



MINISTRY OF HIGHER EDUCATION, LABOUR AND SKILLS  
DEVELOPMENT (MOHELSD)

REPUBLIC OF MALDIVES

# **STAKEHOLDER ENGAGEMENT PLAN (SEP)**

Prepared in February 2022, Revised February 2024

Sustainable and Integrated Labor Services (SAILS)  
(P177240)

Republic of Maldives

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## **1. Introduction**

The Maldives has enjoyed robust growth coupled with considerable advancements in infrastructure, connectivity, and healthcare in the recent years. Despite the country's relatively improving poverty and inequality indicators, the Maldives still faces several challenges in the social sector. Among the major challenges are the high proportion of youth who are either unemployed or discouraged from job-seeking, and the low female labor force participation rate. Labor markets in Maldives suffer from a number of structural problems. Youth unemployment is high, exacerbated by skills mismatches in the private sector. Increasing cash and in-kind subsidies may be inflating reservation wages among youth, and cultural factors may also play a role especially for young women.

The lack of economic opportunities is seen as contributing to other social problems and anti-social activities. A shortage of jobs commensurate with the aspirations of young jobseekers contributes to a sense of dissatisfaction and isolation, especially among youth who have invested heavily in their education and find few opportunities to use it. Job opportunities are especially limited in the atolls. The youth unemployment rate (labor force ages 15-24) is at 18.41%, while it is higher among males (21.25%) and lower among females (13.05%).

It is this population that apart from jobs in the long run needs to be protected from shocks. As seen in the COVID-19 crisis, the young age working groups were the most vulnerable to the pandemic led economic crisis. During the initial phase of the crisis, more than half of the employment complaints in the Job Center relate to those under the age of 30. Overall, more than two out of every five people (41 percent) who reported an employment or income impact on JobCenter are youth between the ages of 21-30 years, while 9 percent are between 15-20 years.

Considering the unemployment rate in Maldives and its consequent impact due to income loss, the Government of Maldives is exploring the possibility of introducing an unemployment insurance benefit scheme to protect those falling into unemployment from a sudden exposure to poverty.

The Sustainable and Integrated Labor Services (SAILS) Project has two parts: an employment services (ES) component and an unemployment insurance (UI) component. The ES was implemented by the Ministry of Economic Development (MoED) during the first year of the Project implementation. However, a result of the Presidential election, in 2024 the Project's Implementing Agency was changed and the PMU was moved under the Ministry of Higher Education, Labour and Skills Development (MOHELSD). The UI component is continued to be implemented by the Maldives Pension Administration Office (MPAO).

The Project was restructured in February 2024 to reflect the change in the ministry from MoED to MOHELSD and the Project's ESF instruments were revised with the new Ministry name and re-disclosed.

## **2. Project Description and Components**

The Project Development Objective (PDO) is to enhance the resilience and employability of Maldivian workers by establishing a sustainably financed unemployment insurance scheme and integrated labor market services.

It is expected 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 will measure progress toward the PDO via the following proposed indicators:

- (a) Coverage of the unemployment insurance (UI) program (gender-disaggregated)
- (b) Employment rate of jobseekers participating in the employability services (ES) program (gender-disaggregated)
- (c) Number of partnerships established by Job Center with schemes promoting: (i) green jobs; (ii) local employment in the tourism sector; and (iii) female employment.
- (d) Beneficiary satisfaction with the UI program
- (e) Beneficiary satisfaction with the ES program

The main project components are:

**The project will support the establishment of the UI and ES programs from design to maturity, and is expected to have the following components:**

**Component 1. Employability Services program administration, case management and job search assistance (\$8 million).** This component will be implemented by the MOHELSD, and have the following subcomponents:

