

STAKEHOLDER ENGAGEMENT PLAN

Maldives Capacity Building Technical Assistance Loan Project (P171185)



MINISTRY OF FINANCE
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Acronyms and Abbreviations

AML Anti-Money Laundering

CMDA Capital Market Development Authority

CTF Countering the Financing of Terrorism

ESS Environmental and Social Standard

ESF Environment and Social Framework

FIU Financial Intelligence Unit

GRS Grievance Redress Service

MED Ministry of Economic Development

M&E Monitoring & Evaluation

MoF Ministry of Finance

MoH Ministry of Health

MMA Maldives Monetary Authority

MPAO Maldives Pension Administration Office

NBS National Bureau of Statistics

NCIT National Centre for Information Technology

NPC National Pay Commission

NSPA National Social Protection Agency

PIU Project Implementation Unit

PSC Project Steering Committee

PTC Project Technical Committee

SAP Strategic Action Plan

SDF Sovereign Development Fund

SEP Stakeholder Engagement Plan

STO State Trading Organization

TOR Terms of Reference

Executive Summary

This Stakeholder Engagement Plan (SEP) is developed for the Maldives Capacity Building Technical Assistance Loan Project. The SEP is aimed to meet the requirements of the requirement of paragraph 13 of Environmental Social Standard 10 (ESS10) Stakeholder Engagement and Information Disclosure of the World Bank's Environmental and Social Framework (ESF).

The main stakeholder groups identified include mostly government institutions, private sector companies such as commercial banks, insurance companies, private hospitals, private pharmacies, users of pharmaceuticals and beneficiaries of Asandha Scheme. The project direct beneficiaries include Ministry of Finance (MoF), Maldives Monetary Authority (MMA), Ministry of Economic Development (MED), National Social Protection Agency (NSPA), President's Office, Ministry of Health, Aasandha Company Ltd, Ministry of Gender, Family and Social Services, National Bureau of Statistics (NBS), Civil Service Commission and Civil Society Organizations working in social protection.

During the project formulation stage, stakeholders were consulted and their needs were identified. The key needs identified include a national risk assessment of the legal and institutional framework for Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT), payment system reforms, legal regime for bankruptcy and insolvency, health financing strategy, an analysis of the pharmaceutical policy, national social protection framework, unemployment insurance program and establishment of an M&E framework for the government's SAP.

There is a need for the stakeholder engagement during the project formulation, project implementation stage, particularly in the elaboration of TORs for different consultancy works and review of the technical reports elaborated by different consultants and experts. This stakeholder engagement will be through project steering committee meetings, project technical committee meetings and stakeholder workshops and consultative meetings.

The main responsible person to implement the proposed SEP is the project director. The project steering committee and project technical committee will be utilized for the stakeholder engagement purposes. They will be used to ensure participation of stakeholder during decision making processes and technical discussions.

A Three-tier grievance redress mechanism has been proposed for the project. This mechanism is aimed to address any complaints from project stakeholders during the project implementation. The three-tier for the grievance redress mechanism are Operating Agencies level, Ministry of Finance which is the project implementation agency level and judiciary level. In addition, a separate two-tier grievance redressal mechanism has been proposed for project workers.

This SEP is a living document which is subjected to changes during the project implementation phase. In this regard the project activities might change, project stakeholders may change, new stakeholders may be introduced, the level of influence and interest of stakeholders may change. Thus, it is important to periodically review the SEP.

1. Introduction and Project Description

This Stakeholder Engagement Plan (SEP) is developed for the Maldives Capacity Building Technical Assistance Loan Project which is funded by the World Bank. This Project is implemented by Ministry of Finance (MoF) on behalf of government of Maldives. The project development objective of the project is to strengthen the coordination and capacity of selected Government institutions to contribute to improved macro fiscal management, and business environment. The project is comprised of the following key components:

Component 1: Enhancing Evidence for Fiscal Management and the Planning

This component aims to use data to enhance fiscal management and ensure that the planning function of government is underpinned by solid evidence. This will be achieved by building capacity to use evidence for the design of monitoring and evaluation of government initiatives as well as developing strategy on key human development areas (Health and Social Protection). Priority activities include:

- Supporting the Strategic Action Plan: in-depth analysis of modernization of public sector salaries and recruitment policies;
- Developing a National Health Financing Strategy;
 - o Drug (pricing) purchasing by Aasandha Company and State Trading Organization (STO),
 - o Road map/implementation options for hospital management systems,
 - Designing a reconfigured service delivery model with a greater focus on primary care in the atolls.
- Developing a National Social Protection Strategy (NSPA) to formalize Assandha, unemployment
 insurance, disability and local service delivery, to rationalize costs (especially for subsidies in the
 long run); and update the targeting methodology for the NSPA programs.
- Strengthen the national statistical system of the Maldives: (i) assessment of existing data and a review of the statistical Act; (ii) strengthening of data management (collate, organize, and dissemination of data).

Component 2: Supporting Policy, Legislative Reforms and Strengthening Institutional Framework:

This component aims to simplify the legal and regulatory framework affecting businesses and enhance financial stability and inclusion, thereby strengthening the overall business environment. This will be achieved through supporting both legislative and institutional reforms. Priority activities include:

- Business Environment Simplification: Formulation of a comprehensive legal regime for bankruptcy and insolvency including insolvency law, regulations and institutional capacity building
- Developing the Legal and Institutional Framework of Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) of the Maldives: Capacity building for Financial Intelligence Unit (FIU), MMA and other relevant institutions based on a road map being developed.

Component 3: Project Management and Incremental Costs

This SEP is developed in order to meet the requirement of paragraph 13 of Environmental Social Standard 10 (ESS10) Stakeholder Engagement and Information Disclosure of the World Bank's Environmental and Social Framework (ESF).

The ESS10: Stakeholder Engagement and Information Disclosure requires the Borrowers to develop and implement a SEP which should be proportionate to the nature and scale of the project and envisaged risks and impacts. Furthermore, the draft SEP will be disclosed as early as possible and before project appraisal and the Borrower is required to seek the views of stakeholders on the SEP. The key aspects which would require feedback from the stakeholders include identification of stakeholders and the proposals for future engagement of stakeholders. If significant changes are made to the SEP, the Borrower is required to disclose the updated SEP.

The outline of the SEP is as follows; First, a brief summary of the regulations and requirements for stakeholder engagement will be described. Second, a description of stakeholder engagement activities conducted during the project formulation stage will be summarized. Third, stakeholder identification via stakeholder mapping will be elaborated. Fourth, proposed stakeholder engagement plan will be described. Fifth, proposed grievance redressal mechanism will be described. SEP will be concluded with information on monitoring and evaluation details of SEP and accompanying annexes.

2. Regulations and Requirements

This section of SEP will enlist the national regulations and world bank requirements which are applicable to stakeholder engagement.

2.1 World Bank Requirement

The most relevant ESS of World Bank ESF is ESS10 Stakeholder Engagement and Information Disclosure. The main objectives of ESS10 include the following;

- 1. To establish a systemic approach for stakeholder engagement that will allow borrowers to identify the stakeholders and maintain a constructive relationship during the project lifecycle.
- 2. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
 - To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

As per the paragraph 13 of the ESS10, Borrowers are required to develop a SEP which is proportionate to the nature and scale of the project and its potential risks and impacts (paragraph 13). Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank.

2.2 National Requirements

The Article 29 of the Maldivian Constitution adopted in 2008 states that everyone has the freedom to acquire and impart knowledge, information and learning. In order to full fill this requirement of the constitution, there are several national legislations and regulations which require stakeholder engagement. The most relevant legislation for the engagement of the stakeholders in the Maldives is Right to Information Act (Act no: 1/2014). Other significant legislation and include Local Government Act (Act no: 24/2019). The following are description of the aforementioned legislations particularly the articles pertaining the stakeholder engagement requirements.

