Stakeholder Engagement Plan

MALDIVES COVID-19 EMERGENCY INCOME SUPPORT PROJECT (P174014)

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Ministry of
Economic Development
Republic of Maldives

Contents

1. Introduction

An outbreak of the coronavirus disease (COVID-19) caused by the 2019 novel coronavirus (SARS-CoV-2) has been spreading rapidly across the world since December 2019, following the diagnosis of the initial cases in Wuhan, Hubei Province, China. In response, the Government of Maldives (GoM) prohibited visitors from COVID-19 affected countries, ceased issuing visas on arrival, and banned travel between resort and local islands and lockdown measures were enforced. Vaccinations have also been conducted swiftly, allowing the country to begin reopening in late 2021. COVID-19 has already caused significant public health and economic impacts, both globally and in the South Asia Region.

According to the Spring 2020 South Asia Economic Focus, Maldives is likely to be the hardest-hit country in the South Asia region as a result of its heavy dependence on the tourism sector for employment and foreign exchange income. The projected growth rate is -14 to -18.5 percent in the fiscal year ending December 2020 (South Asia Economic Focus, Spring 2020). The Government of Maldives (GoM) has announced several support packages for the private sector—the Ministry of Economic Development (MoED) and Ministry of Finance (MoF) are currently facilitating an Economic Relief Program (ERP) for businesses. Businesses with an annual revenue above MVR 10 million are expected to apply for relief packages through the Bank of Maldives (BML), while those with less than MVR 10 million will have to apply through Small and Medium Enterprise Development Finance Corporation (SDFC) for relief packages. Under this program, SDFC has approved MVR 400 million ($26 million) for disbursement to SMEs and self-employed workers. Further, the Ministry of Economic Development through its *Jobcenter*[1] (https://jobcenter.mv/) is facilitating citizens facing hardships due to this crisis to report their cases to the GoM.

Maldives economy and the labor market has been significantly impacted as a result of the COVID-19 pandemic. Maldives real GDP grew by 5.3 percent in 2019, but is estimated to have contracted sharply in 2020 as a result of the COVID-19 pandemic. The pandemic impacted many workers, disproportionately the self-employed, freelancers and contractors. Informal sector workers have also suffered sharp falls in their income – either because they depend directly on the tourism sector, or because demand has dried up as a result of social distancing measures . Women were disproportionately more impacted than men. Although the GoM has announced support packages for the private sector that incentivize firms to retain their workers, many firms have laid off their casual staff and asking contract staff to take leave without pay or significant temporary pay cuts. Informal sector workers have also suffered sharp falls in their income – either because they depend directly on the tourism sector, or because demand has dried up as a result of social distancing measures. Widespread job and income losses that have occurred is expected

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[1] The *Jobcenter* was recently set up to improve matching between employers and jobseekers. Run by the Ministry of Economic Development (MoED), the Jobcenter (*https://jobcenter.mv*) publishes job advertisements and general information about participating employers. The online platform enables registered job seekers to be notified through SMS and e-mail whenever a new job offering appropriate to their skills and experience is posted. Since the start of the crisis, the MoED has used the Jobcenter to register terminated and furloughed workers, and receive complaints about contract violations and unfair dismissal, which are investigated by the Labor Relations Authority (an independent body that enforces the Employment Act in Maldives).

to continue in Maldives as a result of the COVID-19 pandemic. According to the Spring 2020 South without government assistance, many Maldivians would fall into poverty, threatening human capital and social stability. The GoM has requested urgent external assistance to finance its policy response, which is being provided by the World Bank under this project.

2. Project Description and Components

The Project Development Objective (PDO) is to mitigate the economic impact of the COVID-19 crisis on workers and their families, and to increase the capacity of social protection programs to respond to future emergencies. The project would achieve the PDO by (i) providing emergency cash transfers to individuals who have lost their jobs or income sources as a result of the COVID-19 pandemic, to help them survive and protect their and their families' human capital; and (ii) building the capacity of National Social Protection Agency (NSPA) and its delivery systems to ensure that the GoM can respond with assistance more quickly in future emergencies.