- (a) **Policy and Legal Framework (\$0.2 million).** This subcomponent will finance the consultancies and workshops required to develop the UI and ES programs in a consultative and inclusive manner, including drafting regulations, establishing program rules and eligibility criteria and liaising with other government and non-government entities to build service delivery linkages.
- (b) **Development and implementation of the ES program (\$5.8 million).** This subcomponent will finance the design, development and initial implementation of the new ES program. The ES program will provide career counseling, skills development, and job matching services through the Job Center portal to discouraged workers. Partnerships will be established between the Job Center and schemes in the country promoting employment in two strategic priority sectors – green jobs and the tourism sector – and schemes to increase female employment.
- (c) **Expansion of Job Center (\$1 million).** Under the GoM’s decentralization initiative, physical Job Center service centers will be established in 3-5 key strategic locations nationwide (other than the existing office in Malé). The expansion will also involve placing 30-50 dedicated case managers in island council offices, who will serve as a personal contact for beneficiaries of the UI and ES programs at the atoll level. A minimum of 30% of these positions will be filled by women. The case workers will also be trained and empowered to support the delivery of other social programs, including the welfare benefits implemented by NSPA and the Ministry of Social and Family Development (MoSFD). For ‘hard-to-place jobseekers’ the program will accommodate and pay for demand led external employability enhancing interventions (such as soft or technical skills development, self-employment support, and entrepreneurship training).
- (d) **Digital systems for program administration (\$1 million).** This subcomponent will finance the required process reengineering and software development to turn the existing Job Center online platform into a fully functional beneficiary registration and case management portal, including interlinkages to service providers (e.g. counselors, training providers) and employers.

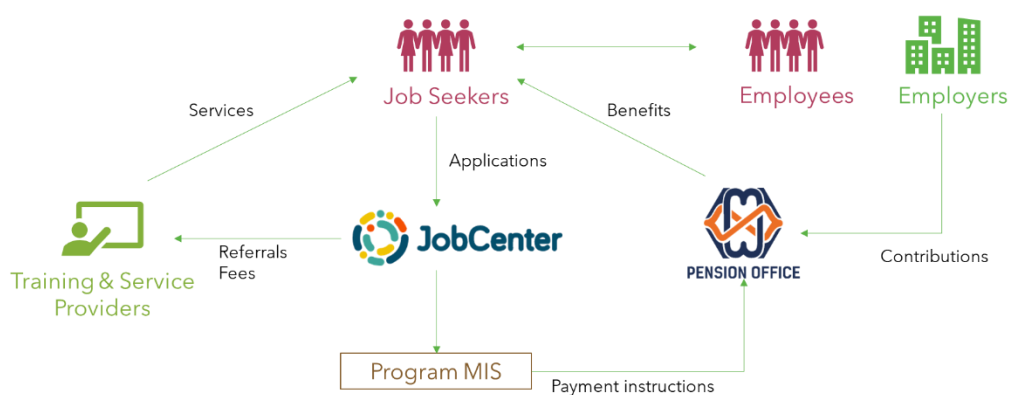
**Component 2: Establishment of the UI Program Fund (\$14 million).** This component will be implemented by the MPAO. The UI program fund will have two parts: a ‘solidarity fund’ and individual savings accounts for each beneficiary. The solidarity fund will finance top-ups to the monthly benefit for beneficiaries whose individual savings account balances are insufficient to cover the minimum UI benefit in the event of an unemployment spell. The MPAO will establish the fund under the new program’s legislation, with financing from the project as follows:

- (a) **Seed financing of UI fund (\$13 million).** The project will capitalize the solidarity fund to ensure sufficient financing is available to pay benefits during the initial years of the new program, including in the event of major unanticipated shocks, including climate shocks, which cause widespread job loss. This fund would finance an extension of unemployment benefits up to 12 months (versus 6 months normally) following a major macroeconomic or climate shock.
- (b) **Internal systems and processes for fund administration (\$0.3 million).** The project will pay for systems engineering and software development consultants to adapt the MPAO’s internal systems and processes to perform its mandated functions under the UI program.
- (c) **Financial management, compliance and audit (\$0.7 million).** The project will finance consultancies for the MPAO to fulfil the legal and operational requirements of establishing the fund.

**Component 3: Technical assistance for project implementation (\$2 million).** This component will be implemented by the MoHELSD and finance the incremental operating costs, stakeholder engagement and communications, monitoring and evaluation activities.

- (a) **Operating costs and capacity building (\$1 million).** This subcomponent will finance the costs of consultants and other incremental costs associated with managing the project.
- (b) **Monitoring and evaluation (\$0.6 million).** Eligible expenditures for this subcomponent will include data collection and analysis, as well as beneficiary feedback surveys and capacity building for the institutional entities. Through a collaboration with the Maldives Bureau of Statistics, a labor market study will be conducted with special focus on the potential and constraints to increasing female labor force participation.
- (c) **Stakeholder engagement and outreach (\$0.4 million).** This will finance consultancies for program development, branding and awareness campaigns, including outreach via workers’ associations and island-level community groups. A full-time communications consultant will be hired for the project.

**Component 4: 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 this crisis or emergency. The allocation to this component is to minimize time spent on a reallocation of funds from programmed activities.