2.2.1 Right to Information Act (Act no: 1/2014)

The Right to Information Act was ratified in 17th January 2014. The Act established an independent office of Information Commissioner who receives complaints, is mandated with ensuring compliance of the law, collecting information, conduct inspections, and investigations. The following are the most relevant articles for stakeholder engagement;

- Under article 4 of Right to Information Act [1/2014], require everyone who requests for information is entitled to the access of such information in accordance with the law.
- Article 07 of the law specifies the procedures for requesting for and disclosure of information from
 and by State institutions. Information must be disclosed within 21 days of request. An institution
 may extend the period for 14 more days, if the requested information is of (a) a large quantity, or
 (b) extensive research is required to collect and disclose the information, or (c) where the work
 needed to disclose such information would substantially hinder the normal operation of the State
 institution. Information needed urgently to prevent a threat to life or freedom of a person must be

- disclosed within 48 hours at most. Upon failure to disclose the information within the periods stipulated, the law deems such requests have been denied.
- As per article 22 the state is not required to disclose information which, if disclosed would amount to an offense under law, or information if disclosed could cause legal action against the government for breach of confidence or which could prevent the government from receiving similar information in the future. Furthermore, State institutions could withhold information, which if disclosed could affect the government's ability to manage and administer the economy of the country and information if disclosed prematurely could have a negative impact on a person or a group of people. The state can further withhold information that harms the immunities of the courts and the parliament, information from a closed court hearing and information that reveal details related to a minor, and victims of sexual abuse.
- Articles 11 and 42 of the Act, further obligates an Information Officer in every office to attend to requests and is mandated with submitting an annual report to the Information Commissioner.

2.2.2 Local Government Act (Act no: 24/2019)

Key amendments were brought to the initial Local Government Act (Act no: 4/2010) which was ratified on 17th March 2010. However, this section will enlist the most recently amended Local Government Act (Act no: 24/2019) which was ratified on 15th December 2015. The local government act is implemented by Local Government Authority (LGA) which was established under the Act. The following articles are most relevant for the stakeholder engagement requirements;

- As per article 68 of the act for any development project undertaken in an island consultation needs to be undertaken with the council and other relevant authorities established in the island. The same article also states that any EIA reports developed for any project needs to be shared with the council and information on the impacts and mitigation measures should be shared with the council.
- As per article 107-1 of the act the council should hold meetings with the public regarding any important development activities undertaken in the island. The same article also specifies that the time and location of the public meeting should be announced 05 days prior to the meeting.
- As per article 56-6 of the act a Women's Development Committee should be established. The members of the committee should be elected based on an election held amongst the women of the community. As per article 56-7 of the act one of the functions of the committee is to give input to the council regarding various development activities undertaken within the island.

3. Stakeholder Engagement Activities undertaken during project formulation

The main stakeholder engagement activities were conducted by the project implementing agency (Ministry of Finance) and World Bank team. The following Table 1 provides a list of all the stakeholders consulted during the project identification and formulation stage. The consultations were used to identify the needs and concerns of the stakeholder. These needs and concerns were utilized to inform the project activities. The detailed list of stakeholders consulted is included in the Annex 01.

Table 1: List of Stakeholders consulted during the project identification and formulation

Main Project Area	Stakeholder Consulted	Needs Identified	Relevant project activities which address these needs	
Financial Sector	Maldives Monetary Authority (MMA)	 Conducting a National Risk Assessment (NRA) of the legal and institutional framework for Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT); Conducting the next Financial Sector Assessment Program (FSAP) development module update; 	Developing the Legal and Institutional Framework of Anti-Money Laundering/Countering the Financing of Terrorism (AML/CFT) of the Maldives: Capacity building for Financial Intelligence Unit (FIU), MMA and other relevant institutions based on a road map being developed.	
Business Environment	Ministry of Economic Development (MED)	Formulation of a comprehensive legal regime for bankruptcy and insolvency including a new insolvency law, regulations and institutional capacity building	Business Environment Simplification: Formulation of a comprehensive legal regime for bankruptcy and insolvency including insolvency law, regulations and institutional capacity building	
Health Sector	Ministry of Finance, President's Office, Ministry of Health, NSPA, Aasandha Company Ltd.	 A health financing strategy exercise, to be led by the MoF in consultation with stakeholders from across the health system; Indira Gandhi Memorial Hospital management study, as discussed in a previous mission with the IGMH leadership; An analysis of the pharmaceutical policy with a focus on pricing issues; 	 Developing a National Health Financing Strategy; Drug (pricing) purchasing by Aasandha Company and State Trading Organization (STO), Road map/implementation options for hospital management systems, Designing a reconfigured service delivery model with a greater focus on primary care in the atolls. 	

Main Project Area	Stakeholder Consulted	Needs Identified	Relevant project activities which address these needs
		 A service delivery optimization study, with a focus on the development of telemedicine to support primary care in the atolls. 	
Social Protection	Ministry of Finance, Ministry of Economic Development, President's Office, Ministry of Gender, Family and Social Service, NSPA, National Bureau of Statistics (NBS)	 Development of a National Social Protection Framework, which will complement the higher-level National Development Plan and the recently launched Strategic Action Plan 2019-2023; updating the NSPA's targeting methodology and streamlining enrollment processes, with the objective of ensuring better coverage of the poor; design of an unemployment insurance program and advice on reforms to the Maldives Retirement Pension Scheme. 	Developing a National Social Protection Strategy (NSPA) to formalize Aasandha, unemployment insurance, disability and local service delivery, to rationalize costs (especially for subsidies in the long run); and update the targeting methodology for the NSPA programs.
Governance	Ministry of Finance Civil Service Commission	 In-depth analysis of the modernization of public sector salaries and recruitment policies; Formulate a "Public Petitions Law" 	Supporting the Strategic Action Plan: in-depth analysis of modernization of public sector salaries and recruitment policies;
Poverty	President's Office	Establishment of an M&E framework and result framework to monitor government Strategic Action Plan 2019 – 2023.	Strengthen the national statistical system of the Maldives: (i) assessment of existing data and a review of the statistical Act; (ii) strengthening of data management (collate, organize, and dissemination of data).

4. Stakeholder Identification and Analysis

4.1 Stakeholder Mapping

Stakeholder identification was done using a stakeholder mapping exercise. Stakeholder mapping is the process used during project management to identify the stakeholders and the level of engagement of different stakeholders during the course of the project lifecycle.

The main objective of this ESS10 are as follows:

- 1. To establish a systemic approach for stakeholder engagement that will allow borrowers to identify the stakeholders and maintain a constructive relationship during the project lifecycle.
- 2. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance.
- 3. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- 4. To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

The ESS10 also identifies the following two levels of stakeholders;

- 1. Affected or likely to be affected by the project (project affected parties); and
- 2. May have an interest in the project (other interested parties)

The following Table 2 identifies the stakeholders relevant for the different activities of the project.

