have access to informal and alternative saving associations. This is particularly prominent in the agriculture and fisheries sector, where women have organised themselves in village savings and loan associations (VSLAs) and self-help groups (SHG) such as *Ayuuto*, an informal money lending system run by women. However, support to these groups has been limited and not focused on formalisation or scaling-up of these networks. Despite the benefits of group-based lending networks, there are challenges from the government and financial institutions to recognise and embrace these critical groups and provide the pathways to formalise so that they can gain access through formal financial institutions to leverage their own capital base.

Women are less likely to join business sector membership associations than men, despite some progress in women serving on the boards of regional Chambers of Commerce. The absence of formal ways for the government to engage with female business owners or associations in business dialogue remains a major gap in women's economic inclusion. Due to the informality of most women-led businesses, they are much more vulnerable to exploitation by larger cooperatives and are often excluded from the business and financial networks that are male dominated. The vast majority of women-led and owned manufacturers across Somalia produce locally made products that are rarely available beyond their home areas. As a result, women continue to have lower revenues compared to male counterparts and are largely excluded from areas of the economy where high profits are seen.

When trying to scale up their businesses, women in Somalia face some particular challenges such as: time constraints due to the reproductive tasks, mobility and the dominance of men in the business space. Social attitudes reinforced by clan traditions are strong, and shape decisions about which occupational and educational opportunities women can pursue. Experience from other countries has shown that norms about women's and girl's economic activities can shift, for example through proactive policies and engagement of boys and men. It is therefore vital to complement economic empowerment programmes with broader, integrated strategies to improve the perception of women's and girls' roles and abilities.

In this context, this action will aim to support the growth of women-owned businesses from micro- to small-and medium-sized enterprises and empower the 'educated risk takers' through comprehensive business development support services for women in the small and medium-sized enterprise space taking into account (but not limited

to) EU selected value chains in selected geographical areas where these enterprises exist. In parallel, this action will aim to address social attitudes and gender stereotypes through media coverage of issues that are overlooked by Somalia's male-dominated media.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action:

- As duty bearers, Government institutions at Federal and Federal Member State levels have policy-making and coordination mandates and, if they are provided with the right capacity development, they should be able to play a key role in supporting the development of key policies and taking the lead in coordination of matters related to women's social and economic empowerment.
- Relevant line ministries and government institutions should be involved in coordination and policy-making, based on their mandate and respective areas of expertise.
- As rights-holders, target beneficiary communities will be closely involved in designing the interventions through consultations, baseline reviews and design of community action plans. If the project supports the consultation, or even the formation of, community committees it is of paramount importance to ensure these committees represent groups that are traditionally excluded from decision-making processes such as women in all their diversity, persons with disability, ethnic minorities and minority clans. It is essential that the action build on local knowledge, skills and traditional coping mechanisms and contributes to address gender biases and harmful social norms.
- Representing rights-holders' interests, civil society organisations such as climate action, environment protection, women and IDP/returnee representatives or interest groups should be closely engaged in the design, implementation and review (M&E) of the action. Specific measures will be employed to ensure the active participation of women in the design and implementation of the action. Consultations with civil society will take into account the specific needs of women and girls in order for them to be able to express their opinions freely (for instance by arranging women-only focus group discussions). Analysis taking into account intersectionality (women, minorities, persons with disability, etc.) should be the basis for the engagement with civil society. Civil society organisations that represent ethnic minority groups should be engaged closely in the design and implementation of the action.
- Private sector entities should be engaged in the consultations of the action but they should also be encouraged to provide basic services that are accessible to poor and marginalised communities.
- Implementing partners will be selected based on their mandates and skills in the relevant sectors of the intervention and as well based on their established presence in, and expertise on, a certain location. Particular emphasis will be put on involving women's organisations and ethnic minority organisations as implementing partners in the action.
- EU Member States will be closely involved in the design and implementation of the intervention to ensure synergies and complementarities in Team Europe spirit.