**Figure 1. Potential role of JobCenter platform linking jobseekers to employers and training**

### **3. Brief Summary of Stakeholder Engagement Activities**

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.

#### **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<sup>1</sup>, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

## b) Affected Parties

Within the context of the project, the Key Affected Parties for the project are:

Key Affected Parties

- Job seekers
- Self-employed workers
- Micro, Small and Medium Enterprises
- Employers

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<sup>1</sup> 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, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

## Other Affected Parties

- Project Management Unit of Ministry of Higher Education, Labour and Skills Development
- Program Management Unit of Maldives Pension Administration Office (MPO)
- National Social Protection Agency (NSPA)
- Ministry of Finance
- Ministry of Higher Education, Labour and Skills Development
- Maldives Polytechnic
- Technical and Vocational Education and Training (TVET) Authority
- Local Government Authority (LGA)
- Tertiary Education Institutes
- Migration Facilitating Agencies
- National Job Centre
- Developers (system/ portal)

### 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:
  - Accounting: Institute of Chartered Accountants of the Maldives
  - Information Technology: National Center for Information Technology (NCIT), Ministry of Environment, Climate Change and Technology.
  - 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

Besides the project affected and other interested parties, it is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a



project. Hence, it would be important for the Project to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals/groups. 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 (i.e. illiterate beneficiaries)
  - Lack of accessibility to online platforms eg: job center (employees 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 accessibility to requirements for eligibility due to documentation issues (such as limited registration of employers in pension system)
  - 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 culturally determined factors (i.e. women burdened with home care duties unable allocate access employment services supported by the project, women not encouraged to take up employment due to religious reasons etc.).
- Employment regulation and Government policy may prevent migrants and foreign workers to access employment services support by the project.
- 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.

### **3. Stakeholder Engagement Program**

#### **a) Summary of stakeholder engagement done during project preparation**

The following stakeholder consultations were carried out providing inputs to the design of the SAILS project:

- Relevant consultations were carried out with key stakeholders to design UI scheme by an international expert with support from the World Bank through the CEISP. The review recommended that existing agencies – in particular, the Maldives Pension Administration Office (MPAO), the nascent Job Center network, and a variety of technical and vocational education and training providers – could play a role in implementing the UI scheme, including for the provision of employment services.
- Consultations were carried out as part of the restructuring of the Maldives COVID-19 Emergency Income Support Project (CEISP) to pilot active labor market programs (ALMPs), including vocational training, apprenticeships, and small business start-up support for unemployed Maldivians. For example, under the CEISP consultations were held with Island Aviation Services

(IAS) to kickstart the apprenticeship programme.

- Consultations were conducted with the Ministry of Social and Family Development and also with Ministry of Youth Empowerment, Information and Arts to discuss the project components and how the key objectives under the Strategic Action Plan for these respective institutes can be included and achieved through the project.
- Furthermore, consultations have also been done with stakeholders linked to the MEERY project under the Ministry of Higher Education, Labour and Skills Development to received inputs on the design of the ALMPs around vocational training.
- In terms of engaging citizens, a Training Requirements Survey was conducted under the Income Support project to inform the designs of the pilot ALMPs under the CEISP. Through the survey, the project was able to obtain feedback from low income and vulnerable groups – 66% had only O’level or no education, 58% had no employment and nearly 75% of those who were employed earned less that 10,000 MVR. For example, a total of 868 responses were received from 20 atolls. 288 women participated in this survey. From the total number of responses 136 had no qualification and 440 had only O’level qualifications. 497 responded that they were unemployed. Of 371 who made an income, 125 earned below MVR 5000 income and 152 earned only between MVR 5000-10,000 income.
- A virtual preparation mission for the proposed Sustainable and Integrated Labor Services Project was carried out from January 23 to February 3, 2022. The primary objective of the mission was to discuss and agree on the design of the Unemployment Insurance program at the core of the project, and from that to develop the project interventions, budget and timeline. During the preparation mission, the team held extensive discussions with the key counterparts in the Ministry of Finance (MoF), Ministry of Higher Education, Labour and Skills Development, Maldives Pension Administration Office (MPAO), as well as other key stakeholders in the new program including with the President’s Office and National Social Protection Agency (NSPA). Through these consultations a detailed project design was developed to establish and develop a sustainable, integrated unemployment insurance (UI) and employment services (ES) program for the Maldives. As per the findings from the mission: The project will be intended to improve the capacity of the country’s social protection system to protect workers against shocks, including those due to climate change. It will provide initial financing to set up the program’s administrative structure, systems and processes, and create public awareness. It will establish systems and processes to register workers, establish the collect contributions, make disbursements, and optimize financial management of funds under its control. It will then support the gradual introduction of ES, including counseling, reskilling and job search assistance. Finally, it will build the capacity of the program to become financially and technically self-sufficient within the project period. This mission was devoted to detailed discussion of the project objectives, design, preparation, timing and implementation.