Table 2: Stakeholder identification for each of the project activities

Project Component/Activities	Targeted Stakeholders	Area of interest for Targeted Stakeholders	Other Interested Parties
Component 1. Strengther	ning Institutional Capacity for Pla	nning, Fiscal Management, and Serv	vice Delivery
1.1 Enhancing the humar	resources framework and wage J	policy	
1.1.1. Wage Assessment and Reform Consultancy	National Pay Commission, Civil Service Commission, Wage Policy Board, Labor Relations Authority, Professional organizations (e.g., associations of employers), Civil servants	Revision of pay structure Revision of wage policy and establishment of minimum wage Amendment to the labor legislations Revision of public sector employee recruitment process	Attorney General's Office, Ministry of Economic Development, Ministry of Finance,
1.2 Strengthening capacit	ty in health care financing, system	s and service delivery	
1.2.1. Consultancy for Maldives Health Financing Strategy	Ministry of Health, Aasandha Company Limited, All types of hospitals and clinics, including	Development of Health Financing Strategy & a roadmap for strengthening financial sustainability	Ministry of Finance, , National Social Protection Agency (NSPA),

Project Component/Activities	Targeted Stakeholders	Area of interest for Targeted Stakeholders	Other Interested Parties
	Tertiary Hospitals like IGMH and Dharumavantha Hospital,		Beneficiary of Aasandha scheme
1.2.2. Consultancy for Pharmaceutical Procurement, Purchasing and Pricing Enhancement	Ministry of Health, Aasandha Company Limited, Private Pharmacies, Users of Pharmaceutical products	Strengthening the pharmaceutical procurement and setting up the prices of pharmaceutical products.	Maldives Food and Drug Authority, State Trading Organization, NSPA, Beneficiaries of Asandha Scheme
1.2.3. Specialist Advisory Services for Management and Financing Of IGMH/Dharumavantha Hospital	Ministry of Health, Tertiary Hospitals including IGMH and Dharumavantha Hospital, Healthcare Providers	Improvement of hospital management and administration.	Maldives National University (Faculty of Health Science), Private Sector Hospitals, Patents/users of IGMH and Dharumavantha Hospital
1.2.4. Consultancy for Optimizing Medical Service Delivery/Telemedicine	Ministry of Health, Tertiary Hospitals including IGMH, Maldives National University (Faculty of Health Science), Private Sector Hospitals, Atoll hospitals, Island councils, patients, healthcare providers	Improvement of Telemedicine initiatives.	Ministry of Science and Technology, National Centre for Information Technology (NCIT)
1.3 Improving capacity in	n social protection strategy, progra	ams and coverage	
1.3.1. Consultancy for Social Protection Strategy and Action Plan/ national social protection framework development consultant	Ministry of Gender, Family and Social Services, beneficiaries of social protection support, Maldives Pension Administrative Office (MPAO), NSPA	Formulation of a strategy for social protection in the Maldives; Reformation of the Welfare Benefit Eligibility Criteria. Enhance fiscal saving through refined targeting of pensions, cash and subsidy support. Phasing out of electricity and food subsidies.	Ministry of Economic Development, Ministry of Finance, Civil Society Organizations representing marginalized groups (e.g., women, people with disabilities, etc) or CSO working on health and social protection.
1.3.2. Consultancy services for development of unemployment insurance benefit program	Ministry of Gender, Family and Social Services, NSPA, Ministry of Finance, beneficiaries of unemployment insurance, private insurance company	Designing and implementation of the unemployment insurance program	Ministry of Economic Development, Private Insurance Companies, Civil Society Organizations representing marginalized groups (e.g., women, people with disabilities, etc) or CSO working on health and social protection.
1.3.2. Consultancy services for pension strategy study	Maldives Pension Administrative Office (MPAO), Pensioners, NSPA	Improvement of fiscal sustainability, coverage and benefits of pension programs	Ministry of Finance, Ministry of Economic Development, Civil Society Organizations representing marginalized groups (e.g., women, people with disabilities, etc) or CSO

Project Component/Activities	Targeted Stakeholders	Area of interest for Targeted Stakeholders	Other Interested Parties			
			working on health and social protection.			
1.4 Enhancing capacity for reporting progress on key priority areas of the SAP (2019 - 2023)						
1.4.1. Consultancy of ICT Specialist for Creating an overarching M&E framework	T Specialist for Technology, The President's government's M&E Framework Planning and Infrastructural Pl		Ministry of National Planning and Infrastructure, NBS			
1.4.2. Consultancy for SAP Monitoring and Evaluation Framework Development and Capacity Building	NBS, The President's Office	Establishment of an M&E framework and result framework to monitor government Strategic Action Plan 2019 – 2023.	Ministry of National Planning and Infrastructure			
Component 2. Building fo	oundations for enhanced business	environment and more inclusive acc	ess to finance			
2.1: Strengthening the Insc	lvency Regime					
2.1.1. Consultancy for Insolvency Legal Reform Assessment and Draft Law, Phase 1	Ministry of Economic Development	Formulation of a legal regime including law, regulation for bankruptcy and insolvency	Attorney General's Office, bankers association for AML/CTF, professional organizations, SME association, commerce chambers			
2.2.2. Consultancy for Insolvency Reform Implementation (implementation regulations and capacity Building)	Ministry of Economic Development	Institutional Capacity Building for implementation of the Insolvency Law	Attorney General's Office, Maldives Monetary Authority, Commercial Banks, bankers association for AML/CTF, professional organizations, SME association, commerce chambers			
2.2: Strengthening Anti-N	Money Laundering (AML) Frame	work				
2.2.1. Consultancy for implementing AML National Risk Assessment Framework	Maldives Monetary Authority	Identification of barriers and gaps in implementation of AML National Risk Assessment Framework	Maldives Police Service, Ministry of Defense and National Security, Attorney General's Office			
2.2.2. Consultancy for Development of Maldives National AML Strategy	Maldives Monetary Authority	Development of Maldives National AML strategy	Maldives Police Service, Ministry of Defense and National Security, Attorney General's Office			
2.2.3. Consultancy for enhancing AML/CTF regulatory framework and institutional capacity of relevant stakeholders	Maldives Monetary Authority	Capacity Building Initiatives for Financial Intelligence Unit (FIU) of MMA	Maldives Police Service, Ministry of Defense and National Security, Attorney General's Office			

Stakeholders are often mapped based on the level of influence or power and level of interest. In this regard the following schematic representation is widely used when mapping stakeholders for the purpose of project management.

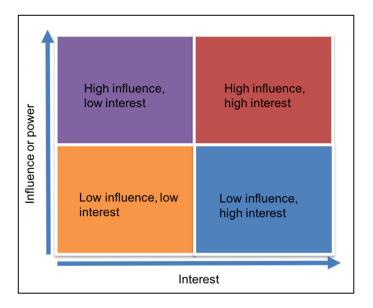


Figure 1: Generic Stakeholder Map used for Stakeholder Analysis

Based on this scheme a mapping exercise was undertaken to determine the key stakeholders of the project based on the information available at the stage of project formulation. Attempt was made to define stakeholders based on interest and influence by categorizing the stakeholders based high, medium, low based on the level of interest and influence. The Table 3 below summarizes the identified stakeholders and their level of interest and influence based on the initial identification exercise.

Table 3: Stakeholder classification based on level of interest and influence

Stakeholder	Level of Interest	Level of Influence
Aasandha Company Limited	High	High
Wage Policy Board	High	High
Attorney General Office	High	High
NSPA	High	High
Ministry of Gender, Family and Social Services	High	High
NPC	High	High
MPAO	High	High
President Office	High	High
National Bureau of Statistics	High	High
Civil Service Commission (CSC)	High	Low
Tertiary Hospitals including IGMH & Dharumavanth Hospital	High	Low
Maldives Police Service	High	Low
Ministry of Defence and National Security	High	Low
Beneficiaries of Asandha Scheme	High	Low
Users of Pharmaceuticals	High	Low
NCIT	Low	High
Capital Market Development Authority (CDMA)	Low	High
Maldives National University	Low	High

Labor Relations Authority	Low	High
Ministry of National Planning and Infrastructure	Low	Low
Civil Society Organizations/Professional Organizations working on social protection and health	High	Low
Civil Society Organizations/Professional Organizations representing marginalized groups (e,g,, women, people with disabilities, unemployed, elderly	High	Low
Ministry of Science and Technology	Low	Low
State-trading Organization	Low	Low
Private Hospitals	Low	Low
Maldives Food and Drug Authority	Low	Low
Commercial Banks	Low	Low
Insurance Companies	Low	Low
Private Pharmacies	Low	Low

The Figure 2 provides the final outcome of the mapping exercise showing the level of interest and influence of each stakeholder.

