THE REPUBLIC OF MALDIVES

MINISTRY OF EDUCATION

&

MINISTRY OF HIGHER EDUCATION

STAKEHOLDER ENGAGEMENT PLAN (SEP)

April, 2020

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ABBREVIATIONS

CA	Coordinating Agency
DoIE	Department of Inclusive Education
EEDP	Enhancing Education Development Project
EGMA	Early Grade Mathematics Assessments
EGRA	Early Grade Reading Assessments
ESF	Environmental and Social Framework
ESP	Education Sector Plan
ESA	Education Sector Analysis
ESQID	Education Supervision and Quality Improvement Division
ESS	Environmental and Social Standard
GA	Grant Agent
GBV	Gender-Based Violence
GoM	Government of Maldives
GPE	Global Partnership for Education
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HEI	Higher Education Institute
ICT	Information Communication Technology
IHDP	Integrated Human Development Project
ISR	Implementation Status and Result
IUM	Islamic University of Maldives
LAMP	Learning Advancement and Measurement Project
LEG	Local Education Group

M&E	Monitoring and Evaluation
MEERY	Maldives Enhancing Employability and Resilience of Youth
MEMIS	Maldives Education Management Information System
MNU	Maldives National University
MoE	Ministry of Education
MoHE	Ministry of Higher Education
MQA	Maldives Qualifications Authority
NIE	National Institute of Education
NALO	National Assessment of Learning Outcomes
NECC	National Education Consultation Committee
PPRD	Policy, Planning and Research Division
PMIS	Project Management Information System
QA	Quality Assurance
QAD	Quality Assurance Department
SBPD	School-Based Professional Development
SEN	Special Education Needs
SEP	Stakeholder Engagement Plan
TRC	Teacher Resource Center
UNICEF	United Nations Children's Fund

EXECUTIVE SUMMARY

Maldives Learning Advancement and Measurement Project (LAMP) has the following components:

- Component One: Strengthening Curriculum Implementation
    - Sub-component 1.1. Improving Learning Outcomes in Key Subjects for Foundation and Primary Education
    - Sub-component 1.2. Assisting Children with Special Education Needs (SEN) and Providing Alternative Learning Pathways for At Risk Students
- Component Two: Improving Teacher Education and Development
    - Sub-component 2.1. Improving School-based Professional Development (SBPD) of Teachers
    - Sub-component 2.2. Strengthening Pre-Service Teacher Education
- Component Three: Advancing the Measurement of Student Learning and School Performance
    - Sub-component 3.1. Modernizing Learning Assessments
    - Sub-component 3.2. Strengthening Quality Assurance (QA) for Learning
- Component Four: Coordination, Monitoring, Policy Analysis and Technical Assistance

The LAMP will be implemented at school and Higher Education Institution (HEI) level, coordinated by the Project Monitoring Team (PMT) at MoE, under the guidance of the LAMP Steering Committee.

This Stakeholder Engagement Plan (SEP) identifies the key stakeholders of the project and describes the timing and methods of engagement with stakeholders throughout the life-cycle of the project. The process of preparing the SEP was inclusive as it was designed to accommodate the needs and circumstances of a diverse range of stakeholders, paying special attention to identify disadvantaged or vulnerable individuals or groups with consideration for stakeholders' communication and physical accessibility challenges. For the LAMP Project, the following people are considered as stakeholders: MoE, NIE, DoIE, QAD, MoHE, MNU, IUM, Private HEIs, Principals, leading teachers, teachers, students, parents, school boards, communities, SEN teachers, SEN students. Potential disadvantaged/vulnerable individuals/groups with regards to the LAMP project are school stakeholders including teachers in remote islands, severely disabled children and SEN children with undiagnosed disabilities (learning difficulties etc).

The key strategies to be followed to engage stakeholders include meetings at different levels including school, regional and central levels. Project related information will be disclosed through guidelines/regional meetings and TRC officers.

Implementing Agencies
Overall responsibility for the implementation of the Project including the SEP will lie with the MoE and MoHE. The Project will be implemented by the MoE, including all fiduciary activities with technical input from the MoHE. The MoE will have a Project Monitoring Team (PMT) that will be responsible for day-to-day project implementation and monitoring of project activities and

implementation of the SEP. The Team will provide reports of project progress and make this available to the Project Steering Committee, the Ministers of Education and Higher Education, the Local Education Group (LEG), UNICEF and the World Bank. To function effectively, the project unit will have at least the following contract officers on hand: (a) Implementation, Monitoring & Evaluation (IME) Specialist, (b) Financial Management Officer, (c) Implementation Officer, and (d) Monitoring and Evaluation Officer. The main responsibilities of the PMT are to coordinate project activities, cover administrative work, coordinate the environmental and social safeguard functions and GRM activities. as well as carry out management and monitoring and evaluation work including stakeholder engagement activities.

GRM

The Employment Act of the Maldives determines the fundamental principles relating to employment in the Maldives, the rights and obligations of employers and employees, establishes a Labour Relations Authority and an Employment Tribunal to protect such rights, and makes provision for all other matters related to employment. However, there is currently no clearly defined GRM reporting system specific to the education sector, for project related matters. Therefore, the project needs to establish a grievance redress mechanism (GRM). The project is expected to strengthen accountability for beneficiaries and provide a mechanism for project stakeholders to provide feedback on project activities. It is also expected to provide a mechanism that allows for the identification and resolution of issues affecting the project, including safeguards related complaints, misuse of funds, abuse of power, and other inappropriate behaviour. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact. A separate GRM will be established by the implementing authorities during implementation to address employee grievances consistent with ESS 2. The GRM established under the project should be accessible to everyone involved including the interested authorities and organisations. The mechanism focuses not only on receiving and recording complaints but also on how complaints are resolved. The GRM should be supported by an information campaign and training. While feedback should be handled at the level closest to the complainant, all complaints should be registered and follow the set procedures.

Monitoring and reporting

Monitoring and evaluation under the project will rely on each level of the education system—from the school level and the central level. The MoE/MoHE is responsible for ensuring effective monitoring processes are adopted and that information flow is smooth, reaching the relevant stakeholders on time. Steps will be taken to ensure that each feedback mechanism established under the project can provide timely data to the local-level stakeholders. The project will maintain a strong GRM given the project's reliance on stakeholder inputs for effective implementation and achievement of project outcomes. Information on the GRM will be provided in the context of community and school-level training. The PMT will ensure timely response to any grievances received.

COVID-19

The Project is to be implemented amidst COVID-19 outbreak which is likely to affect the health of both the workers and the communities. Absence of PPE, lack of training and awareness on social distancing protocol may exacerbate the situation. As such, face to face interactions are likely to be

limited, and IT based interactions/Focus Group Discussions (FGD) in small groups may have to be planned by the MoE/MoHE. While planning stakeholder engagements in different forms, the MoE/MoHE must comply with national, World Bank and WHO guidelines in this regard. Social distancing and all measures on infection control stipulated in the Standard Operating Procedures (SOPs), guidelines and policies issued by the Health Protection Agency of the Maldives, which are in line with the guidelines of the World Health Organization, will be implemented by the project PMT in parallel to measures stipulated in this document.

1. INTRODUCTION AND PROJECT DESCRIPTION

The Maldives Learning Advancement and Measurement Project (LAMP) is a partnership between the Government of Maldives and the funding agency, the Global Partnership for Education (GPE), the United Nations Children's Fund (UNICEF) as the Coordinating Agency (CA), and the World Bank as the Grant Agent (GA), to increase grant resources for the country. The US$ 3.5 million Project aims to support the Government of Maldives (GoM) by promoting learning focused curriculum implementation and strengthening the measurement of student learning outcomes. Specifically, the project will help to improve the quality of curriculum delivery in English and Dhivehi languages and mathematics in primary grades, strengthen teacher education and develop and modernize the measurement of learning outcomes for policy formulation. The project has three components each embodying subcomponents as summarized below.

