



**MINISTRY OF  
ENVIRONMENT, CLIMATE CHANGE  
AND TECHNOLOGY**  
*Republic of Maldives*

# STAKEHOLDER ENGAGEMENT PLAN

**DIGITAL MALDIVES FOR ADAPTATION, DECENTRALIZATION AND DIVERSIFICATION (P177040)**



## TABLE OF CONTENTS

Table of Contents .....	2
List of Figures and Tables .....	4
List of Abbreviations .....	4
1 Introduction and Project Background .....	6
1.1 Background .....	6
1.2 Project Description .....	8
COMPONENT 1 - Enabling Environment for Digital Connectivity, Data, and Services .....	8
Subcomponent 1.1: Strengthening the legal and regulatory framework for digital Transformation .....	9
Subcomponent 1.2: Establishing and empowering public institutions: CAM and NCIT .....	10
Component 2 – Digital Solutions and Data for Service Delivery and Climate Change Adaptation .....	10
Subcomponent 2.1: Digital identification for improved ONLINE and in-person service delivery .....	11
COMPONENT 3 – Shared data platform for climate resilience and agile climate action .....	12
COMPONENT 4 – Project management and implementation support .....	14
1.3 Potential Social and Environmental Risks and Impacts .....	14
1.3.1 Environmental Risks .....	15
1.3.2 Social Risks .....	15
1.4 PROJECT IMPLEMENTATION ARRANGEMENTS .....	16
1.5 Objectives of the Stakeholder Engagement Plan .....	17
2 Regulations and Requirements .....	18
2.1 National Requirements .....	18
2.2 World Bank Requirements .....	19
2.3 Stakeholder Engagement Plan and Disclosure .....	20
3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES .....	21
3.1 Lessons learned from previous consultation .....	24
4. Stakeholder Identification AND ANALYSIS .....	24
4.1 Project Affected Parties .....	25
4.2 Other Interested Parties .....	28
4.3 Disadvantaged/Vulnerable Individuals or Groups .....	31
4.4 Summary Stakeholder Needs .....	35
5. Stakeholder Engagement Program .....	43
5.1 Purpose and Timing of Stakeholder Engagement Program .....	43
5.2 Information Disclosure .....	43
5.3 Proposed Strategy for Stakeholder Engagement .....	46
5.4 Proposed Strategy/Differentiated Measures to Include the Views of and Encourage Participation by Vulnerable Groups .....	51

5.5 Public Comments and Feedback/Reporting to Stakeholders .....	51
6. ROLES, RESPONSIBILITIES OF IMPLEMENTING AGENCIES AND RESOURCES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES.....	51
6.1 Resources.....	52
6.2 Implementation arrangements.....	52
6.3. Estimated Budget .....	54
7 Grievance Redress Mechanism .....	55
7.1 Scope of the GRM .....	55
7.2 GRM Structure/Architecture .....	56
7.2.1 Composition of Grievance Redress Committee (GRC) .....	56
7.2.2 Process for reporting grievances .....	56
7.2.3 Focal points for receiving/recording grievances .....	56
7.2.4 Screening, acknowledgement and closure of grievances.....	56
7.2.5 Appeal process .....	57
7.4 Awareness Raising on GRM .....	57
7.5 Monitoring and Reporting .....	58
7.5.1 Project level reporting and monitoring .....	58
7.5.2 Reporting to World Bank.....	58
7.5.3 GRM Contact Information .....	58
8 Monitoring and Reporting.....	59
8.1 Involvement of Stakeholders in Monitoring Activities .....	59
8.2 Reporting Back to Stakeholder Groups.....	61
8.3 Reporting to the World Bank.....	61
9 References.....	62

## LIST OF FIGURES AND TABLES

Table 1 Stakeholder engagements during project preparation .....	21
Table 2 Stakeholder identification and Classification .....	24
Table 3 Project impacts on Affected Parties and their level of influence .....	28
Table 4 Interest of other parties and their level of influence over the project .....	28
Table 5 Engagement of vulnerable/disadvantaged persons/groups .....	32
Table 6 Communication needs of stakeholders .....	35
Table 7 Information disclosure plan.....	44
Table 8 Strategy for Stakeholder Engagement .....	48
Table 9 Strategy for the engagement of vulnerable and disadvantaged groups .....	51
Table 10 Responsibilities of key stakeholder in SEP implementation.....	52
Table 11 Estimate budget for stakeholder engagement plan .....	54
Table 12 Monitoring requirements of SEP .....	60

## LIST OF ABBREVIATIONS

CAM: Communications Authority of Maldives

CS: Communication Specialist

DNR: Department of National Registration

EIA: Environmental Impact Assessment

EPA: Environmental Protection Agency

ESCP: Environmental and Social Commitment Plan

ESF: Environmental and Social Framework

ESFP: Environmental Social Safeguards Focal Point

E-WMP: E-Waste Management Plan

GDS: Government Digital Service

GRC: Grievance Redress Committee

GRM: Grievance Redress Mechanism

IBM: Interactive Beneficiary Mechanism

ICT: Information and Communication Technology

IXP: Internet Exchange Point

MoECCT: Ministry of Environment, Climate Change and Technology

MoF: Ministry of Finance

MFMC: Maldives Fund Management Corporation

MLSA: Maldives Land Survey AuthorityMMA: Maldives Monetary Authority

MMRI: Maldives Marine Research Institute

MMS: Maldives Meteorological Service

NCIT: National Centre for Information Technology

NDC: Nationally Determined Contributions

PD: Project Director

PMU: Project Management Unit

SEP: Stakeholder Engagement Plan

URA: Utility Regulatory Authority

## 1 INTRODUCTION AND PROJECT BACKGROUND

### 1.1 BACKGROUND

1. The Republic of Maldives is an island state comprising nearly 1,200 coral islands grouped into 26 atolls, spread across roughly 90,000 square kilometers of the Indian Ocean. Maldives is classified as an upper-middle-income country (UMIC) with gross domestic product (GDP) per capita of \$10,331 in 2018. Real GDP grew by 5.3 percent in 2019 but is estimated to have contracted sharply in 2020 during the COVID-19 pandemic. Poverty increased from 3.8% in 2019 to 14.3% in 2020; this is expected to decline to 4.3% by 2023. With over a third of the country's population residing in the capital Male', and the remainder scattered across 200 small islands, access to basic services is difficult and costly. The population, estimated at 557,426 in 2020, is dispersed widely, with many of the inhabited islands remote and unserved by regular public transportation and public services.
2. The severe disruption of global supply chains since COVID-19 pandemic has had an impact on food security and exacerbated the impacts of climate vulnerabilities. At the same time, the pandemic has accelerated the digital transition already underway in Maldives, contributing to the emergence of new digital platforms and applications, including e-payment systems, telehealth, online education, and many others. In 2019, 63% of the population or 60% of households used the Internet; unique mobile subscribers constituted 57% of the population. The Communications Authority of Maldives (CAM) reported 72,421 fixed broadband connections by September 2021. Given around 100,000 households, this is a high fixed broadband penetration. The mobile networks did roll-out 4G/LTE infrastructure across the Maldives. The number of mobile subscribers reported by CAM was 701,291 by September 2021 which implies a mobile penetration far over 100%.
3. Maldives has a high-coverage foundational ID system, managed by the Department of National Registration (DNR). To enable authentication for online transactions, the National Centre for Information Technology (NCIT) introduced the "eFaas" Single Sign On authentication in 2012. Through eFaas, residents can already access several online services and transactions. EFaas and the foundational ID system - together with existing social protection payment systems, pensions, and tax systems - have played an important role in enabling remote applications and identity verification for the roll-out of emergency COVID-19 assistance. However, gaps remain in facilitating secure online authentication for private sector service providers, enabling higher-assurance identity verification for face-to-face transactions, and strengthening consent and people's oversight and control over their identity data.
4. However, 20% of the population lives on outer islands and atolls that lack fixed broadband. Capacity to the outer islands is in some cases constrained by microwave link capacity limitations. Local fixed broadband access networks are still to be deployed to the 100+ islands without fixed broadband service. Tariffs are high and the effective fixed broadband speed is low due to relatively low data volume quota on fixed broadband. The data quota on fixed broadband are well below typical fixed broadband usage patterns and subscribers are throttled down to a low speed after consuming their monthly quota.

5. Limited coverage of high-capacity networks, the high prices of fixed broadband services, and limited digital literacy all contribute to the digital divide between Male' and the atolls and outer islands. Weak institutional frameworks have contributed to these challenges in digital connectivity. By strengthening the regulatory framework and enhancing the capacity of the telecommunications regulatory agency, the CAM, there are opportunities to boost competitive pressure and improve affordability.<sup>1</sup> Lower prices would also contribute towards bridging current usage gaps, enabling more remote and poorer segments of the population to participate in the digital economy and take advantage of new modes of service delivery.
6. Although Maldives has shown steady progress in digitizing back-office functions, the efficient, broad-based adoption of digital services is impeded by inadequate provisions for secure and effective data sharing including the absence of cross-governmental data standards and infrastructure for data exchange. These gaps also limit the ability to deploy advanced monitoring and analytics systems to collect and process data that would support Maldives in planning and implementing climate adaptation measures. Bigger businesses have embraced digital technologies, but there is still ample room for growth and for boosting digital entrepreneurship as well. Fostering digital literacy among all Maldivians will also be critical to reap the benefits of the digital world.
7. The Ministry of Environment, Climate Change and Technology (MoECCT) has some available data on the State of the Environment and other data resources relevant for disaster response and climate adaptation. But these data are not collected or gathered in a central repository and are therefore not readily available for analysis, monitoring, forecasting and early warning / disaster risk management. Other agencies such as the Maldives Meteorological Agency (MMA) report, that there is growing demand for meteorological data but some of the data are stored in excel sheets and data analysis or data requests are often processed manually which is very time consuming, causing delays and lapses in extreme event forecasting and early warning which eventually cause losses and damages. Further, there is a lack of data related to forecasting and a need for better knowledge of local conditions. The absence of a shared data platform has rippling effects on almost all stages of the early warning and alerting process for climate induced disasters and extreme weather events in addition to lack of data and analysis for planning, forecasting, decision making and monitoring in relation to implementation of the Nationally Determined Contributions (NDC). Therefore, there is a need for a unified, shared platform where data can support decision making, planning, forecasting, early warning, assessments and analytics – in implementation of the NDC and the publishing of indicators for State of the Environment Reporting.
8. Although the right to privacy is protected under the Constitution, Maldives has not yet enacted comprehensive data protection legislation or implemented and ensured compliance with standards for data privacy. In terms of cybersecurity, a national cybersecurity policy and strategy as well as legislative framework are yet to be adopted. The lack of a national-level Computer Emergency Response Team and crisis management unit and capacity-building strategy in the field of cybersecurity also pose risks to secure digital data processing. Robust legal and institutional enablers for data governance have to be put in place.

---

<sup>1</sup> The country is categorized by ITU at a G2 level of regulation, indicating that it is missing development opportunities and running the risk of remaining disconnected from global digitization.

9. The Government Strategic Action Plan (SAP) 2019-2023 outlined an ambitious agenda for digital development as a key step towards economic diversification. The five policy priorities for Maldives' digital transformation are: (a) modernize the governance mechanism of the Information and Communication Technology (ICT) sector to prepare Maldives for a digital economy; (b) establish digital infrastructure, platforms and ecosystems that are capable of providing ICT solutions that are more efficient, secure and consistent; (c) modernize government services through digitalization for data-driven policy making and efficient delivery of information and services; (d) encourage digital innovation and create a conducive environment for businesses to thrive in a digital economy; and (e) develop a digital-ready workforce and build human capacity in the ICT industry.
10. Investment in digital technologies and the establishment of digital and data platforms can enhance the implementation of Maldives NDC, enable diversification, and become a game changer for the country's growth. Digital services can help overcome many of the constraints posed by the country's limited land mass and dispersed population. Accelerating Maldives' digital transformation will require investments in infrastructure, data platforms, and services as well as investments in human capital. Strengthening legal and institutional enablers and safeguards for data will also be critical to support the growth in digital services and the digital economy, which would enable economic diversification.

## 1.2 PROJECT DESCRIPTION

11. The proposed Project – Digital Maldives for Adaptation, Decentralization and Diversification - aims to support Maldives' intentions to use digital technologies to decentralize, diversify and to adapt to climate change. The Project Development Objective (PDO) is to enhance the enabling environment for the digital economy in Maldives, to improve identification for in-person and remote service delivery, and to leverage data and analytics for a green, resilient and inclusive development. It is designed around three components and the proposed activities are conceived following the country's priorities and funding needs in the medium term: (a) to develop the enabling environment for a digital economy; (b) to use digital technologies and shared data platforms to enhance and accelerate adaptation, economic diversification, and decentralization strategies and measures; and (c) project management and implementation support

---

### COMPONENT 1 - ENABLING ENVIRONMENT FOR DIGITAL CONNECTIVITY, DATA, AND SERVICES

12. **To foster the Maldives' digital transformation, solid legal and regulatory foundations are needed to create trust in digital services and transactions and to promote affordable, quality Internet access.** Strong legal and institutional frameworks are instrumental for building a dynamic, resilient, and inclusive digital economy and to ensure that as more and more services, transactions, and data move online, associated risks are also adequately mitigated. Investments in improved regulatory capacity and infrastructure such as an Internet Exchange Point (IXP) will contribute to a more competitive telecommunications market that can deliver faster Internet speeds at lower costs, ultimately enabling more people to get online and to take advantage of a broader range of digital products and services. In parallel, interventions to strengthen the legal frameworks and institutional capacity related to data protection, cybersecurity, e-transactions, and identity



management will help foster and maintain trust and security in digital transactions and services. This, in turn, is key for the public and private sector to be able to offer a wider range of services and transactions online, so that people across the Maldives can access more services and opportunities without having to visit an office or branch – which may be located in many islands and hundreds of kilometers away – in person.