## **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.

### 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, online teleconferencing 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. 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:

- <http://www.mohe.gov.mv>
- MoHELSD twitter handle: @MoHEmv
- MoHELSD facebook: <https://www.facebook.com/HigherEducationMV>
- <https://jobcenter.mv>
- <http://www.nspa.gov.mv/v2/>
- Main newswire of the government, [www.gov.mv](http://www.gov.mv)

- **Communication methods with project beneficiaries**

Enrolment information sessions for project beneficiaries will be conducted virtually, through a third-party call center (corporatized one stop service SPV of the Government) and an online interactive platform. Official channels utilizing social media tools such as Viber, Facebook and Whatsapp will be used to share IEC materials and videos, by NPSA and Payment Service Providers. Local language 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.

The UBS will comprise two key institutional entities: (i) a *Program Manager*, responsible for outreach, enrollment, eligibility determination, benefit payment and case management of jobseekers, and operation of the Labour Market Information System (LMIS); and (ii) a *Fund Manager*, responsible for collection of contributions, maintenance of individual accounts (including complementary accounts such as solidarity or provident fund), and payout of benefits. It is likely that the Program Manager would come under the MoHELSD, and initially the Project Management Unit (PMU) would serve this role de facto until legislation is passed to establish a statutory authority. The Fund Manager may be the same institution as the Program Manager, or the MPAO may play this role (as it already performs the same functions for the MRPS). Support is likely to be required to establish the following:

(i) Stakeholder Engagement Strategies

Project Stage	Target Stakeholders	Key topics of consultation	Methods and channels
<b>Project Preparation</b>	<ul style="list-style-type: none"> <li>• Government officials from relevant line agencies (MoHELSD, MPAO, NSPA, MoF)</li> <li>• LGA including Island Councils</li> </ul>	<ul style="list-style-type: none"> <li>• Need of the project &amp; planned activities [outreach, enrollment, eligibility determination, benefit payment and case management of jobseekers, and operation of the Labour Market Information System (LMIS)]</li> <li>• E&amp;S principles, environment and social risk and impact management/ESMF</li> <li>• Grievance Redress mechanisms (GRM)</li> </ul>	<ul style="list-style-type: none"> <li>• Phone, email, letters</li> <li>• One-on-one meetings</li> <li>• FGDs, if permissible</li> <li>• Outreach activities</li> <li>• Appropriate adjustments to be made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, zoom etc.)</li> </ul>
<b>Project Preparation</b>	<ul style="list-style-type: none"> <li>• Government officials from relevant line agencies (MoHELSD, MPAO, NSPA, MOF)</li> <li>• LGA including Island Councils</li> </ul>	<ul style="list-style-type: none"> <li>• Collection of contributions, maintenance of individual accounts (including complementary accounts such as solidarity or provident fund), and payout of benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Outreach activities</li> <li>• Appropriate adjustments to be made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, zoom etc.)</li> </ul>
<b>Throughout project implementation</b>	<p>NPSA's Partners (island councils, other Government agencies, donors, etc)</p>	<ul style="list-style-type: none"> <li>• Technical guidance based on international experience and previous assessments of other social protection program</li> <li>• Progress of this Unemployment Insurance program implementation</li> <li>• Key areas for capacity building to NPSA and partners' staff, including list of systems enhancements required</li> <li>• Feedback on Component 2 activities, including the draft of social protection framework, unemployment insurance program, pension program, etc.</li> </ul>	<p>Virtual Meetings and emails</p>
<b>Design phase of the Emergency Cash Transfer component</b>	<p>Banks (Maldives Monetary Authority, Bank of Maldives, SDFC)</p>	<ul style="list-style-type: none"> <li>• Payment delivery regulations and practices</li> </ul>	<p>Virtual Meetings and emails</p>