Component One: Strengthening Curriculum Implementation

Sub-component 1.1. Improving Learning Outcomes in Key Subjects for Foundation and Primary Education

1. The Project will assist the country to improve learning outcomes in three key subjects at the stages of foundation and primary education: English, mathematics, and Dhivehi.

2. English-language skills are widely acknowledged as vital for success in the modern global knowledge economy. The Project will prioritize support for the development of a strong and effective program to improve English language learning outcomes in the foundation and primary education stage (key stages one and two) of the National Curriculum Framework (NCF). The focus will be on the vital language skills of vocabulary, reading, and writing. The Project will support the following activities in schools: (a) create an English language immersion environment to produce an acquisition-rich environment for students to learn the language, where day-to-day conversation and extracurricular and cocurricular activities would be in English during at least a part of the school week; (b) encourage and affirm students who read books in the English language and engage with English language technology, as appropriate to their ages; (c) encourage families to create an environment at home which fosters English language learning, including English language reading material and TV programs, and discussion and conversation in English at home; (d) promote cocurricular and extracurricular activities such as English literary, drama, and debating societies; and (e) other innovative activities to promote English language learning, with special attention to improving reading skills.

3. The Project will support strengthening early grade mathematics learning to ensure that children leaving the primary education stage have a strong grasp of fundamental mathematics. Several activities will be supported to increase mathematics learning outcomes in the foundation and primary education. The mathematics teaching and learning environment in schools will be improved by the provision of educational material and technology. The learning needs of students and the pedagogical needs of mathematics teachers will be identified by the NIE and QAD using information from the NALOs and QA reviews, and through discussions with mathematics teachers and relevant academics from universities and higher education institutes. Teachers will diagnose student learning problems through formative assessments, especially classroom observations and testing, and the information gained will be employed to improve the teaching-learning process. Support for mathematics teachers for better curriculum implementation will also be given through an enhanced School Based Professional Development, which will be supported under this Project.

4. Dhivehi is gradually diminishing as a local language, as foundation and primary school children are no longer using the language to communicate with each other. The Project will help to create a rich Dhivehi language environment that facilitates children's language acquisition and learning.

The Project will support building a digital library of Dhivehi language resources in schools so children can have access to read and learn Dhivehi. Dhivehi learning will also be promoted through awareness programs on the mother tongue as a cognitive learning language. This will in return develop the children's literacy skills by fostering parental engagement. Literary activities will also be used to broaden children's Dhivehi language experience.

Sub-component 1.2. Assisting Children with Special Education Needs (SEN) and Providing Alternative Learning Pathways for At Risk Students

5. Enhancing early grade literacy and numeracy of special education needs (SEN) children is extremely important for equity. The Project will support the DoIE to improve opportunities for children with SEN from the foundation stage (ages 4-5 years) upwards to the end of Key Stage 2 (Grade 6). Nine special education needs schools will be set up for early intervention as a pilot study, four hub schools in the Malé region, and five focus schools in the atolls each serving a cluster of islands. The Project will help to provide specialized training for about 20 SEN teachers together with learning material for the nine schools in the pilot study, with a view to developing literacy and numeracy of SEN children at an early age. In addition, the Project will help train a further group of 20 SEN teachers to enable them to identify specific learning difficulties of SEN children in all grades. These teachers will serve as master trainers and focal points for development of the SEN program. This will be done by evaluating the teaching and learning of literacy and numeracy programs being offered in established Inclusive Education Support Units. Assistance will also be given to develop tools for teaching to cater to the identified learning difficulties.

6. The country is developing an alternative learning pathway to cater to the most vulnerable students who are at risk of or have already dropped out of school for a variety of reasons. The Project will conduct a study to identify the barriers children and adolescent boys and girls face to remaining in school, identify those students who need alternative learning pathways and develop a program for alternative learning pathways based on the findings of the study that is gender-responsive and rights-based at its core. This program will be piloted, and the findings will be used to develop a policy on alternative learning pathway. The Project will also look at more efficient monitoring and reporting of out-of-school children to enable enhanced support.

Component Two: Improving Teacher Education and Development

Sub-component 2.1. Improving School-based Professional Development (SBPD) of Teachers

7. The Maldives has a policy of School-Based Professional Development (SBPD). SBPD is known from the international education literature to be the most effective mechanism for the continuous professional development of teachers. The Project will help the GoM to develop SBPD to continuously improve teacher motivation, pedagogical skills, competencies and performance. Specifically, the SBPD program will support GoM to: (a) raise the ability of school principals and senior management teams to establish a learning culture within the school; (b) improve teacher motivation for their work; (c) enhance teacher performance by achieving required teacher competencies and improving their pedagogical practices; and (d) link teacher development activities to addressing student learning needs. The Project will support measures to increase: (i) the quality of SBPD programs in schools to improve teacher performance and raise student learning outcomes, with a special focus on atolls showing consistent low performance in NALO and 55 schools that were identified as disadvantaged and low performing schools; (ii) the achievement of required competencies among teachers; (iii) the use of appropriate pedagogical practices among teachers. The NIE and QAD with the assistance of the Teacher Resource Centers (TRCs) will support schools to implement SBPD programs to achieve the desired levels of performance. The QAD will measure (i) to (iii) above through internal and external self-evaluations, and the NIE through SBPD reports provided by the SBPD focal points in schools. The Project will also support

a collaborative research study led by the MNU with contributions from staff of the IUM and relevant non-state HEIs evaluating the SBPD practices in schools and their effectiveness, especially in relation to improving student learning in foundation and primary grades.

Sub-component 2.2. Strengthening Pre-Service Teacher Education

8. This sub-component will help enhance the quality of pre-service teacher education offered by the MNU, IUM, and non-state HEIs. The Project would support the following areas: (a) reading materials/textbooks in Dhivehi for courses, with some translation work; (b) ICT training for student-teachers to understand how to use ICT for education; (c) human resource development of academics; and (d) equipment for teaching and learning.

Component Three: Advancing the Measurement of Student Learning and School Performance

Sub-component 3.1. Modernizing Learning Assessments

9. National and international assessments of learning outcomes are the main instruments for assessing education systems and formulating education policies in OECD and middle-income countries. National assessments are useful to analyze: (a) the quality of learning in relation to the national curriculum; (b) strengths and weaknesses in knowledge and skills in the education system; (c) the learning levels of students across different atolls and islands; (d) educational and socio-economic factors associated with student learning outcomes; and (e) the evolution of learning achievements over time. International assessments are useful to analyze the quality of learning in the education system in relation to international levels. National and international assessments provide complementary information about the performance of education systems. Maldives, as an upper-middle income country, needs to use both sources of information for future education development.

10. The Project will support the design and implement national assessments of learning outcomes (NALO) in Grades 4 and 7 according to a regular cycle for the key subjects of mathematics, English and Dhivehi, and use the results and findings for education policy and program development. The national assessments will include modules of test items drawn from international assessments such as PIRLS, PISA or TIMMS. The Project will also build the capacity of: (a) policy makers and education specialists within the MoE to use the results and findings from national and international assessments for strategic policy and management decisions; and (b) academics from Education Faculties of universities to undertake policy analyses using the information, especially the data, from NALOs. These assessments will help monitor learning outcomes over time. In addition, the Project will support the analysis of factors that contribute to learning outcomes, such as school-related factors, classroom-related factors, and child-related factors. The information and feedback from these national assessments can be used by policy makers and education specialists in key education areas such as curriculum development, pre-service teacher education, continuing teacher development, the production of educational material including textbooks, and the allocation of resources. The Project will also build the capacity in the country to qualify for a future round of PIRLS, PISA or TIMMS to be conducted. This will help fully benchmark learning levels in the Maldives to international standards. In addition, the Project will assist the QAD to develop and implement a national version of the Early Grade Reading Assessments (EGRA) and Early Grade Mathematics Assessments (EGMA).