HIGH

INFLUENCE

Figure 2: Stakeholder Analysis Map

LOW

	NCIT		NPC
	Capital Market Development Authority (CDMA)		МРАО
	Maldives National University		President's Office
	Labor Relations Authority		Aasandha Company Limited
KEEP SATISFIED	Ministry of National Planning and Infrastructure	MANAGE CLOSELY	Wage Policy Board
			Attorney General Office
			NSPA
			Ministry of Gender, Family and Social Services
			National Bureau of Statistics
	Ministry of Science and Technology		Civil Service Commission (CSC)
	State-trading Organization		Tertiary Hospitals
MONITOR	Private Hospitals	te Hospitals KEEP Maldives Police Service	Maldives Police Service
MONITOR	Maldives Food and Drug Authority	INFORMED	Ministry of Defence and National Security
	Commercial Banks		Users of Pharmaceuticals
	Insurance Companies		Beneficiaries of Asandha Scheme
	Private Pharmacies		
	Civil Society Organizations		

LOW HIGH

INTEREST

The following Table 4 provide justification on why the level of interest and influence was assigned to different stakeholders. The Stakeholders has been clustered as most of the stakeholders are related to the project in a similar manner.

Table 4: Justification assigned level of interest and influence for different stakeholders

Name of the Stakeholders	ESS10 Classific ation	Level of Interest	Level of Influenc e	Justification
 Wage Policy Board Attorney General Office NPC MPAO President Office National Bureau of Statistics Aasandha Company Limited NSPA Ministry of Gender, Family and Social Service 	Project Affected Parties	High	High	These stakeholders are the direct beneficiaries of the project intervention. The nature of the project being capacity building and technical assistance, these stakeholders are expected to have high level of interest which would result in improvement of the institutional capacity as well as creation of enabling environment to undertake the mandated task for each of the stakeholder. These stakeholders will act as operating agencies for different component and activities of the project.
 NCIT Capital Market Development Authority (CDMA) Maldives National University Labor Relations Authority 	Project Affected Parties	Low	High	These stakeholders are not direct beneficiaries of the project interventions. However, they are important for successful implementation of project activities hence, their level of influence is high. These stakeholders will work closely with the operating agencies of the project for implementation of the project activities.
 Civil Service Commission (CSC) Tertiary Hospitals including IGMH & Dharumavantha Hospital Maldives Police Service Ministry of Defence and National Security Users of Pharmaceuticals Beneficiaries of Asandha Scheme Patients/users of hospitals 	Other Intereste d Parties	High	Low	These stakeholders will be indirectly benefitting from the project interventions. Hence their level of interest is high. However, since they are not directly involved in the project their level of influence is low. These stakeholders may be consulted by the operating agencies during the implementation of project activities.
 Ministry of National Planning and Infrastructure Ministry of Science and Technology State-trading Organization Private Hospitals Maldives Food and Drug Authority Commercial Banks Insurance Companies Private Pharmacies Civil Society Organizations/Professional Associations working in social protection. CSOs/CBOs representing vulnerable groups (e.g., women, elderly, people with disabilities, unemployed, etc) Bankers association for AML/CTF Professional organizations (e.g., SME association, commerce chambers) 	Other Intereste d Parties	Low	Low	These stakeholders may not have any direct benefits or direct involvement of the project activities. However, they may be affected as a result of project interventions hence, they will be consulted during the project implementation stage. The interest and influence of these stakeholders may be very short-term.

4.2 Disadvantaged/vulnerable individuals or groups

In accordance with the World Bank ESF, vulnerable individuals or groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making associated with the project.

The main vulnerable groups identified are women, elderly, people with disabilities, migrants, and unemployed. These groups either are not provided access to decision-making positions, or they are unable to participate in decision-making forums. For this reason, the proposed consultative meetings, stakeholder consultation workshop and public consultation will ensure gender balance is maintained in terms of participation and representation of stakeholders. Similarly, measures will be put in place to ensure that the participation of these groups are consulted effectively and meaningfully (e.g., house-to-house visits, arranging meetings during evenings once the daily household chores are completed, separate discussion groups with women, etc).

Furthermore, following project activities is expected to improve the women participation in decision making process particularly in health financing and social protection in the Maldives.

- 1. Identification of gender gaps in access to health and social protection services and benefits (including unemployment, pension and others);
- 2. Integration of a gender-sensitive expenditure analysis in the preparation of the health financing and social protection strategies;
- 3. Incorporating gender specific actions in the social protection and health financing strategies,
- 4. Identification of measures that can make service delivery more gender sensitive; and
- 5. Enhancement of an M&E framework for the SAP with indicators disaggregated by sex and disability and specific targets for gender equality.

5. Stakeholder Engagement Plan

This section will describe the proposed stakeholder engagement programme and potential feedback mechanism. A strategy will be proposed for information disclosure for each of the project activities. Furthermore, this section will describe proposed composition of the project steering committee & Technical Committee, mandate of these committees will be described.

5.1 Details of Stakeholder Engagement Plan

In addition, to classifying stakeholders based on the mapping exercise, academic literature often identifies two main aspects that is required for meaningful stakeholder involvement. These conditions can be defined as fairness and competence. Fairness here refers to the notion that each affected party having equal opportunity to express views regarding the project (Palerm, 2000; Petts, 1999b; Webler, 1995). This can be guaranteed by having an inclusive participatory process that ensures that there are no biases towards different stakeholder groups.

The Table 5 below summarizes the details of the SEP including the type of stakeholder based on ESS10 classification, interest of stakeholder, stages of involvement, methods of involvements.

Table 5: Proposed Stakeholder Engagement Plan

Stakeholder	ESS10 Classification	Interests	Stages of Involvement	Methods of Involvement
Aasandha Company Limited	Project Affected Party	 Development of Health Financing Strategy and a roadmap for strengthening financial sustainability; Strengthening the pharmaceutical procurement and setting up the prices of pharmaceutical products. 	 Project Formulation Stage Project Implementation Stage Elaboration of TOR for different consultancy works Review of Technical Reports Data collection for consultancy works 	 Stakeholder Consultation Workshops Consultative Meetings
Wage Policy Board	Project Affected Party	Revision of wage policy and establishment of minimum wage;	 Project implementation Stage Endorsement of revised public sector wage structure Endorsement of proposed minimum wage. 	 Stakeholder Consultation Workshops Consultative Meetings
Attorney General's Office	Project Affected Party	 Revision of pay structure Revision of wage policy and establishment of minimum wage; Amendment to the labor legislations; Revision of public sector employee recruitment process; Formulation of a legal regime including law, regulation for bankruptcy and insolvency; Institutional Capacity Building for implementation of the Insolvency Law; Elaboration of an assessment for integration of Central Depository System. Identification of barriers and gaps in implementation of AML National Risk Assessment Framework Development of Maldives National AML strategy Capacity Building Initiatives for Financial Intelligence Unit (FIU) of MMA 	 Project Implementation Stage Providing Legal inputs for all the project outputs 	 Stakeholder Consultation Workshops Consultative Meetings
NSPA	Project Affected Party	 Development of Health Financing Strategy and a roadmap for strengthening financial sustainability; Strengthening the pharmaceutical procurement and setting up the prices of pharmaceutical products; Formulation of a strategy for social protection in the Maldives; Reformation of the Welfare Benefit Eligibility Criteria. Enhance fiscal saving through refined targeting of pensions, cash and subsidy support. 	 Project Formulation Stage Project Implementation Stage Elaboration of TOR for different consultancy works Review of Technical Reports 	 Project Steering Committee Meetings Stakeholder Consultation Workshops Consultative Meetings