The proposed financing amount for the project is USD 12.8 million equivalent from the World Bank's COVID-19 Fast-Track Facility through the IDA's Crisis Response Window. The three project components are:

Component 1. Emergency income support for those affected by the COVID-19 pandemic ($12 million)

This component has financed temporary income support to 22,940 individuals for a period of 3 months. The support was a top-up of any existing income to a maximum of MVR 5,000 per month. This assistance was offered to anyone applying through the Jobcenter (online or in person at local island council offices) and demonstrating that either they have lost a job since the onset of the crisis or are suffering a total loss of income as a result of the crisis. Documentation to substantiate eligibility was required as part of the application. Anyone requiring assistance preparing the application or opening a bank account was provided with support by NSPA through their partners in the local island councils. Applications was reviewed individually by the MoED team, following clear criteria, and the final list of beneficiaries were sent to NSPA for payment. Beneficiary data were collected and stored electronically in NSPA's Social Protection Information System (SPIS) to facilitate follow-up and future support. A program of media outreach was implemented to inform the public of the program and eligibility conditions, and a hotline was provided to assist people with applications, receive complaints, etc.

Components 1: Details of activities to be restructured :

Due to the COVID-19 crisis the borders of Maldives remained under lockdown with severe restrictions on economic activity, the Income Support allowance program was extended from the initial phase 1 (April, May, June) to Phase 2 (July, August, September); and subsequently to Phase 3 (October, November, December) in 2020. A total of US$12 million dollars was allocated as cash transfers in the component 1. Given there was requirement for additional funding for the Income Support Project reflecting the additional phases and increase volume of applications, additional funding was approved by the World Bank Board for US$21.6 million.

It was estimated that excess funding of USD 6.3 million would be in excess after the application submission in December 2020. The excess funding was proposed to be utilized to restructure the program on

enhancing skills, training and outreach programs to those affected by covid-19 as a way to reintegrate to the workforce.

Component 2 is underway, with the recruitment of consultants for all four sub-tasks. These are:

(a) Strengthening the National Social Protection Agency's (NSPA's) Delivery and Targeting Systems: A local consultant has been hired to develop a beneficiary portal for the NSPA's social registry, to allow online applications and updates to be submitted by local council officials. This would replace the current method of application, based on mailing a written form that needs to be manually entered by NSPA officials at headquarters. It will also facilitate the regular updating of NSPA registry data, which at present is done only every few years.

(b) Developing a Fiscally Sustainable Unemployment Insurance Program: An international consultant is preparing an assessment of options for a new unemployment insurance program, that will provide fiscally sustainable job search assistance, training and income support for a fixed period to the unemployed. The scheme will be self-financing, based on contributions from employers and workers. The scheme will be designed in a way that incentivizes participation by informal sector workers, who are currently uncovered by social insurance (both for unemployment or retirement).

(c) Improving Retirement Pension Programs: An international consultant is preparing recommendations on how to address various issues with the existing Maldives Retirement Pension Scheme, including low contribution rates, difficulties with compliance monitoring, coverage and financing management. In parallel, the World Bank is financing additional technical assistance to the Maldives Pension Administration Office to build its capacity and improve its systems.

(d) Developing a National Social Protection Framework: An international consultant is conducting an assessment of the existing social protection system, and drafting a new policy framework for the sector. This draft will be shared widely among stakeholders and consultations held to refine and finalize the document.

Component 3. Contingent Emergency Response Component (CERC) (US$0 million).

In the event of an Eligible Crisis or Emergency, the project will contribute to providing immediate and effective response to said crisis or emergency. The allocation to this component is to minimize time spent on a reallocation of funds from programmed activities. The unused amount can be reallocated to other components if the CERC component is not triggered a year prior to project closing.

3. Objectives of the Stakeholder Engagement Plan

The Project is being prepared under the World Bank's Environment and Social Framework (ESF) and as per the Environmental and Social Standard ESS 10 on "Stakeholder Engagement and Information Disclosure", the implementing agencies are required to provide stakeholders with timely, relevant, understandable and accessible information and consult with them in an appropriate manner, which is free

of manipulation, interference, coercion, discrimination and intimidation. Accordingly, the overall objective of this Stakeholder Engagement Plan (SEP) is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle.