Sub-component 3.2. Strengthening Quality Assurance (QA) for Learning

11. The measurement of school performance through QA reviews will be supported by the Project. The QA process consists of both self-evaluation by schools and external evaluations organized by QAD. The school self-evaluations are conducted by stakeholders including principals, teachers, parents and local communities. This provides extensive provision for citizen engagement, including consultations, collection of stakeholder feedback, community participation in planning and decision making, and grievance redressal mechanisms. The QA process also provides opportunities for stakeholders, such as the principal, teachers, students, parents, and the local community, to participate in planning and implementation of school improvement plans (SIP). The results of the quality assurance process will feed back into the SIPs, that would include the development of safe shelters in schools as part of the community disaster management plan, as when and when necessary. The quality assurance reports will be publicly available and will also be utilized in regular debates with policy makers including the Cabinet and relevant Parliamentary groups to discuss ways to further enhance the national education system. The analysis of stakeholders' feedback will also examine gender related issues, so that timely action can be taken where needed. The needs of students, staff and stakeholders and management responses will also be incorporated in the SIPs. The relevant information on the implementation of these plans will be shared with the stakeholders. This QA process will also provide the citizen engagement mechanism for the Project.

12. The direct beneficiaries of the Project will be approximately 30,000 primary school students and about 2,500 foundation and primary school teachers in 9 atolls. The indirect project beneficiaries will be about 85 school communities located in these atolls and the suppliers of education material and services under the Project.

Component Four: Coordination, Monitoring, Policy Analysis and Technical Assistance

13. This component will cover coordination, operations and monitoring support, technical expertise, policy research and evaluation, and communication. The Policy Planning and Research Divisions (PPRD) in the MoE and MoHE will implement activities under this component. The PPRD in the MoE will utilize expertise for implementation support and monitoring linked to the sub-components of the LAMP. These will be experts with high-quality expertise and a proven track record of performance in the relevant areas. The expertise will be drawn from universities and higher education institutions, and from consultant firms, as applicable. Consultants needed will be recruited under the relevant GoM and World Bank procurement guidelines and regulations.

14. Specifically, this component will support the MoE/MoHE with technical expertise in project implementation and monitoring for the duration of the LAMP. Under policy research and evaluation this component will support to design and realize policy reforms, including piloting and evaluating innovate approaches, frameworks, and strategic plans under various sub-components of the Project. The component will also ensure the availability of technical expertise for high quality research and policy analysis to achieve the Project's development objective. For instance, this component will secure the required technical expertise to ensure that learning assessment results are appropriately analyzed and utilized for education policy development and planning. The component will also support monitoring and evaluation studies to assess the impact of project activities. Finally, under this component, technical assistance will be given for development and dissemination of any communications material needed to effectively implement the Project and enhance the effectiveness of project activities.

2. STAKEHOLDER ENGAGEMENT

This Stakeholder Engagement Plan has been prepared for the LAMP project according the relevant laws and policies of the GoM and the World Bank. The World Bank is committed to mainstreaming stakeholder engagement in operations it supports in order to improve outcomes. This commitment is reflected in the World Bank's Environmental and Social Framework (ESF)'s Environmental and Social Standard (ESS) 10 -Stakeholder Engagement and Information Disclosure, which 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).

As a part of project preparation, the GoM has carried out a Stakeholder Engagement Analysis which was aimed at identifying: (i) who will be directly or indirectly affected by the project, (ii) how the project plans to reach out to stakeholders, and (iii) how the project would share information and get stakeholders involved in the decision-making and implementation of the project. This Stakeholder Engagement Plan (SEP) therefore summarizes findings of the analysis and describes the timing and methods of engagement with stakeholders throughout the lifecycle of the project. The process of preparing the SEP was inclusive as it was designed to accommodate the needs and circumstances of a diverse range of stakeholders, paying special attention to identified disadvantaged or vulnerable individuals or groups with consideration for stakeholders' communication and physical accessibility challenges.

Engagement Method and Tools in light of COVID 19 Outbreak

With the outbreak and spread of COVID-19, people have been mandated by national or local policy, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Various restrictive measures, some imposing strict restrictions on public gatherings, meetings, people's movement, and others advising against public group events have been adopted.

WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v)

a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website, and can be access via the following link: https://www.who.int/emergencies/diseases/novel-coronavirus-2019.

Given the COVID-19 pandemic situation, managing public consultation and stakeholder engagement in the Project needs to be given to national requirements and any updated guidance issued by WHO. It is important that the alternative ways of managing consultation and stakeholder engagement discussed with clients are in accordance with the local applicable laws and policies, especially those related to media and communication.

With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with the Public Health Protection Act and COVID-19 related policies and guidelines, below are some suggestions for stakeholder consultation amidst COVID-19 outbreak:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations;

- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders; and

- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, specific channels of communication that should be used while conducting stakeholder consultation and engagement activities need consideration. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops, and community meetings;

- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom, and Skype;

- Be sure that everyone involved in stakeholder planning articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.

- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;

- Employ traditional channels of communications (e.g. dedicated phone-lines, mail and TV) when stakeholders to do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;

- However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, the implementing agency (IA) should discuss whether

the project activity can be rescheduled to a later time. Where it is not possible to postpone the activity or where the postponement is likely to be for more than a few weeks, IA should consult WB Teams to obtain advice and guidance.

3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

During the project identification and preparation stage, several consultations took place at the national level involving the Ministry of Education (MoE) and Institutions within the MoE, the Ministry of Higher Education and the Ministry of Finance, and at the local and school levels involving other agencies and key stakeholders(see table 1).

Table 1. List of stakeholder Engagement Activities conducted during the project identification and preparation stage

Stakeholder	Main topics discussed
Ministry of Education (MoE)	▪ Challenges facing the MoE. ▪ Aspects that need improvement to enhance student learning and teacher performance in primary grades. ▪ Goals/objectives MoE wants to achieve. ▪ Strategies to achieve the goals. ▪ Indicators the MoE wants to use to measure attainment of the goals (results framework). ▪ Monitoring mechanism for the project. ▪ Implementation arrangement for the project. ▪ Building capacity of education specialists.
Ministry of Higher Education (MoHE)	▪ Challenges facing the MoHE. ▪ Aspects that need improvement to obtain student teacher cohorts and enhance their learning, as well as teacher retention in primary grades. ▪ Goals/objectives MoHE wants to achieve. ▪ Strategies to achieve the goals. ▪ Indicators the MoHE wants to use to measure attainment of the goals (results framework). ▪ Monitoring mechanism for the project. ▪ Implementation arrangement for the project. ▪ Building capacity of education specialists.
Ministry of Finance and Treasury (MoFT)	▪ Alignment of the project with national strategy. ▪ Sustainability considerations in the project design. ▪ Contribution of the project to the country's economic development, poverty reduction and shared prosperity. ▪ Contribution of the project to enhanced human capital.
Maldives National University (MNU)	▪ Challenges facing the MNU. ▪ Quality of pre-service teaching courses. ▪ Lack of awareness of the National Curriculum among faculty lecturers. ▪ Lack of lecturers who are specialized in specific areas for primary education. ▪ Inability to get students to opt for specialised courses, including Dhivehi language. ▪ Aspects that need improvement to enhance quality of teacher educators. ▪ Recruitment of student teachers and their quality ▪ Research studies on school education.