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The Overall Objective (Impact) of this action is to enhance women's economic and social empowerment in Somalia.

The Specific Objectives of this action are:

SO1: To enhance women's perspectives in business dialogue;
 SO2: To facilitate equal access to finance for women entrepreneurs, formalise saving and lending associations and support non-banking financial regulations;
 SO3: To challenge underlying gender biases and harmful social norms.

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives are:

Contributing to Outcome 1 (or Specific Objective 1):

- Women, in all their diversity, gain collective bargaining power in cooperatives and business associations to better negotiate and gain equal access to resources necessary for their work.
- Women's collective organising within cooperatives, sector groups and associations creates transparency in financial transactions and coordination activities.

Contributing to Outcome 2 (or Specific Objective 2):

- Increased capacity of VSLAs/SHG to reach out to the more remote or risky borrowers, including women living in the most vulnerable situations.
 Groundwork is complete for the adoption of enabling policy and regulations that support non-banking financial institutions to expand access to credit and other support to female entrepreneurs.

Contributing to Outcome 3 (or Specific Objective 3):

- Enhance equal access by Somali women journalists to business development services in Somalia and strengthen their digital technology skills.

3.2 Indicative Activities

Activities relating to Outputs 1:

Activities under this output area will focus on prioritised value chains, designed based on opportunities identified with a gender analysis (for example in the food systems²) conducted at local and community levels. This Activity will be closely linked with the GEED Action that supports the development of value chains and the SPARCC Action that supports the graduation of targeted households from social transfers to income generating activities. The desired outputs will be achieved through – but not limited to – the implementation of the following activities:

- Support female business associations to provide services to its members, including providing equal access to knowledge development and training in bookkeeping, relevant digital skills, sales and management for members, targeted organisations with organisational development training.
- Establish dialogue between (local/federal) governments and the associations of informal entrepreneurs and women entrepreneurs to facilitate and organise members for an inclusive self-regulation of their specific sector as well as gender-responsive trade and shared management of market infrastructure and facilities (including financial transactions).
- Provide platform, network and exchange opportunities, where feasible through social media, for informal women's associations, cooperatives and sector groups and local governments to share their experience, learn about effective approaches and replicate approaches to other localities.
- Strengthen women participation in the formal business associations such as the national and Federal Member State-level chambers of commerce and sectoral groups.

Activities relating to Outputs 2:

² The potential value chains, in order of importance, may be: fisheries and fish products; meat, livestock and dairy; food products (such as sesame or cereals/coarse grains). However, consideration will be taken of the fact that women face serious constraints in the agricultural value chains due to limited access to training, low income base and very limited engagement in the higher nodes of the agriculture value chains due to competing domestic responsibilities.

Activities under this output area will focus on strengthening the internal governance of VSLAs to attract financial institutions to bring more gender-responsive, inclusive and diverse lending options and channels to the market. Particular attention should be paid to ensure government buy-in and sensitisation to develop gender transformative policies that support VSLAs' formalisation and capacitation. Synergies will be sought with the SPARCC Action, which aims to expand opportunities of the women that participate in social transfer activities. The desired outputs will be achieved through – but not limited to – the implementation of the following activities:

- Collect, validate and disseminate sex-age disaggregated data and gender relevant information to relevant stakeholders on informal, semi-formal and indigenous lending and savings groups and non-banking institutions across Somalia.
- Facilitate exchange, learning and dialogue for financial service providers, relevant government authorities, development partners and saving and lending groups to sensitise on the benefits of saving and lending women groups and opportunities for linkages and relationships between informal mechanisms and formal providers. Particular attention will be paid to identify and address the main gender biases and discriminatory norms.
- Provide technical advice to formal lending institutions on the development of gender-tailored financial products suitable for VSLAs/SHGs.
- Support the development of a framework providing gender transformative norms and regulations for formalising saving and lending groups based on the lessons learnt, in consultation and validation with all relevant stakeholders. Even if women as rights-holders will be the main targeted population, the involvement of men, young people as well as traditional and religious leaders will be key during the consultation and validation process.