---

#### SUBCOMPONENT 1.1: STRENGTHENING THE LEGAL AND REGULATORY FRAMEWORK FOR DIGITAL TRANSFORMATION

- 13. This sub-component will focus on legal and regulatory frameworks and institutional capacity for oversight and enforcement in two areas: i) data governance; and ii) broadband regulation and policies.** Improved broadband governance is expected to bring more people online and make it easier for them to access additional content (through improved latency, more affordable data packages, etc.), while improved data governance will help ensure that as people, services, and economic transactions move online, there are appropriate enablers and safeguards in place to make this transition as inclusive, secure, and convenient as possible.
- 14. To improve broadband regulation and policies, the subcomponent will provide support for strengthening the regulatory framework for the broadband market.** Activities to be financed will focus on the review and updating of the current regulatory regime and supervision for both the wholesale and retail broadband markets, including, but not exclusively asymmetric regulation policies and regulations, secondary and bylaw for infrastructure sharing, spectrum monitoring, numbering, Quality of Service, Open Access to submarine cable.
- 15. To improve data governance, the subcomponent help strengthen the legal and regulatory frameworks and institutional capacity in such areas as data protection, cybersecurity and cybercrime, electronic transactions, identification (ID) and civil registration (CR).** Activities to be financed include:
- Technical assistance to support drafting of applicable legislation, regulations, roadmaps, standards, strategies, and similar instruments and tools to put in place robust frameworks for the secure processing of data in the digital sphere<sup>2</sup>. Special attention will be paid to the adoption of good practice frameworks, oversight, and enforcement mechanisms to adequately protect sensitive personal data, such as biometric data.
  - Strengthening of (cyber) incident response and management capabilities within NICT, including the development of standard operations procedures (SOPs), staff training, in alignment with international certification requirements
  - Trainings, technical advisory, and other interventions to support core public and private sector information systems to become compliant with new legislation.

---

<sup>2</sup> Considering that the legislative drafting and adoption process is at different stages and may move at a different pace for data protection, cybersecurity and cybercrime, electronic transactions, and identification and civil registration, the activities financed under the project will be adapted to meet the specific needs in each area.

- Training for public and private sector officials on good practices related to privacy, data protection, and cybersecurity
16. **Activities will be implemented with special attention to the gendered aspects of digital transformation, including with respect to gendered differences in accessing and using digital services and in exposure to risks.** Despite the higher-level political commitment to gender parity in the constitution, most sectoral strategies in Maldives lack gender-specific action plans or a gendered lens for tackling gaps in digital uptake and opportunities among women. To address these gaps, activities financed under this sub-component will be designed in such a way to ensure that gender-specific challenges and approaches are reflected in relevant policy-, legal-, regulatory- and institutional arrangements, with the objective of eliminating the gender digital divide and granting women full access as well as relevant protections to realize digital dividends.

---

#### SUBCOMPONENT 1.2: ESTABLISHING AND EMPOWERING PUBLIC INSTITUTIONS: CAM AND NCIT

17. Under subcomponent 1.2, the project will help strengthen public institutions and build digital, regulatory, and enforcement capacity through:
- **Supporting the establishment of the Government Digital Service (GDS).** The National Centre for Information Technology (NCIT) will be restructured as an independent statutory body. GDS will act as the lead agency entrusted with the government digital transformation and purchase of equipment for the local network.
  - **Supporting the establishment of an Internet Exchange Point (IXP)** where all the local service providers can exchange traffic which can stay domestic. The Government will connect to the IXP to provide better connectivity for citizens to the Government services.
  - **Strengthening regulation and enforcement of government policy for more affordable, quality Internet services by empowering CAM.** To support more affordable Internet access, the subcomponent will provide support through Technical Assistance (TA), regulatory tools, on the job training for strengthening the enforcement of policies and regulations related to the wholesale and retail market segments to ensure open access and fair competition. This would include namely, but not exclusively : (i) regulatory tools for cost modelling, pricing and measurement of anticompetitive practices, establishment of spectrum allocation table, measurement of KPI and QoS, follow up and oversight of license obligations, measurement of market dominance and excessive pricing.

---

#### COMPONENT 2 – DIGITAL SOLUTIONS AND DATA FOR SERVICE DELIVERY AND CLIMATE CHANGE ADAPTATION

18. This component will support the modernization and scale-up of existing digital assets to improve service delivery and the use of new digital solutions to leverage data more effectively for climate change adaptation and beyond.

---

SUBCOMPONENT 2.1: DIGITAL IDENTIFICATION FOR IMPROVED ONLINE AND IN-PERSON SERVICE DELIVERY

19. **Subcomponent 2.1 will help enhance trust and efficiency in both in-person and online transactions and service delivery through a two-pronged approach**, which includes (a) the modernization of existing identity management software and hardware and the introduction of a new digitally enabled ID credential, issued by the Department of National Registration (DNR), and (b) operationalization of a digital ID system to enable secure data sharing and authentication in remote, online contexts.
20. **The new digital ID platform will facilitate remote service delivery by enabling people to securely prove who they are with a high level of assurance from anywhere, any time.** The system will draw on multiple authoritative sources of data, including the existing civil registration and ID system and registries of permanent residents and permit holders, and provide an authentication and consent layer on top of these systems. This authentication layer will allow authorized service providers in both the public and private sectors to securely verify the identities of their beneficiaries and customers. The platform will also offer a user-friendly digital identification app, which will include a virtual version of a person's ID card – with the capability to store additional trusted credentials, such as the driver's license - and through which people will be able to consent to data sharing and authentication requests by service providers in real-time. These features will help enhance digital government-to-citizen communication and people's oversight over their data.
21. **The digital identification platform will be complemented by a strengthened foundational ID system and credentials to meet the growing demand for secure authentication for in-person and offline transactions.** This will be achieved through an upgrade of DNR's existing identity management system and improvements to current registration processes, including the deployment of new software and hardware for data capture and processing, the introduction of fully digitized, ICAO/ISO-compliant photo and fingerprint capture, and the issuance of new physical ID credentials, which will support secure electronic identity verification and authentication in offline contexts.

**Specific activities to be financed under this sub-component include:**

- Technical advisory for the design and implementation of the upgrades to the foundational ID system and the digital ID system, including:
  - Guidance on the design and specifications of the new digitally enabled ID cards
  - Guidance on facilitating secure biometric authentication and de-duplication leveraging multiple data sources
  - Guidance on international standards and good practices for secure biographic and biometric data capture
  - Guidance on developing a business continuity and disaster recovery plan to minimize data and functionality loss due to climatic shocks and other major adverse events
  - Modernization of civil registration and identity management, including the necessary hardware, software, system integration - and consultancy services to enable more efficient and secure registration, data sharing, and authentication
  - Issuance of new digitally-enabled ID credentials, including the necessary

hardware and software to enable customization, printing, and delivery

- Establishment of a digital ID platform, including the necessary software and system integration services to develop an authentication layer, an API gateway, and a mobile application to enable secure authentication for online transactions and services
- Communications related to the upgrades to the foundational and digital ID systems to promote awareness about the systems' new features and to build trust between the government (as identity provider) and the people (the users/primary beneficiaries of the system).

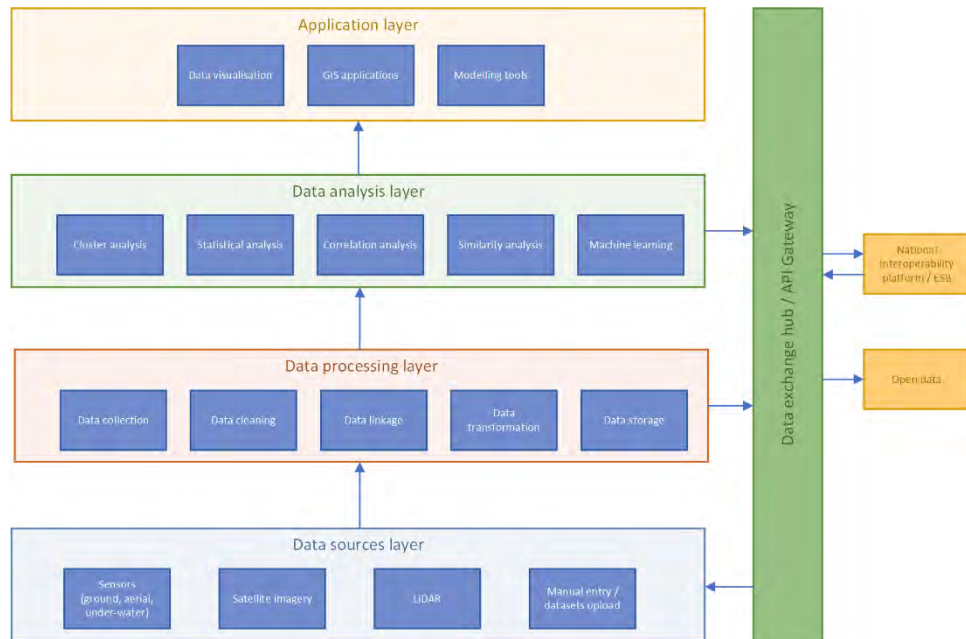
22. **The foundational ID system and the new digital identification platform will support more efficient service delivery across a wide range of sectors, including health, social protection, and financial services.** In the health sector, the new identity credentials and stronger authentication and consent mechanisms will support improved patient management. This includes preventing impersonation for health insurance purposes or medical check-ups for obtaining work permits, making relevant health and insurance information available at patients' fingertips, while also enabling people to minimize and control how health-related data is shared. In the financial sector, the proposed ID system modernization will allow for people to open accounts and complete financial transactions remotely (enabling electronic Know-Your-Customer (eKYC) processes and thus contribute to greater financial inclusion. By enabling people and businesses to transact and access more services online, the digital identification platform is also expected to reduce the need for in-person visits and thus generate saving in terms of time, transportation, office maintenance costs, and related emissions.
23. **The updates to the ID system will follow a people-centric and privacy-conscious approach, in alignment with the Principles on Identification for Sustainable Development.** Features to promote 'privacy-by-design' will include an identity number tokenization system to minimize the sharing and storage of the 'root' ID number across sectors, thus reducing opportunities for misuse and fraud. In addition, the system(s) will be designed and built using international standards and leverage multi-vendor and open-source solutions, to the extent possible, to strengthen operational and financial sustainability and reduce the risk of vendor- and technology lock-in. The hardware procured is also to be energy efficient in its operation, validated through compliance with globally recognized standards.

---

#### COMPONENT 3 – SHARED DATA PLATFORM FOR CLIMATE RESILIENCE AND AGILE CLIMATE ACTION

24. **Component 3 will support the establishment a shared data platform to enhance data-driven policymaking and more responsive service delivery through the improved availability of data and analytics for climate-relevant and environmental indicators and trends.** The data platform will directly contribute to the implementation of adaptation and mitigation measures in the NDC and enable government and businesses to adapt operations and service delivery more rapidly and effectively to changing conditions. Activities will focus on establishing the necessary data infrastructure for a data repository and gathering and migrating existing data within the MoECCT to the platform, to be complemented with data collected by different public and private sector entities and with data collected through novel approaches to be piloted by MoECCT. The platform will include an analytics layer, including a GIS system, and a user interface layer in the form of a portal and a dashboard for distributing services, analytics, and data (see Figure X below). Core

indicators to be collected and analyzed will include meteorological and other biodata related to climate adaptation and mitigation.



25. **The data platform will be complemented by a pilot featuring cutting-edge digital technologies to collect and analyze data related to the health of marine ecosystems to support monitoring and restoration efforts.** Safeguarding reefs and biodiversity is one of the 10 priority areas for adaptation covered by the Maldives’ NDC and is also closely interlinked with other critical areas for resilience and sustainable economic development, including coastal protection, food security, tourism, and fisheries. Emerging technologies such as unmanned aerial or underwater vehicles (also known as drones), robotics, and satellite imagery offer opportunities for new modes of data collection across extended areas that with AI and advanced analytics can produce actionable knowledge for government and the private sector to assess risks, minimize and mitigate harm to the marine ecosystem, and aid restoration efforts. Specifically, the improved data and analytics will inform the preparation, screening, and monitoring of Environment Impact Assessments (EIAs), which are mandatory for many investment projects<sup>3</sup>, enabling MoECCT to more effectively supervise development projects and take timely action to preserve and protect marine ecosystems. In addition, the new tools will generate insights about the effectiveness of different ongoing coral restoration initiatives across the Maldives, generative valuable evidence not just for the Maldivian government but for other island states and researchers worldwide.
26. **The platform will be designed with scaling and interoperability at the forefront.** The platform will be part of the larger government digital infrastructure and will be set up to work seamlessly with other government systems and software, including the planned cloud infrastructure, the API gateway and the technology stack.
27. **Specific activities to be financed under this sub-component include:**
- Technical assistance / studies for the design of the shared data platform:

<sup>3</sup> For a full list, see schedule D of the Maldives’ Environmental Impact Assessment Regulations, 2007.