<b>Throughout project implementation</b>	Private Sector (call moderators, Payment Service providers and programing company)	<ul style="list-style-type: none"> <li>● Key challenges and best practices implemented</li> </ul>	Virtual Meetings and emails
<b>Throughout project implementation</b>	Tertiary Education Institutions and Training Providers.	<ul style="list-style-type: none"> <li>● Technical guidance</li> <li>● Key challenges and best practices implemented</li> <li>● Quality assurance of training modules</li> <li>● Discuss avenues for efficient way to implement the program</li> <li>● Marketing the programs on all avenues</li> </ul>	Physical meetings and emails
<b>Throughout project implementation</b>	State Owned Enterprises (SOEs) and Business Center Corporation (BCC).	<ul style="list-style-type: none"> <li>● Technical guidance</li> <li>● Key challenges and best practices implemented</li> <li>● Quality assurance of training modules</li> <li>● Discuss efficient ways to implement the program</li> <li>● Marketing the programs on all avenues</li> </ul>	Physical meetings and emails

**e) Proposed strategy for information disclosure**

The MoHELSD and MPAO website will be used to disclose project documents, including the SEP, and details of the project Grievance Redress Mechanism will be available on the Ministry of Higher Education, Labour and Skills Development and the Job Center website.

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
<b>Project beneficiaries</b>	Individuals who have lost a job and is eligible for the Unemployment Benefit	<ul style="list-style-type: none"> <li>- Communication to be done in a clear manner in Dhivehi and English</li> <li>- Information about the program to be widely disseminated</li> <li>- Support in account opening and enrollment</li> <li>- Explanation of payment amounts, regularities and payment methods.</li> <li>- Support to submit applications</li> </ul>	Phone calls, SMS, virtual information sessions (When possible) audio-visual materials, outreach activities	<ul style="list-style-type: none"> <li>- Skills training, apprenticeship and entrepreneurship program details</li> <li>- Eligibility criteria/conditions</li> <li>- Application forms</li> <li>- Documents required to support application</li> <li>- Benefit amount</li> <li>- Program duration</li> <li>- Payment mechanism</li> <li>- Enrollment steps</li> <li>- Call center number to reach out for support</li> <li>- Information about GRM (incl. for GBV-related issues)</li> <li>- SEP, LMP, ESMF, ESCP (in project and World Bank's external website)</li> </ul>	MoHELSD, MPAO, Island Council, Business Center Corporation
<b>The Public</b>	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	<ul style="list-style-type: none"> <li>- Explanation about program (objective, duration, target population, selection criteria, sources of data)</li> <li>- Share experiences on the impact of the project, incl. on vulnerable households</li> <li>- Sensitization to digital payment methods</li> <li>- Explanation about how the program and other governmental programs are implemented in a complementary manner</li> <li>- Information about GRM (incl. for GBV-related issues)</li> <li>- SEP, LMP, ESMF, ESCP (in project and World</li> </ul>	Government media team, PMU, MoHELSD, MPAO

				<p>Bank's external website)</p> <ul style="list-style-type: none"> <li>- 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.)</li> <li>-</li> </ul>	
<b>Government officials, including, other concerned ministries/agencies</b>	MOHELSD & MPAO staff not directly engaged; concerned ministries/agencies (e.g., Island Councils, etc)	Brief and clear, in Dhivehi	Emails, phone calls/SMS and virtual meetings as possible	<ul style="list-style-type: none"> <li>- Brief about the project, launch date, objectives and the role of MoHELSD /MPAO/PMU in targeting, data verification and payment</li> <li>- Share experiences on the impact of the project, incl. on vulnerable households</li> <li>- Explanation about how the program and other governmental programs are implemented in a complementary manner</li> </ul>	PMU, MPAO, MOHELSD
<b>Mass media and associated interest groups</b>	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.)	<ul style="list-style-type: none"> <li>- Information about the program objective, target groups, duration of support and showcase of the positive effect it will have on targeted beneficiaries</li> <li>- Experiences on project impact the impact of the project, incl. on vulnerable households</li> <li>- Explanation about how the program and other governmental programs are implemented in a complementary manner</li> <li>- SEP, LMP, ESMF, ESCP (in project &amp; WB's external website)</li> <li>- Documents marked for public disclosure under Component 2 (e.g., targeting systems, pension and unemployment insurance program, social protection framework, skills training,</li> </ul>	Government media team, PMU, MPAO, MoHELSD



				apprenticeship and entrepreneurship etc.)	
<b>Other development partners engaged in project</b>	Financing or supporting social protection program 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, MoHELSD, MPAO, NPSA
<b>Vulnerable groups</b>	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)	<ul style="list-style-type: none"> <li>-Program duration and objective <ul style="list-style-type: none"> <li>- Eligibility criteria/conditions</li> </ul> </li> <li>- Benefit amount</li> <li>- Payment mechanism</li> <li>- Enrollment steps <ul style="list-style-type: none"> <li>- Application forms</li> <li>- Documents required to support application</li> <li>- Call center number to reach for support</li> </ul> </li> <li>- Information about GRM (incl. for GBV-related issues)</li> <li>- SEP, LMP, ESMF, ESCP (in project and World Bank’s external website)</li> <li>- 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.)</li> </ul>	PMU, Island Councils, MoHELSD