The SEP outlines the ways in which the PMU will communicate with stakeholders and include a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. In the context of infectious diseases, broad, culturally appropriate, and adapted awareness raising activities are particularly important to properly sensitize the communities to the risks related to infectious diseases.

Progress made in terms of implementing the stakeholder engagement plan:

The project has successfully implemented the communication and stakeholder engagement plan and has also been highlighted as a best practice in the region. Communication campaigns and awareness raising have been done through social media, television, radio etc. and have carried out 100+ rounds of consultations with local government authorities and island councils, media, and civil society groups to disseminate information about the Income Support Assistance program including the application process. Two satisfaction surveys were also completed by the project. The beneficiary satisfaction surveys provided useful findings to understand areas to improve the project design. Accordingly, the project took measures to reduce the processing time for applications by simplifying processes and improving the time taken for depositing & communicating with the applicants etc. Island Councils also reached out to vulnerable groups to support in the application process and business associations reached out to encourage women in self-employment to apply for ISA. Given these additional measures taken, application approval rate increased from 66 percent in phase 1 to 93 percent in phase 2 and the percentage of female applicants also increased from 23 percent in phase 1 to 45 percent in phase 3.

The GRM for the project has been functioning well with 45,728 grievances received so far of which 45,698 had been resolved. All of the cases had been addressed within a two-week period. In terms of the nature of grievances, 65 percent of the grievances were related to enquires requesting guidance on the application process and the status of the applications submitted, and the remainder were related to delays in payments or expressing dissatisfaction in the application process including the amounts received.

4. Stakeholder Identification and Analysis

Project stakeholders are defined as individuals, groups or other entities who:

i.   are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and

ii.   may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their

respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Depending on the different needs of the identified stakeholders, the legitimacy of the community representatives can be verified by checking with a random sample of community members using techniques that would be appropriate and effective considering the need to also prevent coronavirus transmission.

a) Methodology

In order to meet best practice approaches, the Project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;

- Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities will be provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;

- Inclusiveness and sensitivity: stakeholder identification will be undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly and the cultural sensitivities of diverse population groups.

For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

Affected Parties – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;

Other Interested Parties – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and

Vulnerable Groups – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status[2] , and that may require

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[2] Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness,

special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

b) Identified Stakeholders and Affected Parties

Within the context of the project, the Key Affected Parties for the project are the beneficiaries of the cash transfer, and other affected parties being individuals and groups that will benefit from the policy and institutional reform under Component 2:

Key Affected Parties

- Workers who have been dismissed due to COVID-19 pandemic
- Workers who have been suspended due to COVID-19 pandemic
- Workers who have been given no pay leave due to COVID-19 pandemic
- Workers with salary deductions
- Self-employed workers
- Small and Medium Enterprises

Other Affected Parties

- Real estate
- Banks (Bank of Maldives)
- Major industries; tourism and construction
- Program Implementation Unit of National Social Protection Agency (NSPA), Maldives, Pension Administration Office (MPAO) and other agencies who will benefit/ be affected by policies developed under Component 2

c) Other interested parties

Other parties interested in the Project are identified as individuals, groups, or organizations who may not be directly affected by the Project but who can help play a role in identifying potential risks, impacts, and opportunities for the Borrower to consider and address in the assessment process and throughout project preparation. The following Other Interested Parties (OIPs) have been identified as stakeholders of the Project:

- The public at large
- Other Government entities that are providing support to COVID-19 response (e.g., Ministry of Health, National Social Protection Agency, Maldives Pension Office)
- Public Health care workers and police officers
- Community based organizations, national civil society groups, and NGOs
- Regulatory agencies (e.g., Environmental Protection Authority, Labor Relations Authority)
- Mass Media and other interest groups, including social media & the Government Information Department)
- National and international NGOs, Diplomatic missions, bi-lateral and multilateral agencies (especially UNICEF, WHO etc.)
- Other Banks and Private sector
- Education institutions registered in the following areas:

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physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

- o Accounting: Institute of Chartered Accountants of the Maldives
- o Information Technology: National Center for Information Technolofy (NCIT), Ministry of Environment, Climate Change and Technology.
- o Diving and water sports: Ministry of Tourism (MoT), Employers in the tourism sector (tourists, guesthouses, MSMEs).