Stakeholder	ESS10 Classification	Interests	Stages of Involvement	Methods of Involvement
		 Phasing out of electricity and food subsidies. Designing and implementation of the unemployment insurance program 		
NPC	Project Affected Party	 Revision of pay structure Revision of wage policy and establishment of minimum wage Amendment to the labor legislations Revision of public sector employee recruitment process 	 Project Implementation Stage Endorsement of pay structure 	 Project Steering Committee Meetings Stakeholder Consultation Workshops Consultative Meetings
Civil Service Commission	Project Affected Party	 Revision of pay structure Revision of wage policy and establishment of minimum wage Amendment to the labor legislations Revision of public sector employee recruitment process 	 Project Implementation Stage Endorsement of training curriculum 	 Stakeholder Consultation Workshops Consultative Meetings
President's Office	Project Affected Party	 Development of a platform for government's M&E Framework Establishment of an M&E framework and result framework to monitor government Strategic Action Plan 2019 – 2023. 	 Project Formulation Stage Project Implementation Stage Elaboration of TOR for different consultancy works Review of Technical Reports 	 Project Steering Committee Meetings Stakeholder Consultation Workshops Consultative Meetings
Ministry of Gender, Family and Social Services	Project Affected Party	 Formulation of a strategy for social protection in the Maldives; Reformation of the Welfare Benefit Eligibility Criteria. 	 Project Formulation Stage Project Implementation Stage Elaboration of TOR for different consultancy works Review of Technical Reports 	 Stakeholder Consultation Workshops Consultative Meetings
National Bureau of Statistics	Project Affected Party	Establishment of an M&E framework and result framework to monitor government Strategic Action Plan 2019 – 2023.	 Project Implementation Stage Elaboration of TOR for different consultancy works Review of Technical Reports 	 Stakeholder Consultation Workshops Consultative Meetings
National Centre for Information	Project Affected Party	 Improvement of Telemedicine initiatives. Improvement of hospital management and administration. 	 Project Implementation Stage Elaboration of TOR for different consultancy works 	• Stakeholder Consultation Workshops

Stakeholder	ESS10 Classification	Interests	Stages of Involvement	Methods of Involvement
Technology (NCIT)		Development of a platform for government's M&E Framework	Review of Technical ReportsMaintenance of database established	Consultative Meetings
MPAO	Project Affected Party	 Formulation of a strategy for social protection in the Maldives; Reformation of the Welfare Benefit Eligibility Criteria. Enhance fiscal saving through refined targeting of pensions, cash and subsidy support. Phasing out of electricity and food subsidies. Designing and implementation of the unemployment insurance program Improvement of fiscal sustainability, coverage and benefits of pension programs 	 Project Formulation Stage Project Implementation Stage Elaboration of TOR for different consultancy works Review of Technical Reports 	 Evaluation Committee Meetings Stakeholder Consultation Workshops Consultative Meetings
Maldives National University (MNU)	Project Affected Party	Improvement of hospital management and administration.	 Project Implementation Stage Review of Technical Reports 	 Stakeholder Consultation Workshops Consultative Meetings
Labor Relations Authority	Project Affected Party	Revision of public sector wage structure;	Project Implementation	 Stakeholder Consultation Workshops Consultative Meetings
Ministry of Defense and National Security	Other Interested Party	Capacity Building Initiatives for Financial Intelligence Unit (FIU) of MMA	Project Implementation	 Consultative Meetings with National Counter- Terrorism Centre. Stakeholder Consultation Workshop
Users of Pharmaceuticals	Other Interested Party	Strengthening the pharmaceutical procurement and setting up the prices of pharmaceutical products.	Project Implementation	Public consultations
Beneficiaries of Asandha Scheme	Other Interested Party	Strengthening the pharmaceutical procurement and setting up the prices of pharmaceutical products.	Project Implementation	Public consultations

Stakeholder	ESS10 Classification	Interests	Stages of Involvement	Methods of Involvement
Maldives Police Service	Other Interested Party	Capacity Building Initiatives for Financial Intelligence Unit (FIU) of MMA	Project Implementation	 Stakeholder Consultation Workshops Consultative Meetings
Tertiary Hospitals including IGMH and Dharumavantha Hospital	Other Interested Party	 Development of Health Financing Strategy and a roadmap for strengthening financial sustainability; Improvement of Telemedicine initiatives; Improvement of hospital management and administration. 	 Project Implementation Elaboration of TOR for different consultancy works Review of Technical Reports 	 Stakeholder Consultation Workshops Consultative Meetings
State-trading Organization (STO)	Other Interested Party	Strengthening the pharmaceutical procurement and setting up the prices of pharmaceutical products.	Project Implementation	 Stakeholder Consultation Workshops Consultative Meetings
Maldives Food and Drug Authority	Other Interested Party	Strengthening the pharmaceutical procurement and setting up the prices of pharmaceutical products.	Engage if and where required	• Stakeholder Consultation Workshops
Ministry of National Planning and Infrastructure	Other Interested Party	Establishment of an M&E framework and result framework to monitor government Strategic Action Plan 2019 – 2023.	Project Implementation	 Stakeholder Consultation Workshops Consultative Meetings
Ministry of Science and Technology	Other Interested Party	 A database for public sector employee which will be most probably hosted in president's office website; Capacity building of main tertiary and vocational education institutions; Improvement of Telemedicine initiatives. Improvement of hospital management and administration. 	Project Implementation	 Stakeholder Consultation Workshops Consultative Meetings
Private Hospitals	Other Interested Party	 Development of Health Financing Strategy and a roadmap for strengthening financial sustainability; Improvement of Telemedicine initiatives; Improvement of hospital management and administration. 	Engage if and where required	Stakeholder Consultation Workshops

Stakeholder	ESS10 Classification	Interests	Stages of Involvement	Methods of Involvement
Insurance Companies	Other Interested Party	Designing and implementation of the unemployment insurance program	Engage if and where required	 Stakeholder Consultation Workshops
Commercial Banks	Other Interested Party	Institutional Capacity Building and formulation of a legal regime including law, regulation for bankruptcy and insolvency	Engage if and where required	Stakeholder Consultation Workshops
Private Pharmacies	Other Interested Party	• Strengthening the pharmaceutical procurement and setting up the prices of pharmaceutical products.	Project Implementation	Public consultations
Civil Society Organization working in Social Protection.	Other Intrested Party	 Formulation of a strategy for social protection in the Maldives; Reformation of the Welfare Benefit Eligibility Criteria. Enhance fiscal saving through refined targeting of pensions, cash and subsidy support. Phasing out of electricity and food subsidies. Designing and implementation of the unemployment insurance program 	Engage if and where required	 Stakeholder Consultation Workshops Public consultations

The following Table 6 proposes the information disclosure strategy for the Maldives Capacity Building Technical Assistance Loan Project.

Table 6: Strategies for Information Disclosure for Stakeholders

Project Component/Activities	Type of Information to be disclosed	Method of Disclosure	Target Stakeholder	Responsible Stakeholder
Component 1. Strengthe	ening Institutional (Capacity for Planning, Fiscal	Management, and Serv	vice Delivery
1.1 Enhancing the human resources (HR) framework and wage policy	Proposed changes to pay structure	 Stakeholder Consultation Workshop Consultative Meetings Email Communications Public Consultation 	Attorney General's Office, Civil Service Commission, Wage Policy Board, Ministry of Economic Development Implementing agencies of donor	Ministry of Finance, NPC
	Proposed changes to the wage policy	 Stakeholder Consultation Workshop Consultative Meetings Email Communications Public Consultation 	agencies of donor funded projects Independent Commissions, Department of Judicial Administration, Local Government Authority, Labor Relations Authority, Ministry of Science and Technology Maldives National University, Private Colleges, National Centre for Information Technology, Private Auditing Firms TVET Authority,	
	Proposed changes to labor legislation for recruitment of public sector employees	 Stakeholder Consultation Workshop Consultative Meetings Email Communications Public Consultation 		
	Information on the procedures of database developed for the public sector	 Consultative Meetings Email Communications User guides 		