Stakeholder	Main topics discussed
Islamic University Maldives (IUM)	▪ Challenges facing the IUM. ▪ Quality of pre-service teaching courses. ▪ Lack of new cohorts for primary teaching programs. ▪ Lack of Dhivehi resources for teaching Dhivehi medium courses. ▪ Aspects that need improvement to enhance quality of teacher educators. ▪ Recruitment of student teachers and their quality. ▪ Research studies on school education.
Other Higher Education Institutes (HEIs)	▪ Challenges facing the HEIs. ▪ Lack of awareness of the national school curriculum among lecturers ▪ Aspects that need improvement to enhance quality of lecturers ▪ Quality of pre-service teaching courses ▪ Low language competency both in Dhivehi and English languages among student teachers ▪ Poor quality of secondary school graduates who are enrolled to train as teachers ▪ Research studies on school education
National Institute for Education (NIE)	▪ Challenges facing the NIE. ▪ Aspects that need improvement to enhance curriculum implementation and student learning. ▪ Goals/objectives NIE wants to achieve. ▪ Strategies to achieve the goals. ▪ Indicators the NIE wants to use to measure attainment of the goals (results framework).
Quality Assurance Department (QAD)	▪ Improvements required for enhancing the process of quality assurance of schools. ▪ Developing and implementing a national version of EGRA) and EGMA. ▪ Building capacity of education specialists.
Educational Supervision and Quality Improvement Department (ESQID)	▪ International expertise in perfecting alternative learning pathways. ▪ Building capacity of education specialists.
Department of Inclusive Education (DoIE)	▪ Enhancing early grade literacy and numeracy of Special Education Needs (SEN) children ▪ Building capacity of SEN teachers and improving resources for SEN children
Training Resource Centres (TRCs)	▪ Challenges facing TRCs ▪ Support and funding for TRCs from MoE ▪ Functions of TRCs and staffing ▪ Demand for training through TRCs
School principals	▪ Challenges facing schools. ▪ Competences of teachers. ▪ Challenges facing teachers and professional development of teachers. ▪ Challenges in curriculum implementation ▪ Student performance and actions to improve student learning. ▪ Quality assurance process in school and its effectiveness ▪ Issues on gender and inclusive education.

Stakeholder	Main topics discussed
	▪ Learning grants for schools ▪ Teaching and library resources ▪ Shortage of SEN teachers and SEN classrooms ▪ Student weakness in applying mathematical concepts ▪ Lack of educational resources including library books ▪ Absence of proper monitoring mechanism for teaching and learning
Leading teachers	▪ Challenges facing schools and leading teachers. ▪ How leading teachers could support schools better.
Teachers	▪ Challenges facing schools and teachers. ▪ Competences and qualifications of teachers. ▪ Professional development of in-service teachers, school-based and other. ▪ Challenges in curriculum implementation. ▪ Quality assurance process in school and its effectiveness ▪ Student learning and factors affecting performance. ▪ Quality of teaching and learning materials. ▪ Issues relating to gender and inclusive education.
Parents	▪ Challenges schools face. ▪ Satisfaction by parents with school performance. ▪ Satisfaction with curriculum and curriculum implementation. ▪ Community support in school management.
Development Partners	Coordination of LAMP activities between GPE, World Bank and the Ministries discussed with UNICEF, the Coordinating Agency for the GPE grant.

Lessons Learned on Stakeholder Engagement

Prior World Bank funded projects in the Maldives Education and Higher Education sectors include the Integrated Human Development Project (IHDP) and the Enhancing Education Development Project (EEDP), while the ongoing Maldives Enhancing Employability and Resilience of Youth (MEERY) Project is also being funded by the World Bank.

All these projects had/have various categories of stakeholders. Each stakeholder group brings with them unique requirements, concerns, values and responsibilities, and as such, needs to be engaged in different contexts and means. Moving forward with the implementation of the LAMP, it is imperative that the GoM correctly identifies, rightly engage and responsibly address the inputs and concerns of all stakeholders involved. Also, the contractors and consultants employed during the implementation of a project are important stakeholders in a project. As they are not identified during the preparation of a project-specific SEP, they are not consulted. It is important to consider an SEP a living document and include the contractors and other workers in stakeholders' engagement process once they are identified.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1. Target Stakeholders and Other Interested Parties

For the LAMP Project, the following people are considered as stakeholders: (i) those who are affected or likely to be affected by the Project, and (ii) those who may have an interest in the Project. Table 2 summarizes affected (target stakeholders) and non-affected parties who may have a direct or indirect interest in the Project. The target stakeholders will be informed and consulted about the Project throughout.

Table 2. List of Potentially Affected Stakeholders and Other Interested Parties

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
Component One: Strengthening Curriculum Implementation			
1.1 **Improving Learning Outcomes in Key Subjects for Primary Education**	MoE, NIE, MoHE, MNU, IUM	Curriculum review, provision of guidance for formative assessment and targeted teaching in English, Maths and Divehi	MoFT, Policy makers, research institutes, community leaders, NGOs
	Principals, leading teachers, teachers	Updating teaching methodologies and class room assessment, provision of resources i.e. reading material, digital libraries	
	Students, parents, school boards, communities	Better literacy and numeracy of primary children	
1.2 **Assisting Children with Special Education Needs (SEN)** and Providing Alternative Learning Pathways for At Risk Students	MoE, NIE, MoHE	SEN curriculum review and upgrade of early grade curriculum, SEN teacher training in specialized areas	MoFT, Ministry of Health, Policy makers, community leaders, NGOs
	Principals, leading teachers, teachers, SEN teachers	Updating teaching methodologies, provision of resources for 8 Model (HUB) SEN schools	
	SEN students, other students, parents, school boards, communities	Improved early grade literacy and numeracy of SEN children and better facilities in schools	
Component Two: Improving Teacher Education and Development			
2.1 **Improving SBPD of Teachers**	MoE, NIE, MoHE, MNU	Provision of framework and guidance for SBPD	Policy makers, IUM, Private HEIs, community leaders
	Principals, leading teachers, teachers, SEN teachers	Better practice of SBPD to improve student learning outcomes in English, maths and Dhivehi	
	Students, parents, school boards, communities	Better literacy and numeracy of primary children	
2.2 **Strengthening Pre-Service Teacher Education**	MoE, NIE, MoHE, MNU, IUM, Private HEIs	Review and upgrade of pre-service teacher education curriculum, improve quality of teacher educators	Policy makers, community leaders
	Principals, leading teachers, teachers	Better quality teachers in school, improved teaching methodologies	

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
	Students, parents, school boards, communities	Better literacy and numeracy of primary children	
Component Three: Advancing the Measurement of Student Learning and School Performance			
3.1**Modernizing Learning Assessments**	MoE, NIE, QAD, MoHE, MNU	Modernizing national assessments and conducting assessments in a regular cycle to understand how well the system is performing, capacity building of staff	Policy makers, research institutes, IUM, Private HEIs, community leaders
	Principals, leading teachers, teachers	Understanding of how well the education system is performing	
	Students, parents, school boards, communities	Understanding of how well the education system is performing	
Component Four: Coordination, Monitoring, Policy Analysis and Technical Assistance			
	MoE, MoHE, NIE, QAD, DoIE, MNU, IUM, schools, private HEIs	Coordination, operations and monitoring support, technical expertise, policy research and evaluation, and communication	Policy makers, principals, leading teachers, teachers, students, parents, school boards, communities

4.2. Disadvantaged / Vulnerable Individuals or Groups

Disadvantaged/vulnerable individuals and groups, who often do not have a voice to express their concerns or understand the impacts of a project, are sometimes excluded from stakeholder engagement. Table 3 shows potential disadvantaged/vulnerable individuals/groups and limitations they may have regarding participating in the consultation process.