- State Owned Enterprises (SOEs) Business Center Corporation (BCC) to provide training as part of the grants assistance program

d) Disadvantaged/Vulnerable Individuals or Groups

While the project's objective is to target Maldivians that are most vulnerable to the economic effects of COVID 19, it is important to ensure that project benefits are fully understood and accessed by disadvantaged or vulnerable individuals and groups, who often do not have a voice to express their concerns or understand the benefits. Awareness raising and stakeholder engagement should take into account such groups and individuals with particular concerns and cultural sensitivities and ensure their full understanding of project activities and benefits. The vulnerability may stem from a person's origin, gender, age, health condition, economic deficiency and financial insecurity, and disadvantaged status in the community. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision-making process so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Within the Project, the vulnerable or disadvantaged groups may include and are not limited to the following:

- Groups with accessibility challenges, which include;
  - ✔ Lack of accessibility to communication and enrollment (i.e. illiterate beneficiaries)
  - ✔ Lack of accessibility to online enrollment forms through the job center (i.e. beneficiaries who do not have access to internet, do not own smartphones or the required devices to access *job center*, lack the required technical skills to fill online forms)
  - ✔ Lack of physical accessibility to island councils to get assistance to prepare applications, open grant account and apply through job center. This includes people with disability or chronic diseases, geographical distance from the closest island council office.
- Excluded potential beneficiaries due to targeting exclusion errors; exclusion errors are always present in social assistance programming as there is not a perfect "targeting formula" so exclusion errors are expected.

- Individuals/groups not eligible for the income support even though they are experiencing hardships (e.g., unemployed, foreign workers, home based workers and domestic workers, etc)

Additionally, under Component 2, the impacts of activities to enhance the national social protection system in the Maldives, such as the NPSA's delivery and targeting systems, the unemployment insurance program, pension program and the national social protection framework, may disproportionately fall on disadvantaged or vulnerable individuals or groups. However, the needs and concerns of these groups may

not be reflected in these initiatives as these groups do not have a voice to express their concerns or understand the impacts of a project.

5. Stakeholder Engagement Program

a) Summary of stakeholder engagement done during project preparation

Given the emergency nature of this operation and the transmission dynamics of COVID-19, consultations during the project preparation phase were limited to technical discussions with the President's Office including the economic line ministries; MoF, MoED, Ministry of Tourism, Ministry of Fisheries, Agriculture and Marine Resources, NSPA, MPAO, United Nations Development Programme (UNDP), relevant SOEs, associated banks and private sector. NPSA will continue to coordinate with other Government agencies, NGOs, private sector, multilateral agencies, etc., as laid out in the SEP to receive additional feedback from stakeholders and use it to refine the approach, procedure and implementation arrangements for both the income support as well as the system strengthening components of the Project. Specifically, consultations with representatives from: (i) potential project beneficiaries; (ii) vulnerable groups; (iii) island councils; and (iv) private sector, especially employers, will be carried out prior to project effectiveness (tentatively, 15 June 2020). Issues raised/discussed during the consultations, will be used to update the SEP, if required.

This SEP along with the ESMF and the LMP prepared under the Project was disclosed on 17th May 2020 for virtual consultation and feedback. The SEP will be continuously updated throughout the project implementation period, as required, and the project includes resources to implement the actions included in the Plan.

b) Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement

Strong citizen and community engagement are preconditions for the effectiveness of the project. Accordingly, different tools, techniques and methods will be used for engagement to cover different needs of the stakeholders. Given the nature of the project, the strategy for stakeholder engagement is heavily focused on on-going information disclosure and dissemination that is efficient, transparent, and addresses the needs of different stakeholders. The design and means of stakeholder engagement will be adapted to the current social distancing requirements of the GoM that are now in effect and based heavily on electronic and virtual modalities. The implementing entity, PMU will work on ensuring that virtually disseminated information is in line with the standards of information sharing that was implemented pre-COVID 19.

c) Communication Channel and Engagement Mechanism

Communication Channels and engagement mechanisms will include the following:

- **Inter-governmental/Project staff engagement mechanisms**
Telecommunication through phone calls, text messaging and emails is widely used and teams working on the emergency response have adapted their working schedules to the needs of the project design work.