- An assessment of existing data within the MoECCT that covers data availability, data quality, data formats.
- An assessment of data needs in the short and medium term in support of the NDC project pipeline, effective screening and supervision of EIAs, and other priority projects.
- A market assessment of data, analytics and platform technology solutions for a hybrid model architecture.
- Procurement of relevant software and hardware for the operationalization of the data platform, including to support secure data sharing, data analytics, data visualization, and data dissemination/ re-use via an interactive user interface
- Implementation of a pilot using cutting-edge digital technologies for data collection with focus on marine ecosystems

---

## COMPONENT 4 – PROJECT MANAGEMENT AND IMPLEMENTATION SUPPORT

**28. The Project will support the creation of a dedicated Project Management Unit (PMU) in MoECCT.** The MoECCT has already established a Special Project Management Unit to expedite the implementation of the Digital Development Action Plan in line with the National Resilience and Recovery Plan. The PMU will be responsible for overall project management and coordination, procurement, financial management, citizen engagement and Interactive Beneficiary Mechanism (IBM), environmental and social safeguards, monitoring and evaluation, and communication. This component would also provide support to finance project management related issues including project coordination, financial management, and citizen engagement, and will provide support through office equipment, incremental operating costs, and audits. The project will emphasize gender equity in recruitment and retention by ensuring inclusion of women in all decision-making bodies under the project.

### 1.3 POTENTIAL SOCIAL AND ENVIRONMENTAL RISKS AND IMPACTS

29. The Project is expected to offer multiple social and economic benefits and build the country's resilience to shocks, driven by increased digital adoption, expected efficiency and productivity gains<sup>4</sup>. The project will help the country become more adaptive to shocks, be they economic, health, or climatic, by building foundations for digital service delivery. The positive impacts of increased broadband uptake on economic growth, poverty reduction and employment are widely documented. Increased broadband adoption is estimated to stimulate GDP and job growth<sup>5</sup>. It will facilitate the provision of remote education, contribute to adoption of DFS, and the development of telehealth services, and reduce the need to travel between islands to access certain services. Greater technology adoption across all sectors and skill categories, particularly for unskilled and lower-educated workers, can lead also to substantial potential for job creation<sup>6</sup>. Increased application of digital platforms and tools in the public sector are expected to yield

---

<sup>4</sup> World Bank (2016), World Development Report, Digital Dividends

<sup>5</sup> Kim, Y., Kelly, T., & Raja, S. (2010), Building broadband: Strategies and policies for the developing world. Washington DC: World Bank.

<sup>6</sup> World Bank (2020), The Future of Jobs Report.

substantial efficiency-gains and cost-savings, as well as enhance the quality of and access to key public services.

30. The project will have positive social impacts for all people in the Maldives with improved access to affordable and reliable digital services by ensuring more open access to internet linkages and regulating fair and reasonable terms of access. While creating strong connectivity, the project will improve trust in digital transactions and service delivery with an improvement in legal and regulatory frameworks in data protection, cybersecurity, electronic transactions, and personal identification and civil registration focusing on internet security and promoting privacy of personal data.
31. Updates in the ID system will follow a people-centric and privacy-conscious approach using Good International Industry Practice (GIIP). With increased digital access and privacy protection trust can be built between the government, the service provider and the people who are the users and primary beneficiaries. Citizens will be able to remotely access services from anywhere throughout the Maldives at any time. With a trusted digital network, the government will be able to more efficiently deliver services in several sectors including health which will improve patient management and medical check-ups. The financial sector will also be improved as people will be able to open accounts and complete financial transactions remotely which will contribute to greater financial inclusion. Accessing various sectors via a digital platform will reduce in-person visits which will save time as well as other costs such as transportation.
32. MoECCT's Project Management Unit is committed to following World Bank Environment and Social Standards, promoting citizen and stakeholder engagement following the Stakeholder Engagement Plan prepared for the project, and implementing an Interactive Beneficiary Mechanism (IBM). Stakeholder engagement and IBM will improve over time as more people have digital access and thus able to participate in virtual discussions, contact PMU, and actively provide beneficiary feedback. The project will emphasize gender equity in recruitment and retention by ensuring inclusion of women in all decision-making bodies under the project.
33. In terms of environmental and social risks the project has been rated as a low risk project. However, like any project there are potential environmental and social risks associated with the project. These are briefly summarized below.

---

#### 1.3.1 ENVIRONMENTAL RISKS

34. The project does not envisage any civil construction works, and hence the anticipated environmental risks of the project would be minimal. The only environmental risk identified during project preparation is the risk of end of life e-waste that will be generated as part of the project. This risk will be further exacerbated by the lack of appropriate mechanism and facilities to manage e-waste in the Maldives. The vacuum will be addressed by implementing a comprehensive E-waste Management Plan developed for the project.

---

#### 1.3.2 SOCIAL RISKS



35. Since the project does not involve any land acquisitions, civil works or resettlements, anticipated social risks associated with the project will also be minimal. In terms of anticipated risks, however, the project may have the potential to exclude some sections of the society in terms of their access and affordability to pay for digitalized services. The groups that would be potentially excluded would comprise the elderly, the poor, people who lack knowledge in digital technology, and people who do not have access to internet facilities or have access only to poor quality internet facilities. These subgroups would include both men and women. Additionally, digitalization may also lead to the requirement of retaining minimal manpower in the government and private sector service providing agencies. This may result in a redundancy of some staff and them losing their employment. In order to minimize those risks, the project will place its thrust on raising people's awareness and capacity on the use of digital technology, building employable skills in digital technology especially for those who are likely to lose their employment as a result of digital transformation, and ensuring equitable distribution of digital infrastructure and associated facilities.

#### 1.4 PROJECT IMPLEMENTATION ARRANGEMENTS

36. The MoECCT will be responsible for leading the overall implementation of this project, specifically through the NCIT, which reports to the MoECCT. The PMU will be responsible for all fiduciary matters as well as monitoring and evaluation and safeguards.

37. While the MoECCT, through the PMU, will be leading the overall project implementation, other government agencies (beneficiaries) will be actively involved in the implementation of specific subcomponents in close collaboration with the NCIT. More specifically, CAM will be an implementing partner for Component 1.1, and DNR an implementing partner for Subcomponent 2.1. Each digital public service to be improved under Component 2 will be represented by a focal point, which will work directly with the NCIT to ensure quality, user friendliness, and appropriateness of platform capabilities. At the same time, NCIT will provide product management to ensure user-centricity by applying iterative development to prioritize user needs and learn what works as quickly as possible.

38. A Steering Committee chaired by the Minister of the Ministry of Environment, Climate Change and Technology will be established to carry out high-level monitoring of the project implementation. The rest of the members of the steering committee will include representatives from the Ministry of National Planning, Housing and Infrastructure and the Ministry of Finance. The steering committee will meet twice per year and will only facilitate monitoring. It will not be engaged in operational decision making but will provide guidance for strategic pivots in the project implementation if needed.

39. The PMU will have a project director, procurement and fiduciary management specialists, an environment and social safeguards specialist, project coordinators and a communications specialist. In addition, for each implementation partner an environmental and social safeguards focal point will be identified.



40. The roles of key implementation partners are summarized below:

- ✓ **Ministry of Environment, Climate Change and Technology (MoECCT)** is the main project implementing agency responsible for the overall coordination, monitoring and supervision of the project.
- ✓ **National Centre for Information Technology (NCIT)** is the main project implementation body under MoECCT. NCIT will be responsible for the overall implementation and coordination of the project.
- ✓ **Communications Authority of Maldives (CAM)** is a regulatory body, and will be a key implementing partner of Component 1 by bringing necessary changes to the regulatory framework.
- ✓ **Department of National Registration (DNR)** will be the main focal point and implementing partner for interventions planned under component 2.1. The DNR which is responsible for the registration of persons and issuing of Identity Cards will benefit from the proposed digitization as it eventually would lead to efficient and faster services avoiding any possible impersonation.
- ✓ **Ministry of Finance (MoF)** whose Minister will be a member of the project steering committee and the Ministry will contribute to the process of digitizing the finance sector under component 2.

#### 1.5 OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN

41. The Stakeholder Engagement Plan (SEP) is prepared for the Digital Maldives for Adaptation, Decentralization and Diversification Project (P177040) in accordance with the requirements of the World Bank's Environmental and Social Framework (ESF) and in particular with the Environment and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of potentially affected or impacted individuals and groups, and building relationships based on trust. Therefore, stakeholder engagement is important for successfully addressing the environmental and social risks and impacts of the project.
42. The purpose of the present SEP is to explain how various stakeholders relating to the project will be engaged throughout the course of the project and which methods will be used as part of the process. The SEP also outlines the responsibilities of the PMU, and other relevant government and private institutions in the implementation of stakeholder engagement activities, including the ways in which the PMU will communicate with stakeholders; the mechanism by which people can raise concerns; provide feedback; and/or make complaints about the PMU, other implementing partners and the project itself. Furthermore, the SEP will ensure that a consistent, comprehensive, coordinated and culturally appropriate approach to engagement will be undertaken for the project and for addressing environmental and social risks and impacts and that the approach fulfils all relevant legal and regulatory requirements of the Republic of Maldives and is aligned with

World Bank's ESF. The involvement of the relevant stakeholders is essential for the success of the project in order to ensure smooth collaboration between project staff and other stakeholders including project beneficiaries to minimize and mitigate environmental and social risks related to the proposed project activities. SEP will identify stakeholders and mechanisms through which they will be included in the engagement process as part of project preparation and implementation and will serve as a record for the engagement process during the project preparation period.

43. The SEP prepared and to be implemented by the PMU, includes: description and overview of the project, including environmental and social risks and impacts; national and World Bank requirements on stakeholder engagement, information disclosure and consultations; summary of stakeholder engagement activities already organized under the project; stakeholder identification and analysis; proposed stakeholder engagement program for the project; roles, responsibilities and resources for the stakeholder engagement program; description of the range of information to be communicated to stakeholders and the methods to be used for stakeholder consultation at each stage; project grievance redress mechanism; and monitoring and reporting requirements for the SEP.

## 2 REGULATIONS AND REQUIREMENTS

44. This section looks briefly into national and the World Bank requirements applicable with regards to stakeholder engagement.

### 2.1 NATIONAL REQUIREMENTS

45. There are a number of legal requirements for stakeholder engagement highlighted in national laws and regulations. These are summarized below:

#### **Constitution of the Republic of Maldives**

46. The Constitution of the Republic of Maldives under its Article 29 guarantees the freedom of the people to acquire and impart knowledge, information and learning.

#### **Decentralization Act (Act No: 24/2019)**

47. Article 68 of the Decentralization Act requires for any development project undertaken in an island, to engage in consultation 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.
48. 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.
49. 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 inputs to the council regarding various development activities undertaken within the island.

### **Environmental Impact Assessment Regulations (Regulation No: 2012/R-27)**

50. The EIA Regulations specify the following.

- All relevant stakeholders should be invited to participate in the scoping phase of the EIA process (Article 11);
- Stakeholder and public consultation needs to be undertaken as part of the EIA process (Article 12)
- During the EIA review stage, a public hearing could be undertaken for highly controversial projects (Article 13).

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

51. The Article 4 of Right to Information Act [1/2014], ratified on 17<sup>th</sup> January 2014, advocates that 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 institutes. Information must be disclosed within 21 days of such 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 body. 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.

52. 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. And 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.

53. The Act established an independent office of Information Commissioner who receives complaints, is empowered with ensuring compliance of the law, collecting information, conduct inspections, and investigations. 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 WORLD BANK REQUIREMENTS**

54. The World Bank’s Environmental and Social Framework (ESF), Environmental and Social Standard (ESS) 10, “Stakeholder Engagement and Information Disclosure”, recognizes “the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice” (World Bank, 2017: 97). Specifically, the requirements set out by ESS10 are the following:

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98).

### 2.3 STAKEHOLDER ENGAGEMENT PLAN AND DISCLOSURE

55. This SEP was consulted with key implementation partner and disclosed publicly in March 2022, prior to project appraisal. The objective is to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with them, consider stakeholders’ views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. The project will set up a project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints if they feel unfairly treated or are affected by any of the sub-projects.

56. The underlying principle of stakeholder engagement for the project will be that engagement shall be: a) free of manipulation, and b) free of interference, coercion, and intimidation, and conducted based on timely, relevant, understandable and accessible information, in a culturally appropriate format. It shall involve interactions between project’s stakeholders and shall provide stakeholders with an opportunity to raise their concerns and opinions and shall ensure that this information is taken into consideration when designing the project and making decisions.

57. This SEP is a living document and will be updated throughout the project lifecycle. If significant changes are made to the SEP, the Borrower has to disclose the updated SEP (World Bank, 2017: 99). According to ESS10, the Borrower should also propose and implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner (World Bank, 2017: 10).