Activities relating to Output 3.1:

Activities under this output area will focus on supporting women's media in Somalia, with the view of supporting women in the media (a sector dominated by men) and generating positive, widely-available and gender transformative content on issues that are usually ignored in Somali media. Content partnerships will be developed with European media groups to support raising content to an international audience and giving visibility to Somali women journalists. Particular attention will be paid to develop long-term training to women journalists and/or internship opportunities for women journalism graduates. The desired output will be achieved through – but not limited to – the implementation of the following activities:

- Provide Somali women journalists with durable skills training in content creation and digital media to publish news and in-depth features on issues of direct relevance to women and/or considered social taboo subjects due to gender biases and discriminatory cultural and social norms.
- Challenge gender stereotypes and harmful norms in Somali TV and radio network, and foster Somali women journalists' partnerships with national and international media outlets.
- Establish an internship programme to provide women journalism graduates a first opportunity in the media and offer long-term training to women journalists, including in digital skills, to ensure high quality reporting.

3.3 Mainstreaming

Environmental Protection & Climate Change

Outcomes of the SEA screening: N/A

Outcomes of the EIA (Environmental Impact Assessment) screening (relevant for projects and/or specific interventions within a project): The EIA (Environment Impact Assessment) screening classified the action as Category C (no need for further assessment).

Outcome of the CRA (Climate Risk Assessment) screening (relevant for projects and/or specific interventions within a project): The Climate Risk Assessment (CRA) screening concluded that this action is no or low risk (no need for further assessment).

Gender equality and empowerment of women and girls

As per the OECD Gender DAC codes identified in section 1.1, this action is labelled as G2. This implies that gender equality is the main objective of the project/programme and is fundamental in its design and expected results. The project/programme would not have been undertaken without this objective. In particular, the intervention, will go a step further across the three outcomes by addressing the gender biases and root causes of discrimination that prevent the full enjoyment of women's human rights, particularly in the economic sphere. Therefore, the intervention will fully contribute to GAP III, in particular to the following priority thematic areas of engagement: “Promoting economic and social rights and empowering girls and women” and “Addressing the challenges and harnessing the opportunities offered by the green transition and the digital transformation. It also complies with GAP III commitment on applying a gender transformative approach together with the HRBA and intersectionality approach.

Human Rights

The human rights situation in Somalia is dire. Somalia ratified the Convention on the Rights of Persons with Disabilities on 6 August 2019 but as it is highlighted in the last UPR review, concerns remain about the absence of a legal framework for the protection of the rights of persons with disabilities, who in Somalia suffered discrimination and marginalization in many areas, such as access to employment opportunities. At the regional level, Somalia ratified the African Union Convention for the Protection and Assistance of Internally Displaced Persons in Africa on 6 March 2020.

As mentioned above, gender rights and equality remain a critical issue and men, in Somali culture, make the majority of financial and family decisions, and dominate the public sphere. The most common violations against women and girls include: almost universally-practiced Female Genital Mutilation (FGM), significant prevalence of child and forced marriage, high maternal mortality rates and a lack of access to fundamental rights. This action will therefore apply the working principles of the rights-based approach throughout the design and implementation of the intervention as well as an intersectionality approach. As a G2 action, promotion of women's and girls' fundamental rights will be the principal objective.

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1. This implies that persons with disability will be actively involved in decision-making and as beneficiaries of the project. The needs and rights of women with disability will also be taken into account in the design of activities across all three outcomes to promote their full participation. Data will be disaggregated by disability, whenever possible, in order to monitor to what extent the intervention has a positive impact on persons – in particular women – with disabilities.

