

Stakeholder Engagement plan

Maldives Fire Reconstruction and Building Resilience Project

Ministry of construction, housing and infrastructure

APRIL 2025

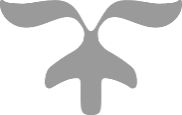


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# Executive Summary

This Stakeholder Engagement Plan (SEP) is developed for the Maldives Fire Reconstruction and Building Resilience Project (REBUILD). The SEP is aimed at meeting the requirements as stated under paragraph 13 of the Environmental Social Standard 10 (ESS10): Stakeholder Engagement and Information Disclosure, of the World Bank’s Environmental and Social Framework (ESF).

The main stakeholder groups identified include mostly government institutions, private sector and general public. The project direct beneficiaries include Ministry of Construction, Housing and Infrastructure (MoCHI), Ministry of Finance and Planning (MoFP), Ministry of Tourism and Environment (MoTE), Maldives National Defense Force (MNDF), Atolls, Islands and city councils. Further, ‘Other Interested Parties,’ include construction companies, Design and Supervision Consulting companies, Insurance companies, nearby businesses to the project site, Maldives Police Service, General Public including users of existing parking space, nearby government offices and Environmental Protection Agency (EPA).

During the project formulation stage, stakeholders were consulted, and their needs were identified. The key needs identified include a new office space for 3 ministries including MoCHI, MoTE, MoFP. A significant need to strengthen fire prevention and response to fire accidents in building code was highlighted by the stakeholders.

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

The main person responsible for implementing the proposed SEP is the Project Director. The Project Steering Committee (PSC) and Project Technical Committee (PTC) will be utilized for stakeholder engagement purposes. They will be used to ensure participation of stakeholders during decision making processes and technical discussions.

A three-tier grievance redress mechanism has been proposed for the project. This mechanism is aimed to address any complaints from project stakeholders during the project implementation. The three-tier for the grievance redress mechanism are at: Contractor level, MoCHI level, which is the project implementation agency, and at the judiciary level. In addition, a separate modality for project workers will be prepared under the overall GRM for the project.

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

# Acronyms and Abbreviations

|  |  |
| --- | --- |
| EPA | Environmental Protection Agency |
| GoM | Government of Maldives |
| GRM | Grievance Redress Mechanism |
| MNDF | Maldives National Defense Force |
| MoCHI | Ministry of Construction, Housing and Infrastructure |
| MoFP | Ministry of Finance and Planning |
| MoTE | Ministry of Tourism and Environment |
| MNDF | Maldives National Defense Force |
| PTC | Project Technical Committee |
| PSC | Project Steering Committee |
| PMU | Project Management Unit |
| SEP | Stakeholder Engagement Plan |

# Introduction and Project Description

This Stakeholder Engagement Plan (SEP) is developed for the Maldives Fire Reconstruction and Building Resilience Project which is funded by the World Bank. This Project is implemented by the Ministry of Construction, Housing and Infrastructure (MoCHI) on behalf of the Government of Maldives (GoM).

A fire broke out in the building of the Ministry of Construction and Infrastructure (MCI) and Ministry of Housing, Land and Urban Development (MHLUD) on 12th December 2024 which was spread across to nearby Green Building which is the office premises for the Ministry of Climate Change, Environment and Energy (MCCEE) and Environmental Protection Agency (EPA). Both buildings were destroyed in the fire beyond further usage. During the fire accident, it was evident that the fire safety of the government buildings requires significant improvements and triggered the urgent need for constructing a new, fire-resilient office complex to house these ministries. Currently, the displaced ministries are operational in a makeshift office space in Dharubaaruge, which is a convention center in Male’ city.

## Project Description

The project development objective is to reconstruct a fire safe, climate and multi-hazard resilient government office building that serves as a model and strengthen capacities for building resilience in the Maldives. The project is comprised of the following key components:

**Component 1 – Resilient government building that serves as model (USD 13 million):**

This component focuses on the timely reconstruction (design, construction, and supervision) of the destroyed government office building to provide a permanent work environment for the currently displaced staff. The building shall serve as model for resilient building design and construction in the Maldives, following a building-back-better approach and considering Malé’s high-density, high-rise urban environment. First, the design will ensure fire and multi-hazard resilience in line with the relevant Maldives’ legal framework, draft code compliance documents and global good practices. Second, the design will be climate resilient and energy efficient to ensure the building is adapted to heat, humidity and durability, compliant with a green certification (most likely BREEAM (which is currently the most commonly used certification in the Maldives) or at minimum Excellence in Design for Greater Efficiencies (EDGE) certification level 1 (i.e. at least 20 percent energy savings). Third, a cost-efficient approach tailored to the Maldivian context including locally available materials and straightforward construction techniques for ease of implementation will be sought. The construction will also be one of the first to implement the accessibility guideline (endorsed in 2024) for public buildings. The component will adopt the national construction code and best international construction practices.

Under the site selection process for the building reconstruction, in-situ reconstruction was considered, however, ruled out for two reasons: (i) the building which housed MoCHI and the Planning functions was completely destroyed with the remaining rubble removed from site by February 2024, however, the two adjacent buildings which housed MoCCEE and MCC were only partially damaged. Given the concerns of structural integrity, staff from both MoCCEE and MCC buildings have been evacuated and working under temporary office arrangements, however the buildings remain standing and would require demolition if Component 1 were to be implemented on this site. (ii) GoM is looking into developing the surrounding seven blocks as a larger sustainable mixed-use development called Malé Center Point, and incorporating the block which housed MoCHI into this mixed-use development will increase the land value potential.

Based on the above considerations, GoM has concluded that the new government building will be developed on a 12,625-sqare-foot, government-owned plot located at M. Dhandaheluge, Orchid Magu, Malé, Republic of Maldives; which is in front of the Supreme Court of the Maldives at the corner of Orchid Magu and Aaburuzu Higun streets (see map in Annex 2). Much of the land registry records were destroyed during the December 2024 fire incident, and the most recent land registry for the above-mentioned plot is not available. The MoFP is working with MCC to issue a new land registry for the above-mentioned land plot. In the meantime, MoFP has shared in a letter dated March 12, 2025, the initial land registry (Registry No: 18357.B, dated September 22, 2016) of the plot, along with a court ruling (Ref: 428/Cv-C/2020, dated September 15, 2020) confirming that the entire lot is owned by the State. MoFP has agreed that the issuance of the new land registry would be a condition for Effectiveness.

Given the nature and objective of Component 1, a Design-Build Contract (DBC) will be used for the building reconstruction. GoM had positive experience with DBC in the past and this approach leads to faster project completion and fewer revisions and callbacks, since the same firm carries out both, design and construction. Feasibility Studies will be conducted under the MUDRP project to expedite project preparation. The involvement of Maldivian firms will be encouraged, on one side to ensure that the local context is considered, and on the other side, in order to strengthen capacity in the Maldives. From the construction process, all relevant materials including design brief, design basis report, specifications for building and all services, bidding documents, operation and maintenance requirements etc. will be compiled, lessons learnt extracted and training sessions held with government engineers.