	Training modules developed as part of the capacity building initiatives	 Stakeholder Consultation Workshop Consultative Meetings Email Communications 		
1.2. Strengthening capacity in health care financing, systems and service delivery	Health Financing Strategy and Roadmap for strengthening financial sustainability	 Stakeholder Consultation Workshop Consultative Meetings Email Communications Website 	Tertiary Hospitals including IGMH, Maldives National University (Faculty of Health Science), Private Sector Hospitals, Maldives Food and Drug Authority, Ministry of Economic	Ministry of Health, Aasandha Company Limited, NSPA, Ministry of Finance
	the pharmaceutical procurement and setting up the prices of pharmaceutical products.	Consultation Workshop Consultative Meetings Email Communications Public consultation	Development, State Trading Organization, Beneficiaries of Asandha Scheme, Users of Pharmaceuticals, Private Pharmacies Civil Society Organizations	
	Improvement of Telemedicine initiatives.	Consultative MeetingsEmail Communications	working in social protection.	
	Improvement of hospital management and administration.	 Consultative Meetings Email Communications 		
1.3. Improving capacity in social protection strategy, programs and coverage	Formulation of a strategy for social protection in the Maldives;	 Stakeholder Consultation Workshop Consultative Meetings Email Communications Website 	Ministry of Economic Development, Ministry of Finance Ministry of Economic Development, State Trading Organization,	Ministry of Health, Aasandha Company Limited, NSPA, Ministry of Finance

	Reformation of the Welfare Benefit Eligibility Criteria.	 Stakeholder Consultation Workshop Consultative Meetings Public Consultation Email Communications Email Communications Website 		
	Designing and implementation of the unemployment insurance program	Consultative MeetingsEmail Communications		
1.4. Enhancing capacity for monitoring & reporting progress on key priority areas of the SAP (2019-2023)	M&E framework and result framework to monitor government Strategic Action Plan 2019 – 2023.	 Stakeholder Consultation Workshop Consultative Meetings Email Communications Website 	Ministry of Finance Ministry of National Planning and Infrastructure	President's Office, NBS
Component 2. Building	foundations for enha	nced business environment a	and more inclusive acc	ess to finance
2.1 Strengthening the Insolvency Regime	Formulation of a legal regime including law, regulation for bankruptcy and insolvency	 Stakeholder Consultation Workshop Consultative Meetings Email Communications Public Consultation 	Commercial Banks Attorney General's Office	Ministry of Economic Development
2.2. Enhancing AML/CTF framework	Preparing National Risk Assessment and AML/CTF strategy	 Stakeholder Consultation Workshop Consultative Meetings Email Communications Public Consultation 	Maldives Monetary Authority Commercial Banks Other financial institutions Ministry of Finance Ministry of Economic Development Other stakeholders (police, customs, tax, enforcement agencies etc)	Maldives Monetary Authority

5.2 Feedback Mechanism

A component often missing in consultative activities are a feedback mechanism that shows how the issues raised by the stakeholders are addressed by the project. It is important that such a mechanism is established to ensure stakeholder confidence in the process is maintained. To facilitate this, it is essential all stakeholder engagement activities are well documented. In this regard the following actions will be taken:

1. All meeting minutes will be shared and finalized based on the input of the respective stakeholder

The issues identified by the stakeholders will be listed and mechanisms/strategy to address the issues identified will be devised and communicated with the respective stakeholders. The following mechanisms will be used to report back to the stakeholder;

- 1. Email communication with the stakeholder;
- 2. In case an official letter is required, an official letter will be send to the stakeholder;
- Follow up meetings will be held with stakeholders to determine acceptability of the proposed solutions.

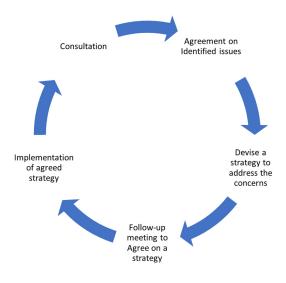


Figure 3: Proposed Feedback Mechanism

5.3 Project Steering Committee (PSC)

Project Steering Committee (PSC) is essential for successful implementation of a project as well as for effective stakeholder engagement. A project steering committee will be formulated comprising of the most influential and interested stakeholders. This section discusses the composition, charter of the project steering committee and their role vis-à-vis the SEP.

5.3.1 Composition

The project Steering Committee will be comprised on the following stakeholder;

- Ministry of Economic Development
- Ministry of Finance
- Ministry of Health
- President's Office
- Maldives Monetary Authority
- NSPA
- MPAO

Of these the first five stakeholders identified are the permanent members of the committee. However, NSPA and MPAO will be invited if the agenda of a meeting involves issues pertaining to their interests. The chair of the committee is Ministry of Finance and the secretariat of the committee is the project implementation unit within the Ministry.

Project Steering Committee



Figure 4: Composition of the project steering committee

5.3.2 Charter of the project steering committee

- Steering committee meetings will be held at least twice every year. Ideally in the first quarter and the last quarter of the year.
- The quorum for the committee is 04 members including the chair.
- The secretariat for the steering committee is the Project Management Unit.
- Each steering committee stakeholder will identify one senior individual at the decision-making level to represent the stakeholder at the committee.
- Steering committee meeting invitation will be sent at least 05 days prior to holding the meeting.
- The Project Director or in his/her absence a project staff designated by the manager, will provide a presentation to committee members covering the following aspects the progress of each of the components of the project, key milestones/achievements and challenges.
- Yearly work plan and budget will be presented and endorsed by the project steering committee.
- The meeting agenda and any supporting documents relevant to the discussions will be sent with the meeting invitation.
- Of the two compulsory meetings at least one meeting will be held in one of the outer islands where project activities are undertaken.
- If any member requests to hold a steering committee meeting such a request will be made in writing with reason submitted to committee secretariat. In such an event the committee secretariat will hold the meeting within one month of receiving the request.
- Minutes of the steering committee meetings will be shared with the all committee members including non-attending members within 03 days of holding the meeting. The committee members will be given one week to submit comments to the minutes. If no comments are received within a week the minutes will be considered as final and will be endorsed in the subsequent meeting.
- Once meeting minutes are endorsed it will be shared publicly through the website of the Ministry.

5.3.3 Role of PSC in Implementation of SEP

Since the Project Steering Committee is a high-level committee which will be involved mainly in decision making during the implementation of the project. PSC will be used to endorse and obtain feedback from stakeholders on findings of stakeholder activities such as stakeholder consultation workshops and public consultations. Furthermore, Furthermore, the PSC will endorse any outreach material and technical produced by consultants recruited for different project activities.

5.4 Project Technical Committee (PTC)

In addition, to the project steering committee a project technical committee is equally important to discuss technical issues which arise during project implementation. Such a committee will enable quick resolution of issues that arise during project implementation. This section discusses the composition and charter of this committee.

5.4.1 Composition

The project technical committee will be comprised of the following stakeholders;

- Ministry of Economic Development
- Ministry of Finance
- Ministry of Health
- President's Office
- Maldives Monetary Authority
- NSPA
- MPAO

This committee will include all the technical stakeholders identified through the mapping exercise. This includes, in addition to technical staff within the PIU and the Ministry of Finance, technical staff of different operating agencies. This committee will facilitate the Project Director to consult technical staff regarding various aspects prior to taking decisions. The committee will be chaired by the project director and will include in its composition all technical staff within the project implementation unit, technical focal points allocated to the project from the different operating agencies. In addition, based on issue any other invitees by the manager can take part in this committee. The meetings of this committee will be held more often than the steering committee as issues are likely to arise more often. The composition of the project technical committee will be same as the project steering committee, however each of the operating agency will be represented by technical level staffs.

5.4.2 Charter of the project technical committee

- Technical committee meetings will be held at least every quarter.
- The quorum for the committee is 03 members including the chair.
- The secretariat of the technical committee is the Project Management Unit.
- Each technical committee stakeholder will identify at least one technical staff to represent the stakeholder at the committee.
- Technical committee meeting invitation will be sent at least 03 days prior to holding the meeting.
- The meeting agenda and any supporting documents relevant to the discussions will be sent with the meeting invitation.