Reduction of inequalities

Somalia is one of the poorest countries in the world, In 2019, an estimated 69% of the population lived below the poverty line, with GDP per capita estimated at \$502 in 2021. The country is ranking at the bottom of country comparisons of child mortality and life expectancy. Poverty is consistently high among nomadic pastoralists, agro-pastoralists, residents of Internally Displaced Persons (IDP) settlements and some areas of Mogadishu. Poverty in urban areas other than Mogadishu is lower in comparison (60%). The strength of the traditional clan system, which provides a type of social safety net, weakens the correlation between poverty and whether a household is female-headed or male-headed. Instead, poverty is determined by location, displacement, access to remittances, exposure to drought and affiliation to marginalised groups and/or ethnic minorities.

At the same time, Somalia has deep-rooted gender inequalities, resulting in diminished agency and limited political representation and economic opportunities for women and girls. By supporting women's economic empowerment to close the gender gap in employment and entrepreneurship as well as addressing restrictive social norms, this action places the reduction of gender inequalities at the centre of this action.

Democracy

This action will build capacities of federal, member state and local authorities on engaging with women entrepreneurs and women's cooperatives, sector groups and associations. Support to women's only media house in the country will also support the development of a democratic culture by providing the Somali population with information on problems in society and serve as a medium for deliberation on issues of relevance to women and girls. Women's economic and social empowerment will also serve to enable women's political participation, which is a fundamental prerequisite for gender equality and genuine democracy.

Conflict sensitivity, peace and resilience

This action will apply the 'do no harm' principles in relation to the conflict dynamics of the areas where activities will be carried out. To improve social cohesion and peacebuilding, the analysis that will guide the design of interventions will be informed by the real needs and perceptions of Somali women, men, girls and boys who are the most affected by conflict and insecurity. While Somali women's participation in peacebuilding and conflict has been limited, it may improve as women become socially and economically more empowered.

Disaster Risk Reduction

Somalia is extremely prone to climate-related disasters affecting both rural and urban households at a large scale every year. Most of Somalia is characterised as arid and semi arid, and drought and inconsistent rainfall are underlying threats. Somalia has endured multiple severe drought episodes since 1965. The ongoing severe drought is estimated to negatively affect 8.3 million people in Somalia by mid-2023.

Somalia's economy and population remain highly vulnerable to natural hazard shocks. In the absence of stable institutions, the combination of conflict, environmental degradation and a harsh climate have resulted in multiple large-scale humanitarian crises. Recurrent natural disasters affect the most vulnerable populations. The ongoing drought in Somalia and the wider Horn of Africa is particularly harsh for women and children, who travel longer and longer distances on foot to reach food, water and safety. The ongoing drought is estimated to be the cause of rising levels of SGBV, sexual harassment, domestic violence, early and forced marriages and FGM across Somalia.

Other considerations if relevant

This Action will take a gender-transformative approach, i.e. by addressing the rigid gender norms and imbalances of power. The Action will focus on promoting change in social attitudes, including by actively engaging men and boys and putting focus on young people as drivers of change. Partnerships and dialogue will be sought with local actors, civil society and women's organisations. Taking into account the challenges in relation to displacement and migration, and the existing large number of female IDPs, returnees and refugees in Somalia, these women will be included as beneficiaries of this action.

3.4 Risks and Lessons Learnt

Category	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
External environment	Risk 1: Insecurity from violent community conflicts and the threat of Al Shabaab prevents or stalls implementation at the local level.	Medium/High	High	Political economy and conflict analysis carried out during inception phase as well as regular review of the political and security context through the cycle of the action. Partners will develop clear criteria before commencing activities in an area. In addition, ensuring an integrated, territorially focused and gender responsive, bottom-up programming (for