58. The structure of the stakeholder engagement plan will be as follows:

- Stakeholder Identification and Analysis
- Stakeholder Engagement Program
- Grievance Redress Mechanism
- Monitoring and Reporting

### 3 BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

59. For the purpose of project identification and preparation, the World Bank team engaged with several key stakeholders of the project during two separate missions undertaken from October 25 – November 5, 2021 and January 10-20, 2022 respectively and the former followed by a roundtable discussion held in November 2021. The roundtable discussion focused on identifying the issues, gaps and challenges in the digital field in the Maldives, and eliciting the views and recommendations of the stakeholders. The key outcomes of these consultations together with the details of the stakeholders are presented in Table 1 below.<sup>7</sup>

**Table 1 Stakeholder engagements during project preparation**

Venue	Date	Type/details of stakeholder/s	Key issues/challenges & assessment of current status	Suggestions & recommendations
<b>Maldives</b>	October 25 – November 5, 2021 & January 10-20, 2022	Minister of Environment, Climate Change and Technology (MoECCT)	The market is characteristically dominated by two major operators – Ooredoo and Dhiraagu	Create a conducive, competitive environment in the mobile market through licensing
		Minister of State, MoECCT	The Government has showcased accelerated efforts to digitize	Explore furthering the use of market-based measures to ensure affordability and quality of service
		Permanent Secretary, MoECCT		Increase transparency by releasing more information

<sup>7</sup> Refer Aide Memoires of Preparation Missions, October 25-November 5, 2021 and January 10-20, 2022, and power point presentation on Digital enablers for Adaptation, Decentralization and Diversification, Roundtable, November 2021 for details

		Minister of Finance (MoF)	public services through applications and websites as evident during the COVID-19 pandemic.	on the state of the telecom sector to the public
		Senior Policy Director, MoF		High level political commitment and a multi-sectoral approach.
		Minister of Economic Development (MoED)	Absence of robust data governance architecture curtails interoperability and shared services among Government entities.	Change management practices among Government entities.
		Deputy Minister, MoED		Redesign Government websites and mobile applications to be user friendly.
		HOD of Climate Change Department		One-stop electronic platform for trade facilitation
		Chief Executive, Communications Authority of Maldives (CAM)	Certain Government agencies have embraced digital adoption whereas others have lagged which has impeded trade facilitation	Ensure strong trust services are available for digital services.
		Chief Executive Officer and Managing Director, Maldives Fund Management Corporation (MFMC)	Absence of trust in services, data protection legislations and regulations jeopardize the safety and security of users of online services	Robust Data Management Infrastructure
		Chief Executive Officer and Managing Director, Dhiraagu		Establish a central monitoring and oversight authority
		Managing Director and Chief Executive Officer; Ooredoo	Concerted efforts have been made by the Maldives Monetary Authority (MMA) to digitalize financial services in order to narrow the gap in financial inclusion.	Promote universal access to digital financial services
		Managing Director, ROL		Strengthen regulatory environment by improving co-ordination among institutions
		Chief Executive Officer, Sparkhub		Support and expand programmes to bring gender parity in the ICT workforce
		NCIT Project Manager		Develop Digital Skills Competency Framework
		Senior Software Engineer, NCIT	Mobile money penetration has shown a marked increase since the onset of the	Further integrate ICT into school-based education

		Resident Representative and Deputy Resident Representative, UNDP	<p>COVID-19 pandemic.</p> <p>Maldives lacks a Digital Skills Framework</p> <p>Some concerns exist around access to ICT education at primary and secondary school level</p>	<p>Expanding international cooperation or participation with international alliances to promote a culture of data privacy in the country</p> <p>Strengthening cybersecurity laws and regulations in Maldives</p> <p>Developing a National Cybersecurity Strategy or Policy for building a secure ecosystem and designating a central authority to manage the development and coordination of national cybersecurity policy-related matters</p> <p>Planning effective management of large-scale cyber incidents to enhance nation's resilience</p> <p>Operationalize a National-level unit for cyber incident detection and response management</p> <p>Facilitating the identification and protection of critically important information infrastructure along with a central platform for Information Sharing and Analysis</p> <p>Promoting greater collaborations, networking, and knowledge sharing in the field of cybersecurity</p> <p>Encouraging skilling and awareness programs at school, professional or public level</p>
		Minister of State for Transport and Civil Aviation (MoTCA)		
		Senior Policy Director, Ministry of Education		
		Director General, Department of National Registration (DNR)		
		Engineer, Utility Regulatory Authority		
		Director, Environmental Protection Agency		
		Director, Maldives Meteorological Service		
		Director, State Electric Company Ltd		
		Director, Fenaka Corporation Ltd		
		Manager of Information Systems, Waste Management Corporation Ltd		
		Chairman, ROL		

### 3.1 LESSONS LEARNED FROM PREVIOUS CONSULTATION

60. The consultations with potential stakeholders, especially with the state sector institutions, provided several inputs and insights for the preparation of the project design, and a comprehensive understanding of the benefits of digitization, as well as the key issues, gaps and challenges which have to be addressed within the overall framework of the project. The recommendations made by the stakeholders in strengthening the legal framework, governance structure, inter-agency collaboration, capacity building and other technical considerations serve as precursors for the creation of an enabling environment for the successful realization of the national digitalization program. Further consultations would continue during this project preparation and planning phase and would specifically engage with the non-state sector actors such as those from the private business sector, non-governmental organizations, community service organizations, academic and professional agencies, and those that represent the vulnerable groups.

## 4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

61. For the purposes of the SEP, stakeholders of the proposed Project will be divided into the following core categories: (i) project-affected; (ii) other interested parties; and (iii) vulnerable groups (Table 2). Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholders toward the successful implementation of the project and will enable the project to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community's and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

Table 2 Stakeholder identification and Classification

Affected Parties	Other Interested Parties	Disadvantaged and Vulnerable groups
<b>Ministry of Environment, Climate Change and Technology</b>	<b>Universities &amp; tertiary education institutions</b>	<b>Women</b> who would specifically include those: (i) who do not have sufficient access to/excluded from digital services due to lack of available digital infrastructure; (ii) who are deprived of access due to concerns related to women's safety and security; and (iii) who are deprived of access due to social and cultural factors
<b>National Centre for Information Technology</b>	<b>University Students</b>	<b>Men and women with low IT literacy</b>
<b>Communications Authority of Maldives</b>	<b>Financial Institutions(Maldives Monetary Authority [Central Bank] and Commercial Banks operating in Maldives)</b>	



Department of National Registration	Health Care Service Providers	Men and women living in outer islands where there is no or adequate digital infrastructure
Maldivian Citizens	National Disaster Management Authority	
Island/City Councils	Ministry of National Planning, Housing and Infrastructure	
Internet Service Providers	National Social Protection Agency	
Maldives Marine Research Institute	Utility Service Providers (Fenaka, Stelco, WAMCO etc.)	Elderly men and women with low IT literacy and cannot access digital platforms
Maldives Meteorological Service	Ministry of Finance	Men and women with disability who cannot access digital services
Environmental Protection Agency	Ministry of Fisheries, Agriculture and Marine Resources	Poor men and women who cannot afford the cost of the internet, devices and usage, the design and usability of devices
Maldives Land Survey Authority	Suppliers of technology products	Men and women who will lose their jobs with digital penetration into their work places
Local Government Authority	Private Businesses entrepreneurs	
Work Permit Holders (Migrant Workers)		
Maldives Immigration Authority	Utility Regulatory Authority	
	Non-Governmental Organizations working on environment related issues NGOs	
	Dive Schools	
	Press and Media	
	Attorney General's Office	
	Women's Development Committees	
	Non-Governmental Organizations promoting the rights of persons with disability	
	Non-Governmental Organizations promoting the rights of elderly persons	

#### 4.1 PROJECT AFFECTED PARTIES

72. 'Affected Parties' are, 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 being 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. A brief account of the role of project affected parties is presented below.

- ✓ **Ministry of Environment Climate Change and Technology (MoECCT)** is the main project implementing agency responsible for the overall coordination, monitoring and supervision of the project. Moreover, the Ministry is the key Ministry related to the policy aspects of both climate change and technology. Hence, all the departments of the Ministry as a whole will be affected by the project. Particularly those departments related to technology, climate change and environment policy.
- ✓ **National Centre for Information Technology (NCIT)** is the main project implementation body under MoECCT. NCIT will be responsible for the overall implementation and coordination of the project. For the successful implementation of the project, training of the staff of NCIT is needed and the need to make the staff competent in delivery of the required technological solutions through the project.
- ✓ **Communications Authority of Maldives (CAM)** is a regulatory body, and will be a key implementing partner of Component 1 by bringing necessary changes to the regulatory framework. The staff and management of the authority needs to be involved in developing the regulatory framework and needs to be given training and required necessary resources to implement the new regulations that come into force.
- ✓ **Department of National Registration (DNR)** will be the main focal point and implementing partner for interventions planned under component 2.1. The DNR which is responsible for the registration of persons and issuing of Identity Cards will be impacted positively with the introduction of digital ID system which eventually would lead to efficient and faster services and avoid any possible impersonation. The staff of DNR needs to be trained on the new system for efficient implementation of the project.
- ✓ **Maldivian Citizens:** The digitization process will have an overall impact on the Maldivian citizens in general. For example, the introduction of digital ID under component 2 of the project will impact all Maldivian Citizens. Digitization would also impact on the employees of both the public and private sector institutions.
- ✓ **Island Councils** will be key partners in the digital ID introduction nation-wide. The councils hold all the key information on those who reside in that particular island. Hence introduction of digital system will require training of council staff and dissemination of information to the public through the councils. Moreover, councils will be of interest in the establishment of the climate data platform, which will be used by the council to provide data and also in decision making based on the data available in the system.

- ✓ **Internet Service Providers (ISPs)** will be impacted by the proposed changes to the regulatory framework under component 1 of the project. The project requires engaging them in information sharing and continuous consultations as their support and cooperation is needed for the successful implementation of the project.
- ✓ **Maldives Marine Research Institute (MMRI)** is the main marine research institute in the Maldives and its contribution is significantly required for the development shared data platform for climate change under component 3, especially with regards to providing data on the marine environment.
- ✓ **Maldives Meteorological Service (MMS)** will contribute to the development of shared climate data platform under component 3, in terms of providing meteorological data.
- ✓ **Maldives Land Survey Authority (MLSA)** conducts land-based surveys in the Maldives and is in the possession of the NGIS system. Contribution of MLSA is essential for the development of shared climate data platform under component 3.
- ✓ **Environmental Protection Agency (EPA)** will contribute to the process of development of climate data platform through component 3 of the project by sharing the marine data that they generated through site surveys undertaken for conservation purposes as well as the data included in the Environmental Impact Assessment (EIA) reports submitted for EPA's review.
- ✓ **Local Government Authority (LGA)** will support the project by providing the required information to local councils and encourage their support for the project.
- ✓ **Work Permit Holders (Migrant Workers):** The digital ID system under component 2 could extend to work permit holders as well. As various services will become digitized it is essential that work permit holders also have the ease of access to these services through the digital system.
- ✓ **Maldives Immigration:** Maldives immigration will have an efficient means of tracking the movements of emigrants and immigrants to and from the country including the migrant workers. The Maldives Immigration will be a key stakeholder in implementation of component 2 of the project. Input from immigration and data from immigration will be key to develop the digital ID system. Moreover, training needs to be given to staff of immigration on the new system being introduced.

73. Table 3 provides an assessment of the project's impacts on individuals, groups, local communities, and other stakeholders that may be directly or indirectly or positively or negatively affected by

the project. This assessment further extends to analyse the level of influence that these different stakeholder groups can exercise over the project preparation and implementation processes.

Table 3 Project impacts on Affected Parties and their level of influence

Affected Parties	Impact	Influence
Ministry of Environment, Climate Change and Technology	High	High
National Centre for Information Technology	High	High
Communications Authority of Maldives	High	High
Department of National Registration	High	High
Maldivian Citizens	High	Moderate
Local Councils	High	High
Internet Service Providers	High	Moderate
Local Government Authority	Moderate	Moderate
Maldives Marine Research Institute	Moderate	Moderate
Maldives Meteorological Service	Moderate	Moderate
Maldives Land Survey Authority	Moderate	Moderate
Environmental Protection Agency	High	Moderate
Work Permit Holders	High	Moderate
Maldives Immigration	High	High

#### 4.2 OTHER INTERESTED PARTIES

74. 'Other Interested Parties' constitute 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. Table 4 presents the multiple interests of other parties and their level of potential influence over the Project.