**Component 3 – Project Management Support and Capacity Building (USD 1 million):**

The component aims at supporting the effective implementation of the project. It will finance project management staff and consultants, monitoring and evaluation, communications and relevant trainings. Project preparation has been supported by the MUDRP Project Management Unit (PMU) which will, after project effectiveness, also carry out the implementation, with the support of additional members as required.

The main stakeholder groups to be engaged in the project include government ministries, local government councils, users of existing parking space, nearby businesses and residents, private sector building contractors and consultants.

## Potential Environmental and Social Risks Associated with the project

### ENVIRONMENTAL RISKS and impacts

Potential Environmental Risks include impacts on groundwater quality due to dewatering for the foundation and basement works of the new building, dust and noise impacts to the vicinity of the project site. Potential oil spill from the construction machinery and equipment, removal of existing trees at the proposed project site are some additional anticipated environmental risks. In addition, generation of waste and wastewater during the operational phase of the building is a potential environmental risk.

### SOCIAL RISKS and impacts

Potential social risks associated with the project include disruptions to traffic flow during concrete work of the building construction and loss of the parking space for the existing users of the parking lot on the proposed project site. Positive impacts of the project are mostly social impacts due to nature of the project. The most significant positive impact of the project include the provision of a fire-resilient, safe workspace for the government employees and general public who acquire services from the government offices.

## 1.4 Institutional Arrangement for the project implementation

The following figure 01 is the proposed instructional arrangement for the implementation of the project.

A diagram of a project management

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Figure 1: Proposed institutional arrangement for the project implementation for REBUILD project

The following table 01 lists the main roles and responsibilities for the implementation of the project

|  |  |
| --- | --- |
| **Institution** | **Roles and Responsibilities** |
| Ministry of Finance and Planning (MoFP) | * The MoFP will be responsible for the overall execution of the project. * Liaise with World Bank on arrangement and execution of implementation support missions (ISM), project appraisal and mid-term evaluation. |
| Ministry of Construction Houisng and Infrastructure (MoCHI) | * Ensure that the project meets its objectives and achieves expected outcomes. * Ensure technical execution according to the execution plan laid out in the project document. * Ensure technical quality of products, outputs and deliverables. * Ensure compilation and submission of progress, financial and audit reporting to World Bank. * Submit budget revisions to the World Bank for approval. * Develop and Implement the Grievance Redress Mechanism (GRM) for the project. * Facilitate meetings of Project Steering Committees and Project Technical Committee. * Day to day oversight of project execution. * Monitoring and evaluation of the project results framework. * Proper coordination among all project stakeholders; in particular national parties. * Timely submission of all project reports, including work plans and financial reports, * Follow-up with, or progress, procurement, financial and audit reports. |
| World Bank Group | * Overall oversight of the project implementation. * Conduct Mid-term Evaluation of the project * Organize and conduct implementation support missions. |
| Project Steering Committee (PSC) | * Provide guidance on overall implementation of the project |
| Stakeholders | * Provide technical input for the project deliverables. |
| Project Technical Committee (PTC) | * Provide technical input for the project deliverables. |
| Consultants and Contractors | * Delivery of the project deliverables and construction of the office building. |

## 1.5 Feedback Mechanism

A feedback mechanism refers to the arrangements made by the project to enable stakeholders to communicate their issues, concerns, and suggestions regarding project activities to the implementing agency, and for the agency to respond appropriately. A component often missing in consultative activities are a feedback mechanism that shows how the issues raised by the stakeholders are addressed by the project. It is important that such a mechanism is established to ensure stakeholder confidence in the process is maintained. To facilitate this, it is essential all stakeholder engagement activities are well documented. In this regard, all meeting minutes will be shared and finalized based on the input of the respective stakeholder. Further, the issues identified by the stakeholders will be listed and mechanisms/strategy to address the issues identified will be devised and communicated with the respective stakeholders. The following mechanisms will be used to report back to the stakeholder;

1. Email communication with the stakeholder;
2. In case an official letter is required, an official letter will be sent to the stakeholder;
3. Follow up meetings will be held with stakeholders to determine acceptability of the proposed solutions.
4. A project hotline at the MoCHI
5. Focal points in the inline ministries
6. Digital platforms such as social media of MoCHI

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Figure 2: Proposed Feedback Mechanism

## 1.6 PROJECT Steering Committee (PSC)

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

### 1.6.1 Composition

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

* Ministry of Construction, Housing and Infrastructure
* Ministry of Finance and Planning
* Maldives National Defense Force
* Ministry of Tourism and Environment
* Male’ City Council

The chair of the committee is Ministry of Construction, Housing and Infrastructure and the secretariat of the committee is the project implementation unit within the Ministry.

A diagram of a project

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Figure 3: Composition of the project steering committee

### 1.6.2 Charter of the project steering committee

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

### 1.6.2 Role of PSC in Implementation of SEP

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

## 1.7 Project Technical Committee (PTC)

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

### 1.7.1 Composition

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

* Ministry of Construction, Housing and Infrastructure
* Ministry of Tourism and Environment
* Maldives National Defense Force
* Male’ City Council
* Environmental Protection Agency

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

### 1.7.2 Charter of the project technical committee

* Technical committee meetings will be held at least every quarter.
* The quorum for the committee is 03 members including the chair.
* The secretariat of the technical committee is the Project Management Unit.
* Each technical committee stakeholder will identify at least one technical staff to represent the stakeholder at the committee.
* Technical committee meeting invitation will be sent at least 03 days prior to holding the meeting.
* The meeting agenda and any supporting documents relevant to the discussions will be sent with the meeting invitation.
* Minutes of the technical committee meetings will be shared with the all committee members including non-attending members within 03 days of holding the meeting. The committee members will be given one week to submit comments to the minutes. If no comments are received within a week the minutes will be considered as final and will be endorsed in the subsequent meeting.
* All technical committee meeting minutes will be shared with the members of the steering committee for their information.

### 1.7.3 Role of PTC in implementation of SEP

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

# Roles and Responsibilities and Resources for Stakeholder Engagement

## 1.8.1 Roles and Responsibilities

The project implementation unit will be provided with appropriate resources to implement this SEP. The **Error! Reference source not found.** illustrates the composition of the Project implementation structure proposed for Maldives Fire Reconstruction and Building Resilience Project.

A diagram of a project

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Figure 4: The implementation arrangement for the project

The following Table 8 indicates the roles and responsibilities of different entities in the implementation of SEP.