				example, by engaging with women-led CSO actors in design and implementation) will ensure that programmes are adapted to local contexts and are better responding to people's and institutions' needs and priorities.
People and the organisation	Risk 2: Strong gender discriminatory cultural norms and social norms and existing patriarchal power networks work against efforts to strengthen women's social and economic empowerment.	Medium	High	Women are still at risk despite many actions going on to mitigate the situation (e.g. support to initiatives in the justice sector, recruitment of women police officers, support to women's advocacy organisations, etc.) The programme will seek to sensitise key influencers (traditional and religious leaders, politicians) on the value and importance of women's economic and social empowerment.
People and the organisation	Risk 3: Lack of agreement on roles and responsibilities of the different layers of Government as duty bearers and other influential actors and institutions.	Medium	Medium	The programme will seek to ensure that capacity building elements and coordination with government and influential actors and institutions is included in the design. Partners will be encouraged to not rely on good collaboration between different layers of government and other actors to avoid dependency for the success of the project.
Legality and regulatory aspects	Risk 4: Fiduciary risks	Medium/High	Medium/High	Third party monitoring during implementation and making sure all projects have good plans to handle such risks.

Lessons Learnt:

The economic empowerment of women is one of the most fundamental components of achieving gender equality and women's empowerment more broadly. Investing in women's economic empowerment helps achieve poverty eradication and inclusive economic growth. According to McKinsey Global Institute, women's equal participation in the economy would add up to 26% to annual GDP in 2025 when compared with a business as usual scenario, and this economic potential is highest in developing countries.

The UN Secretary-General's High Level Panel on Women's Economic Empowerment stresses that women's economic empowerment is critical for the achievement of the 2030 Agenda for Sustainable Development. However, focusing on women's economic empowerment alone will not automatically lead to enhanced gender equality. According to the High-Level Panel, the pace of improvement in expanding women's economic empowerment and closing gender gaps has been slowed down by four systemic constraints: adverse social norms, discriminatory laws and lack of legal protection, the failure to recognise and reduce unpaid housework, and a lack of access to financial and property assets. The Panel stressed the importance of tackling adverse norms and promoting positive role models at the top of the 2030 Agenda to expand women's economic opportunities.

Women's economic and social empowerment is fundamental to women's ability to enjoy other human rights. It also enables women to lead their lives with more freedom, self-esteem and self-confidence. Across the world, evidence has shown that women who control more household income has a direct positive correlation on the family's health and nutrition. As such, enhancing women's economic empowerment helps ensure sustainable development outcomes across a wide variety of sectors.

3.5 The Intervention Logic

The underlying intervention logic for this action is that an investment in including women's perspectives in business dialogue and facilitating access to finance for female entrepreneurs, accompanied by activities addressing adverse social norms, can effectively strengthen women's economic empowerment and contribute to inclusive economic development in Somalia.

IF investment are made towards:

- Strengthening female cooperatives, sector groups and associations;
- Promoting and formalising women's saving and lending associations and support to gender-transformative non-banking financial regulations;
- Improving women's entrepreneurs equal access to finance;
- Improving women's entrepreneurial, financial and digital literacy skills;
- Enhancing the representation of women in Somali media;
- Ensuring issues for women and about women, in all their diversity, are covered by Somali media in a gender-responsive way;

And IF the following assumptions are true:

- The political situation is conducive for policy development, adoption and implementations;
- Rural and urban communities remain supportive and target areas accessible;
- Religious and traditional leaders are willing to support the women's empowerment agenda;
- The private sector has the capacity and willingness to support the implementation of activities.

THEN women's perspectives in business dialogue can be enhanced, women entrepreneurs will be able to access finance, and underlying gender biases and harmful social norms will be addressed.

IF that outcome or Specific Objective is achieved, and IF these assumptions hold true:

- Target areas remain accessible;
- Security levels are conducive to project implementation and regular monitoring;
- Natural disasters do not adversely affect implementation of the Action;
- Government authorities remain supportive.

THEN the desired impact or Overall Objective to strengthen women's economic and social empowerment will be achieved.

3.6 Logical Framework Matrix

This indicative logframe constitutes the basis for the monitoring, reporting and evaluation of the intervention.