Table 4 Interest of other parties and their level of influence over the project

Other interested parties	Interests	Influence
Universities & Tertiary Education Institutions	<ul style="list-style-type: none"> <li>Obtaining climate related data for research and also providing data of their research outcomes.</li> </ul>	Moderate
University Students	<ul style="list-style-type: none"> <li>Easy access to data under component 3 for those engaged in research studies.</li> </ul>	Low

<b>Financial Institutions</b>	<ul style="list-style-type: none"> <li>To enhance the security of the personal data of their customers, reduce transaction costs, and the efficient delivery of services.</li> </ul>	Low
<b>Health Care Service Providers</b>	<ul style="list-style-type: none"> <li>Efficient patient management, referrals and insurance services.</li> </ul>	Low
<b>National Disaster Management Authority (NDMA)</b>	<ul style="list-style-type: none"> <li>To plan for disasters, prepare the required plans and policies and undertake public awareness programs</li> </ul>	Moderate
<b>Ministry of National Planning, Housing and Infrastructure</b>	<ul style="list-style-type: none"> <li>As the main Ministry responsible for development planning and infrastructure development, access to the climate data platform can benefit the Ministry in developing necessary plans and policies. Moreover, this would ensure that infrastructure development across the country considers climate change data. Influence is high as the ministry is part of the steering committee of the project.</li> </ul>	High
<b>National Social Protection Agency (NSPA):</b>	<ul style="list-style-type: none"> <li>NSPA uses health data to provide their services, including financial assistance to people who are in need through various government schemes. Digitization of ID data under component 2 can benefit NSPA in efficient management of their services and reaching to the</li> </ul>	Moderate

	appropriate target groups	
<b>Utility Service Providers</b>	<ul style="list-style-type: none"> <li>Digitization of personal data through component 2 of the project will benefit in the ease of service provided by utilities including registration for service etc. Moreover, the climate data platform developed through component 3 can be used for policy level decision making by the Utilities.</li> </ul>	Low
<b>Ministry of Finance</b>	<ul style="list-style-type: none"> <li>Ministry of Finance will be interested in the impacts of digitization on financial institutions. Moreover, as the parent Ministry for all donor funded projects will be interested on the successful implementation of the project. As the ministry is a member of project steering committee the influence is rated as high.</li> </ul>	High
<b>Ministry of Fisheries Agriculture and Marine Resources</b>	<ul style="list-style-type: none"> <li>Access to data on climate platform will benefit decision making and policy formulation in Fisheries and Agriculture sector</li> </ul>	Moderate
<b>Suppliers of technology products</b>	<ul style="list-style-type: none"> <li>Enhanced opportunities to supply equipment through the project</li> </ul>	Low
<b>Private businesses entrepreneurs</b>	<ul style="list-style-type: none"> <li>Improved access to markets, technology, finance, and customers</li> <li>Reduced investment costs</li> </ul>	Low

<b>Utility Regulatory Authority</b>	<ul style="list-style-type: none"> <li>• Access to climate data and information for monitoring and decision making</li> </ul>	Moderate
<b>Environmental NGOs</b>	<ul style="list-style-type: none"> <li>• Environmental NGOs will be positively impacted through the development of data platforms through component 3 of the project. They can play a critical role in increasing awareness of the public and undertake advocacy programs through evidence based information.</li> </ul>	Low
<b>Dive Schools</b>	<ul style="list-style-type: none"> <li>• Access to data on coral reefs.</li> <li>• To expand and diversify their diving programs</li> </ul>	Low
<b>Press &amp; media</b>	<ul style="list-style-type: none"> <li>• Use of digital platform for information communication</li> </ul>	Moderate
<b>Attorney General's Office</b>	<ul style="list-style-type: none"> <li>• Ensuring an effective regulatory framework</li> </ul>	High
<b>Women's Development Committee (WDC)</b>	<ul style="list-style-type: none"> <li>• Impacts on women as a result of digitization</li> <li>• Women's proactive engagement in digitization process</li> </ul>	Moderate
<b>NGOs promoting rights of Disabled persons</b>	<ul style="list-style-type: none"> <li>• Impacts on the disabled persons as a result of digitization</li> <li>• Assisting the disabled persons to participate in the digitization process</li> </ul>	Low
<b>NGOs promoting rights of Elderly persons</b>	<ul style="list-style-type: none"> <li>• Impacts on the elderly as a result of digitization</li> <li>• Assisting the elderly persons to participate in the digitization process</li> </ul>	Low

#### 4.3 DISADVANTAGED/VULNERABLE INDIVIDUALS OR GROUPS

75. ‘Vulnerable Groups’ are 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>8</sup>, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. They would include the following groups.

- ✓ Women who would specifically include those: (i) who do not have sufficient access to/excluded from digital services due to lack of available digital infrastructure; (ii) who are deprived of access due to concerns related to women’s safety and security; and (iii) who are deprived of access due to social and cultural factors
- ✓ Men and women with low IT literacy
- ✓ Men and women living in outer islands where there is no or adequate digital infrastructure
- ✓ Elderly men and women with low IT literacy and cannot access digital platforms
- ✓ Men and women with disability who cannot access digital services
- ✓ Poor men and women who cannot afford the cost of the internet, devices and usage, the design and usability of devices
- ✓ Men and women who will lose their jobs with digital penetration into their work places

76. Providing access to information and encouraging their participation in consultations require special measures such as face- to-face verbal communications, public address systems, help desks, and a modest travel allowance for their participation in consultative meetings. Table 5 identifies the communication methods and resources required for the engagement of vulnerable persons and groups in the project.

Table 5 Engagement of vulnerable/disadvantaged persons/groups

Stakeholder Group	Key Vulnerability/disadvantage	Preferred means of notification/consultation	Additional Resources Required
<b>Women</b> who would specifically include those: (i) who do not have sufficient access to/excluded	<ul style="list-style-type: none"> <li>• Being the primary caretaker of the household, unable to participate in community meetings etc.</li> <li>• Often not in key decision-making</li> </ul>	<ul style="list-style-type: none"> <li>• Face-to-face meetings</li> <li>• Meetings organized exclusively for women</li> <li>• Small focus group meetings/discussions undertaken in collaboration with</li> </ul>	<ul style="list-style-type: none"> <li>• Support of WDCs to engage women in information sharing and consultations</li> <li>• Printed material</li> </ul>

<sup>8</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.



Stakeholder Group	Key Vulnerability/disadvantage	Preferred means of notification/consultation	Additional Resources Required
from digital services due to lack of available digital infrastructure; (ii) who are deprived of access due to concerns related to women's safety and security; and (iii) who are deprived of access due to social and cultural factors	<ul style="list-style-type: none"> <li>positions, and hence less opportunity to contribute/influence through formal channels</li> <li>Men often dominate consultative proceedings</li> <li>Deprived of access to digital services due to concerns related to women's safety and security</li> <li>Deprived of access due to social and cultural factors</li> </ul>	<ul style="list-style-type: none"> <li>Women Development Committees (WDCs)</li> <li>Printed notices/brochures in Divehi in main public places (eg: council office, public offices, service centres, schools etc.)</li> <li>E-brochures and leaflets provided in social media groups.</li> <li>GRM awareness campaigns</li> </ul>	<ul style="list-style-type: none"> <li>Visual presentations</li> <li>Targeted advertisements</li> </ul>
Men and women with low IT literacy	<ul style="list-style-type: none"> <li>Do not have the skills in the use of digital platforms</li> </ul>	<ul style="list-style-type: none"> <li>Multi channelled information flow.</li> <li>Individual consultations</li> <li>Small focus group discussions/meetings</li> <li>Printed notices/brochures in Divehi in public places (eg: public offices, service centres, schools etc.)</li> <li>Media Campaigns</li> <li>GRM awareness campaigns</li> </ul>	<ul style="list-style-type: none"> <li>Provide information and guidance through a kiosk/helpdesk with visual aids</li> <li>Mobilize technology product suppliers and IT service providers to engage them in consultations and capacity development</li> <li>Audio visual presentations</li> </ul>
Men and women living in outer islands where there is no or adequate digital infrastructure	<ul style="list-style-type: none"> <li>Lack of access to good quality internet.</li> <li>Do not have access to digital infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Consultations conducted at Island level in collaboration with island councils</li> <li>Feedback surveys in collaboration with island councils</li> <li>Media campaigns</li> <li>GRM awareness campaigns</li> </ul>	<ul style="list-style-type: none"> <li>Encourage Island Councils to share information and engage people in consultations</li> </ul>
Elderly men and elderly women with	<ul style="list-style-type: none"> <li>Do not have the skills in the use of digital platforms</li> </ul>	<ul style="list-style-type: none"> <li>Multi channelled information flow.</li> <li>Individual consultations</li> </ul>	<ul style="list-style-type: none"> <li>Provide information and guidance</li> </ul>

Stakeholder Group	Key Vulnerability/disadvantage	Preferred means of notification/consultation	Additional Resources Required
low IT literacy and cannot access digital platforms	<ul style="list-style-type: none"> <li>Lack of access to digital devices and the internet.</li> </ul>	<ul style="list-style-type: none"> <li>Small focus group discussions/meetings</li> <li>Printed notices/brochures in Divehi in public places (eg: public offices, service centres, schools etc.)</li> <li>Media Campaigns</li> <li>GRM awareness campaigns</li> </ul>	<p>through a kiosk/helpdesk with visual aids</p> <ul style="list-style-type: none"> <li>Mobilize technology product suppliers and IT service providers to engage them in consultations and capacity development</li> <li>Audio visual presentations</li> </ul>
Men and women with disability <b>who cannot access digital services</b>	<ul style="list-style-type: none"> <li>Impairment of hearing, vision and mobility</li> </ul>	<ul style="list-style-type: none"> <li>Multi channelled information flow.</li> <li>Individual consultations</li> <li>Small focus group discussions/meetings</li> <li>GRM awareness campaigns</li> </ul>	<ul style="list-style-type: none"> <li>Use of NGOs promoting the rights of Disabled persons in providing information to these groups.</li> <li>Use of aides through multiple channels, audio, video and sign language to provide information regarding the project during engagement activities.</li> </ul>
Poor men and women who cannot afford the cost of the internet, devices and usage, the design and usability of devices	<ul style="list-style-type: none"> <li>Lack of access to digital devices and the internet.</li> </ul>	<ul style="list-style-type: none"> <li>Multi channelled information flow.</li> <li>Individual consultations</li> <li>Small focus group discussions/meetings</li> <li>Printed notices/brochures in Divehi in public places (eg: public offices, service centres, schools etc.)</li> <li>Media Campaigns</li> </ul>	<ul style="list-style-type: none"> <li>Access to internet through information centres/kiosks etc at or near service centres.</li> </ul>

Stakeholder Group	Key Vulnerability/disadvantage	Preferred means of notification/consultation	Additional Resources Required
		<ul style="list-style-type: none"> <li>GRM awareness campaigns</li> </ul>	
Men and women who will lose their jobs with digital penetration into their work places	<ul style="list-style-type: none"> <li>Would not have other skills to fit into the digital system requirements</li> </ul>	<ul style="list-style-type: none"> <li>Individual consultations</li> <li>Focus group discussions</li> <li>GRM awareness campaigns</li> </ul>	<ul style="list-style-type: none"> <li>Mobilize support of the employers to bring them for consultations</li> </ul>

#### 4.4 SUMMARY STAKEHOLDER NEEDS

77. Table 6 describes the needs of the key stakeholders who have been identified and their preferences/needs for engagement.

Table 6 Communication needs of stakeholders

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
<b>PROJECT AFFECTED PARTIES</b>				
<b>Ministry of Environment, Climate Change and Technology</b>	Has the policy mandate for both technology and climate change; Project implementing agency and the Minister in-charge and the chair of the steering committee.	English/Dhivehi	Formal physical/virtual meetings, review meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>Advance notification for meetings and mutually agreed dates and times</li> <li>Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Communications Authority of Maldives</b>	Key partner in implementation of component 1	English/Dhivehi	Formal physical/virtual meetings, review meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>Advance notification for meetings and mutually agreed dates and times</li> <li>Meetings to be held periodically to update on project progress and</li> </ul>

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
				seek inputs for the way forward
<b>National Centre for Information Technology</b>	Project implementing agency under MoECCT	English/Dhivehi	Formal physical/virtual meetings, review meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Department of National Registration</b>	Key partner in implementation of subcomponent 2.1	English/Dhivehi	Formal physical/virtual meetings, review meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Maldivian Citizens</b>	Final beneficiaries of the project who include men, women, youth, children, occupational groups etc.	Dhivehi	<p>Public advertisements in news media including social media, Whatsapp/viber/ or other equivalent groups</p> <p>Public surveys, through media outreach, information sessions and Q &amp; A sessions</p>	<ul style="list-style-type: none"> <li>• Mobilize support of civil organizations to share information and engage in consultation</li> </ul>
<b>Local Councils</b>	Key partner in the promotion of digitalization in ID	Dhivehi/English	Formal physical/virtual consultative meetings, reports, e-	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually</li> </ul>

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
			mails, telephone calls and training programs	<p>agreed dates and times</p> <ul style="list-style-type: none"> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Internet Service Providers</b>	A key contributor for the development of the regulatory framework and service provider	English/Dhivehi	E-mail/letter Consultative meetings/workshops/trainings	<ul style="list-style-type: none"> <li>• Regular consultative meetings</li> </ul>
<b>Local Government Authority</b>	A conduit for communication with local/Island councils to share information on ID related interventions	English/Dhivehi	Formal physical/virtual meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Maldives Marine Research Institute</b>	Will feed the project with marine and coral ecosystem data and use the digital systems for storing and dissemination of marine system related data/information	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
<b>Maldives Meteorological Service</b>	Will feed the project with meteorological data and use the digital systems for storing and dissemination of meteorology related data/information	Dhivehi/English	Formal physical/virtual consultative meetings, reports, e-mails, telephone calls and training programs	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Maldives Land Survey Authority</b>	A key contributor for the development of the proposed GIS system	English/Dhivehi	E-mail/letter Consultative meetings/workshops	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Environmental Protection Agency</b>	Will feed the project with marine, terrestrial and coral ecosystem data and use the digital systems for storing and dissemination of environment related data/information	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Work Permit Holders (Migrant Workers)</b>	Require awareness on the new digital platforms	English and mother tongue of migrant worker	Awareness material and media outreach	<ul style="list-style-type: none"> <li>• Language barrier maybe an issue hence needs to be accommodated</li> </ul>