- **Engagement with donors and development partners**

Virtual communication will be used for project coordination between the GoM and DPs (e.g. virtual meeting platforms, emails and phone calls)

- **Communication channels with the public**

The Government is using mass media (TV, radio and electronic newspapers) as the main communication channel with the public. A daily press conference is conducted usually twice, to communicate updates regarding the COVID-19 situation, including support programs to mitigate the impact of the crisis. Website and Social Media platforms are also used to publish updates and awareness messages. Online websites/Social Media platforms contain but are not limited to:

- ✔ https://covid19.health.gov.mv/en/
- ✔ Hotline: 1676 (available 24/7)
- ✔ Maldivian Red Crescent hotline for psychosocial support: 1425 (8pm-12am).
- ✔ http://www.trade.gov.mv
- ✔ MoED twitter handle: @MoEDmv
- ✔ MoED facebook handle: Ministry of Economic Development
- ✔ https://jobcenter.mv
- ✔ http://www.nspa.gov.mv/v2/

- **Communication methods with project beneficiaries**

Enrolment information sessions for project beneficiaries are conducted virtually, through a third-party call center and an online interactive platform. WhatsApp will be used to share IEC materials and videos, by NPSA and Payment Service Providers. Local languages will be used in all communications for better understanding by the wider community.

d) Proposed strategy for stakeholder engagement

The project will utilize various methods for engaging with stakeholders in a manner that meets current GoM   policies and guidelines for social distancing. Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the Stakeholder Engagement Plan and the grievance mechanism.

Stakeholder group	Key topics of consultation	Methods and channels	Timing
Beneficiaries receiving cash assistance	• Accessibility to payments, key challenges, and suggestions for improvement	Online GRM forms and call center	Throughout the project implementation
NPSA's Partners (island councils, other Government agencies, donors, etc)	• Technical guidance based on international experience and previous assessments of other social protection program • Progress of this Income support program implementation • Key areas for capacity building to NPSA and partners' staff, including list of systems enhancements required • Feedback on Component 2 activities, including the draft of social protection	Virtual Meetings and emails	Throughout the project implementation

	framework, unemployment insurance program, pension program, etc.		
Banks **(**Maldives Monetary Authority, Bank of Maldives, SDFC)	• Payment delivery regulations and practices	Virtual Meetings and emails	Design phase of the Emergency Cash Transfer component
Private Sector (call moderators, Payment Service providers and programing company)	• Key challenges and best practices implemented	Virtual Meetings and emails	Throughout the project implementation
Education institutions and training providers.	• Technical guidance • Key challenges and best practices implemented • Quality assurance of training modules • Discuss avenues for efficient way to implement the program • Marketing the programs on all avenues	Physical meetings and emails	Throughout the project implementation
State Owned Enterprises (SOEs) and Business Center Corporation (BCC).	• Technical guidance • Key challenges and best practices implemented • Quality assurance of training modules • Discuss efficient ways to implement the program • Marketing the programs on all avenues	Physical meetings and emails	Throughout the project implementation

e) Proposed strategy for information disclosure

The MoED and NPSA website will be used to disclose project documents, including the SEP, and details of the project Grievance Redress Mechanism will be available on the Job Center website and the island council premises.

Below is a table showing the proposed strategy that will be adopted by the PMU for information disclosure, considering the needs of different stakeholders during project implementation. All information will be updated regularly so that it is kept up-to-date with the evolving situation and to include future stages of the project including supervision and monitoring.