On the basis of this logframe matrix, a more detailed logframe (or several) may be developed at contracting stage. In case baselines and targets are not available for the action, they should be informed for each indicator at signature of the contract(s) linked to this AD, or in the first progress report at the latest. New columns may be added to set intermediary targets (milestones) for the Output and Outcome indicators whenever it is relevant.

- At inception, the first progress report should include the complete logframe (e.g. including baselines/targets).
- Progress reports should provide an updated logframe with current values for each indicator.
- The final report should enclose the logframe with baseline and final values for each indicator.

The indicative logical framework matrix may evolve during the lifetime of the action depending on the different implementation modalities of this action.

The activities, the expected Outputs and related indicators, targets and baselines included in the logframe matrix may be updated during the implementation of the action, no amendment being required to the Financing Decision.

PROJECT MODALITY (3 levels of results / indicators / Source of Data / Assumptions - no activities)

Results	Results chain: Main expected results (maximum 10)	Indicators (a): (at least one indicator per expected result)	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	To enhance women's economic and social empowerment in Somalia.	1 Proportion of women, in all their diversity, having access to decision-making positions and economic resources.	1 <i>to be defined</i> 2 <i>to be defined</i>	1 <i>to be defined</i> 2 <i>to be defined</i>	Project reports, third party monitoring and evaluation.	<i>Not applicable</i>
Outcome 1	To enhance women's perspectives in business dialogue.	1.1 Improved access for women in all their diversity to managerial and leadership roles in social and economic sectors (GAP III indicator)	1.1 <i>to be defined</i> 1.2 <i>to be defined</i>	1.1 <i>to be defined</i> 1.2 <i>to be defined</i>	1.1 1.2	Target areas remain accessible.
Outcome 2	To facilitate equal access to finance for women entrepreneurs, formalise saving and lending associations and support non-banking financial regulations;	2.1 Number of practices aimed at removing barriers preventing women from market access, investment and business development (GAP III indicator) 2.2 Number of beneficiaries, disaggregated at least by sex (and if feasible, by age and migratory status), with access to financial services (Adapted from EU RF 2.13 and GAP III)	2.1 <i>to be defined</i> 2.2 <i>to be defined</i>	2.1 <i>to be defined</i> 2.2 <i>to be defined</i>	2.1 2.2	Security levels are conducive to project implementation and regular monitoring. Government, traditional/religious leaders and communities remain supportive of women's economic and social empowerment.
Outcome 3	To challenge underlying gender biases and harmful social norms.					
Output 1 relating to Outcome 1	Women gain collective bargaining power in cooperatives and business associations to better negotiate and	1.1.1 Number of associations of informal entrepreneurs have	1.1.1 <i>to be defined</i> 1.1.2 <i>to be defined</i>	1.1.1 <i>to be defined</i> 1.1.2 <i>to be defined</i>	1.1.1 1.1.2	

	gain access to resources necessary for work.	strengthened capacities in bookkeeping, digital literacy and business skills, sales and management and organisational development. 1.1.2 Number of participants from women's associations, cooperatives and sector groups taking part in platform, network and exchange for a established to share experience, learn about effective approaches and replicate approaches to other localities (disaggregated by sex, age, migratory status and disability)				
Output 2 relating to Outcome 1	Collective organising within cooperatives, sector groups and associations creates transparency in financial transactions and coordination activities.	1.2.1 Number of women-led saving and lending associations formalised 1.2.2 <i>to be defined</i>	1.2.1 <i>to be defined</i> 1.2.2 <i>to be defined</i>	1.2.1 <i>to be defined</i> 1.2.2 <i>to be defined</i>	1.2.1 1.2.2	
Output 1 relating to Outcome 2	Increased capacity of VSLAs/SGH to reach out to the more remote or risky borrowers, including women living in the most vulnerable situations.	2.1.1 Number of new women borrowers having access to VSLAs/SHGs (disaggregated by age, migratory status and disability) 2.1.2 Extent to which VSLAs/SHGs have been able to reach out to the	2.1.1 <i>to be defined</i> 2.1.2 <i>to be defined</i>	2.1.1 <i>to be defined</i> 2.1.2 <i>to be defined</i>	2.1.1 2.1.2	