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
				as much as possible
<b>Maldives Immigration</b>	Will be the source of information on work permit holders	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>National Disaster Management Authority</b>	Will look into climate data for planning for disasters and making relevant policies	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>Ministry of National Planning, Housing and Infrastructure</b>	Will be interested to attain climate data from the platform development when developing national plans, policies and when undertaking infrastructure development	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
<b>National Social Protection Agency</b>	Will be interested in data provided through the digital ID system when administering government support services through the national social protection scheme	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> <li>• Meetings to be held periodically to update on project progress and seek inputs for the way forward</li> </ul>
<b>OTHER INTERESTED PARTIES</b>				
<b>Universities and other tertiary education institutions in Maldives</b>	Beneficiaries of digitized data, especially on climate change related data for their research studies	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls/trainings	<ul style="list-style-type: none"> <li>• Advance notification for meetings and mutually agreed dates and times</li> </ul> <p>Expert/focus group discussions</p>
<b>University Students</b>	Beneficiaries of digitized data, especially on climate change related data for their research studies	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls/trainings	
<b>Financial Institutions</b>	Will provide input on digitization of finance sector including introduction of biometrics	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls, trainings	-
<b>Health Service Providers</b>	Will look into positive impacts on the efficiency of service delivery with digitization of personal data	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls, trainings	-
<b>Utility Service Providers</b>	Will look into climate data for decision making	Dhivehi/English	Formal physical/virtual meetings, reports, e-	-



Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
			mails, telephone calls/trainings	
<b>Ministry of Finance</b>	Will be interested on the impacts on financial institutions as a result of the project. Part of the project steering committee.	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls/trainings	
<b>Ministry of Fisheries, Agriculture and Marine Resource</b>	Use the digital systems for making sector decisions and may feed some information to the systems as well	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls, trainings	-
<b>Technology Suppliers</b>	Will be interested in opportunities available through the project to supply and install technology	English	As per the procurement guidelines of Maldives and World Bank	-
<b>Utility Regulatory Agency</b>	Will look into climate data for decision making	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls, trainings	-
<b>Environmental NGOs</b>	Will be interested to have access to climate data to use the data for climate awareness and advocacy	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls	-
<b>Dive Schools</b>	Will be interested to have access to climate data	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls	-
<b>Press and Media</b>	Will be interested in project	Dhivehi/English	News briefings, press release interviews, advertisements	-

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
	information and update			
<b>Attorney General's Office</b>	Will play a critical role in the reforms to legal and regulatory framework	Dhivehi/English	Formal procedure set by AG for all government offices	Engagement as per formal procedure
<b>Women's Development Committee</b>	Will be interested on the impacts of women as a result of digitization. Can facilitate to involve women and attaining views of the women during public participation exercises.	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls, trainings	-
<b>Ministry of National Planning, Housing and Infrastructure</b>	Use the digital systems for making planning decisions and may feed some information to the systems as well	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls, trainings	-
<b>NGOs promoting rights of Disabled</b>	Will be interested in the impacts on disabled persons as a result of digital ID introduction	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls, trainings	-
<b>NGOs promoting rights of Elderly</b>	Will be interested in the impacts on elderly persons as a result of digital ID introduction	Dhivehi/English	Formal physical/virtual meetings, reports, e-mails, telephone calls, trainings	
<b>Private businesses entrepreneurs</b>	Will look into positive impacts on the business	Dhivehi/English	Formal physical/virtual meetings, reports, e-	-

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
	as a result of digitization		mails, telephone calls, trainings	

## 5. STAKEHOLDER ENGAGEMENT PROGRAM

### 5.1 PURPOSE AND TIMING OF STAKEHOLDER ENGAGEMENT PROGRAM

78. The overall objectives of SEP as stated in the ESS-10 are:

- To identify the roles and responsibility of all stakeholders and ensure their participation in the complete project cycle
- Establish a systematic approach to stakeholder engagements that will help the Project identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties
- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and implementation
- Promote and provide means for effective and inclusive engagement with project- affected parties throughout the project life -cycle on issues that could potentially affect them.
- 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 with special consideration for the disadvantaged or vulnerable groups.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Project to respond to and manage such grievances.
- To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder.
- To allocate budgetary and other resources in the project design, project implementation, and Monitoring and Evaluation (M&E) for stakeholder engagement and participation

79. Thus, SEP provides an opportunity for all-inclusive approach in project preparation, planning, implementation and monitoring processes. It is geared toward ensuring meaningful and a wide consultative process guided by World Bank's Environmental and Social Framework (ESF), particularly ESS-10.

80. Information disclosure and consultation processes will continue with affected parties, other interested parties and vulnerable groups during (i) project preparation, (ii) project implementation, and (iii) project operational phases. A variety of methods such as group consultations, individual consultations and interviews through different offline and virtual medians such as emails, telephone and conference calls etc. and communication through printed and electronic media, appropriate to the target audience, will be used for information disclosure and consultation.

### 5.2 INFORMATION DISCLOSURE

- 81. During project preparation and planning, information related to project scope and schedule will be shared with project affected persons and other stakeholders during consultations.
- 82. Information about each component and phase of the Project will be provided to the public through media briefings, targeted media articles, information sessions, television/radio programs. The Project will also provide up-to-date information on the website of NCIT and/or MoECCT.
- 83. At the appraisal stage, safeguard instruments including Environmental and Social Commitment Plan (ESCP), SEP and E-Waste Management Plan prepared for this project will be disclosed on the website of MoECCT and/or NCIT and on the World Bank’s external website, after their clearance by the government and the Bank. Additionally, copies of the referenced documents will be kept at the MOECCT and NCIT for public reference. Any changes to the approved ESCP, SEP and E-Waste Management Plan would have to follow the same clearance/ approval procedures and disclosure.
- 84. During project implementation, sub-project specific safeguard instruments will be publicly disclosed in-country. The documents and plans to be disclosed include:
  - Environmental and Social Commitment Plan (ESCP)
  - Stakeholder Engagement Plan (SEP)
  - E-Waste Management Plan (EWMP)
  - Monitoring activities undertaken as per ESCP, SEP and EWMP
  - Project quarterly reports and annual reports
- 85. Translations of executive summary of all documents prepared by the project in Dhivehi, will also be made available to the public through the website of MoECCT and/or NCIT. Information can also be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp/viber groups, and traditional means of communications (TV, newspaper, radio, phone calls and e-mails) with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

Table 7 provides a plan for information disclosure during project preparatory, implementation and operational periods.

Table 7 Information disclosure plan

List of information to be disclosed	Proposed methods	Timetable/ Location Dates	Target stakeholders	Responsibility
<b>Project preparation and planning phase</b>				
<b>Environmental and Social Commitment Plan, Stakeholder Engagement</b>	Display of the reports. Public to be informed of the	Website & physical display at the PMU,	Affected parties, other interested	PMU/NCIT/MoECCT

List of information to be disclosed	Proposed methods	Timetable/ Location Dates	Target stakeholders	Responsibility
<b>Plan and E-Waste Management Plan</b>	availability of reports via newspaper advertisements published in Dhivehii and English languages and public notices, project website and through other direct communication channels such as mobile/telephone calls, SMS, etc. Online/ virtual consultations to be organised when required.	MoECCT & NCIT. Reports to be disclosed 3 months prior to the commencement of the project and will continue throughout the project period	parties and vulnerable groups	
<b>Project designs, feasibility studies, implementation plans prepared for each component/subcomponent of the project</b>	Display of the documents. Public to be informed of the availability of documents via newspaper advertisements published in Dhivehi and English languages and public notices, project website and through other direct communication channels such as mobile/telephone calls, SMS, social media etc. Online/ virtual consultations to be organised when required.	Website & physical display at the PMU, MoECCT & NCIT as and when they are available	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT
<b>Grievance redress mechanism including places to report sexual</b>	E-Brochures/ Brochures of GRM in Dhivehi and English, social	Within 03 months of commencement of the project	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT

<b>List of information to be disclosed</b>	<b>Proposed methods</b>	<b>Timetable/ Location Dates</b>	<b>Target stakeholders</b>	<b>Responsibility</b>
<b>harassment, gender-based violence</b>	media, mainstream medias, etc.	and will continue throughout the project period		
<b>Project implementation phase</b>				
<b>Progress reports of the project prepared by PMU &amp; other partner agencies and video clips related to project performance</b>	Website/ Social Media of MoECCT and NCIT and via emails to stakeholders	Continuously and as and when they are ready	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT
<b>Summary outcomes of consultation meetings</b>	Website of MoECCT and NCIT	Continuously	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT
<b>Status/progress of grievance resolution</b>	Website of MoECCT and NCIT	As per the GRM	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT
<b>Awareness raising/capacity building training programs planned &amp; conducted</b>	Website of MoECCT and NCIT, print and electronic media, social media, mainstream media	Continuously	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT
<b>Project's key deliverables e.g. regulatory framework, ID system, databases etc.</b>	Website of MoECCT and NCIT, print and electronic media, social media	Continuously	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT
<b>Results of user satisfaction surveys</b>	Website of MoECCT and NCIT, print and electronic media, social media	Continuously	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT
<b>Project operational phase</b>				
<b>Project's operational modalities, responsible agencies</b>	Television programs, video clips on social media	Continuously for 3-4 years	Affected parties, other interested parties and vulnerable groups	PMU/NCIT/MoECCT

### 5.3 PROPOSED STRATEGY FOR STAKEHOLDER ENGAGEMENT

86. The project will continue to consult the project affected parties; other interested parties and the vulnerable and disadvantaged groups, specifically on themes listed below, in order to elicit their views and feedback. Individual and group meetings, mini-workshops/focus group discussions (during Covid 19 pandemic period preferably virtual, keeping in mind social distancing requirements), satisfaction surveys, social media, community monitoring, etc. will be used to facilitate the consultations on the following<sup>9</sup>:

- ✓ Digital literacy programs
- ✓ Data privacy issues
- ✓ Accessibility to data
- ✓ Data security issues
- ✓ Available trainings to familiarize employees to digital platforms
- ✓ Transfer of data from existing platforms to digital platforms
- ✓ Changes in laws/regulations governing the IT sector
- ✓ Changes in service methodology as a result of data digitization
- ✓ Data storage issues
- ✓ Impacts on vulnerable/disadvantaged groups
- ✓ Public satisfaction with the delivery of public services

87. During Covid-19 pandemic restrictions, the project shall adapt to different and most appropriate requirements for the stakeholder engagement process. Given the need to consider social distancing norms as per the WHO *“COVID-19 Strategic Preparedness and Response Plan—Operational Planning Guidelines to Support Country Preparedness and Response, 2020”*, stakeholder engagement strategy during time of pandemic should focus on using IT-based technology, telecommunications, mobile technology, social media platforms, print and broadcast media, etc. to a large extent. The project may employ online communication tools to design virtual workshops in situations where large meetings and workshops are not possible due to Covid 19 restrictions. Virtual medians such as Webex, Microsoft Teams, Google Meet, etc. and in low ICT capacity situations, audio meetings, can be effective tools to design virtual workshops. The format of such workshops could include the following steps:

- ✓ Virtual registration of participants: Participants can register online through a dedicated platform.
- ✓ Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires and discussion topics: These can be distributed online to participants.
- ✓ Review of distributed information materials: Participants are given a scheduled duration for this, prior to scheduling a discussion on the information provided.
- ✓ Discussion, feedback collection and sharing
- ✓ Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this.
- ✓ Group, team and table discussions can be organized through social media means, such as webex, Microsoft Teams, Google meet, skype or zoom, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back.

---

<sup>9</sup> This is not an exhaustive list rather a general overview

- ✓ Conclusion and summary: The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions, and share electronically with all participants.

Table 8 presents the strategy for stakeholder engagement.