Stakeholder group	Key characteristics	Specific needs	Preferred Methods means	List of Information to be disclosed	Responsible Entity
Project beneficiaries	Individuals who have lost a job since the onset of the crisis or are suffering a total loss of income as a result of the crisis	- Communication to be done in a clear manner in Dhivehi and English - Information about the program to be widely disseminated - Support in account opening and enrollment - Explanation of payment amounts, regularities and payment methods. - Support to submit applications	Phone calls, SMS, virtual information sessions (When possible) audio-visual materials, outreach activities	- Income support in response to COVID-19 - Skills training, apprenticeship and entrepreneurship program details - Eligibility criteria/conditions - Application forms - Documents required to support application - Benefit amount - Program duration - Payment mechanism - Enrollment steps - Call center number to reach out for support - Information about GRM (incl. for GBV-related issues) - SEP, LMP, ESMF, ESCP (in project and World Bank's external website)	NPSA, PMU, Island Councils, MoED
The Public	Households in Maldives; of variety of deciles, educational levels, geographic areas (outer islands/atolls), age, gender	Communication to be done in a clear manner, including relevant facts, and in both Dhivehi and English	Mass Media (Radio, TV and e-newspapers) Social Media (Governmental platforms), outreach activities, audio-visual materials	- Explanation about program (objective, duration, target population, selection criteria, sources of data) - Share experiences on the impact of the project, incl. on vulnerable households - Sensitization to digital payment methods - Explanation about how the program and other governmental programs are implemented in a complementary manner - Information about GRM (incl. for GBV-related issues) - SEP, LMP, ESMF, ESCP (in project and World Bank's external website) - Documents marked for public disclosure under Component 2 (e.g., targeting systems, pension and unemployment insurance program, social protection	Government media team, PMU, NPSA, MoED

				framework, skills training, apprenticeship and entrepreneurship etc.)	
Government officials, including, other concerned ministries/ agencies	NPSA & MoED staff not directly engaged; concerned ministries/agencies (e.g., MoH, MOGFSS, NSPA, MPAO, Bank of Maldives, SDFC, Island Councils, etc)	Brief and clear, in Dhivehi	Emails, phone calls/SMS and virtual meetings as possible	- Brief about the project, launch date, objectives and the role of MoED /NPSA/PMU in targeting, data verification and payment - Share experiences on the impact of the project, incl. on vulnerable households - Explanation about how the program and other governmental programs are implemented in a complementary manner	PMU, NPSA, MoED
Mass media and associated interest groups	Dissemination channel of news and information, local and international NGOs, digital/web-based entities, and their associations.	Frequent updates that are accurate.	Depends on the media type and technology use (TV, radio, social media,etc.)	- Information about the program objective, target groups, duration of support and showcase of the positive effect it will have on targeted beneficiaries - Experiences on project impact the impact of the project, incl. on vulnerable households - Explanation about how the program and other governmental programs are implemented in a complementary manner - SEP, LMP, ESMF, ESCP (in project & WB's external website) - Documents marked for public disclosure under Component 2 (e.g., targeting systems, pension and unemployment insurance program, social protection framework, skills training, apprenticeship and entrepreneurship etc.)	Government media team, PMU, NPSA, MoED

Other development partners engaged in COVID-19 response	Financing or supporting COVID-19 projects/ initiatives in the Maldives through loans, funds, technical assistance	Regular	Emails (status reports), briefing notes, and virtual meetings	Project implementation updates; in line with the planned activities, outputs and outcomes	PMU, NPSA
Vulnerable groups	Illiterate, without access to internet and other technology, limited mobility (elderly, people with disability or chronic diseases), geographical distance, survivors of GBV, SEA, SH	Audio communication in Dhivehi , using simplified terms; Support in enrollment and application; written guidance provision in Dhivehi	Phone calls, Visits to island councils (if permissible), audio-visual materials, outreach activities, house visits by community and other workers mobilized by island councils (if necessary)	-Program duration and objective 　-　Eligibility criteria/conditions - Benefit amount - Payment mechanism - Enrollment steps 　-　Application forms 　-　Documents required to support application 　-　Call center number to reach for support 　-　Information about GRM (incl. for GBV-related issues) 　-　SEP, LMP, ESMF, ESCP (in project and World Bank's external website) 　-　Documents marked for public disclosure under Component 2 (e.g., targeting systems, pension and unemployment insurance program, social protection framework, Skills training, apprenticeship and entrepreneurship etc.) 　-　Liaise with MoGFSS to conduct text message-based and/or email-based information and outreach campaigns about the available domestic violence prevention and response services.	NPSA, PMU, Island Councils, MoED