- Minutes of the technical committee meetings will be shared with the all committee members including non-attending members within 03 days of holding the meeting. The committee members will be given one week to submit comments to the minutes. If no comments are received within a week the minutes will be considered as final and will be endorsed in the subsequent meeting.
- All technical committee meeting minutes will be shared with the members of the steering committee for their information.

5.4.3 Role of PTC in implementation of SEP

PTC will be mainly involved in technical issues of the project. This include providing technical inputs to the TORs developed for different consultancy assignments of the project activities. PTC will ensure that all the stakeholder feedback are obtained during formulation of TORs and all the stakeholders are consulted during the formulation of the technical reports. PTC will guide the Project Director on which stakeholders to be consulted for different project activities. Furthermore, PTC will provide technical inputs for any outreach material produced by the consultants or PIU.

6. Roles and Responsibilities and Resources for Stakeholder Engagement

6.1 Roles and Responsibilities

The project implementation unit will be provided with appropriate resources to implement this SEP. The Figure 5 illustrates the composition of the Project implementation structure proposed for Maldives Capacity Building Technical Assistance Loan Project.

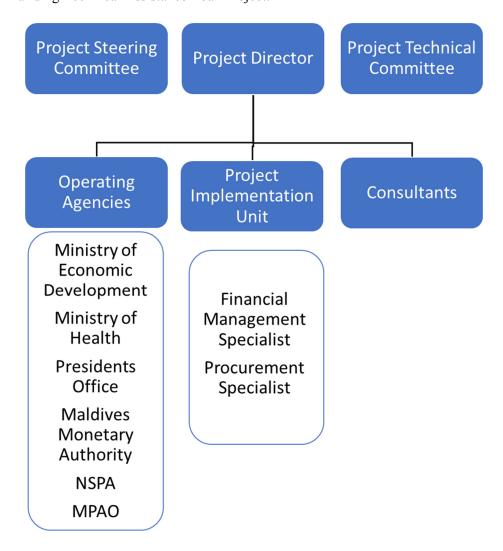


Figure 5: The implementation arrangement for the project

The following Table 7 indicates the roles and responsibilities of different entities in implementation of SEP.

Table 7: Role of the PIU staff on implementation of SEP

Entity/Person	Role in implementation of SEP
Project Director	 Ensure that all project activities are undertaken as per SEP Undertake stakeholder and public consultations Provide feedback to stakeholders Provide Information on Safeguards requirements to stakeholders Implement Tier-2 of the GRM Give information on GRM of the project to all stakeholders.
Financial Specialist and Procurement Specialist	 Ensure Financial and Procurement related aspects required for this plan are implemented in a timely manner.
Operating Agencies	 Ensure that the consultants hired is informed regarding the provisions of the SEP; Ensure relevant stakeholder engagement activities in SEP are implemented in a timely manner; Participate in the Project Steering Committee and Project Technical Committee Meetings; Implement Tier-1 of the GRM Give information on GRM of the project to consultants and stakeholder involved. Liaise with consultants to conduct stakeholder consultation workshops and public consultations.
Project Steering Committee	 Endorsement of the outreach material and technical reports; Provide guidance on identification of any additional stakeholder which require consultation for particular project activity.
Project Technical Committee	 Provide guidance to different operating agencies on preparation of outreach materials where necessary; Provide technical inputs on outreach materials and reports;
Consultants	 Development of any outreach material where required Conduct stakeholder consultations workshops and public consultations.

6.2 Budget Estimate for SEP implementation

Due to nature of the project being capacity building most of the expense for implementation of SEP will be on stakeholder consultation workshops, trainings and public consultation session. The following Table 8 enlist the budget estimate for implementation of SEP. Assumption is made that stakeholder consultation

workshop will involve approximately 50 people and public consultations will involve around 100 people. The budget estimates are consisting of the logistical expanses for the workshops.

Table 8: Budget estimate for implementation of SEP

Type of Stakeholder Engagement	No. of Pax	Rate (MRV)	Budget Estimate (MRV)
Stakeholder Consultation Workshops	11	35,000	385,000
Public consultations	4	65,000	260,000
Total			645,000

7. Grievance Redress Mechanism

It is important to have an avenue for any affected persons to raise their concerns regarding the project and such issues addressed promptly. For this purpose, a grievance redress mechanism becomes integral part of stakeholder engagement process. For this project, the following grievance redress mechanism has been proposed.

7.1 Grievance Redress Mechanism for the project

The following is the Grievance Redress Mechanism for the whole project.

Table 9: Grievance Redress Mechanism for the project

Tiers of Grievance Mechanism	Nodal Person for Contact	Contacts, Communication and Other Facilitation by Project	Timeframe to address grievance
First Tier: Operating Agencies	Focal Point for the Maldives Technical Capacity Building Technical Assistance Loan Project.	 Each of the Operating Agency will have an Information Board providing details of the Grievance redress mechanism listing the names and contact telephones/emails. Grievances can be registered by contacting the designated person through phone/email or by submitting a letter of complaint or by filling a Tier-1 complaint form. The Tier-1 form must be available online on the websites operating agencies, Ministry of Finance (MoF) and from the front office counters of the respective offices. (note PIU of MoF will supply the form to respective parties). For those who cannot properly write, a staff will assist in filling the complaint form and get it signed by the aggrieved party. A formal receipt of the complaint will be provided to the aggrieved party. The Operating Agencies will screen the grievance to determine whether the grievance is related to Maldives Capacity Building Technical Assistance Loan Project or not. If it is related to the project, the aggrieved party will be informed in writing (copied to MoF) how the case will be processed as per this grievance redress mechanism. This will occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event. Alternatively, if it is not related to the project the aggrieved party will be informed that it is not related to the project in writing (copied to MoF) and will inform how the case will be 	14 working days

Second Tier: Ministry of Finance MoF will forwa the grievance to Project Implementing U (PIU) of the Ministry. A dedicated numb will be allocated the PIU.	the contact person(s) or by submitting a letter of complaint addressed to the Minister of Finance or by filling a Tier 1 complaint form. • For those who cannot properly write, the MoF staff will fill a complaint form and get it signed by the aggrieved party.	14 Working Days
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		PIU will screen the grievance to determine if it is related to the project.	
		• If it is related to the project PIU will inform the aggrieved party in writing how the case will be processed as per this grievance redress mechanism. This will occur within 03 working days of receiving the complaint. If the aggrieved party	
		is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event. • Alternatively, if it is not related to the project PIU will inform	
		the aggrieved party that it is not related to the project in writing and will inform how the case will be handled. This communication will occur within 03 working days of receiving the complaint. If the aggrieved party	
		is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event.	
		• Where the grievance is related to the project, the PIU will come up with a solution either by (i) Discussing in the project steering committee; (ii) project technical committee (iii) a combination of all these options.	
		• The PIU will be responsible to ensure that there is no cost imposed on the aggrieved person, due to the grievance mechanism at the third tier.	
		 MoF will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party 	
		is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event.	
		 The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days. If no acknowledgement is submitted from the aggrieved party 	
		then the decision will be considered as accepted.	
Tier Three: Judiciary	Civil Court registrar	• Where the aggrieved party is not happy with the outcome of the decision by the Ministry of Finance or where the aggrieved party is of the view that the council is not capable of justly solve the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 2.	Variable

At the premises of the operating agencies (Ministry of Economic Development, Ministry of Health, MMA, President Office, NSPA & MPAO) the information on the focal points responsible for implementation of this GRM will be displayed in the notice board and also on social media platforms in the following format:

Description	Contact details
Company:	
То:	
Address:	
E-mail:	
Website:	
Telephone:	

7.2 Addressing Project Workers' Grievances

In general, GRM for workers under ESS2 is separate from the Project level GRM under ESS10. However, given the nature, type and scale of the project, the GRM will be streamlined to address grievances relating for the workers as well as for the whole project. In this regard, the following will be the procedure that will be adopted for resolving workers' grievances.