Table 3. List of Disadvantaged/Vulnerable Individuals/Groups

Project Component	Vulnerable groups and individuals	Peculiar Characteristics/ Needs	Preferred means of notification/ Consultation	Additional Resources Required
Component One: Strengthening Curriculum Implementation				
1.1 **Improving Learning Outcomes in Key Subjects for Primary Education**	School stakeholders in remote islands	Lack of access and resources, weak communication network with remote islands	School notice boards, PTA meetings, community level meetings, community notices	Transportation (to islands) for dissemination of information, recruitment of volunteers to disseminate information
1.2 **Assisting Children with Special Education Needs (SEN)** and Providing Alternative Learning Pathways for At Risk Students	Severely disabled children, SEN children with undiagnosed disabilities (learning difficulties etc)	Lack of access and resources (transportation etc) due to nature of disabilities, lack of support in school due to undiagnosed disabilities	Greater awareness through community level meetings, community notices, posters	Transportation (to islands) for dissemination of information, recruitment of volunteers to disseminate information

Project Component	Vulnerable groups and individuals	Peculiar Characteristics/ Needs	Preferred means of notification/ Consultation	Additional Resources Required
Component Two: Improving Teacher Education and Development				
2.2 **Strengthening Pre-Service Teacher Education**	Potential teachers in remote islands	Accessibility to pre-service teacher education	Teachers' Association to meetings, community notices	Transportation (to islands) for dissemination of information, recruitment of volunteers to disseminate information

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1. Purpose and Timing of Stakeholder Engagement Program

As set out in ESS10, stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle. Table 4 presents an outline of key stakeholder engagement activities to take place during the project preparation stage through to implementation and closure.

Table 4. Proposed Stakeholder Engagement at Preparation and Implementation Stage

Project component	Target stakeholders	Expected discussion and decisions
Project preparation stage		
Component One: Strengthening Curriculum Implementation		
1.1 **Improving Learning Outcomes in Key Subjects for Primary Education**	• MoE • NIE • ESQID • MoHE • MNU • IUM • Non-state HEIs • Principals • Leading teachers • Teachers • Parents • School boards • Communities	• How literacy and numeracy can be improved in primary education • The nature of interventions to improve English language, mathematics and Dhivehi language learning outcomes of children • Preparation of plans with time lines to implement the desired interventions • Monitoring of implementation • Capacity in the related institutions to plan, implement and monitor program • Environmental and Social safeguards and Environmental and Social Framework (ESF) • Organizational structure for ESF • Project Grievance Mechanisms (GRM) • Disclosure of Stakeholder Engagement Plan, Environmental and Social Commitment Plan, Labour Management Procedures (LMP) and related information
1.2 **Assisting Children with Special Education Needs (SEN)** and Providing Alternative Learning Pathways for At Risk Students	• MoE • DoIE • MoHE • Principals • Leading teachers • Teachers • SEN teachers • Parents • School boards • Communities	• Present opportunities and facilities/resources for SEN children • Proposed interventions to improve early grade literacy and numeracy of SEN students • Deployment and training of SEN teachers and adequacy of training • Further training required for SEN teachers • Issues in identification of disabilities of SEN children and targeted interventions
Component Two: Improving Teacher Education and Development		

2.1 **Improving School-based Professional Development (SBPD) of Teachers**	• MoE • NIE • MoHE • MNU • IUM • Non-state HEIs • Principals • Leading teachers • Teachers • SEN teachers • Parents • School boards	• Present SBPD policy and guidelines to schools • Effectiveness of SBPD program • Proposed interventions to upgrade SBPD program with a focus on improving learning outcomes of students • Preparation of plans with time lines to implement the desired interventions • Monitoring of implementation • Capacity in the related institutions to plan, implement and monitor program
2.2 **Strengthening Pre-Service Teacher Education**	• MoE • NIE • MoHE • MNU • IUM • Non-state HEIs • Principals • Leading teachers • Teachers • Parents • School boards	• Strengthening pre-service teacher education and alignment with school curriculum • HRD of academics • ICT training of student-teachers • Quality of students enrolling in courses • Making teaching service more attractive to school leavers • Quality control of courses across service providers
Component Three: Advancing the Measurement of Student Learning and School Performance		
3.1 **Modernizing Learning Assessments**	• MoE • NIE • QAD • MoHE • MNU • Principals • Leading teachers • Teachers • Parents • School boards • Communities	• Quality assurance mechanism in schools and its effectiveness • Improvements required • Capacity of schools to conduct quality assurance and training requirements • Developing and implementing a national version of Early Grade Reading Assessments (EGRA) and Early Grade Mathematics Assessments (EGMA). • Recent NALO cycles held and student achievements in English language, mathematics and Dhivehi • Including modules of test items drawn from international assessments in NALO and conduct of NALO according to regular cycle • Building capacity of policy makers and education specialists
Project implementation stage		
Component One: Strengthening Curriculum Implementation		
1.1 **Improving Learning Outcomes in Key Subjects for Primary Education**	• MoE • NIE • ESQID • MoHE • MNU • IUM • Non-state HEIs • Principals • Leading teachers • Teachers • Parents • School boards • Communities	• Progress of actions to improve English language, mathematics and Dhivehi language learning outcomes of children • Whether monitoring mechanisms are working • Whether expected improvements in student performance are being seen • Follow up on Environmental and Social safeguards and ESF • Awareness on GRM
1.2 **Assisting Children with Special Education Needs (SEN)** and Providing	• MoE • DoIE • MoHE	• Progress of interventions to improve early grade literacy and numeracy of SEN students

Alternative Learning Pathways for At Risk Students	• Principals • Leading teachers • Teachers • SEN teachers • Parents • School boards Communities	• Progress in training of SEN teachers
Component Two: Improving Teacher Education and Development		
2.1 **Improving School-Based Professional Development (SBPD) of Teachers**	• MoE • NIE • MoHE • MNU • IUM • Non-state HEIs • Principals • Leading teachers • Teachers • SEN teachers • Parents School boards	• Progress of SBPD program being implemented and the program's effectiveness • Feedback from teachers • Whether monitoring mechanisms are working • Whether improvements in student learning outcomes are being seen
2.2 **Strengthening Pre-Service Teacher Education**	• MoE • NIE • MoHE • MNU • IUM • Non-state HEIs • Principals • Leading teachers • Teachers • Parents • School boards	• Mechanisms to strengthen pre-service teacher and implementation progress • Progress in capacity building program of academics • Training of student-teachers in ICTs
Component Three: Advancing the Measurement of Student Learning and School Performance		
3.1 **Modernizing Learning Assessments**	• MoE • NIE • QAD • MoHE • MNU • Principals • Leading teachers • Teachers • Parents • Communities	• Improvements made in quality assurance mechanism in schools and impact of improvements • Progress in developing and implementing national version of EGRA and EGMA • Progress of design of test items for NALO • Conduct of NALO according to regular Cycle and student achievement levels • Whether capacity building of policy makers and education specialists have taken place
Component Four: Coordination, Monitoring, Policy Analysis and Technical Assistance		
	• MoE • MoHE • NIE • QAD • DoIE • MNU • IUM • Schools • Private HEIs	• Progress on implementation of all Project components • Coordination of all Project components • Policy formulations based on the results of the Project components • Improving data collection, dissemination and usage

5.2. Proposed Strategy for Information Disclosure

Table 5 describes what information will be disclosed, how it will be disclosed and the frequency with which it will be disclosed to each of the stakeholder groups.