6. Resources and Responsibilities for Implementing SEP Activities

a) Resources

The MoED will be in charge of stakeholder engagement activities. PMU will take the lead role in initiating this function. The budget for the SEP (and the implementation of other environment and social activities such as ESMF, LMP) is approximately USD 100,000.

b) Management functions and responsibilities

The entities responsible for the implementation of the SEP activities are the NPSA, MoED and MoF . The stakeholder engagement activities will be carried out and documented through NPSA via the PMU established for the duration of the Project. The stakeholder engagement activities will be documented through quarterly progress reports, to be shared with the World Bank.

7. Grievance Mechanism

The main objective of a Grievance Redress Mechanism (GRM) is to help resolve complaints and grievances in a timely, effective and efficient manner that satisfy all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. It is also used as a mechanism to analyze and enhance project processes. Specifically, the GRM;

- Provides affected people with a venue for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Use the outputs of the GRM process to enhance program implementation

a) GRM Description & Structure

Grievances will continued to be operated under the Ministry of Economic Development (MoED). The GRM for the project has been functioning well with 45,728 grievances received so far of which 45,698 had been resolved. All of the cases had been addressed within a two-week period. In terms of the nature of grievances, 65 percent of the grievances were related to enquires requesting guidance on the application process and the status of the applications submitted, and the remainder were related to delays in payments or expressing dissatisfaction in the application process including the amounts received.

Given below is the GRM structure that has been put in place:

Tier 1: PMU at the Ministry of Economic Development (MoED): The GRM focal point of PMU will record grievances received from multiple channels (phone, email, website, Island Councils etc.) in the Grievance Register in the MoED's intranet. Depending on the nature of the grievance, the PMU will assign the resolution of the complaints to relevant staff of the PMU, and if necessary, will also engage other staff of the MoED for advice and support. Any grievances that cannot be resolved by the PMU or if the

complainant is unhappy with the resolution, the grievance will be escalated to the Executive Management Team of MoED. The Complainant also has the right to submit grievances directly to the Executive Management Team**.**

Tier 2: Executive Management Team of MoED: The Executive Management Team of MoED, comprising Minister, State   Ministers and   Deputy Ministers of the MoED will review unresolved grievances escalated from the PMU. The team will review the grievance and all documentation gathered throughout the investigation carried out at the PMU level and determine whether further actions are required to resolve the grievance. Based on additional information collected, including meeting with the complainant and/or the representative(s), if required and/or requested, the MoED will give the final decision based on their review. If the Complainant is still not satisfied with the   resolution given by the Executive Management Team, then s/he   can seek legal recourse.

Access to the GRM however will not replace and/or impede an individual's decision to seek legal action through the country's judiciary system, at any time.

b) Grievance Resolution Process

<u>Step 1:</u> **Submission of grievances -** Complainants can submit grievances via multiple channels, including:

- Telephone - Call Jobcenter on +960 1691, +960 7266602, +960 7266603
- Email – Send email to: support@jobcenter.mv
- Online form - lodge a complaint using the form available at the website www.jobcenter.mv
- In-person – grievances can be physically handed over and lodged with the GRM focal points available at the Island Councils which then will be forwarded to the PMU or directly to the PMU itself at the MoED. In addition, when Island Council staff do home visits, Complainants can submit grievances directly to them as well.