Table 1: Role of the PMU staff on implementation of SEP

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

## 1.9 Objective of the Stakeholder Engagement Plan

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

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

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

# Regulations and Requirements

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

## 2.1 National Requirements

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

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

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

* Under article 4 of Right to Information Act [1/2014], require everyone who requests for information is entitled to the access of such information in accordance with the law.
* Article 07 of the law specifies the procedures for requesting for and disclosure of information from and by State institutions. Information must be disclosed within 21 days of request. An institution may extend the period for 14 more days, if the requested information is of (a) a large quantity, or (b) extensive research is required to collect and disclose the information, or (c) where the work needed to disclose such information would substantially hinder the normal operation of the State institution. Information needed urgently to prevent a threat to life or freedom of a person must be disclosed within 48 hours at most. Upon failure to disclose the information within the periods stipulated, the law deems such requests have been denied.
* As per article 22 the state is not required to disclose information which, if disclosed would amount to an offense under law, or information if disclosed could cause legal action against the government for breach of confidence or which could prevent the government from receiving similar information in the future. Furthermore, State institutions could withhold information, which if disclosed could affect the government’s ability to manage and administer the economy of the country and information if disclosed prematurely could have a negative impact on a person or a group of people. The state can further withhold information that harms the immunities of the courts and the parliament, information from a closed court hearing and information that reveal details related to a minor, and victims of sexual abuse.
* Articles 11 and 42 of the Act, further obligates an Information Officer in every office to attend to requests and is mandated with submitting an annual report to the Information Commissioner.

Regulation on Right to Information (RRI), 2016

* specifying access mechanisms, including inspection, provision of copies, and grievance redress for information requests. It also ensures accessibility for special groups.
  + Section 5: Clarifies the right to inspect, obtain copies, and review documents held by State institutions. This includes ensuring the documents are complete, accurate, and not misleading.
  + Section 9: Allows requests for information orally if the individual cannot make a written request, ensuring inclusiveness.
  + Section 12: Ensures requests for information are handled promptly and transparently, with institutions required to determine fees, availability, or reasons for delay/refusal.
  + Section 25: Includes a grievance mechanism where individuals can lodge complaints about delayed or unsatisfactory responses. It also provides for appeals to the Information Commissioner and the High Court if necessary.

### 2.2.2 Decentralization Act (Act no: 24/2019)

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

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

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

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 need 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).

### 2.2.4 Urban Planning and Management Act (16/2024)

Section 12 of the Act mandates stakeholder feedback as stated below:

* Seek views and suggestions while preparing the plan
* The physical development plan for a particular city or island should be prepared in consultation with the people belonging to that city or town.
* The physical development plan for urban areas or special economic zones or areas earmarked for an industrial project should be prepared in consultation with the local bodies belonging to the area.

## 2.2 World Bank Requirement

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

1. To establish a systemic approach for stakeholder engagement that will allow borrowers to identify the stakeholders and maintain a constructive relationship during the project lifecycle.
2. To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance.
3. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances.

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

# Stakeholder Engagement Activities undertaken During Project Formulation

During project preparation, a series of stakeholder engagement activities were carried out by the project implementing agency (Ministry of Construction, Housing and Infrastructure) and World Bank team. These consultations were conducted during February & March 2025. Table 1 provides a list of all the stakeholders consulted during the project identification and formulation stage. The inputs from these consultations were used to identify the needs and concerns of the different stakeholders. Accordingly, these needs and concerns were utilized to inform the project activities. The detailed list of stakeholders consulted is included in Annex 01.

Table 2: The main findings of stakeholder consultations during project formulation

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Venue of the consultations | Date of the consultations | Details of the stakeholders | Key outcomes of the consultations | Suggestions/Recommendations |
| Meeting room 1. Ministry of Construction, Housing and Infrastructure | Tuesday, 15th April 2025 | **Stakeholder:**  Construction Industry Development Department,  **Participant:**  Ms. Fathimath Shaufa, Director, MoCHI | * Importance of incorporation of fire safety into the building code compliance documents. * CIDD already initiated incorporation of fire safety aspects into 7 code compliance documents. * There is a need for advocacy campaigns on fire safety. | * Importance of conducting market research and awareness of the importers. * Cost analysis and implication on the builders need to be explored. |
| Ground Floor Meeting Room, Housing Development (HDC) | Sunday, 20th April 2025 | **Stakeholder:**  Child Care Space administrative staff of HDC  **Participant:**  Ms. Nishfa, HDC  Ms. Sama. HDC | * Operation challenges of Child Care Space in HDC * There is a high demand for childcare facilities in HDC. | * Sustainable way of operating the childcare space in the new building. * Explore the development of a childcare facility in the new building rather than a small childcare space. |
| Second Floor Meeting Room, Umar Zahir Building | Sunday, 20th April 2025 | **Stakeholder:**  Ministry of Social and Family Development (MoSFD)  Participants:  Sidhna, Acting Permanent Secretary, MoSFD)  Thifla, MoSFD  Saif, MoSFD | * MoSFD has developed guidelines for both childcare facilities and childcare spaces in government institutions. * MoSFD regulates the existing privately owned childcare spaces. * MoSFD and Ministry of Foreign Affairs are the only government ministries currently with operational childcare spaces. | * Recommend and supports the inclusion of a childcare facility or a childcare space within the premises of the new building. * Recommends having a separate bathroom for the childcare facility in the new building. * Recommends provision of diaper changing facility within the childcare facility or childcare space in the new building. |
| 2nd Meeting Room, Ministry of Construction, Housing and Infrastructure (MoCHI) | Sunday, 20th April 2025 | Stakeholder:  Utilities Regulatory Authority (URA)  Participants:  Ahmed Naufal, Engineer, URA  Ahmed Jazlaan Fahmy Didi, Director, URA | * Installation of solar PV system in the new building. * Electrical requirements for the new building | * URA recommends submission and approval of any PV systems prior to installation in the new building. * URA recommend provision of a back-up generator for the new building. |
| 3rd Floor Meeting Room, Rehijehi Koshi Building | Monday, 21st April 2025 | **Stakeholder:**  National Disaster Management Authority (NDMA), Maldives National Defense Force (MNDF)  Ministry of Construction, Housing and Infrastructure  **Participants:**  Ms. Faroosha Ali Naseer, Director – Emergency Management, NDMA  Mr. Ibrahim Kashif Naseer, Director – Policy and Planning, NDMA  Mr. Mohamed Nadheem Ibrahim, Colonel, MNDF  Mr. Mohamed Majdhee, First Lieutenant, MNDF | * MNDF provides approval for fire alarm and fighting system for any building including government buildings. * MNDF provided technical inputs regarding the fire safety aspects of the proposed building. * NDMA provided technical inputs disaster resilience aspects of the building. | * MNDF recommended conducting a fire risk assessment for the building once the building location is finalized. * MNDF recommended developing a fire safety strategy for the building. * MNDF requires technical assistance for the fire safety advocacy campaigns which are currently conducted at an annual basis. * Fire safety regulation or act to be developed. * NDMA recommended insuring the building for any natural or man-made disaster. * NDMA recommended to consider other hazards such as flooding, earthquake and storms. |

# Stakeholder Identification and CLASSIFICATION

## 4.1 Stakeholder Identification

The following Table 2 enlists the stakeholder identified for the project.