				<ul style="list-style-type: none"><li>- Liaise with <u>MoSFD</u> to conduct text message-based and/or email-based information and outreach campaigns about the available domestic violence prevention and response services.</li></ul>	
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## 4. Resources and Responsibilities for Implementing SEP Activities

### a) Resources

The MOHELSD 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 1.5 Million. The budget will be utilized to design and implement information, communication and awareness raising campaigns for UI and ES programs.

### b) Management functions and responsibilities

The entities responsible for the implementation of the SEP activities are MoHELSD, MPAO, NPSA, and MoF. The stakeholder engagement activities will be carried out and documented through MoHELSD 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.

SEP Activities	Responsible staff
Design and implementation of information, communication and awareness raising campaigns.	Communication Specialist; Gender and Safeguard Specialist and Gender and Safeguard Manager
Engaging and ongoing consultations with key stakeholders, including with project beneficiaries, vulnerable groups.	Communication Specialist; Gender and Safeguard Specialist and Gender and Safeguard Manager; Project Director & Project Manager.
Operation of the GRM	Staff at the Call centers and supervised by Communication Specialist; and Gender and Safeguard Manager and Monitoring & Evaluation Specialist
Carrying out Feedback and satisfaction surveys	Monitoring & Evaluation Specialist.

## 5. 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 be operated under the Ministry of Higher Education, Labour and Skills Development. Given below is the GRM structure that has been put in place:

**Tier 1: PMU at the Ministry of Higher Education, Labour and Skills Development:** 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 MoHELSD'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 MoHELSD 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 MoHELSD. The Complainant also has the right to submit grievances directly to the Executive Management Team.

**Tier 2: Executive Management Team of MOHELSD:** The Executive Management Team of MoHELSD, comprising State Ministers and Deputy Ministers of the MoHELSD 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 MoHELSD 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

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

- Telephone - Call Jobcenter on +960 1475 (hotline)
- Email – Send email to: support@jobcenter.mv
- Online form - lodge a complaint using the form available at the website [www.jobcenter.mv](http://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 MOHELSD. In addition, when Island Council staff do home visits, Complainants can submit grievances directly to them as well.
- Grievances can also be received through the one-stop service centers of the Government.

**Step 2: 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.

**Step 3: 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 MoHELSD. 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 MoHELSD 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, including safeguarding and responding to (sexual and gender based violence) SGBV and child abuse. Information regarding these programs will also be disseminated across the country using the Women's Development Committees as a means of information dissemination
- 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.
- All project staff, trainers providers, employers and project beneficiaries will subscribe to a zero tolerance policy on sexual harassment, undergoing awareness training in SEA/SH prevention and reporting, signing a code of conduct, and making safe spaces available for beneficiaries to share any concerns around SEA/SH experiences.
- 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 MoHELSD and the World Bank of any GBV complaints, with the consent of the survivor.

## **6. 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.

Just like in the CEISP, beneficiary feedback surveys will be conducted to obtain feedback on the level of satisfaction regarding the ES and the UI programs and understand areas to improve and strengthen the ES and UI programs. The Grievances Redressal Mechanism (GRM) that successfully operated for the CEISP, will be used for the SAILS project as well. The GRM that is incorporated into the Jobcenter website to promptly response to enquiries, suggestions and complaints from citizens and beneficiaries through the website and the available Information hotline. As in the CEISP, all grievances will be resolved within a two week period. Information provided will be treated as confidential and not disclosed at the individual level or in a manner that could identify individuals. GRM data will also be analyzed regularly to understand program & system issues, and the learnings will be used at the aggregate level for course correction to improve program operation. The three beneficiary feedback indicators used for the project will be:

- (a) Beneficiary satisfaction with the UI program (percentage by gender),
- (b) Beneficiary satisfaction with the ES program and
- (c) Grievances addressed within two weeks (percentage).

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.