<u>Step 2:</u> **Screening of grievances & acknowledgement of receipt (within 2 days) -** Grievances will be screened depending on the level of severity in order to determine who the relevant entity (department, unit, etc.), hereafter called 'grievance owner', to seek resolution will be and make decisions on addressing the complaint. The acknowledgement of a grievance will include a summary of the grievance, method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required, the acknowledgment will also have a section requesting for any additional information or to clarify any issues. All grievances will be acknowledged within two working days of a grievance being submitted in writing.

<u>Step 3:</u> **Investigating the grievance and communication of the response (within 21 days)** - The investigation process may involve remote consultations with different stakeholders including contacting the Complainant to obtain additional information. If site visits are required, they will be done following appropriate health and safety guidelines as described in the ESMF and LMP prepared for the project. All records of meetings, discussions and activities will be recorded. Information gathered during the investigation will be analyzed and will assist in determining how the grievance is handled and what steps need   to be taken in order to resolve the grievance. The grievance owner is responsible for assigning actions, monitoring actions undertaken to resolve the grievances and making sure deadlines are adhered to. Once all actions have been completed and the grievance has been resolved, the grievance owner will

then formally inform the Complainant in writing. All grievances are expected to be investigated and Complainant informed of the response within 21 days of complaint receipt.

Step 4: Follow-up (after 21 days) and Appeal - The grievance owner will contact the Complainant three weeks after the grievance is resolved to verify if Complainant is satisfied with the outcome and also gather any feedback on the grievance process. Minutes of the meeting will be recorded and saved in the Ministry's Intranet. If the Complainant is unhappy with the resolution and/or does not agree with the proposed actions, then the grievance owner will escalate the matter to the Executive Management Team of MoED. The Executive Management Team will review the grievance and all documentation gathered throughout the investigation and determine whether further actions are required to resolve the grievance. Then MoED will give the final decision based on their review. Once all possible avenues of redress have been proposed and if the Complainant is still not satisfied then s/he would be advised of their right to legal recourse.

c) Handling Gender Based Violence (GBV) issues

World Bank Group's 'Technical Note on SEA/H for HNP COVID Response Operations,' Inter-Agency Standing Committee's 'Interim Technical Note: Protection From Sexual Exploitation and Abuse (PSEA) during COVID-19 Response,' 'The COVID-19 Outbreak and Gender: Key Advocacy Points from Asia and the Pacific', 'UN Women, 2020 and the COVID-19 resources to address gender-based violence risks', will be used as a guide towards the design and implementation of measures.

● Communication campaign related to specific issues women face during the pandemic, including safeguarding and responding to (sexual and gender based violence) SGBV and child abuse.
● Publicly post or otherwise disseminate messages clearly prohibiting (sexual exploitation and abuse (SEA)/ sexual harassment (SH) during community interactions. Key messages to be disseminated will focus on : i) No sexual or other favors can be requested during provision of employment support; ii) Staff of Island Council and Community workers are prohibited from engaging in sexual exploitation and abuse; iii) Any case or suspicion of sexual exploitation and abuse can be reported to the GRM.
● Prepare and implement and train all workers in regard to GBV prevention and child protection protocols during community engagement activities. First respondents to be trained on basic skills to respond to disclosures of GBV, in a compassionate and non-judgmental manner and know to whom they can make referrals to.
● Ensure GBV psychosocial support services are identified and are ready to support victims.
● GRM to have procedures to handle allegations of GBV/SEA/SH violations and to immediately notify both the MoED and the World Bank of any GBV complaints, with the consent of the survivor.

8. Monitoring and Reporting

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.

Monthly and Quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions, will be collated by the designated GRM focal person, and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year will be conveyed to the stakeholders through the publication of an annual report which among others will include the project's interaction with the stakeholders.

In addition, the project will establish two mechanisms for receiving feedback and using it for course correction or any other changes required:

- Beneficiary satisfaction with COVID-19 Support Allowance enrollment and payment processes (percentage by gender)
- Percentage of grievances addressed within 2 weeks

Based on the feedback, changes will be made on project activities and procedures, including community engagement approaches, based on evidence and needs and cultural appropriateness. Such changes made will then be shared with the stakeholders as and where appropriate. Further, the feedback will also be used as part of documentation of lessons learned to inform future preparedness and response activities.