		more remote or risky borrowers				
Output 2 relating to Outcome 2	Groundwork is complete for the adoption of enabling policy and regulations that support non-banking financial institutions to expand access to credit and other support to female entrepreneurs.	2.2.1 <i>to be defined</i> 2.2.2 <i>to be defined</i>	2.2.1 <i>to be defined</i> 2.2.2 <i>to be defined</i>	2.2.1 <i>to be defined</i> 2.2.2 <i>to be defined</i>	2.2.1 2.2.2	
Output 1 relating to Outcome 3	Enhance access by Somali women journalists to business development services in Somalia and strengthen their digital technology skills.	3.1.1 Number of published news and in-depth features on issues of direct relevance to women and/or considered social taboo subjects 3.1.2 Number of Somali women journalists receiving training, including on digital skills.	3.1.1 <i>to be defined</i> 3.1.2 <i>to be defined</i>	3.1.1 <i>to be defined</i> 3.1.2 <i>to be defined</i>	3.1.1 3.1.2	

4 IMPLEMENTATION ARRANGEMENTS

4.1 Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with the partner country.

4.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 60 months from the date of adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3 Implementation of the Budget Support Component

N/A

4.4 Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measure³.

4.4.1 Direct Management (Grants)

Grants: (direct management)

(a) Purpose of the grant(s)

The grants will be supporting the implementation of both Specific Objective 1 and Specific Objective 2 with the aim of enhancing women's perspectives in business dialogues and facilitating access to finance for women entrepreneurs, formalising saving and lending associations and nonbanking financial regulations.

(b) Type of applicants targeted

Non Governmental Organisations (NGOs), NGO consortia, Non-profit development organisations (NPO) with operational presence in the areas of intervention and expertise in the relevant sectors of the intervention.

4.4.2 Indirect Management with an entrusted entity

This action may be implemented in indirect management with an entity which will be selected by the Commission's services using the following criteria: the entity needs to have expertise in supporting women journalists in Somalia, providing sustained training and mentoring for women journalists as well as expertise

³ www.sanctionsmap.eu. Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

in working with both national and international media. The implementation by this entity entails all activities under Specific Objective 3.

4.4.3 Changes from indirect to direct management mode (and vice versa) due to exceptional circumstances (one alternative second option)

The part of the action under the budgetary envelope reserved for grants may, partially or totally, be implemented in indirect management with an entity, which will be selected by the Commission's services using the following criteria: entities that have experience in working in supporting women journalists in Somalia, providing sustained training and mentoring for women journalists as well as expertise in working with both national and international media.

If negotiations with entities in section 4.4.2 fail, that part of the action may be implemented in direct management in accordance with the implementation modalities identified in section 4.4.1.

4.5. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

4.6. Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)	Third-party contribution, in currency identified
Specific Objective 1 and Specific Objective 2	7 500 000	TBC
Grants (direct management) – cfr section 4.4.1	N.A.	N.A.
Specific Objective 3	2 500 000	TBC
Indirect Management with an entrusted entity – cfr section 4.4.2	2 500 000	TBC
Grants – total envelope under section 4.4.1	7 500 000	N.A.
Evaluation – cf. section 5.2 Audit – cf. section 5.3	may be covered by another Decision	N.A.
Contingencies	N.A.	N.A.
Totals	10 000 000	

4.7 Organisational Set-up and Responsibilities

The Action will be coordinated through a Programme Steering Committee that will meet on an annual basis and cover all the projects in the intervention. Individual Project Steering Committee meetings will take place every six months while Technical Committee meetings will be arranged when appropriate.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action and may sign or enter into joint declarations or statements, for the purpose of enhancing the visibility of the EU and its contribution to this action and ensuring effective coordination.