PIU level: Social specialist will serve as Grievance Focal Point (GFP) to file the grievances and appeals. He/She will be responsible to coordinate with relevant departments/organization and persons to facilitate addressing these grievances. If the issue cannot be resolved at the PIU level within 7 working days, then it will be escalated to the Ministry level.

Ministry of Finance level: If there is a situation in which there is no response from the PIU level, or if the response is not satisfactory then complainants and feedback providers have the option to contact the Focal Person in Human Resource Department of the MoF directly to follow up on the issue.

GRM will be accessible to all employees through various means (written, telephone, fax, social media etc). Grievance logbook will be maintained in the PIU's office.

The Project worker's grievance mechanism will not prevent workers to use judicial procedure.

Moreover, monitoring of work-related grievances will be carried out by the Human Resources Department of MoF on quarterly basis. Assigned person from HR department will review received grievances and their resolution, and prepare a short summary to be included in the quarterly progress report to World Bank.

7.1 World Bank Grievance Redress Mechanism

Parties who believe that they are adversely affected by a project supported by the World Bank may also complaints directly to the Bank through the Bank's Grievance Redress Service (GRS) (http://projects-beta.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service).

A complaint can be submitted to the Bank GRS through the following means:

• By email: grievances@worldbank.org

- By fax: +1.202.614.7313
- By mail: The World Bank, Grievance Redress Service, MSN MC10-1018, 1818 H Street Northwest, Washington, DC 20433, USA
- Through the World Bank Maldives Country Office: Hotel Jen 4th Floor, Ameer Ahmed Magu Male', Maldives. Tel: +9603005289 email:infomaldives@worldbank.org

The complaint must clearly identify the adverse impact(s) caused by the project. This will be supported by available documentation and evidence. The complainant may also indicate the desired outcome of the complaint. Furthermore, the aggrieved party will identify a point contact for communications. Complaints submitted via the GRS are promptly reviewed to allow quick attention to project-related concerns.

In addition, project-affected communities and individuals may submit complaints to the World Bank's independent Inspection Panel, which will then determine whether harm occurred, or could occur, as a result of the World Bank's non-compliance with its policies and procedures. Complaints may be submitted to the Inspection Panel at any time after concerns have been brought directly to the World Bank's attention, and after Bank Management has been given an opportunity to respond. Information on how to submit complaints to the World Bank Inspection Panel can be found at www.inspectionpanel.org.

8. Monitoring and Evaluation of SEP

During implementation of the project it is likely that the situation on the ground might change. In this regard the project activities might change, project stakeholders may change, new stakeholders may be introduced, the level of influence and interest of stakeholders may change. Thus, it is important to periodically review the SEP. Hence, it is proposed to review the plan during mid-term and if necessary, revise the plan.

As for reporting, minutes of all the public/stakeholder meetings held and log records of grievances received and how it was handled will be included as part of the project quarterly reports prepared and will be communicated by the PIU to the World Bank.

Furthermore, annual reports of stakeholder engagement activities undertaken by the project will be prepared and disclosed publicly through the website of the Ministry. This may be part of project annual report or maybe a standalone report.

In addition, those staff who are involved in dealing with public will be provided with required necessary specialist trainings for successful implementation of this plan.

9. References

Amendment to Local Government Act (Act no: 24/2019)

National Bureau for Statistics (2014). Census Analytical Report, Male', Maldives

Palerm, J. R. (2000). An empirical theoretical analysis framework for public participation in environmental impact assessment. *Journal of Environmental Planning and Management, 43*(5), 581-600. doi:10.1080/713676582

Right to Information Act (Act no: 1/2014)

The World Bank (2018). Environmental and Social Framework. Washington DC: International Bank for Reconstruction and / The World Bank.

Webler, T. (1995). "Right" discourse in citizen participation: An evaluation yardstick. In O. Renn, T. Webler, & P. M. Wiedemann (Eds.), *Fairness and competence in citizen participation: Evaluating models for environmental discourse* (pp. 35-87). Dordrecht, Netherlands: Kluwer Academic.

United Nations Development Programmed (2014) "Women in public life in the Maldives", Male', Maldives.

Annex 1: List of all the stakeholders consulted during project formulation

Name	Designation	Institution
Hon. Fayyaz Ismail	Minister of Economic	Ministry of Economic Development
	Development	
Ms. Neeza Imad	Minister of State for Economic Development	Ministry of Economic Development
Mr. Ali Sujau	Director Legal	Ministry of Economic Development
Ms. Mariyam Visam,	Registrar of Companies	Ministry of Economic Development
Mr. Ali Hashim	Governor,	Maldives Monetary Authority
Ahmed Naseer	Former Governor,	Maldives Monetary Authority
Ms. Aishath Zahira	Deputy Governor	Maldives Monetary Authority
Mr. Ibrahim Ahmed Nasir	Head, Financial Intelligence Unit	Maldives Monetary Authority
Mr. Safiyyuddeen Rasheed	Project Director,	Maldives Monetary Authority
Ms. Fathimath Ahmed	Assistant Manager, Strategic Planning and Development Project Section	Maldives Monetary Authority
Mr. Ahmed Imad,	Executive Director, Monetary and Exchange Rate Policy Division	Maldives Monetary Authority
Ms. Mirufa Haleem	Administration and International Cooperation, FIU	Maldives Monetary Authority
Mr. Idham Hussain,	Assistant Governor, Financial Stability	Maldives Monetary Authority
Mr. Ahmed Iman Moosa	Deputy Minister	Ministry of Finance
Mr. Ismail Ali Manik	Minister of State for Finance	Ministry of Finance
Ms. Maryam Manarath	Senior Policy Director	Ministry of Finance
Ms. Aishath Nazhath	Under Secretary	The President's Office
Ms. Nuha Riza	Undersecretary,	The President's Office
Ms. Aminath Shauna	Secretary-Policy,	The President's Office
Mr. Ahmed Hamdhaan	Under Secretary,	The President's Office
Ms. Nuha Mohamed Riza	Under Secretary,	The President's Office
Mr. Mohamed Hunaif	Under Secretary,	The President's Office
Uz Ashraf Rasheed	Senior Counsel,	Ministry of Finance
Mr. Arshad Jameel	Tax Policy Consultant,	Ministry of Finance
Mr. Ahmed Zayan Mohamed	Economic and Fiscal Consultant	Ministry of Finance
Ms. Mariyam Abdul Nasir	Chief Resource Mobilization and Debt Management Executive,	Ministry of Finance
Mr. Ahmed Azyan Hameed	Fiscal Analyst,	Ministry of Finance
Ms. Aminath Nashia	Resource Mobilization Executive, Resource Mobilization and Debt Management Division	Ministry of Finance

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Ms. Aishath Shardhin Jameel	Coordinating Officer WB Projects	Ministry of Finance
Mr. Azzam Wajeeh	CEO,	National Social Protection Agency
Hon. Shidhatha Shareef	Former Minister of Gender, Family and Social Services	Ministry of Gender, Family and Social Service
Ms. Aishath Laila	Statistician,	National Bureau of Statistics
Ms. Fathimath Riyaza	Deputy Statistician,	National Bureau of Statistics
Dr. Shah Abdulla Mahir	Minister of State for Health	Ministry of Health
Mr. Ibrahim Rasheed	Assistant Managing Director	Aasandha
Mohamed Hameed	Commissioner of Police	Maldives Police Service
Mohamed Nazeeh Ibrahim	Head of FIU, Criminal Intelligence Department	Maldives Police Service
Ms. Shadiya Adam	Operations Analyst,	World Bank