Table 3: List of the Stakeholder Identified

|  |  |  |
| --- | --- | --- |
| Project Affected Parties | Other Interested Parties | Vulnerable/Disadvantaged persons/groups |
| * Ministry of Construction, Housing and Infrastructure * Ministry of Finance and Planning * General Public including users of existing parking space * Nearby Businesses and residences * Nearby Government Offices | * Ministry of Tourism and Environment * Maldives Police Service * Maldives National Defense Force * Atolls, Islands and City Council * Environmental Protection Agency (EPA) * Utility Regulatory Authority (URA) * Construction Companies * Design and Supervision Consulting companies * Insurance companies | * Disabled residents utilizing the services of nearby government offices and the building once constructed |

## 4.2 Analysis of Project’s impact on affected parties and their influence

The following Table 3 provides information on the analysis of project’s impact on affected parties and their influence on the project.

Table 4: Analysis of project impacts on project affected parties and their influence on the project

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Project affected parties (PAPs) | Projects impact on PAPs | Level of impact | Level of influence that PAPs can have over the project | Justification |
| Ministry of Construction, Housing and Infrastructure | New workspace for the employees.  Implementing agency for the fire code related technical outputs of the project. | High | High | These stakeholders are the direct beneficiaries of the project intervention. The nature of the project being construction of a new office building and currently some of these stakeholders are in a temporary office space there is a significant level of interest from these stakeholders.  These stakeholders will act as implementing and executing agencies for different components and activities of the project. |
| Ministry of Finance and Planning | New workspace for the employees. | High | High |
| Ministry of Tourism and Environment | New workspace for the employees. | High | Low | These stakeholders will benefit from the project interventions. Hence their level of interest is high.  However, since they are not directly involved in the project their level of influence is low. These stakeholders may be consulted by the operating agencies during the implementation of project activities. |
| General Public including users of existing parking space | Loss of existing parking space at the proposed location of the project.  Diversion of traffic flow during the concrete batching period. | Moderate | Low |
| Nearby Businesses and residences | Minor disruptions during the project construction phase. | Low | Low | These stakeholders may not have any direct benefits or direct involvement of the project activities. However, they may be affected as a result of project interventions hence, they will be consulted during the project implementation stage.  The interest and influence of these stakeholders may be very short-term. |
| Nearby Government Offices | Minor disruptions during the project construction phase. | Low | Low |

## 4.3 Interest of other parties and their level of influence over the project

The following Table 4 provides information on the analysis of other interested parties and their level of influence over the project.

Table 5: Interests of other parties and their level of influence over the project

|  |  |  |  |
| --- | --- | --- | --- |
| Other interested parties (OIPs) | OIP’s interest over the project | Level of interest | Level of influence that OIPs can have over the project |
| Maldives Police Service | Management of traffic during concrete batching works | Low | High |
| Maldives National Defense Force | Project outputs regarding the fire safety and fire safety building codes. | Moderate | High |
| Atolls, Islands and City Council | Project outputs regarding the fire safety and fire safety building codes. | Moderate | Low |
| Environmental Protection Agency | Approval of ESIA for the new office building construction. | Low | High |
| Utility Regulatory Authority (URA) | Issuance of dewatering permit | Low | High |
| Construction Companies | Tender of the construction of new office building.  Project outputs regarding the fire safety and fire safety building codes. | High | Low |
| Design and Supervision Consulting companies | Concept design for the construction of a new office building.  Project outputs regarding the fire safety and fire safety building codes. | High | Low |
| Insurance companies | Project outputs regarding the fire safety and fire safety building codes. | Moderate | Low |

# Stakeholder Engagement Plan

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

## 5.1 Details of Stakeholder Engagement Plan

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

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

Table 6: Proposed Stakeholder Engagement Plan

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Stakeholders | Themes/subjects for consultations | Methods for consultations | Project phase for consultation | Responsible agency/persons for consultations |
| Project Affected Parties | | | | |
| Ministry of Finance and Planning | * New workspace for the employees | * Orientation and stakeholder consultation workshops. * Consultative Meetings | * Project planning phase; * Project implementation phase; * Project operation phase | Ministry of Construction, Housing and Infrastructure (MoCHI). |
| Ministry of Tourism and Environment | * New workspace for the employees | * Stakeholder Consultation Workshops * Consultative Meetings | * Project planning phase. * Project implementation phase. | Ministry of Construction, Housing and Infrastructure (MoCHI). |
| General Public including users of existing parking space | * Loss of public parking space * Disruptions to the traffic during the construction phase of the project. | * Consultations during elaboration of ESIA. | * Project planning phase; * Project implementation phase; | ESIA consultants and ESS specialist of PMU |
| Nearby Businesses and residences | * Disruptions to the traffic during the construction phase of the project. | * Consultations during elaboration of ESIA. | * Project implementation phase; | ESIA consultants and ESS specialist of PMU |
| Nearby Government Offices | * Disruptions to the traffic during the construction phase of the project. | * Consultations during elaboration of ESIA. | * Project implementation phase; | ESIA consultants and ESS specialist of PMU |
| People with Disabilities | * Road Closure information and access to the new office building | * Consultation during elaboration of ESIA and operation of the new building. | * Project implementation phase; * Project Operational Phase | ESIA consultants and ESS specialist of PMU |
| Migrant workers residing near the project site | * Road Closure information and access to the new office building. * Dust and noise mitigation measures during construction stage. | * Consultations during elaboration of ESIA. | * Consultations during elaboration of ESIA. | ESIA consultants and ESS specialist of PMU |
| Other Interested Parties | | | | |
| Maldives Police Service | * Management of traffic during the construction phase of the project | * Consultative Meetings | * Project implementation phase. * Project operation phase | Ministry of Construction, Housing and Infrastructure (MoCHI). |
| Maldives National Defense Force | * Fire related code compliance documents. * Fire Safety Construction Guide. * Fire safety aspects incorporated into the building audits carried during construction phase. * Guidelines for regular fire safety audits. * Fire safety related aspects of the new building | * Stakeholder Consultation Workshops * Consultative Meetings | * Project implementation phase. * Project operation phase | Ministry of Construction, Housing and Infrastructure (MoCHI). |
| Atolls, Islands and City Council | * Fire related code compliance documents. * Fire Safety Construction Guide. * Fire safety aspects incorporated into the building audits carried during construction phase. * Guidelines for regular fire safety audits. * Coordination for the road closure during the concrete batching period. | * Orientation and stakeholder consultation workshops. * Consultative Meetings | * Project implementation phase. * Project operation phase | Ministry of Construction, Housing and Infrastructure (MoCHI). |
| Environmental Protection Agency | * Issuance of TOR and Approval of ESIA report | * Consultative Meetings | * Project planning phase; | ESIA consultants, ESS specialist of PMU |
| Utility Regulatory Authority (URA) | * Issuance of dewatering permit during the foundation work of the new building construction. | * Consultative Meetings | * Project implementation phase; |  |
| Construction Companies | * Construction of the new office building * Fire related code compliance documents. * Fire Safety Construction Guide. * Fire safety aspects incorporated into the building audits carried during construction phase. * Guidelines for regular fire safety audits. | * Stakeholder Consultation Workshops * Consultative Meetings | * Project implementation phase. | Ministry of Construction, Housing and Infrastructure (MoCHI). |
| Design and Supervision Consulting companies | * Technical services for construction of the new office building * Fire related code compliance documents. * Fire Safety Construction Guide. * Fire safety aspects incorporated into the building audits carried during construction phase. * Guidelines for regular fire safety audits. | * Stakeholder Consultation Workshops * Consultative Meetings | * Project implementation phase. | Ministry of Construction, Housing and Infrastructure (MoCHI). |
| Insurance companies | * Fire related code compliance documents. * Fire Safety Construction Guide. * Fire safety aspects incorporated into the building audits carried during construction phase. * Guidelines for regular fire safety audits. | * Stakeholder Consultation Workshops * Consultative Meetings | * Project implementation phase. * Project operation phase | Ministry of Construction, Housing and Infrastructure (MoCHI). |