Table 8 Strategy for Stakeholder Engagement

Target stakeholders	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
<b>PROJECT PLANNING AND PREPARATORY PHASE</b>				
<b>Project implementing agencies (MoECCT &amp; NCIT), members of the project steering committee, and key implementing partner agencies (DNR and CAM)</b>	<ul style="list-style-type: none"> <li>• Overview of environmental &amp; social requirements of the project</li> <li>• Introduction to E &amp; S documents</li> <li>• E &amp; S monitoring and reporting</li> </ul>	Consultative workshop with ppt. presentations, and a document summarizing the key aspects of the topics to be covered for circulation	At MoECCT/NCIT Prior to the commencement of the project activities	PMU/NCIT/MoECC T
<b>Project managers, engineers, key staff, consultants, contractors</b>	<ul style="list-style-type: none"> <li>• E&amp;S requirements of the project</li> <li>• Introduction to E &amp; S documents</li> <li>• Information disclosure &amp; consultations</li> <li>• Labour management procedures</li> <li>• Grievance handling procedures</li> <li>• E &amp; S monitoring and reporting</li> </ul>	Consultative workshop with ppt. presentations, and a document summarizing the key aspects of the topics to be covered for circulation	At MoECCT/NCIT Prior to the commencement of the project activities	PMU/NCIT/MoECC T
<b>Maldivian Citizens/Work Permit Holders/ NGOs/WDC</b>	<ul style="list-style-type: none"> <li>• Perceived benefits and impacts</li> <li>• E &amp; S risks and impacts</li> <li>• Enhancing digital literacy especially among vulnerable population</li> </ul>	Feedback mechanisms via project websites, social media, Whatsapp/viber and other equivalent messages etc.	Continuously	PMU/NCIT/MoECC T



	<ul style="list-style-type: none"> <li>• Citizens engagement</li> <li>• Grievance redress process</li> <li>• Suggestions/Recommendations to enhance benefits and minimize risks</li> </ul>			
<b>PROJECT IMPLEMENTATION PHASE</b>				
<b>Project implementing agencies (MoECCT &amp; NCIT), members of the project steering committee, and key implementing partner agencies (DNR, CAM)</b>	<ul style="list-style-type: none"> <li>• Review of E &amp; S management in the project</li> <li>• Identifying gaps &amp; issues</li> <li>• Recommendations for E &amp; S strengthening</li> </ul>	Review workshop	At MoECCT Bi-annual workshops	PMU/NCIT/MoECC T
<b>Project managers, engineers, key staff, consultants, contractors</b>	<ul style="list-style-type: none"> <li>• Review of E &amp; S management in the project</li> <li>• Identifying gaps &amp; issues</li> <li>• Recommendations for E &amp; S strengthening</li> </ul>	Review workshop/meetings	At MoECCT Quarterly workshops/meetings	PMU/NCIT/MoECC T
<b>Project beneficiary agencies/other interested parties (refer Table 4)</b>	<ul style="list-style-type: none"> <li>• Perceived benefits and impacts</li> <li>• E &amp; S risks and impacts</li> <li>• Enhancing digital literacy</li> <li>• Suggestions/Recommendations to enhance benefits and minimize risks</li> </ul>	Consultative meetings with individual agencies (physical/virtual)	At the offices of individual agencies Bi-annual	PMU/NCIT/MoECC T
<b>Maldivian Citizens/Work Permit</b>	<ul style="list-style-type: none"> <li>• Perceived benefits and impacts</li> </ul>	Feedback mechanisms via project websites, social media,	Continuously	PMU/NCIT/MoECC T

<b>Holders/ NGOs/WDC</b>	<ul style="list-style-type: none"> <li>• E &amp; S risks and impacts</li> <li>• Enhancing digital literacy especially among vulnerable population</li> <li>• Grievance redress mechanism &amp; reporting procedures</li> <li>• Project monitoring and citizens' feedback</li> <li>• Suggestions/ Recommendations to enhance benefits and minimize risks</li> </ul>	Whatsapp/viber and other equivalent messages etc.		
<b>PROJECT OPERATION PHASE</b>				
<b>Project implementing agencies (MoECCT &amp; NCIT), members of the project steering committee, and key implementing partner agencies (DNR and CAM)</b>	Review and monitor the establishment and functioning of project's outputs, outcomes and impacts	At pre-arranged and invited meetings	Quarterly	PMU/NCIT/MoECC T
<b>Project managers, engineers, key staff, consultants, contractors</b>	Review and monitor the establishment and functioning of project's outputs, outcomes and impacts	At pre-arranged and invited meetings	Quarterly	PMU/NCIT/MoECC T
<b>Maldivian Citizens/Work Permit Holders/NGOs/WDC</b>	Citizens' feedback	Feedback mechanisms via project websites, social media, Whatsapp/viber and other equivalent messages etc.	Continuously	PMU/NCIT/MoECC T

#### 5.4 PROPOSED STRATEGY/DIFFERENTIATED MEASURES TO INCLUDE THE VIEWS OF AND ENCOURAGE PARTICIPATION BY VULNERABLE GROUPS

Table 9 presents a strategy for the engagement of vulnerable and disadvantaged groups in consultative processes.

Table 9 Strategy for the engagement of vulnerable and disadvantaged groups

Vulnerable/Disadvantaged group	Strategy
<b>Women</b>	<ul style="list-style-type: none"> <li>➤ Focus group discussions preferably facilitated by a female</li> <li>➤ Mobilize support of Women’s Development Committees</li> <li>➤ Provide information on the GRM</li> </ul>
<b>Elderly, disabled and poor persons who have low digital literacy &amp; do not have access to digital infrastructure due to poverty etc.</b>	<ul style="list-style-type: none"> <li>➤ Targeted social media and Main stream media posts</li> <li>➤ Establish help desks in suitable places</li> <li>➤ Focus group discussions to attain views of the elderly and disabled</li> <li>➤ Provide information on the GRM</li> </ul>
<b>Those who reside outside capital region</b>	<ul style="list-style-type: none"> <li>➤ Targeted consultations, covering islands of different sizes, geography and population dynamics</li> <li>➤ Coordinating with island councils and Internet Service Providers (ISPs) to resolve any issues</li> <li>➤ Provide information on the GRM</li> </ul>
<b>Peoples who may lose their jobs with digital transformation</b>	<ul style="list-style-type: none"> <li>➤ Identify such parties as early as possible via employers</li> <li>➤ Focus group discussions</li> <li>➤ Provide targeted trainings</li> <li>➤ Provide information on the GRM</li> </ul>

#### 5.5 PUBLIC COMMENTS AND FEEDBACK/REPORTING TO STAKEHOLDERS

88. Public/stakeholders will be given a period of 2 weeks to review and submit their comments on the E & S documents disclosed. Such submissions can be made to a designated focal point at the PMU either verbally or in writing including emails, social media messages etc. Verbal communications either via telephone or in person will be recorded by a member of the PMU. All comments received by the project will be reviewed by the PMU and any decisions made based on public/stakeholders comments will be communicated to all relevant stakeholders within 05 days after the review meetings. If the project had not been able to make any decision in response to public/stakeholder comments, same will be communicated to the relevant stakeholders with explanations as to why a decision cannot be made.

#### 6. ROLES, RESPONSIBILITIES OF IMPLEMENTING AGENCIES AND RESOURCES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

## 6.1 RESOURCES

89. As outlined below, resources required for implementation of the stakeholder engagement plan would include implementation arrangement for the project, costs of information disclosure and stakeholder consultation at Male’ and in outer islands; and the cost of the grievance redress mechanism. The project cost tables and annual work plans and budget shall allocate costs for specific information disclosure and stakeholder consultation activities including: maintenance of preparation, printing and dissemination of information materials, and costs of stakeholder consultation workshops. In addition, the project cost tables shall include specific budget for the Grievance Redress Mechanism (GRM)

## 6.2 IMPLEMENTATION ARRANGEMENTS

90. The project will be implemented by MoECCT via the NCTI. A Project Management Unit (PMU) will be established for implementation of the project. The PMU will be headed by a Project Director (PD) who will be designated by NCIT. The PMU is responsible for overall implementation of the project ensuring that all environmental and social safeguard requirements are met in accordance with the requirements of the World Bank’s Environmental and Social Framework. The key staff of the PMU will comprise a Financial Specialist, a Procurement Specialist, an Environmental and Social Safeguards Specialist, and a Communications Specialist. The Environmental and Social Safeguards Specialist will be responsible for the overall coordination, implementation and monitoring of the SEP including the GRM. He/she will be assisted by the Communications Specialist especially in relation to coordination with media and undertaking awareness raising activities. Moreover, the implementation partners will identify Environmental and Social Focal points who will assist in implementation of SEP.

The roles and responsibilities of the different stakeholders in SEP implementation are described in Table 10.

**Table 10 Responsibilities of key stakeholder in SEP implementation**

Stakeholder	Responsibilities
PMU	<ul style="list-style-type: none"> <li>• Overall coordination and implementation of the SEP</li> <li>• Provide adequate financial resources for SEP implementation</li> <li>• Coordinate and collaborate with project partner agencies, other stakeholders, consultants and contractors and ensure their proactive participation in SEP implementation</li> <li>• Maintain regular communications with all relevant stakeholders</li> <li>• Design and produce relevant communication tools and materials</li> <li>• Organize and conduct or facilitate stakeholder engagement activities including meetings and discussions, surveys, awareness raising campaigns etc.</li> <li>• Ensure efficient functioning of the GRM and manage the grievance resolution processes</li> <li>• Document all stakeholder engagement activities and their outcomes, and maintain a systematic database</li> </ul>

Stakeholder	Responsibilities
	<ul style="list-style-type: none"> <li>• Review feedback received from all stakeholders, make appropriate decisions in collaboration with project partners and report back to the relevant stakeholders and concerned parties</li> <li>• Monitor and report on the progress of SEP implementation including operations of the GRM</li> <li>• Undertake periodic reviews of SEP and update and disclose whenever necessary</li> </ul>
<b>Project's partner agencies (refer Table 3)</b>	<ul style="list-style-type: none"> <li>• Organize and conduct or facilitate stakeholder engagement activities including meetings and discussions, surveys, awareness raising campaigns etc. with their respective sub-departments, institutions etc.</li> <li>• Document all stakeholder engagement activities and their outcomes, and maintain a systematic database</li> <li>• Review feedback received from all stakeholders, make appropriate decisions in collaboration with project partners and report back to the relevant stakeholders and concerned parties</li> <li>• Undertake periodic reviews of SEP in relation to the aforementioned activities and update and disclose whenever necessary</li> <li>• Devise appropriate methods and tools to disseminate project related information to their respective clients</li> <li>• Conduct stakeholder consultations on project interventions, implementation procedures, anticipated benefits and impacts and timeframes</li> <li>• Participate in the resolution of public grievances</li> <li>• Provide feedback on project related documents disclosed for public scrutiny</li> <li>• Monitor and evaluate the information disclosure programs and stakeholder consultations</li> </ul>
<b>Project affected parties including general public (refer Table 3)</b>	<ul style="list-style-type: none"> <li>• Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities</li> <li>• Use GRM to report grievances and complaints and ensure their satisfactory resolutions</li> <li>• Assist the relevant authorities to develop and implement appropriate mitigation measures</li> <li>• Participate and support the implementation of stakeholder engagement activities in the SEP, ESCP, etc.</li> <li>• Provide feedback on project related documents disclosed for public scrutiny</li> </ul>
<b>Other interested parties (refer Table 4)</b>	<ul style="list-style-type: none"> <li>• Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities</li> <li>• Assist the project affected parties to raise their grievances and concerns with the relevant agencies</li> <li>• Assist the project to sustain transparency and anti-corruption measures throughout project implementation and its operations</li> <li>• Assist the relevant authorities to develop and implement appropriate mitigation measures</li> </ul>

Stakeholder	Responsibilities
	<ul style="list-style-type: none"> <li>Provide feedback on project related documents disclosed for public scrutiny</li> </ul>

### 6.3. ESTIMATED BUDGET

91. The costs associated with the implementation of the SEP will be provided by MoECCT. A budget for SEP implementation over a period of 6 years is presented in Table 11. The project will review the SEP every six months to determine whether any changes to stakeholder classification or engagement are required including the project implementation period. If any significant changes were observed, the SEP will be updated and disclosed, and the budget will be revised accordingly.

Table 11 Estimate budget for stakeholder engagement plan

No	Activity	No. Units	Unit cost (MVR)	No. Months/units	Total Amount (SLRs)	
					In MVR	In USD (\$1 = MVR 15.42/-)
<b>1</b>	<b>PERSONNEL</b>					
<b>1.1</b>	Environmental and Social Safeguards Specialist/SEP & GRM Coordinator	1	38,000	60	2,280,000	147,859
<b>1.2</b>	Communications Resource Person	1	38,000	24	912,000	59,143
<b>1.3</b>	Project Co-ordinator	2	38,000	60	4,560,000	295,729
<b>2</b>	<b>INFORMAITON DISCLOSURE</b>					
<b>2.1</b>	Development of communication tools, methods and materials (animations, e-brochures, e-leaflets, information booklets, posters, display boards, etc. for content creation, editing, layout and printing)	-	Lump sum	72	3,500,000	226,977
<b>2.2</b>	Newspaper advertisements (in three languages), radio announcements, TV programs etc.	-	Lump sum	72	500,000	32,425
<b>3</b>	<b>STAKEHOLDER ENGAGEMENT</b>					
<b>3.1</b>	Meetings/workshops/FGDs (hiring of venues, refreshments etc.)	-	140,000	15	2,100,000	170,233
<b>3.2</b>	Implementation of Grievance Redress Mechanism		Lump		150,000	9,727

<b>3.3</b>	Surveys for monitoring and evaluation of SEP (questionnaire design, printing, questionnaire administration, data processing and analysis etc.)	6	Lump		150,000	9,727
<b>3.4</b>	Travel Logistics		Lump sum		4,000,000	259,403
<b>Total</b>					18,152,000	1,177,172.50

## 7 GRIEVANCE REDRESS MECHANISM

92. The Grievance Redress Mechanism (GRM) addresses grievances in an efficient, timely and cost-effective manner, that arise in the project, either due to the actions of the project staff and from affected communities and external stakeholders. The PMU will be responsible for managing the GRM. The Project will administer the GRM process and determine the best course of action to resolve the grievance. Further, the project affected persons as well as other interested parties will be fully informed of the GRM, its functions, procedures, timelines and contact persons both verbally and through booklets and information brochures during consultation meetings and other stakeholder engagement activities.