5 PERFORMANCE MEASUREMENT

5.1 Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix (for project modality) and the partner's strategy, policy or reform action plan list (for budget support).

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

Roles and responsibilities for data collection, analysis and monitoring:

Likewise, all monitoring and reporting shall assess how the action is considering the principle of gender equality, human rights-based approach and rights of persons with disabilities including inclusion and diversity. Indicators shall be disaggregated at least by sex and age, and disability if possible.

In addition to the continuous and regular monitoring, reporting and analysis carried out by the implementing partners, the reporting against the logical framework of this action will depend on inputs from third party consultants recruited by the Commission to take stock as part of the mid-term evaluation and final evaluation of the programme. In addition, throughout the implementation of the intervention third-party monitoring on individual projects will be carried out on a needs-basis and this may include a review of achievements against the logical framework of this action.

5.2 Evaluation

Having regard to the importance of the action, a mid-term and final evaluation will be carried out for this action or its components via independent consultants contracted by the Commission.

The mid-term evaluation will be carried out for problem solving and learning purposes in particular with respect to the intention to launch a second phase of the action and the final evaluation will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that the action is innovative in its ambition to combine a urban and rural approach to resilience and climate change in certain geographic locations.

The Commission shall inform the implementing partner at least one month in advance of the dates envisaged for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

In addition, all evaluations shall assess to what extent the action is taking into account the human rights-based approach as well as how it contributes to gender equality and women's empowerment and disability inclusion. Expertise on human rights, disability and gender equality will be ensured in the evaluation teams.

The evaluation reports may be shared with the partners and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, apply the necessary adjustments, including, if indicated, the reorientation of the project. The financing of the evaluation may be covered by another measure constituting a Financing Decision.

5.3 Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6 STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

The 2021-2027 programming cycle will adopt a new approach to pooling, programming and deploying strategic communication and public diplomacy resources.

In line with the 2022 “[Communicating and Raising EU Visibility: Guidance for External Actions](#)”, it will remain a contractual obligation for all entities implementing EU-funded external actions to inform the relevant audiences of the Union’s support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. This obligation will continue to apply equally, regardless of whether the actions concerned are implemented by the Commission, partner countries, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU member states.

However, action documents for specific sector programmes are in principle no longer required to include a provision for communication and visibility actions promoting the programmes concerned. These resources will instead be consolidated in Cooperation Facilities established by support measure action documents, allowing Delegations to plan and execute multiannual strategic communication and public diplomacy actions with sufficient critical mass to be effective on a national scale.

Appendix 1 REPORTING IN OPSYS

A Primary Intervention (project/programme) is a coherent set of activities and results structured in a logical framework aiming at delivering development change or progress. Identifying the level of the primary intervention will allow for:

Articulating Actions or Contracts according to an expected chain of results and therefore allowing them to ensure efficient monitoring and reporting of performance;

Differentiating these Actions or Contracts from those that do not produce direct reportable development results, defined as support entities (i.e. audits, evaluations);

Having a complete and exhaustive mapping of all results-bearing Actions and Contracts.

Primary Interventions are identified during the design of each action by the responsible service (Delegation or Headquarters operational Unit).

The level of the Primary Intervention chosen can be modified (directly in OPSYS) and the modification does not constitute an amendment of the action document.

The intervention level for the present Action identifies as (tick one of the 4 following options);

Action level (i.e. Budget Support, blending)		
<input type="checkbox"/>	Single action	Present action: all contracts in the present action
Group of actions level (i.e. top-up cases, different phases of a single programme)		
<input type="checkbox"/>	Group of actions	Actions reference (OPSYS#):
Contract level		
<input checked="" type="checkbox"/>	Single Contract 1	Foreseen individual legal commitment (or contract) – grant –
<input checked="" type="checkbox"/>	Single Contract 2	Foreseen individual legal commitment (or contract) – indirect/direct management –
<input checked="" type="checkbox"/>	Single Contract 3	Foreseen individual legal commitment (or contract) – indirect/direct management –