## 5.2 Strategy for engagement of vulnerable/disadvantaged persons/groups

The following Table 6 provides information on strategy for engagement of vulnerable/ disadvantaged persons/groups.

Table 7: Proposed strategy for engagement of vulnerable groups

|  |  |  |  |
| --- | --- | --- | --- |
| Vulnerable persons/groups | Key vulnerability/disadvantage | Strategy/approach for their engagement | Additional resources required for engagement |
| Disabled residents utilizing the services of nearby government offices and the building once constructed | Restricted mobility  - Risk of exclusion in design and access to public buildings | * Use sign language and other assistive tools, as required, for blind people. * Translate project materials into local language if target group know the written language(s) * Provide transportation support for them to travel to the meeting venues, where possible, or visit them at their homes for the planned consultation. * Provide sufficient prior time for internal decision-making process. | * Cost of sign language translator and assistive tools * Translation cost for project consultations. * Transportation cost for convening or visit them. |
| Displaced government staff (especially women and persons with disabilities) | - Working in makeshift, non-purpose-built spaces (Dharubaaruge)  - Reduced work efficiency and comfort  - Accessibility issues for PWDs in temporary facilities | * Conduct targeted consultations on functional and accessibility needs for the new building * - Ensure accessibility features are reviewed with disabled staff * - Provide regular updates on construction timeline and transitional arrangements | * Cost of sign language translator and assistive tools * Translation cost for project consultations. * Transportation cost for convening or visit them. |
| Elderly Population | - Greater vulnerability to fire and life-safety issues  - Often excluded from design or campaign messaging | * Ensure fire and safety campaign materials are elderly-inclusive (simple language, visuals) | * Cost of sign language translator and assistive tools * Translation cost for project consultations. * Transportation cost for convening or visit them. |
| Migrant Workers residing close to the project site. | Living in a crowded living space with limited access to affordable healthcare and employment opportunities. | * Conduct targeted consultation regarding the fire risk communication. * Conduct consultation | * Cost of an interpreter for the language of migrant workers. * Translation cost for project consultations. |

The following Table 7 proposes the information disclosure strategy for the Maldives Fire Reconstruction and Building Resilience Project.

Table 8: Strategies for Information Disclosure for Stakeholders

| Type of Information to be disclosed | Method of Disclosure | Target Stakeholder | Responsible Stakeholder |
| --- | --- | --- | --- |
| Detailed Design for the new office building | * Stakeholder Consultation Workshop * Consultative Meetings * Email Communications | Ministry of Finance and Planning, Maldives National Defense Force, Ministry of Tourism and Environment, Construction Companies, Design and Supervision Consulting companies  Nearby Businesses Maldives Police Service  General Public including users of existing parking space  Nearby Government Offices  Environmental Protection Agency | Ministry of Construction, Housing and Infrastructure |
| ESIA report on the construction of the new office building | * Stakeholder Consultation Workshop * Consultative Meetings * Email Communications * Public Consultation * Website |
| Fire related code compliance documents | * Stakeholder Consultation Workshop * Consultative Meetings * Email Communications | Atoll, Island and City Councils, National Defense Force, Construction Companies, Design and Supervision Consulting companies, Insurance companies. | Ministry of Construction, Housing and Infrastructure |
| Fire Safety Construction Guide. | * Stakeholder Consultation Workshop * Consultative Meetings * Email Communications | Atoll, Island and City Councils, National Defense Force, Construction Companies, Design and Supervision Consulting companies, Insurance companies. | Ministry of Construction, Housing and Infrastructure |
| Fire safety aspects incorporated into the building audits carried during construction phase. | * Stakeholder Consultation Workshop * Consultative Meetings * Email Communications | Atoll, Island and City Councils, National Defense Force, Construction Companies, Design and Supervision Consulting companies, Insurance companies. | Ministry of Construction, Housing and Infrastructure |
| Guidelines for regular fire safety audits. | * Stakeholder Consultation Workshop * Consultative Meetings * Email Communications | Atoll, Island and City Councils, National Defense Force, Construction Companies, Design and Supervision Consulting companies, Insurance companies. | Ministry of Construction, Housing and Infrastructure |

## 

## 6.2 Budget Estimate for SEP implementation

Due to the nature of the project being capacity building most of the expense for implementation of SEP will be on stakeholder consultation workshops, trainings and public consultation session. The following Table 9 enlist the budget estimate for implementation of SEP. Assumption is made that the stakeholder consultation workshop will involve approximately 50 people and public consultations will involve around 100 people. The budget estimates consist of the logistical expanses for the workshops which includes venue hiring and catering costs.