Table 5. Strategy for Information Disclosure

Project Component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timetable/ Frequency	Target stakeholders	Responsible stakeholders
Component One: Strengthening Curriculum Implementation					
1.1 **Improving Learning Outcomes in Key Subjects for Primary Education**	Actions to improve English language, mathematics and Dhivehi language learning outcomes of children	Guidelines/regional meetings, through TRC coordinators	Every term	Principals, teachers, parents, school boards, communities	MoE, NIE, ESQID, MoHE
	Library reading material provided and digital libraries set up	School notice board	When material is received	Parents, school boards, communities	MoE, NIE, Principals, teachers
	Performance of students	School level meetings, school notice board	Every term	Parents, school boards, communities	Principals, teachers
1.2 **Assisting Children with Special Education Needs (SEN)** and Providing Alternative Learning Pathways for At Risk Students	Actions to improve early grade literacy and numeracy of SEN students, Availability of trained SEN teachers	Guidelines/regional meetings, through TRC officers Disclose on website, newspapers	Annual	Principals, teachers, parents, school boards, communities	MoE, DoIE, NIE, MoHE
Component Two: Improving Teacher Education and Development					
2.1 **Improving School-Based Professional Development (SBPD) of Teachers**	Training plan and teacher feedback	School level meetings	Every term	Teachers	Principals, leading teachers
	Performance of students	School level meetings, school notice board	Every term	Parents, school boards, communities	Principals, teachers
2.2 **Strengthening Pre-Service Teacher Education**	Actions to strengthen pre-service teacher trainingand progress, Progress in capacity building program of	Meetings of higher education institutes Disclose on website, newspapers	Monthly meetings	Academics, Student teachers	NIE, MoHE, MNU, IUM, private HEIs

Project Component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timetable/ Frequency	Target stakeholders	Responsible stakeholders
	academics and training of student-teachers to improve ICT skills etc.				
Component Three: Advancing the Measurement of Student Learning and School Performance					
3.1 **Modernizing Learning Assessments**	Progress in developing and implementing national version of EGRA and EGMA, Progress of design of test items forNALO,	Ministry level meetings	Monthly	MoE, MoHE, principals, teachers	NIE, QAD, ESQUID
	Findings of NALO	NALO report and dissemination workshop	After NALO results are analyzed	Principals, teachers, parents, school boards, communities	NIE, QAD, MoE, MoHE,
Component Four: Coordination, Monitoring, Policy Analysis and Technical Assistance					
	All project related documents which must be disclosed to the stakeholders (GRM, SEP, LMP, etc.)	MoE website	After every revision	• MoE • MoHE • NIE • QAD • DoIE • MNU • IUM • Schools • Private HEIs • Parents • Communities	PMT

5.3. Proposed Strategy for Consultation

Table 6 is a proposed strategy for consultation. Methods vary depending on target audience, nature of activities and level of interest of the stakeholder group in project activity.

Table 6. Strategy for Consultation

Project Component	Topic of consultation	Methods used	Timetable	Target stakeholders	Responsibilities
Component One: Strengthening Curriculum Implementation					
1.1 **Improving Learning Outcomes in Key Subjects for Primary Education**	Strategies to improve English language, mathematics and Dhivehi language learning outcomes of	Meetings (central and regional)	During the preparation stage	Principals, teachers, TRC coordinators	MoE, NIE, ESQID, MoHE

Project Component	Topic of consultation	Methods used	Timetable	Target stakeholders	Responsibilities
	children and progress Monitoring of delivery to schools and utilization of materials Performance of students	Meetings	After grant approval	Parents, school boards, communities	MoE, principals, teachers
		School level meetings	Every term	Parents, school boards, communities	Principals, teachers
1.2 **Assisting Children with Special Education Needs (SEN)** and Providing Alternative Learning Pathways for At Risk Students	Actions to improve early grade literacy and numeracy of SEN students and progress, Availability of trained SEN teachers	Meetings (central and regional)	Annual	Principals, teachers, parents, school boards, communities	MoE, DoIE, NIE
Component Two: Improving Teacher Education and Development					
2.1 **Improving School-Based Professional Development (SBPD) of Teachers**	Training plan and teacher feedback, Performance of students	School level meetings School level meetings, school notice board	Every term Every term	Teachers Parents, school boards, communities	Principals, leading teachers Principals, teachers
2.2 **Strengthening Pre-Service Teacher Education**	Actions to strengthen pre-service teacher training and progress, Progress in capacity building program of academics and training of student-teachers to improve ICT skills etc.	Meetings at higher education institutes Disclose on website, newspapers	Monthly meetings	Academics in HEI, student teachers	NIE, MoHE, MNU, IUM, private HEIs
Component Three: Advancing the Measurement of Student Learning and School Performance					
3.1 **Modernizing Learning Assessments**	Progress in developing and implementing national version of EGRA and EGMA, Progress of design of test items for NALO Findings of national assessment	Ministry level meetings NALO report	Monthly	MoE, MoHE, principals, teachers	NIE, QAD

Project Component	Topic of consultation	Methods used	Timetable	Target stakeholders	Responsibilities
		and dissemination workshop	When NALO is conducted and after results are analyzed	Principals, teachers, parents, school boards, communities	NIE, QAD, MoE, MoHE,
Component Four: Coordination, Monitoring, Policy Analysis and Technical Assistance					
	Progress on implementation of all Project components	Meetings with stakeholders, progress reports	As required for each component	As required for each component	PMT
	Coordination of all Project components	Meeting with stakeholders	As required for each component	As required for each component	
	Policy formulations/reviews based on the results of the Project components	Ministry level meetings, policy discussions and reports	When need is identified from the Project reviews	MoE, MoHE, NIE, QAD, DoIE, MNU, IUM, Schools, Private HEIs	
	Improving data collection, dissemination and usage	Ministry level meetings	Semi-annually	MoE, MoHE, NIE, QAD, DoIE, MNU, IUM, Schools, Private HEIs	

5.4. Proposed Strategy to Incorporate the View of Vulnerable Groups

The MoE and MoHE are responsible for ensuring inclusion and representation, including for vulnerable groups. The project has developed a strategy which aims to remove obstacles to participation of such groups (see table 7).

Table 7. Strategy to incorporate vulnerable groups

Target groups	Strategy
School stakeholders in remote islands and those with limited access to information	• More information dissemination through the regional meetings and discussions • Community level engagement/consultations • Engagement of local NGO's who work with vulnerable people at the community level to help disseminate information and organize consultations
Severely disabled children and their parents, SEN children with undiagnosed disabilities (learning difficulties etc)	• Provision of transportation or transportation cost for meetings • More information dissemination through the regional meetings and discussions • Engagement of local NGOs who work with vulnerable people at the community level to help disseminate information and organize consultations

5.5. Responsibilities and Resources for Implementing Stakeholder Engagement Activities

Overall responsibility for the project will lie with the MoE and MoHE. The Project will be implemented by the MoE, including all fiduciary activities with technical input from the MoHE. The MoE will have a Project Monitoring Team that will be responsible for day-to-day project implementation and monitoring of project activities. The Team will provide reports of project progress and make this available to the Project Steering Committee, the Ministers of Education and Higher Education, the Local Education Group, UNICEF and

the World Bank. To function effectively, the project unit will have at least the following contract officers on hand: (a) Implementation, Monitoring & Evaluation (IME) Specialist, (b) Financial Management Officer, (c) Implementation Officer, and (d) Monitoring and Evaluation Officer. The Implementation Officer will coordinate project activities and cover administrative work. The IME Specialist will coordinate the environmental and social safeguard functions and GRM activities. The M&E officer with the guidance of the IME Specialist will carry out management and monitoring and evaluation work. All fiduciary work will be carried out by the Financial Management Officer. Other functions, including procurement, communications and human resources, will be carried out by the MoE and MoHE with support and guidance from the project unit. The SEP including the GRM will be incorporated in the Environmental and Social Commitment Plan as will be the Labour Management Procedures.

Policy direction and the oversight of the project will be carried out at the national level by the Local Education Group (LEG): The National Education Consultation Committee (NECC). The committee will review the overall performance of the project and decide on important policy aspects to facilitate the achievement of outcomes and results. The NECC would help relax any constraints to implementation. The NECC is co-chaired by the Ministers of Education and Higher Education. The other members of the NECC are the State Ministers and the Deputy Ministers of Education and Higher Education; the Directors-General and Heads of Agencies of the MoE and MoHE; and representatives of the NGOs, the CA and the GA. The Policy Planning and Research Division (PPRD) of the MoE and MoHE would be the conveners of the NECC.