### 7.1 SCOPE OF THE GRM

93. The impacts of the Project may raise grievances and complaints on the part of affected persons in relation to: (i) lack of infrastructure for digital facilities; (ii) inequitable distribution of services and facilities; (iii) exclusion of some sections of the communities benefiting from the project; (iv) affordability and accessibility to services and facilities; (v) loss of employment due to digitization systems; (vi) issues related to data privacy and security etc.
94. Additionally, the GRM will also include special provisions for reporting and responding to the grievances and complaints related to sexual harassment, sexual exploitation and abuse, and gender based violence. Apart from the GRM, project staff shall also be made aware of the avenues available for victims of sexual harassment, sexual exploitation and abuse, and gender based violence such as reporting to the Sexual Harassment Prevention Committee at the Ministry/NCIT, established under Prevention of Sexual Harassment Act (16/2014).
95. The Project will establish a Grievance Redress Committee (GRC). Project related GRM will be available for project stakeholders including project affected persons, to submit complaints/grievances, questions, comments, and suggestions, or provide any form of feedback on all project-funded activities. The GRM will be easily accessible to the aggrieved parties irrespective of their ethnicity, religion, gender, and other social and economic differences. Moreover, it will ensure its transparency, efficiency and accountability in grievance handling and responding while winning the confidence of the complainants. The GRM will endeavour to resolve the grievances locally, and to avoid lengthy court procedures. The GRM will be managed and coordinated by the PMU to be set up for the Project. The Environmental and Social Safeguards Specialist for the project will act as GRM focal for the project.

## 7.2 GRM STRUCTURE/ARCHITECTURE

96. The GRM will function throughout the life cycle of the project implementation. The PMU will ensure adequate female representation and participation in the composition of the GRM.

---

### 7.2.1 COMPOSITION OF GRIEVANCE REDRESS COMMITTEE (GRC)

97. The Grievance Redress Committee will be chaired by the Project Director. The remaining members of the committee will comprise representatives from (i) Ministry of Environment, Climate Change and Technology; (ii) National Centre for Information Technology (NCIT); (iii) Department of National Registration (DNR); and (ii) Communications Authority of Maldives (CAM).

98. The GRC will convene its meetings when a grievance has been lodged. The committee will also consult the relevant technical experts or other partner agencies and carry out site visits, when required. GRC will reach a settlement through consensus among its membership. The GRC will conclude its proceedings within a period of 14 days since the submission of the grievance. If an agreement or resolution is reached, the key points of the agreement/resolution will be summarized, documented and signed by both, the affected person and the GRC.

---

### 7.2.2 PROCESS FOR REPORTING GRIEVANCES

99. The GRM will establish multiple channels through which citizens/beneficiaries/affected persons can make complaints regarding project funded activities. Complaints can be submitted either verbally or in written form using a variety of communication tools such as formal letters/petitions, telephone, email, SMS, on-line entry system etc. Moreover, there will be printed standard formats made available at the GRM focal points to receive grievances which can be accessed by the complainants to record their grievances. If project stakeholders/affected parties provide verbal feedback/complaint, project staff will lodge the complaint on their behalf, and it will be processed through the same channels.

---

### 7.2.3 FOCAL POINTS FOR RECEIVING/RECORDING GRIEVANCES

100. The environmental and social safeguards specialist will be the main focal point for receiving the grievances related to the project. He/She will also be the GRM coordinator. Moreover, the Communications Specialist will be overall responsible to increase awareness of GRM of project affected/interested/disadvantaged parties. Additionally, there will be designated focal points in each of the project implementing partner agencies. Records of grievances should be maintained online through a grievance log data sheets that should be shared with all implementation partners of the project. Names of the focal points together with their contact phone numbers, and email addresses will be posted at visible locations and other strategic locations and will be visible on all awareness material prepared for the project.

---

### 7.2.4 SCREENING, ACKNOWLEDGEMENT AND CLOSURE OF GRIEVANCES

101. The focal points who receive the grievances will forward the grievances to the GRM coordinator at PMU either on the same day or the following day. The coordinator will respond to the complainant acknowledging the grievance and explaining the course of action to be taken and its approximate time frame for resolution. This acknowledgement and notification will be sent to the complainant within three days of receiving the complaint in writing, i.e. through letter or email.



102. In consultation with Project Director (PD), the GRM coordinator will review and determine the (i) eligibility of the grievance/complaint for hearing by the GRC; and (ii) the timeframe within which the complaint should be resolved. Having determined the above, the coordinator will refer the complaints to the GRC. Such referrals should be completed within a maximum of 4 working days of receiving the complaint. If complaints take longer than the stipulated period to handle, weekly updates will be provided to the complainant in writing indicating the reasons for delay. Grievances that do not meet the eligibility criteria to be investigated in the GRM will be notified to the aggrieved party/complainant by GRM coordinator within 03 working days of receiving the grievance.

103. Decisions of the GRC will also be formally communicated to the complainants by the GRM coordinator. A grievance will be considered 'resolved' or 'closed' when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or is implemented, the GRM coordinator will also request feedback from the complainant as to whether s/he deems the action(s) satisfactory, and this will be recorded along with the details of the complaint and the action taken.

104. In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or it is obviously speculative or fraudulent. In such situations, the project's efforts to investigate the grievance and to arrive at a conclusion will be well documented and the complainant advised of the situation. The project will not dismiss grievances based on a cursory review and close them unless the complainant has been notified and had the opportunity to provide supplementary information or evidence.

---

#### 7.2.5 APPEAL PROCESS

105. The GRM established under the project will not impede access to the legal system. Affected persons can leave the GRM at any point, if they are dissatisfied with the process and the decisions of the GRM, and resort to legal action through the country's judiciary system at any time.

#### 7.4 AWARENESS RAISING ON GRM

106. Information about the grievance handling system will be distributed to all project affected people and other stakeholders through regular information channels used by the project including initiating meetings at the start of the project, public consultations held, public meetings during project implementation, brochures/pamphlets in local languages, posting on notice boards and online. The Environmental and Social Safeguards Specialist together with Communications Specialist of the project will play a lead role in awareness building and information sharing on the GRM. Moreover, the stakeholder engagement program of the project will be used by the PMU to encourage the use of the GRM. When organizing and conducting these campaigns, special efforts shall be made to reach vulnerable groups. Information to be disseminated will include the scope

of the GRM, focal points for receiving grievances, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints. Furthermore, the project will provide orientation and training to the members of the GRC on effective grievance handling procedures.

## 7.5 MONITORING AND REPORTING

### 7.5.1 PROJECT LEVEL REPORTING AND MONITORING

107. The PMU will assess the functioning of the GRM. The PMU will be responsible for regular reporting of the GRM status including those grievances received, resolved, and pending. The GRM coordinator will: (i) ensure accurate entry of GRM data into the online log-sheet (data base); (ii) include details of GRM on project quarterly reports; and (iii) review the status of complaints to track which are not yet resolved and suggest any needed remedial action.
108. The quarterly and annual progress reports will include updated information on the following:
- ✓ Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting etc.).
  - ✓ Quantitative data on the number of complaints received, the number that were eligible, and the number resolved
  - ✓ Qualitative data on the type of complaints and answers provided, issues that are unresolved
  - ✓ Time taken to resolve complaints
  - ✓ Number of grievances resolved and raised/appealed to higher levels
  - ✓ Summary of resolutions/decisions made
  - ✓ Satisfaction with the action taken
  - ✓ Any particular issues faced with the procedures/staffing or use
  - ✓ Factors that may be affecting the use of the GRM/beneficiary feedback system
  - ✓ Any corrective measures adopted

### 7.5.2 REPORTING TO WORLD BANK

109. The World Bank will be kept informed and where necessary consulted on World Bank requirements, during the process of grievance resolution, and also on the outcome of the process. A summary sheet of all complaints received and resolved will be shared with the World Bank Task Team. Any complaint or incident categorized as high risk should be reported to the World Bank Task Team immediately.

### 7.5.3 GRM CONTACT INFORMATION

110. Aggrieved parties can approach and use the following contact/s for any inquiries regarding their grievances/complaints and feedback. The contact details will be updated once the Project Management Unit is formed and the required staff are appointed.

Description	Contact Details
-------------	-----------------

<b>Project Implementing Agency:</b>	Ministry of Environment Climate Change and Technology (MoECCT)  National Centre for Information Technology
<b>Project:</b>	Digital Maldives for Adaptation, Decentralization and Diversification Project (P177040)
<b>Address:</b>	National Centre for Information Technology 64, Kalaafaanu Hingun, Male' 20064 Republic of Maldives
<b>e-mail:</b>	secretariat@ncit.gov.mv
<b>Website:</b>	Ministry of Environment, Climate Change and Technology  National Centre for Information Technology (www.gov.mv)
<b>Telephone:</b>	+(960)334-4000

## 8 MONITORING AND REPORTING

### 3.2 8.1 INVOLVEMENT OF STAKEHOLDERS IN MONITORING ACTIVITIES

111. The project will establish multiple mechanisms for monitor and evaluate the SEP implementation. They would include the following arrangements.

- ✓ Overall monitoring and evaluation by the PMU
- ✓ Engagement of the project implementing partners to monitor and receive feedback from the relevant stakeholders
- ✓ Engagement of the project affected parties, vulnerable groups, and media to monitor and report on the adequacy and usefulness of (i) information disclosure programs; (ii) consultations; and (iii) stakeholder engagement activities via their participation in individual/group consultations, and in the GRM. This should be undertaken during project mid-term and during project closure.

112. The project will use a variety of methods and tools for monitoring and evaluation. They will include review of project documents and progress reports, stakeholder interviews and group

discussions, feedback surveys, site visits etc. SEP implementation team of PMU will coordinate and facilitate documentation of the monitoring and evaluation results and outcomes including the maintenance of records of all consultations and meetings conducted with stakeholders, types of information disclosed, issues and concerns raised at consultations/meetings, public comments/feedback received for disclosed documents, informal feedback, decisions made, and reporting back to the stakeholders. The following monitoring framework in Table 12 provides a set of indicators that could guide the monitoring processes.

**Table 12 Monitoring requirements of SEP**

<b>No.</b>	<b>Monitoring Indicators</b>	<b>Methods</b>	<b>Timeframe</b>	<b>Responsibility</b>
1.	No. of affected parties, other stakeholders and vulnerable groups engaged in SEP implementation	Review of reports on consultations and progress reports	Quarterly	Environment & Social Specialist, Communications Specialist and project partners
2.	Type of information shared/disclosed	Review of information material shared and their content	Quarterly	Environment & Social Specialist, Communications Specialist and project partners
3.	Type of methods used for information dissemination and their effectiveness	Review of communication methods used, observations and feedback interviews and consultations with information recipients	Quarterly	Environment & Social Specialist, Communications Specialist and project partners
4.	Accessibility to information and language used for communication	Records of persons who sought information; observations and feedback interviews and FGDs with stakeholders, feedback survey (annual)	Quarterly	Environment & Social Specialist, Communications Specialist and project partners
5.	Level of awareness among affected parties, other stakeholders and vulnerable groups on project implementation procedures and potential impacts	Focus group discussions and individual interviews with a cross-section, feedback survey (annual)	Bi-annually	Environment & Social Specialist, Communications Specialist and project partners
6.	No. consultations conducted with affected parties, other stakeholders, and vulnerable groups	Review of reports on consultations by project and its partners	Bi-annually	Environment & Social Specialist, Communications Specialist and project partners
7.	Type of issues/concerns raised and discussed at consultative meetings	Review of reports on consultations	Quarterly	Environment & Social Specialist, Communications

				Specialist and project partners
8.	Type of decisions made based on consultation outcomes	Review of progress reports	Quarterly	Environment & Social Specialist, Communications Specialist and project partners
9.	Feedback sessions conducted with affected parties, other stakeholders and vulnerable groups to report on the decisions made	Review of progress reports, and focus group discussions and individual interviews with a cross-section	Bi-annually	Environment & Social Specialist, Communications Specialist and project partners
10.	Level of satisfaction among APs, other stakeholders and vulnerable groups on the consultative process and its outcomes	Feedback surveys, focus group discussions and individual interviews with a cross-section	Annually	Environment & Social Specialist, Communications Specialist and project partners
11.	No. grievances/complaints received and resolved	Review of progress reports and GRM database	Quarterly	Environment & Social Specialist, Communications Specialist and project partners
12.	Level of efficiency and responsiveness of the GRM	Review of the records of GRC meetings and decisions made	Bi-annually	Environment & Social Specialist, Communications Specialist and project partners
13.	Level of satisfaction among affected parties, other stakeholders and vulnerable groups on the overall performance of GRM	Focus group discussions, feedback surveys and individual interviews with a cross-section of parties who reported grievances	Annually	Environment & Social Specialist, Communications Specialist and project partners

## 8.2 REPORTING BACK TO STAKEHOLDER GROUPS

113. The results of the stakeholder engagement activities including results and outcomes of monitoring and evaluation of SEP implementation will be reported back to the stakeholders through website and/or formal communications.

## 8.3 REPORTING TO THE WORLD BANK

114. The PMU will collate all monitoring and evaluation results and produce bi-annual reports to be submitted to the World Bank. SEP monitoring will be part of the project Monitoring reports submitted to WB.

## 9 REFERENCES

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

Environmental Impact Assessment Regulations (Regulation No: 2012/R-27)

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.