Table 9: Budget estimate for implementation of SEP

|  |  |  |  |
| --- | --- | --- | --- |
| Type of Stakeholder Engagement | No. of Pax | Rate (MRV) | Budget Estimate (MRV) |
| Salary of ESS specialist | 36 | 39,330 | 1,415,880 |
| Salary of Communications Specialist | 36 | 34,000 | 1,224,000 |
| Stakeholder Consultation Workshops | 6 | 35,000 | 210,000 |
| Public consultations | 3 | 65,000 | 195,000 |
| Communication Materials for consultation |  |  | 100,000 |
| Translation of Material for consultation |  |  | 45,000 |
| Sign Language Translators and Assistive Tools |  |  | 100,000 |
| Travel Expenses for consultation with vulnerable groups |  |  | 50,000 |
| Implementation of Tier 2 of GRM |  |  | 50,000 |
| Monitoring and Evaluation costs of SEP implementation |  |  | 50,000 |
| Total |  |  | 3,439,880 |

# Grievance Redress Mechanism

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

## 7.1 Grievance Redress Mechanism for the project

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

### 7.1.1 Objective and Scope of the GRM

This Grievance Redress Mechanism (GRM) is designed for the World Bank funded project “MALDIVES FIRE RECONSTRUCTION AND BUILDING RESILIENCE EMERGENCY PROJECT (REBUILD) implemented by Ministry of Construction, Housing and Infrastructure (MoCHI). This GRM is aimed to record, monitor, and resolve grievances/complaints and accommodate where possible any request and suggestions proposed by the project affected parties. The scope of this GRM is to redress any grievances/complaints regarding the project activities particularly regarding civil works under the project. Any grievance/complaints which may arise in the project area however not due to direct or indirect intervention of project activities will not be addressed under the GRM.

The main civil work of the project includes the following;

1. **Component 1 – Resilient government building that serves as model (USD 13 million):**

Table 10: Grievance Redress Mechanism for the project

|  |  |  |  |
| --- | --- | --- | --- |
| **Tiers of Grievance Mechanism** | **Nodal Person for Contact** | **Contacts, Communication and Other Facilitation by Project** | **Timeframe to address grievance** |
| **First Tier:** Contractor | Focal Point from the contractor | * There will be a board at the project site that will have an Information Board providing details of the GRM focal points listing the names and contact telephones/emails. * Grievances can be registered by contacting the designated person through phone/email or by submitting a letter of complaint or by filling a Tier-1 complaint form. The Tier-1 form will be available online on the websites Ministry of Construction (MoCHI), Housing and Infrastructure and from the project site. * For those who cannot properly write, a staff will assist in filling the complaint form and get it signed by the aggrieved party. * A formal receipt of complaint will be provided to the aggrieved party. * Contractor will screen the grievance to determine if the grievance is related to the Project or not. * If it is related to the Project, the aggrieved party will be informed in writing (copied to MoCHI) how the case will be processed as per this GRM. This will occur within 03 working days of receiving the complaint. If aggrieved party is unable to read, for whatever reason, the issued letter will be read to the person in presence of a witness and the witness will declare their witness to this event. * Alternatively, if it is not related to the project, the aggrieved party will be informed in writing (copied to MoCHI) and will inform how the case will be handled. This communication will occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness will declare their witness to this event. * Where the grievance is related to the project, the contractor will come up with a solution either by (i) discussing internally; (ii) joint problem solving with the aggrieved parties, MoCHI and Contractor or; (iii) a combination of both options. * Contractor will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event. * The aggrieved party must acknowledge the receipt of decision and submit their agreement or disagreement with the decision within 10 days. * If no acknowledgement is submitted from the aggrieved party then the decision will be considered as accepted. * If the grievance is not resolved to the satisfaction of the aggrieved party within 14 working days of submission of the grievance to tier 1 then the aggrieved party may notify local council in writing, of the intention to move to tier 2. | 14 working days |
| **Second Tier:** Ministry of Construction, Housing and Infrastructure | MoCHI will forward the grievance to the Project Management Unit (PMU) of the Ministry. A dedicated staff will be allocated to the PMU. | * Grievances can be registered by contacting MoCHI (directed to the contact person(s) or by submitting a letter of complaint addressed to the Minister of Construction, Housing and Infrastructure or by filling a Tier 2 complaint form. * For those who cannot properly write, the MoCHI staff will fill a complaint form and get it signed by the aggrieved party. * A formal receipt of the complaint will be provided to the aggrieved party. * The aggrieved party must submit a copy of the decision from the council and the letter submitted to council raising their disagreement to decision where the reason for upgrading tier 2 is the disagreement with the council decision. * The aggrieved party must submit a copy of the grievance form submitted to the council or the grievance letter submitted to council, where the reason for upgrading to tier 2 is due to lack of response from the council. * The Ministry will forward all the grievances related to the project to the PMU. * PMU will screen the grievance to determine if it is related to the project. * If it is related to the project PMU will inform the aggrieved party in writing how the case will be processed as per this grievance redress mechanism. This will occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read, the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event. * Alternatively, if it is not related to the project PMU will inform the aggrieved party that it is not related to the project in writing and will inform how the case will be handled. This communication will occur within 03 working days of receiving the complaint. If the aggrieved party is unable to read, the issued letter will be read to the person in presence of a witness and the witness should declare their witness to this event. * Where the grievance is related to the project, the PMU will come up with a solution either by (i) Discussing in the project steering committee; (ii) project technical committee (iii) a combination of all these options. * PMU will be responsible to ensure that there is no cost imposed on the aggrieved person, due to the grievance mechanism at the third tier. * MoCHI will communicate the final decision in writing, in terms how the grievance was handled to the aggrieved party within 14 working days of receiving the complaint. If the aggrieved party is unable to read (for whatever reason) the issued letter will be read to the person in the presence of a witness and the witness should declare their witness to this event. * The aggrieved party must acknowledge the receipt of the decision and submit their agreement or disagreement with the decision within 10 days. * If no acknowledgement is submitted from the aggrieved party, then the decision will be considered as acceptable. | 14 Working Days |
| **Tier Three: Judiciary** | Civil Court registrar | * Where the aggrieved party is not happy with the outcome of the decision by the Ministry of Construction, Housing, Infrastructure or where the aggrieved party is of the view that the council is not capable of justly solving the issue or where the grievance is not resolved within 14 working days the grievance can be upgraded to tier 2. | Variable |

At the premises of the project site the information on the focal points responsible for implementation of this GRM will be displayed in the notice board and also on social media platforms in the following format:

|  |  |
| --- | --- |
| Description | Contact details |
| Company: |  |
| To: |  |
| Address: |  |
| E-mail: |  |
| Website: |  |
| Telephone: |  |

### Grievance Forms

The Tier 1 and Tier 2 grievance form will be attached in annex 2 and annex 3 of this document.

### 7.1.2 Acknowledgement Receipt for Complainant

The following format shall be used to acknowledge any grievance or complaint received contractor or MoCHI.

**This receipt is acknowledgement of grievance registration by\_\_\_\_\_\_\_\_\_\_**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, resident of Male’**

**on date \_\_\_\_\_\_\_\_\_\_\_\_\_\_. His grievance number is \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and the date for response is \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.**

**Full name & signature of recording person**

In case the grievance is assessed to be out of the scope of the GRM, communication towards the same shall be made to the aggrieved party, and an alternative mode of redressal shall be suggested.

### 7.1.3 Grievance registry

* Two Grievance registries will be maintained under this GRM. They include one registry in each of the following institutions
  + Contractor (Tier 1)
  + MoCHI
* These registries will have 3 main aspects which include the following. The format for the grievance register shall be as follows
  + **Grievance receipt and recording**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Grievance No | Date | Complainant Name | Complainant ‘s address and Contact – Phone | Summary of the Complaint | Location | Current Status |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

### 7.1.4 Grievance tracking (Screening and validation)

The following are the screening procedures to be followed once a complaint is received.

* Establishing complainant’s identity
* Establishing that complainant is affected by the project
* Establishing the relationship between the complainant and the project
* Establishing that the issue/s raised by the complainant fall within the scope of the issues that the GRM is mandated to address
* If the complaint is not eligible, it should be notified to the complainant in writing.
* These screening procedures will be undertaken by Tier 1 GRM focal point and ESS specialist of PMU.
  + **Closeout (Decisions taken at GRC Meeting)**

|  |  |  |
| --- | --- | --- |
| GRC meeting date | Meeting Decision | Follow-up required |
|  |  |  |

* These registries will be maintained in Excel format and will be only accessible to Tier 1 GRM focal points and ESS specialist of PMU.
* Data will be entered only by Tier 1 GRM focal points and ESS specialist of PMU.
* The Grievance registry will be updated once every week and shared with the ESS specialist of PMU who is responsible for coordination of screening and validation process.

### 7.1.5 Grievance resolution process

**Tier 1: Contractor**

* When a grievance/complaint is submitted to the contractor through Tier 1 Grievance form the grievance will be recorded in a grievance registry to be maintained by the contractor.
* The grievance registry will be shared with the ESS specialist of PMU on a monthly basis to ensure coordination between Tier 1 and Tier 2.
* Tier 1 Grievance Resolution Committee (GRC) meeting will be scheduled by the GRM focal point from contractor.
* Tier 1 GRC will decide on the following in the initial meeting;
  + A need to invite the complainant/aggrieved party for the GRM process
  + A requirement to collect additional information regarding grievance or undertake site inspection.
  + if any technical expertise is required to resolve the grievance, Chairman of the GRC can invite such technical persons depending on the issue.
* If there is a requirement for the above activities, the GRM focal point in collaboration with ESS specialist of PMU will conduct the site inspection or collect any additional data required by the GRC members.
* If there is no requirement for the above activities, Tier 1 GRC will announce its unanimous decision which will be communicated to the complainant/aggrieved party.
* Meeting minutes will be shared with the ESS specialist of PMU and the complainant/aggrieved party along with a written communication on the decision made by Tier 1 GRC.
* In case consensus cannot be reached among the GRC members or no resolution can be decided by the Tier 1 GRC member, grievance will be communicated to the ESS specialist of PMU to be forwarded to Tier 2.

**Tier 2: Ministry of Construction, Housing and Infrastructure (MoCHI)**

* When a grievance/complaint is submitted to the Ministry of National Planning and Infrastructure Tier 2, the grievance will be recorded in a grievance registry to be maintained by MoCHI.
* The grievance registry for Tier 2 will be linked to the Tier 1 grievance registry. It will have a column to record whether the grievance has been submitted to Tier 1.
* Tier 2 Grievance Resolution Committee (GRC) meeting will be scheduled by the ESS specialist of PMU.
* Tier 2 GRC will decide on the following in the initial meeting;
  + A need to invite the complainant/aggrieved party for the GRM process
  + A requirement to collect additional information regarding the grievance or undertake site inspection.
  + if any technical expertise is required to resolve the grievance, Chairman of the GRC can invite such technical persons depending on the issue
* If there is a requirement for the above activities, ESS specialist of PMU will conduct the site inspection or collect any additional data required by the GRC members.
* If there is no requirement for the above activities, Tier 2 GRC will announce their decision reached with consensus which will be communicated to the complainant/aggrieved party.
* Meeting minutes will be shared with complainant/aggrieved party along with a written communication on the decision made by Tier 2 GRC.

### 7.1.6 Grievance Tracking

Additionally, a monitoring system will track grievances and feedback to ensure timely resolution, with regular updates shared with stakeholders regarding how their concerns are being addressed.

### 7.1.7 Monitoring, Evaluation and Reporting of Grievance resolution

It is important to monitor the implementation of the GRM to ensure that all the affected parties (APs) are well informed about the GRM and improve the public image of the project amongst the APs.

The monitoring of the GRM implementation will be undertaken on a quarterly basis by the PMU. Monitoring and Evaluation will include[[1]](#footnote-2):

Table 11: Monitoring and Evaluation of Grievance Redress Mechanism

|  |  |
| --- | --- |
| **Monitoring** | **Evaluation** |
| * How many complaints have been raised? * What types of complaints have been raised? * What is the status of the complaints (rejected or not eligible, under assessment, action agreed upon, and action being implemented or resolved)? * How long did it take to resolve the problems? * How many people have used the grievance redress procedure? * What were the outcomes? | * Is the GRM effective in realizing the stated goals, objectives, and principles? * Is the GRM capable of responding to the range of grievances specified in their scope? * Is the GRM equipped with an adequate and diverse set of resolution approaches? * Has the GRM adopted measures to improve the resolution approaches, e.g., capacity building, consultation, with technical experts. * Was the GRM effectively integrated into overall Project management |

### 7.1.7 Awareness Raising and Capacity Building

The ESS specialist of PMU will be responsible for conducting the online surveys and trainings for the GRM focal points. Training will be provided to the GRM focal points, contractors, supervision consultants. A copy of GRM note will be made available at the project site and contact information of GRM focal points will be included in the signage put up in the project sites. This information will be in both Dhivehi (local language and English). Quarterly reports on the performance of the GRM will be submitted to the project director and World Bank ESS specialists.

## 7.2 Addressing Project Workers’ Grievances

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

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

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

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

The Project worker’s grievance mechanism will not prevent workers from using judicial procedure.

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

## 7.3 World Bank Grievance Redress Mechanism

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

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

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

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

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

# 8. Monitoring and Evaluation of SEP

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

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

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

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

## 8.1 Institutional arrangement for monitoring and evaluation of SEP implementation

The main responsibility of Monitoring and Evaluation of SEP implementation will be Monitoring and Evaluation Specialist, ESS specialist and Project Manager of PMU. The oversight for the SEP implementation will be done by the project director, project steering committee and ESS specialist of World Bank. The following Figure 5 is proposed institutional arrangement for monitoring and evaluation of SEP implementation.

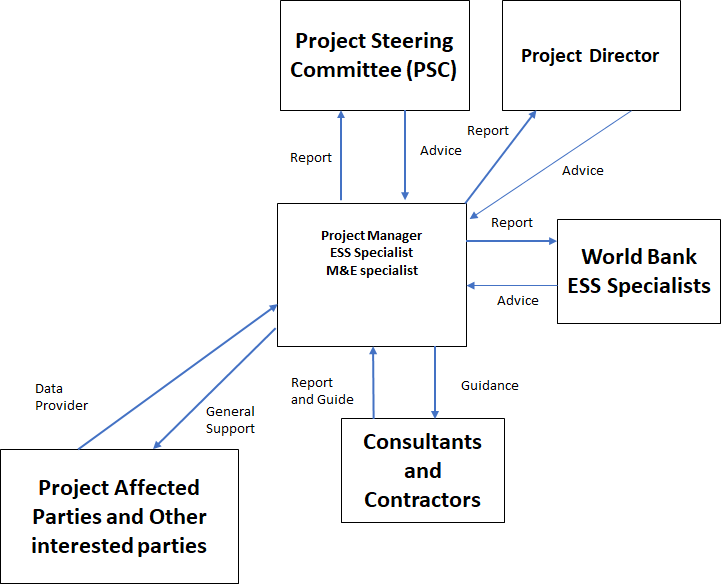


Figure 5: Institutional Arrangement for Monitoring and Evaluation of SEP implementation

## 8.2 Monitoring and Evaluation Plan

The following Table 12 is a monitoring and evaluation plan for implementation of SEP.

Table 12: Monitoring and Evaluation for SEP implementation

|  |  |  |  |
| --- | --- | --- | --- |
| Monitoring Indicator | Monitoring method | Timeframe for monitoring | Responsible Party for monitoring |
| Number of meetings, consultations, workshops, focus groups held with different stakeholder groups | Meeting minutes, workshop reports. | During Project Implementation | Project Manager, PMU |
| Gender disaggregated information on the number of stakeholders participating in engagement activities | Meeting participant sheets | During Project Implementation | Project Manager, PMU |
| Number of grievances received through the GRM | Grievance Registry | During Project implementation | ESS specialist, PMU  M &E specialist, PMU |
| Percentage of grievances resolved | Grievance Registry | During Project implementation and operation |  |
| Budget expenditure on stakeholder engagement activities compared to the planned budget | Monitoring budget expenditure | During Project implementation and operation | Financial Management specialist, PMU  M&E specialist, PMU |

## Reporting on M&E of SEP implementation

The SEP will be periodically revised and updated as necessary in the course of project implementation. Quaterly, summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project. The Quarterly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the Project’s ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in various ways such as stakeholder engagement meetings and website of MoCHI.

# 9. References

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

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

United Nations Development Programmed (2014) “Women in public life in the Maldives”, Male’, Maldives.

# List of Annexes

Annex 1 – List of Stakeholder Consulted

Annex 2 – Tier 1 Grievance Form

Annex 3 – Tier 2 Grievance Form

# Annex 1 – List of Stakeholders Consulted

Table 13: List of stakeholders consulted during project formulation

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Name** | **Gender** | | **Designation** | **Organization** |
| **Male** | **Female** |
| Ms. Fathimath Shaufa |  | X | Director | CIDD, MoCHI |
| Nishfa |  | X |  | HDC |
| Sama |  | X |  | HDC |
| Sidhna |  | X | Acting Permanent Secretary, | MoSFD |
| Thifla |  | X |  | MoSFD |
| Saif | X |  |  | MoSFD |
| Ahmed Naufal, | X |  | Engineer |  |
| Ahmed Jazlaan Fahmy Didi, | X |  | Director | URA |
| Faroosha Ali Naseer |  | X | Director | NDMA |
| Ibrahim Kashif Naseer, | X |  | Director – Emergency Management, NDMA | NDMA |
| Mohamed Nadheem Ibrahim | X |  | Colonel | MNDF |
| Mohamed Majdhee | X |  | First Lieutenant | MNDF |

# Annex 2 – Tier 1 Grievance Form

Form number (for office use):

Contractor

……………., Maldives

**Grievance Form – Tier One**

**Project: MALDIVES FIRE RECONSTRUCTION AND BUILDING RESILIENCE EMERGENCY PROJECT**

**Part 1: Complainant/ Aggrieved Party Information**

Name:

ID card number:

Contact number:

Current Address:

Signature:

**Part 2: Details of Complainant/ Aggrieved Party**

Event leading to Grievance:

Proposed Solution:

**Part 3: Received by (for office use only):**

Name:

Designation:

Signature:

Date of Grievance submission:

Time of Grievance submission:

Official Stamp

**Note:**

1. This grievance form is for the first tier of the GRM of the MALDIVES FIRE RECONSTRUCTION AND BUILDING RESILIENCE EMERGENCY PROJECT (REBUILD).
2. If the aggrieved party is not satisfied with the response from the Contractor or did not get a response within 14 working days, the aggrieved party may proceed to Tier 2 of the GRM. Details of GRM will be available at the reception counter of project site and Ministry of National Planning and Infrastructure and website of the Male’ city council/HDC.
3. A copy of this form shall be provided to the aggrieved party upon completion of the Part 3: Received by: section of this form.
4. Grievances for second tier shall be submitted with designated grievance form for Tier 2. When submitting the second-tier grievance form, the aggrieved party is encouraged to submit a copy of first tier grievance form and reply from the Contractor. The Second-Tier grievance form shall be submitted to the Ministry of National Planning and Infrastructure. This form will be available at the reception counter of project site and their respective websites.

# Annex 3 – Tier 2 Grievance Form

(National Emblem)

Form number (for office use):

Ministry of National Planning, Housing and Infrastructure

Male’, Maldives

**Grievance Form – Tier Two**

**Project: MALDIVES FIRE RECONSTRUCTION AND BUILDING RESILIENCE EMERGENCY PROJECT**

**Part 1: Complainant/ Aggrieved Party Information**

Name:

ID card number:

Contact number:

Current Address:

Signature:

**Part 2: Reason for submission of grievance**





**Part 3: Documents submitted along with this form**



****

**Part 4: Received by (for office use only):**

Name:

Designation:

Signature:

Date of Grievance submission:

Time of Grievance submission:

Official Stamp

**Note:**

1. This grievance form is for the second tier of the 2-tier grievance redress mechanism (GRM) for MALDIVES FIRE RECONSTRUCTION AND BUILDING RESILIENCE EMERGENCY PROJECT.
2. Details of GRM will be available at the reception counter and website of Ministry of Construction, Housing and Infrastructure
3. This form shall be submitted to;

Ministry of Construction, Housing and Infrastructure

Dharubaaruge, Ameenee Magu, Male’, Maldives

Telephone number: 4004700

Email address: [m-rebuild@infrastructure.gov.mv](mailto:m-rebuild@infrastructure.gov.mv)

1. A copy of this form shall be provided to the aggrieved party upon completion of Part 4: Received by: section of this form.

1. Third Party evaluation of GRM by the Monitoring and Evaluation Specialist of PMU. [↑](#footnote-ref-2)