6. GRIEVANCE REDRESS MECHANISM

6.1. Introduction

The Employment Act of the Maldives determines the fundamental principles relating to employment in the Maldives, the rights and obligations of employers and employees, establishes a Labour Relations Authority and an Employment Tribunal to protect such rights, and makes provision for all other matters related to employment. However, there is currently no clearly defined GRM reporting system specific to the education sector, for project related matters. Therefore, the project needs to establish a grievance redress mechanism (GRM). The project is expected to strengthen accountability for beneficiaries and provide a mechanism for project stakeholders to provide feedback on project activities. It is also expected to provide a mechanism that allows for the identification and resolution of issues affecting the project, including safeguards related complaints, misuse of funds, abuse of power, and other inappropriate behaviour. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact. A separate GRM will be established by the implementing authorities during implementation to address employee grievances consistent with ESS 2. The GRM established under the project should be accessible to everyone involved including the interested authorities and organisations. The mechanism focuses not only on receiving and recording complaints but also on how complaints are resolved. The GRM should be supported by an information campaign and training. While feedback should be handled at the level closest to the complainant, all complaints should be registered and follow the set procedures.

6.2. GRM scope and use

Scope

The project should include a GRM that will be available for project stakeholders to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project funded activities.

Who Can Use The GRM?

Project beneficiaries as well as the broader citizenry can use the GRM for the purposes of making complaints or providing feedback. There should be no charge for making a complaint or conveying comments or suggestions.

6.3. Procedures

6.3.1. Establishment of Grievance Redress Committee/Body

The Grievance Redress Committee (GRC) shall be established by MoE and MoHE in consultation with other relevant parties to the project. The membership of the GRC shall comprise of representatives from the following:
   a. Project Steering Committee;
   b. Project Coordinating Agency (UNICEF);
   c. Project Monitoring Team;
   d. Project Implementers;
   e. Local Councils;
   f. Legal Officer; and
   g. NGOs/Civil society Organization.

6.3.2. Channels to make complaints

It is suggested that the project will establish the following channels through which citizens/beneficiaries can provide feedback or make complaints regarding project activities:

a. A dedicated email address [lamp@moe.gov.mv]
b. A dedicated phone line [7957744]
c. On the project website [support.moe.gov.mv]
d. Letters sent to [Ministry of Education, Velaanaage 8th Floor, Ameer Ahmed Magu, Malè]
e. Verbal or written complaints to project staff (directly or through project meetings). (If project stakeholders provide verbal feedback/complaint, project staff will lodge the complaint on their behalf, and it will be processed through the same channels. Project at all stages will have options for use of local languages + interpreters when submitting complaints.)
f. Constitution of Grievance Committee members (which include women).
g. Project meetings set up at the policy level, each of which include women.
h. Oral language interpreters for lodging complaints. The project shall ensure flexibility in the channels available, make sure that different contact points are available for a person to make a verbal complaint, and that complaints addressed to the wrong person or entity are redirected to the Project Monitoring Team.

6.3.3. Confidentiality and conflict of interest

Complaints may be made anonymously, and confidentiality will be ensured in all instances, including when the person making the complaint is known. For this reason, multiple channels to make a complaint have been established and conflicts of interested will be avoided.

6.3.4. Collection/receipt of complaints

The person receiving the complaint will complete a grievance form (see Annex 1), or make the form available to the complainant to fill out directly, and submit it without delay (within 24 hours) to the M&E Specialist of the Project Monitoring Team (GRM Manager) who is responsible for GRM. The complaints for the project will be collected and compiled by the Project Monitoring Team on a regular basis.

6.3.5. Sorting/categorization

Once received and filed, the Project Monitoring Team will sort the complaints/feedback into the following categories

Category No	Classification
Category 1	Grievances regarding violations of policies, guidelines and procedures
Category 2	Grievances regarding contract violations
Category 3	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
Category 4	Grievances regarding abuse of power/intervention by project or government officials
Category 5	Grievances regarding Project Monitoring Team staff performance
Category 6	Suggestions
Category 7	Appreciation

6.3.6. Recording/logging

Once the complaints have been categorized, the GRM Manager logs the details regarding the complaint into the tracking system. This system may be manual (hard copy) or connected to the project management information system (PMIS). GRM files should be stored in a secure setting (password protected IT database or locked storage cabinet for hard copies).

Once a complaint has been logged and sorted, the GRM Manager refers the case to the Project Coordinator. The latter shall determine the following:
> • The person responsible to investigate the complaint;
> • The timeframe within which the complaint should be resolved; and
> • The agreed course of action (e.g. investigation, reply not requiring investigation, etc.).

The investigation process is determined based on the nature and gravity of the complaint, however, regardless of type/category complaints all complainants should be assured of receiving feedback within 10 business days:
> • For local level complaints, the investigation will be conducted by First Investigating Officer in five days; and
> • For complex complaints, the investigation will be conducted by Second Investigating Officer/Entity in ten days or as otherwise agreed with the GRM Manager.

When determining who will be the investigating officer, the Project Monitoring Team will ensure that there is no conflict of interest, i.e. all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses. Once the investigation process has been established, the person responsible for managing the GRM records and enters this data into the logbook. The number and type of suggestions and questions should also be recorded and reported so that they can be analysed to improve project communications.

6.3.7. Notification to the complainant
If the complainant is known, the Project Monitoring Team will communicate the timeframe and course of action to her/him by phone, email or mail, within two weeks of receipt of the grievance. Where the complainant's address is available, this should be provided in writing with a tracking number and the deadlines by which they will hear back from the Project Monitoring Team (see Annex 2 Notification Form).

6.3.8. Investigation
The person responsible for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance. Verification normally includes onsite visits, review of documents, a meeting with the complainant (if known and willing to engage), and a meeting with those who could resolve the issue (including formal and informal leaders.

In cases of gender-based violence (GBV) related complaints no investigation should be conducted. Rather, cases should be referred to the Ministry of Gender, Family and Social Services. The results of the verification and the proposed response to the complainant will be presented for consideration to the GRM committee of the MoE and MoHE. Once the decision has been made on the course of action and on the response to provide to the complainant, the Project Monitoring Team describes the actions to be taken in the grievance form (see Annex 1), along with the details of the investigation and the findings and enters it into the PMIS.

6.3.9. Response to complainant
If the complainant is known, the Project Monitoring Team communicates the proposed action to her/him via letter, email, verbally, as received within 10 days. The complainants will also be informed by who on how s/he can appeal the action decided in the initial case. The Project Monitoring Team will 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 response taken.

6.3.10. Possibility to appeal

In the event the complainant is satisfied with the response, discussions will be held in group or individually to further clarify the positions at stake. Senior management will take part in these meetings and a final decision on the action(s) will be made. The Project Monitoring Team will form a Grievance Committee that will hear appeals. The Grievance Committee shall be comprised of staff from the Project Monitoring Team, representatives of the Project Steering Committee and persons who is independent from the project implementing authorities and the government. The terms of the Grievance Committee will be agreed prior to its format. The complainant is not precluded from appealing outside the project/Project Monitoring Team GRM if they are not satisfied with the proposed response.

6.4. Awareness-building
6.4.1. Information provided in an accessible format

Information about the grievance handling system is expected to be distributed to all beneficiaries through regular information channels used by the project, including initiating meetings at the start of the project, public meetings during project implementation, brochures/pamphlets in local languages, posting on notice boards and online (including council meetings, meetings with vulnerable groups, and meetings with implementing institutions). The Project Monitoring Team will include information provided on the scope of the GRM, 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.

6.4.2. Proactive advertisement/regular public information campaigns

Information campaigns will be designed by the Project Monitoring Team before project commencement to encourage the use of the GRM. The campaigns will use local media (e.g. TV, newspaper, radio). When organising and conducting these campaigns, special efforts shall be made to reach vulnerable groups. The campaigns should include information on the scope of the GRM, 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, principle of confidentiality and right to make anonymous complaints. Information on complaints received and resolved will be reported as part of the project's routine quarterly reporting. Also, a summary of implementation of the grievance mechanism will be provided to the public on an annual basis, after removing identifying information on individuals to protect their identities.

6.5. Staffing and capacity-building

6.5.1. Roles and responsibilities

The Project Monitoring Team will allocate responsibilities to Project Monitoring Team's staff (unless the GRM is outsourced). These will be documented in the first Quarterly Progress Report and kept updated:
- Overall management of the GRM system;
- Developing and maintaining awareness-building;
- Collection of complaints;
- Recording/logging of complaints;
- Notification to the complainant;
- Sorting/categorization of complaints;
- Investigation;
- Decision-making based on the investigation results;
- Processing appeals - Publishing responses to complaints;
- Organisation and implementation of information materials and awareness campaigns; and

- Budgeting of the GRM - Reporting and feedback on GRM results.

6.5.2. Capacity-building
Training for all relevant staff and relevant stakeholders will be held annually, or as otherwise agreed. New staff will receive training as a regular part of the on-boarding process. The training will include all aspects of the GRM set out in this chapter. All trainings should include information on the GRM principles and procedures. The training will have an emphasis on accountability to the complainant. A key focus at the outset will be shifting from informal complaint resolution, to the logging of all complaints/feedback into this system.

Dedicated trainings should be provided to staff directly engaging with beneficiaries, those handling the system, and those involved in the management and oversight of the system.

6.6. Transparency, monitoring and reporting
6.6.1. Transparency
Policies, procedures and regular updates on the GRM system, the complaints made and resolved, will be available online, as well as on local/ministerial notice boards and other permanent displays. They will be updated quarterly.

6.6.2. Regular internal monitoring and reporting
The Project Monitoring Team will assess the functioning of the GRM and undertake spot checks during regular supervision visits. The Project Monitoring Team which includes the M&E Specialist, will work to:
- Ensure accurate entry of GRM data into the PMIS or other system. Produce compiled reports to the format agreed with the Project Coordinator;
- Provide a monthly/quarterly snapshot of GRM results (as set out below) including any suggestions and questions, to the project team and the management; and
- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action. During annual/bi-annual general meetings, the Project Monitoring Team shall discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it.

6.6.3. Reporting in quarterly and annual progress reports submitted to the Bank
Quarterly and annual progress reports shall include a GRM section which provide 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 relevant, 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 at the lowest level, raised to higher levels;
- 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; and
- Any corrective measures adopted.

6.6.4. Oversight and review
The status of the development of the GRM, the levels of use by beneficiaries/ citizens, the challenges of implementation, etc. will be discussed in semi-annual/annual portfolio meetings. The Project Monitoring Team will discuss with the Bank during implementation support missions, any corrective measures that may be needed.

An independent review/audit of the GRM, will be conducted prior to the mid-term review to assess the effectiveness and use of the mechanism, and recommend and introduce improvements as necessary.

7. MONITORING AND REPORTING

7.1. Involvement of Stakeholders in Monitoring Activities

The M&E activities will focus on inputs, processes, and outcomes. Given the strong alignment between the proposed project's indicators and those to be used to monitor the implementation, and measure the impact of the Government's program, monitoring of these indicators will be incorporated into the Maldives Education Management Information System (MEMIS), as well as the MoHE's management information system and will be tracked as part of standard monitoring under the technical supervision and support of the Policy and Planning and Research Division (PPRD) of the MoE and the Policy Section of the MoHE. A M&E Specialist of the Project Monitoring Team will work closely with the PPRD to ensure data collection, cleaning, analysis, and reporting are completed according to the project requirements. The MoE/MoHE collects data annually on all schools and other pre-service education institutions who are implementing the project annually, including information on gender and children with disabilities. School performance and key indicators including gender and children with disabilities will also be tracked. Given the project's reliance on timely and reliable data for effective implementation, capacity building in the areas of data collection, analysis, reporting, and dissemination will be provided. The Project Monitoring Team will be responsible for monitoring and compiling a number of reports as well as ensuring the effective carrying out of the annual data collection and other project-supported activities reliant on data. The following reports will be required throughout the project duration at established intervals:

a) Annual work plan on project implementation by component and subcomponent, including stakeholder engagement plan; and

b) Progress reports detailing achievements under each activity, progress on each of the indicators in the Results Framework, and analysis of identified gaps and next steps (biannually). The performance of the project will be reviewed regularly, including through biannual implementation support and supervision mission led by the Word Bank.

The World Bank will provide implementation support and supervision during the project implementation period. Implementation support and supervision missions will be undertaken at least every six months and will monitor and report on progress made under the project through the implementation status and results reports (ISRs). The World Bank will also review whether the project has taken necessary actions to address issues on gender, GBV, and disability. An in-depth review will be undertaken at the project implementation midpoint, by June 30, 2022. A midterm review will provide an opportunity to assess overall progress in project implementation, update the Results framework as necessary, review allocation across components, reassess the risks, and propose corrective measures to ensure achievement of the PDO.

Monitoring and evaluation under the project will rely on each level of the education system—from the school level and the central level. The MoE/MoHE is responsible for ensuring effective monitoring processes are adopted and that information flow is smooth, reaching the relevant stakeholders on time. Steps will be taken to ensure that each feedback mechanism established under the project can provide timely data to the local-level stakeholders. The project will maintain a strong GRM given the project's reliance on stakeholder inputs for effective implementation and achievement of project outcomes. Information on the GRM will be provided in the context of community and school-level training. The PMT will ensure timely response to any grievances received.

Annex 1: Grievance Form

GRIEVANCE/INQUIRY RECORD
Instructions: This form is to be completedby staff receiving the inquiry or grievance and sent to the LAMP Project Monitoring Team at the Ministry of Education. Attach any supporting documentation/letters as relevant.

Date Grievance Received:	Name of Staff Completing Form:

Grievance Received: *(check √)*		
□ National	□ Atoll	□ School/Island

Mode of Filing Inquiry or Grievance (check √):
□ In person □ Telephone □ E-mail □ Phone Text Message □ Website
□ Grievance/Suggestion box □ Meeting □ Public consultation □ Other

Name of Person Raising Grievance: *(information is optional and always treated as confidential)*
Gender: □ Male □ Female

Address or contact information for Person Raising Grievance: *(information is optional and confidential)*

Location where grievance/problem occurred:*[write in]*

National:	Atoll:	School/Island:	Others:

Brief Description of Grievance or Inquiry: *(Provide as much detail and facts as possible)*

	Category 1	Grievances regarding violations of policies, guidelines and procedures
	Category 2	Grievances regarding contract violations
	Category 3	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
	Category 4	Grievances regarding abuse of power/intervention by project or government officials
	Category 5	Grievances regarding Project Monitoring Team staff performance
	Category 6	Suggestions
	Category 7	Appreciation

Who should handle and follow up on the grievance:

Progress in resolving the grievance:*(e.g., answered, being resolved, settled)*

Other Comments:

Annex 2: Notification Form

GRIEVANCE ACKNOWLEDGEMENT
Instructions: This form is to be completed by the LAMP Project Monitoring Team and mailed or delivered to the complainant.

Date Grievance Received:	Tracking Number:

Grievance Received: *(check √)*
□ National   □ Atoll   □ School/Island

Mode of Filing Inquiry or Grievance (check √):
□ In person   □ Telephone   □ E-mail   □ Phone Text Message   □ Website
□ Grievance/Suggestion box   □ Meeting   □ Public consultation   □ Other

Name of Person Raising Grievance: *(information is optional and always treated as confidential)*
Gender: □ Male   □ Female

Contact information for the Person Raising Grievance: *(information is optional and confidential)*
Email:
Phone:
Address: