



THE MINISTRY OF EDUCATION (MOE), MALDIVES
Atoll Education Development Project
(P177768)

Draft

STAKEHOLDER ENGAGEMENT PLAN (SEP)

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LIST OF ABBREVIATIONS

AEDP	The Maldives Atoll Education Development Project
CS	Communication Specialist
DoIE	Division of Inclusive Education
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESSFP	Environmental Social Safeguards Focal Point
E-WMP	E-Waste Management Plan
EPA	Environmental Protection Agency
ESS	Environmental and Social Safeguards Specialist
GRC	Grievance Redress Committee
IBM	Interactive Beneficiary Mechanism
ICP	Individualized Curriculum Plan
IE	Inclusive Education
MoE	Ministry of Education
NIE	National Institute of Education
PD	Project Director
OMSU	Operation and Monitoring Support Unit
QAD	Quality Assurance Department
SEN	Special Education Needs
SEP	Stakeholder Engagement Plan

1. PROJECT BACKGROUND AND DESCRIPTION

1.1. Background

The Maldives has had several notable achievements in the education sector over the past few decades, particularly in terms of access to education. Today, access to foundation and primary education are at near universal levels, a remarkable achievement for a country in which only 15 percent of children were enrolled in primary school three decades ago. Gender parity at the foundation and primary education levels are high. At the stage of primary education (grades 1-7),¹ the net enrolment rate among both female and male students was almost 100 percent in 2019. At the lower secondary education stage (grades 8-10), the net enrolment rate among female students and among male students was again nearly 100 percent. At the stage of higher secondary education (grades 11-12) the overall net enrollment rate is 37 percent. Among female students the net higher secondary education enrollment rate is 56 percent and among boys 21 percent. The gender disparity is striking. The low enrollment rate at higher secondary education level is mainly due to an inadequate number of students successfully completing secondary education to obtain places in higher secondary education and to a limited number of schools that offer higher secondary education in the country.

The quality of general education needs to be strengthened, and with a special focus on the outer atolls. The most recent National Assessments of Learning Outcomes (NALO) conducted in 2017 showed that learning outcomes are moderate, with considerable regional disparities between Male' and the outer atolls. The average scores for English, mathematics and Dhivehi for Grade 4 and Grade 7 students ranged between 50 to 60 percent. For the first language, Dhivehi, approximately 19 percent of Grade 4 and 6 percent of Grade 7 students failed to achieve a minimum score of 40 percent. Similarly, about 27 and 35 percent of Grade 4 and Grade 7 students failed to achieve a minimum score of 40 percent in English. In mathematics, approximately 20 and 33 percent of students in Grade 4 and Grade 7 failed to achieve a score of 40 percent. Moreover, a comparison of the time trend of results show that progress has been mixed. Between 2015 and 2017, Dhivehi results declined for Grade 4 students but improved for Grade 7 students. In English, there was no significant change in either grade. In mathematics, Grade 4 results did not show much change, but significant improvement was seen in Grade 7. There are also clear geographical disparities in learning outcomes: Laamu Atoll performed well below all others, followed by atolls such as Raa, Alifu Dhaalu, Faafu, and Noonu. In contrast, Greater Malé, Seenu and Gnaviyani Atolls had the best performance.

The Maldives also needs to strengthen support for children with complex learning profiles (CLP). About 4,000 students in 212 government schools across the country need an Individual Education Plan (IEP), either based on the confirmed diagnosis or on suspicion of having special educational needs. The Maldives has made progress towards promoting the inclusion of CLP children in the education system. However, more support is needed. There is a shortage of adequately trained teachers for CLP, and the capacity of the Ministry of Education (MoE) to develop CLP policy and programming also needs to be improved. Sufficient physical resources, such as space and equipment

¹ The grades defined as primary, lower secondary and higher secondary are taken from the School Census of 2019, which provides the most recent statistics on schools and student enrollment. A new Education Act passed in 2021 has defined primary education as grades 1-6, secondary education as grades 7-10, and higher secondary education as grades 11-12. In the subsequent section of this PCN the new definition of grades will be followed.

for CLP children, are a challenge in most schools. A critical aspect of improving the country's CLP program is the training of teachers. School teachers require specialized training to identify/initially screen children with CLP, and then plan interventions for these children.

The GoM Education Sector Plan (ESP) has four main goals. The first goal is to improve learning for all through equitable access to quality education. The main results the GoM seeks to achieve under this goal are to ensure that all children from pre-school through grade 12 are enrolled in school, learning gaps across atolls are reduced, and overall learning outcomes are improved. The second goal is to provide youth and adults with the necessary skills for employment and entrepreneurship. The third goal is to ensure equitable access to lifelong learning and a high-quality higher education for all. The fourth and final goal is to improve the capacity of the Ministry of Education (MoE), Ministry of Higher Education (MoHE), and atoll and island² level education institutions, to deliver high quality education. Under the first goal the MoE has been expanding the number of schools providing higher secondary education in the atolls. Under the second goal the GoM is planning to strengthen English language learning of students, as this is a vital skill for employment in the dominant tourism sector. In addition, GoM is seeking to improve science and mathematics education in the school curriculum, as a foundation for Science, Technology, Engineering and Mathematics (STEM) education, and to strengthen vocational education (VE) options in schools.

The GoM is implementing a comprehensive curriculum reform initiative for foundation (early childhood education), primary education and secondary education. This new National Curriculum Framework (NCF), initially launched in 2015 and updated in 2020, is designed to serve as a blueprint for the content of foundation, primary and secondary education in the Maldives. The NCF defines seven key competencies across the following learning areas: Islam and Spirituality; Language and Communication; Mathematics; Environment, Science and Technology; Health and Wellbeing; Social Sciences; Creative Arts; and Entrepreneurship. The reforms address syllabi across most subject areas at the primary and secondary education levels. The key focus is on improving literacy and numeracy of students in primary and secondary education and widening the curriculum options available to students in secondary education. The roll-out of this curriculum reform is a major undertaking and covers education materials and textbooks, teacher quality and performance, classroom assessments, and overall school learning environment.

The quality and performance of teachers are a major determinant of learning outcome and the GoM is taking steps to improve the quality of teachers. These include a program of School-Based Professional Development (SBPD) and the strengthening of the services provided by the Teacher Resource Centers (TRCs) in each atoll. Nevertheless, teacher quality remains a major challenge. In particular, teacher education and training need to be more closely aligned with the new school curriculum. SBPD, which is increasingly recognized as a central component of teacher effectiveness and performance, requires more attention at secondary education level. Also, the current teacher development program needs to be strengthened to meet the teaching and learning needs of schools across the diverse range of atolls. In addition, school principals and section heads

² The Maldives has two spheres of administration, national and local. Administratively, there are currently 189 inhabited islands contained in 19 atolls, and 3 cities (Malé, Addu and Fuvah Mulak) in the country. The responsibility for education lies primarily with the MoE and schools. City and Island Councils have an oversight function of the schools, although in most cases this is chiefly in terms of the physical environment of schools. Each atoll has a Teacher Resource Center (TRC), based in one of the larger islands within the atoll. The role of the TRC is to support continuing teacher development in the schools located within the islands belonging to the atoll.

need greater capacity to manage teacher professional development effectively.

The country's system for measuring learning outcomes is being improved. A high-quality learning assessment system is vitally important for improving the quality of the education system and ultimately, for improving student learning outcomes. In recent years, the GoM has made progress in establishing a culture of national assessment, which measures learning outcomes at the system level. To this end, the GoM has instituted the National Assessment of Learning Outcomes (NALO). The establishment of such a system is itself a notable accomplishment, although greater attention is needed to ensure that this tool is effectively used for education policy and planning. The NALO is conducted for Grades 4 and 7 in schools in both Male' and the outer atolls. The NALO provides information to strengthen curriculum implementation, creating a feedback loop to policy and program planning. NALO findings are expected to be widely disseminated and discussed at appropriate levels of the education system to facilitate the actions needed to improve learning outcomes. Over time the NALO needs to be developed further, especially to be implemented at secondary education grades and to measure learning in science, mathematics and English at this level. Tools from international assessments such as PISA, TIMSS and PIRLS will be integrated into future rounds of the national assessments of learning.

The Maldives has developed a school quality assurance and enhancement system. This system is implemented over a range of domains such as general management, physical and human resources, curriculum implementation, co-curricular activities, student achievements, student welfare, school health and nutrition, and school-community interactions. The existing system for quality assurance of schools is being strengthened, with a focus on building the capacity of school stakeholders to carry out effective self-evaluations, and the capacity of education officials to conduct robust external quality reviews and utilize the findings in the development and implementation of school improvement plans. Special attention needs to be given to quality assurance and enhancement of schools in the atolls where learning outcomes are lowest and/or have been most adversely affected by the COVID-19 pandemic.

The MoE is being supported under the Learning Advancement and Measurement Project (LAMP) financed by the Global Partnership for Education (GPE) to improve English, mathematics and Dhivehi learning in foundation and primary education during the period 2020-2023. The LAMP supports 131 out of the 212 schools in the Maldives. The LAMP supports SBPD, quality assurance and NALO activities at the primary education level. The proposed Atoll Education Development Project (AEDP) will build on the LAMP and expand support to the Maldivian education system at the secondary education level as well as extend the LAMP initiatives to the remaining schools not covered by the LAMP for SBPD, quality assurance and NALO activities.

1.2 Project Description

The project development objective (PDO) of the proposed Atoll Education Development Project (AEDP) – P177768 is to enhance access to, and quality of, secondary education. It endeavors to achieve an increased net male enrollment rate in higher secondary education; improved English, mathematics, and science language learning in secondary grades; improved teaching practices in secondary grades; and completion of national assessments of learning outcomes and utilize them for program development. The project comprises the following components.

Component One: Enhancing Curriculum Delivery and Increasing Participation in Higher Secondary Education (US\$ 6.5 million)

The objective of this component is to promote strategic initiatives at the country level to strengthen and develop the general education system with a special focus on secondary grades. The activities under this component will be mainly implemented by schools with policy and technical support of the Ministry of Education (mainly PPR and School Administration Section), National Institute of Education (NIE), and the Department of Inclusive Education (DoIE). The following key sub-components will be supported under this component.

Sub-component 1.1: Improving learning in strategic subjects in secondary education grades

The delivery of the secondary education curriculum will be enhanced to improve the quality of secondary education in subjects of strategic importance for economic development. First, there will be a focus on improving the English language skills of students. This will help open a variety of future job opportunities for students, including in the key tourism industry and related services. Second, mathematics and science learning will be strengthened in the school curriculum to promote science, technology, engineering and mathematics (STEM) education. Mathematics and science are increasingly important in the modern knowledge-based economy. Science will also increase environmental awareness among students by incorporating learning on mitigation (e.g. food waste, energy efficiency, and recycling). Improved English language, mathematics and science learning levels will better prepare secondary school completers for higher secondary education and tertiary education in the future. Third, the vocational education (VE) option will be strengthened in the school curriculum. This option will directly target the skills in demand in the local economy, defined as the atoll in which the school is located, as well as the national economy. Fourth, emphasis will be placed on developing green jobs skills that can advance sustainability transformations in key sectors, including tourism and allied services. The implementation of the Fehi Madharusa (green school) initiative will help raise awareness to reduce adverse environmental footprints, promote eco-literacy, enhance climate literacy and support students' emergency preparedness and response measures. Improvements in the quality of education at the secondary education level will also enable more students to qualify for higher secondary education, enabling increased participation in higher secondary education.

The AEDP will increase the resources available for the teaching and learning of science, mathematics, English and vocational education (VE). The AEDP will support the development of science laboratories and vocational education workshops through the refurbishment of classrooms and the provision of equipment and technology in strategically selected secondary schools in the atolls. In addition, the Project will assist the expansion of ICT equipment and technology in atoll schools. The science laboratories, ICT facilities and vocational education workshops will incorporate green designs, such as rainwater harvesting systems and improved insulation that allows for energy efficiency and makes classrooms more resilient to rising temperatures. Schools will also be trained in measures to reduce e-waste. The refurbishment of facilities will take account of the learning needs of students with complex learning profiles (CLP). The Project will also support digitization efforts, including online teaching systems for English language, mathematics, science and vocational education subjects to support blended learning and uninterrupted learning during natural disasters.

Improving English Language Learning Outcomes

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 secondary stage of education of the school curriculum. This sub-component will be aligned with and complement the program for improvement of English language skills being implemented in the foundation and primary education stages (key stages one and two) through the Learning Assessment and Measurement Project (LAMP) financed by the Global Partnership for Education (GPE) trust fund. The focus will be on the vital language skills of vocabulary, reading, and writing. The Project support the following activities in homes and schools: (a) create an acquisition-rich English language learning environment for students to learn the language, where day-to-day conversation and extracurricular and co-curricular activities will 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 materials and TV programs, and discussion and conversation in English at home; (d) promote co-curricular and extracurricular activities such as English literary, drama, and debating societies; (e) design other innovative activities to promote English language learning, with special attention to improving reading skills; and (f) support digitization efforts, including online teaching systems to facilitate English language learning. The pedagogical training needs of English teachers in a set of schools will be identified by the NIE, and training modules prepared and delivered to teachers in order to improve their pedagogical practices and assessment approaches. Assistance for English teachers for better curriculum implementation will be strengthened through an enhanced teacher development program, including SBPD.

Improving Mathematics Learning Outcomes

Mathematics is increasingly important in the modern knowledge-based economy and plays an important role in areas such as science and technology and is vital to research and development in fields such as engineering, computer science, and science. It is an integral component of the science, technology, engineering and mathematics (STEM) discipline. Several activities will be supported to strengthen mathematics learning in the secondary school curriculum and promote STEM education. The mathematics teaching and learning environment in schools will be improved by the provision of mathematics educational material and technology. The use of technology will be promoted in appropriate and effective ways to support the curriculum. Innovative teaching learning approaches will be encouraged through the curriculum to stimulate children and promote their enjoyment of mathematics through planned active learning which provides opportunities to observe, explore, investigate, experiment, play, discuss and reflect and further to develop problem-solving capabilities and critical thinking skills. The pedagogical training needs of mathematics teachers in a set of schools will be identified by the NIE, and training modules prepared and delivered to teachers in order to improve their pedagogical practices, from how they plan to how they assess and how they teach mathematics. Attention will be paid to training teachers to diagnose student learning problems through formative assessments and classroom-based assessments and use the information gained to improve the teaching-learning process. Assistance for mathematics teachers for better curriculum implementation will be strengthened through an enhanced teacher development program, including SBPD. Online teaching systems to facilitate mathematics

learning will be supported through digitization.

Improving Science Learning Outcomes

Science and its application are central to the economic future, health and wellbeing of individuals and society. Science is a vital subject in the science, technology, engineering, and mathematics (STEM) discipline. STEM subjects permeate nearly every dimension of modern life and are key to solving many of society's most pressing challenges. The Project aims to improve science knowledge and promote STEM education in secondary grades by promoting teaching learning approaches that will help capture students' interest and provide them with the necessary skills and knowledge to raise science learning. The teaching and learning environment in schools will be improved through the provision of equipment and technology in strategically selected secondary schools in the atolls. The intervention will help students to focus on practical work which is a distinct feature of science education and essential for understanding how science works. Different teaching learning approaches will be encouraged through the curriculum by connecting children's learning to the real world. Teachers and students will be encouraged to make connections between the lesson and real-world experiences, current events, and/or students' lives. Further by linking with local industries, schools can show science and STEM in action. In addition, project-based learning approaches combining the individual disciplines within STEM will be promoted to create an exciting learning experience for children where they can work in teams to solve problems or tackle challenges. Technology will be used as a resource and a support system for the curriculum. The pedagogical training needs of science teachers in a set of schools will be identified by the NIE, and training modules prepared and delivered to teachers to improve their pedagogical practices and assessment approaches in a way that will align the curriculum, teaching and learning and assessment. Assistance for science teachers for better curriculum implementation will be strengthened through an enhanced teacher development program, including SBPD.

STEM Education

The focus on science and mathematics, combined with ICT, will provide a foundation for STEM education. The school curriculum will also explicitly include topics such as coding and robotics which are important for the labor market and, in addition, will be useful for disciplines such as engineering and technology at higher levels of education. The AEDP will support the refurbishment of physical spaces and the provision of equipment and technology for STEM education, as well as continuing teacher development for STEM education.

Improving Skills Education

The school curriculum seeks to promote skills education through vocational education subjects introduced as an integral part of the education system. The AEDP will support the refurbishment of physical spaces and the provision of equipment and technology for skills education, as well as continuing teacher development for skills education.

Sub-component 1.2: Promoting participation of boys in higher secondary education

The Maldives has an atoll-wide network of schools that provide universal access to primary (grades 1-7) and secondary (grades 8-10) education. However, until recently access to higher secondary education (grades 11-12) was very limited, initially to one school in Male', and then to

four more schools in the atolls. The government has now expanded access to higher secondary education through 38 strategically selected schools across the country. These schools serve as hubs for higher secondary education in the atolls and in Male'. The higher secondary schools, and the secondary schools which feed students into them, need greater teaching-learning material and equipment, especially for IT and science, but also for English, mathematics, and VE. Strong IT and English skills are necessary for all secondary school completers who either plan to seek employment opportunities in the labor market or proceed onwards to higher education. Better STEM and VE will enable students to seek job opportunities in the labor market. As noted in the sector context, there is high gender disparity between girls and boys in higher secondary education enrollment. A key activity of the AEDP is to increase the enrollment of boys in higher secondary education and reduce the gender disparity in higher secondary education participation. Under this sub-component, schools will provide good career guidance for male students and their families in secondary grades to facilitate the transition to higher secondary education.

Component 2: Continuing Teacher Development (US\$ 0.75 million)

The component will assist GoM to implement a program of continuing teacher development. The activities under this component will be mainly implemented by schools with the policy and technical support of the NIE.

Sub-component 2.1: Improving the delivery of teaching services

This sub- component will assist the National Institute of Education (NIE), with the support of the Teacher Resource Centers (TRCs), to implement targeted teacher development programs (TDPs) for schools. The focus of these TDPs will be on improving subject content knowledge, pedagogical practices, career guidance skills, learning needs of SEN students, and climate change preparedness / emergency response of teachers. Through the outcomes defined in English, mathematics, and science subjects, teachers will be guided to use a skillful mix of learning and teaching approaches and instructional strategies, including activity-based learning and project-based learning, to stimulate children and promote an exciting and enjoyable learning experience. Teachers will also be guided in developing curricular materials and pedagogical practices for vocational education, including techniques such as hands-on problem solving, cooperative and team-based project learning, and activities that draw on knowledge and skills from various domains. An effective classroom assessment system to identify and assess the knowledge, understanding and skills students are developing in the classroom in each curriculum area will be incorporated, and teachers trained well for classroom assessment. Teachers will also be trained to provide career guidance to students. Special attention will be given to guiding students, and especially male students, to participate in appropriate higher secondary education subjects. The TDPs will be informed by the COACH³ principles to tailor the support to teachers to improve their teaching. Innovative approaches for the delivery of TDP, including blended approaches through online/ apps on smartphones will be supported under the Project. The Banks' Teach⁴ tool will be used as part of this evaluation to track and improve teaching quality.

³ <https://www.worldbank.org/en/topic/teachers/brief/coach-helping-countries-accelerate-learning-by-improving-in-service-teacher-professional-development>.

⁴ <https://www.worldbank.org/en/topic/education/brief/teach-helping-countries-track-and-improve-teaching-quality>.

Sub-component 2.2: School-based Professional Development (SBPD) of teachers

The SBPD program will focus on: (a) raising the ability of school principals and senior management teams to establish a learning culture within the school with specific reference to English, mathematics, science and vocational education; (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, including the needs of CLP students. SBPD is known from the international education literature to be the most effective mechanism for the continuous professional development of teachers. The NIE will measure (a) to (d) above through SBPD reports provided by the SBPD focal points in schools. The component will also support research to evaluate the SBPD practices in schools and their effectiveness in relation to improving student learning in science, mathematics, English, vocational education and green job skills in the atoll schools.

At each school, a Professional Development (PD) coordinator is identified by the principal and works as a focal point. The PD coordinator is expected to be competent and have the potential to coordinate and conduct the necessary training for the school staff. Teacher Resource Center (TRC) coordinators are expected to provide guidance and support to PD coordinators. In order to apply the SBPD activities and develop schools to become learning organizations, there is a need for on-going capacity building of the PD coordinators and TRC coordinators.

The AEDP will assist the MoE, especially the National Institute of Education (NIE), to further develop the system for SBPD by improving the capacity of PD coordinators and TRC coordinators, helping schools undertake SBPD activities, and assisting the NIE to monitor the implementation of SBPD in schools. All schools in Male' and the outer atolls will implement SBPD programs according to an annual cycle.

The range of SBPD activities will include school-based mentoring, peer learning, peer coaching, individual consultations, visits to classrooms in other schools and islands, and online interactions, including social media, apps, and cloud computing, for networking among teachers. Under SBPD:

- teachers can receive useful lessons on teaching techniques and observe demonstrations including in differentiated learning for classes with children with varying learning needs.
- teachers can practice and discuss new techniques and new materials with colleagues and senior teachers on a regular basis.
- leading teachers can give classroom demonstrations using SBPD activities.
- the activities can increase communication and sharing of ideas among teachers.
- provide a positive focus for inspectors' school visits, classroom observation, and meetings with teachers.
- leading teachers can mentor and coach other teachers using SBPD activities frequently and regularly; and
- can serve as a link between a centralized type of in-service training program and specific teacher needs.

Component 3: Measuring and Enhancing School and System Performance (US\$ 0.75 million)

The component will assist GoM to measure the performance of the school system through quality assurance activities and national assessments of learning outcomes. The activities under this

component will be mainly implemented by the Quality Assurance Department (QAD), and by schools with the policy and technical support of the QAD.

Sub-component 3.1: Modernizing Quality Assurance for School Improvement

Quality assurance (QA) is a key feature of education systems in many high-income countries, such as Scotland, Singapore, the United Kingdom (UK), and the United Arab Emirates (UAE), and several Asian middle-income countries, including Malaysia and Sri Lanka. Quality assurance provides a framework for the systematic review and monitoring of an education system to determine whether an acceptable standard of quality is being achieved over the medium-term and enhanced over the long-term in line with global developments in education.

The sub-component will help GoM to carry out a program of activities designed to support measurement of school performance through quality assurance (QA) reviews consisting of both self-evaluation by schools and external evaluations by the Quality Assurance Department (QAD). The AEDP will help the MoE to establish a regular, annual QA system for schools, with the main emphasis on internal self-evaluations. The school self-evaluations (SSEs) will, in turn, feed into the School Improvement Plans for the following year. QAD has prepared QA standards to facilitate the assessment of education inputs, processes and outcomes by schools (self-assessment) and by regional and national level authorities (monitoring and supervision). External evaluations of schools will be conducted by the QAD with special emphasis on the weaker schools.

The school self-evaluations will be conducted by stakeholders including principals, teachers, parents and local communities. This will enable extensive 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 development plans. The results of the quality assurance process will feed back into the school development plan that would include the development of safe shelters in schools as part of the community disaster management plan, when necessary. The relevant information on the implementation of these plans will be shared with the stakeholders. This QA process constitutes the citizen engagement mechanism for the Project.

Sub-component 3.2: National Assessments of Learning Outcomes for Policy and Program Development

National assessments of learning outcomes have become one of the main vehicles for assessing education systems and formulating education policies in OECD countries and middle-income countries. National assessments are useful to analyze: (a) the quality of learning in the education system; (b) the particular strengths and weaknesses in the knowledge and skills of students; (c) the education performances of different atolls and islands; (d) educational and socio-economic factors associated with student learning outcomes; and (e) the evolution of learning achievements over time.

The AEDP will support the MoE to implement national assessments of learning outcomes in grades 4 and 7 according to a regular cycle for key subjects such as English, mathematics, Dhivehi and science, and also for grade 9 for English, mathematics and science, and use the results and

findings for education program development. The AEDP will help build the technical capacity within the MoE, especially the QAD, to undertake rigorous, state-of-the-art national assessments. The Project will also build the capacity of policy makers and education specialists within the MoE, including NIE and the PPRD, to use the results and findings from national assessments for strategic policy and management decisions. The national assessments under the Project 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. 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. The national assessments will be aligned to the UN's global proficiency framework⁵ and will include modules of test items drawn from international assessments such as PISA and/or TIMSS and/or PIRLS.

Component 4: Coordination, Monitoring, Capacity Building and Technical Assistance (US\$ 2 million)

Under this component the Project will help the MoE to coordinate and monitor the Projects' activities, as well as provide technical assistance and knowledge support to the MoE agencies and to schools. Project coordination would be through a team of experts in operations, monitoring, procurement, financial management, and environment and social safeguards, who would assist the MoE, including atoll level officials such as the Teacher Resource Center (TRC) Coordinators, to implement and monitor project activities efficiently. The monitoring activities will take place at three levels: national, atoll and school. The purpose of monitoring will be formative, and support implementation at each level by identifying problems and taking action to resolve issues and remove bottlenecks to implementation. A Maldives education management information system (MEMIS) is in place and the statistics generated through it will be used for monitoring purposes. The resources from the Project will also support the communication and dissemination of information to education stakeholders, including political authorities, policy makers, academics and researchers, principals and teachers, students, and the public.

Cross-cutting areas

The human resources in the education sector need to be developed urgently. The majority of education staff members in the MoE and the Atoll Education Offices have not had adequate management and leadership training. Therefore, considerable investment is required to develop the human resources of the education sector. The AEDP will assist the MoE to develop the human resources in the education sector, with a special focus on the staff of the MoE and associated institutes and departments. MoE staff, including from the Atoll Education Units, will be provided with short-term courses and/or programs tailor made to develop their administrative, managerial and technical skills for work in the MoE and Atolls.

School-Based Learning Enhancement Grants

The Project will provide school-based learning enhancement grants (SBLEGs) to build the capacity of schools to improve learning outcomes and socio-emotional skills of students and to increase higher secondary enrolment, especially of boys. Special attention will be paid to

⁵ <https://www.edu-links.org/resources/global-proficiency-framework-reading-and-mathematics>.

improving learning in English, mathematics, science, STEM, and VE, and the green school's initiative, at secondary grades. All schools with secondary education grades will be eligible for the grants.

Part of the SBLEGs can also be used for school level teacher development activities such as SBPD to improve teacher effectiveness, with a special focus on the teachers at secondary education level in the priority disciplines. A further part of the school grants can be used to enable schools to implement the recommendations of QA reviews to improve learning and increase higher secondary enrolment. Special attention will be paid to improving learning in English, mathematics, science and VE, and the green school's initiative, in secondary education. Also, attention will be paid to measures to increase boys' enrollment in higher secondary education. The School Administration (SA) section of the MoE will assist the OMSU to monitor the efficient utilization of the SBLEGs by including it in the annual performance review of the school principals.

The Project is expected to directly benefit about 69,000 students, including around 4,000 children with complex learning profiles, and approximately 8,000 teachers. In addition, the Project will indirectly benefit suppliers of education material and equipment, and later on employers and tertiary education institutions that will receive better qualified secondary school completers.

1.3 Potential Environmental and Social Risks and Impacts

Based on the project components, the overall risks of the project will be **Moderate**. In terms of physical interventions, the project will involve minor civil works such as the refurbishment of existing buildings to set up STEM laboratories and vocational skills workshops through the refurbishment of classrooms, the provision of equipment and technology, and the delivery of teaching-learning material including textbooks and supplementary reading material. In addition, the Project will assist the development of ICT laboratories, especially through the delivery of equipment and technology. The procurement, use, and disposal of this equipment will lead to the generation of E-waste at the end of their useful lifecycle that will have to be managed via protocols and arrangements to ensure that sound management is undertaken in line with the regulations of the Maldives Waste Management Department, Environmental Protection Agency, and follows Good International Industry Practice (GIIP) including requirements of ESS3. The project is preparing an E-Waste Management Plan to address this concern.

Before any building works are undertaken, the project will assess and seek to safeguard, and mitigate, any risks to children. Preparation of construction work plans will be done in consultation with school officials, and parents, to minimize disruptions to school activities. Further all contractors will implement strict health and safety protocols including ensuring that workers are vaccinated, adhere to a child protection guidelines and sign a Code of Conduct. Finally, the project will follow a selection process, identifying schools for support and teachers for training, will be done in an equitable and a transparent manner in consultation with key stakeholders.

Due to the nature of associated Moderate risks and scale of project interventions, the sub-project specific ESF instruments have been identified in the Environmental and Social Commitment Plan (ESCP) which identifies actions to be undertaken with regards to environment and social standards as well as agencies responsible for implementing various activities listed in the ESCP. ESF instruments to be prepared include: ESIA, ESMP, Labour Management Procedures (LMP), Occupational Health and Safety Management Plans, Community Health and Safety Plans, an E-

Waste Management Guidance Document, and a Stakeholder Engagement Plan (SEP). A Grievance Redress Mechanism (GRM) will be included in the LMP to specifically address workers' rights and concerns. The SEP will also provide a GRM which can be utilized by impacted persons and the general public. All ESF documents will be disclosed by the GoM and the World Bank on 30, August 2022.

A Gender Based Violence (GBV) and Sexual Exploitation, Abuse, and Harrassment (SEA/H) assessment has been conducted for this project. Domestic violence and Sexual Harassment are rated low risk. Since the GBV risk rating is rated 'low', a separate GBV action plan will not be required. However, other measures will be put in place based on the GBV Good Practice Note for projects with Low GBV risks. The project will incorporate initiatives at the school level which will impact TVET and STEM programs as well as influence learning institutions and teacher training. Interventions include educating students, staff, parents, and communities on gender equality, GBV, and SEA/H. Protocols will be established to address biases, harassment or violence. Vulnerable groups, especially females, will be empowered to report any cases encountered, and made aware of GRM system. All contracts and staffing will be subject to Code-of-Conduct clauses which will include gender issues, equality, prevention of GBV and SEA/H.

Diversifying the existing curriculum and promoting TVET and STEM for all persons will ensure boys and girls, either in Male' or rural islands, have equal chances and opportunity to access these subjects. Vocational education training subjects will target both genders to avoid stereotyping certain courses to certain groups. Teacher groups, principals, and parents will be made aware of opportunities for both genders, and encourage girls to enter non-traditional fields. Education at secondary level will promote equality for all students. Additionally, school development plans will include measures to ensure gender equality.

The extent of labor needs will be with regards to classroom rehabilitation. Although contractors would be encouraged to hire locally, in order to accomplish refurbishments, it is expected a small, temporary influx of labor will be needed. As such, all contractors and workers will be subject to Labor Management Plans, workers' rights, health and safety measures, and code-of-conduct clauses. Additionally, workers and local communities will be educated in gender equity and prevention of harassment and violence and informed on GRM responsive to SEA/SH.

The coordination activities in the MoE will be assisted by a small team, it is proposed to recruit or secondment of qualified Environmental and Social Specialists along with the project effectiveness that will manage oversight of ESF implementation. The Government of Maldives has gained experience in World Bank-financed projects through its successful implementation of the MEERY project in the Education sector and this project will be the third project in the Maldives under the ESF and it will benefit from the support of the Bank's E&S specialists in further enhancement of E&S management in projects. Some of the E&S staff of ongoing projects has already received ESF training as part of the project; additional training will be carried out with all stakeholders once the E&S staff is recruited.

1.4 Institutional and Project Implementation Arrangements

National Level

The MoE will be in overall charge of the project. The MoE will implement the project through its institutions, such as the Policy Planning and Research Division (PPRD), the National Institute of Education (NIE), the Quality Assurance Department, the Human Resource (HR) and School Administration (SA) sections, and the Physical Facilities Development Division. These institutions will implement the activities of the Project in line with their respective mandates and responsibilities. All these agencies have experience of working with and successfully implementing Bank financed projects. The coordination activities in the MoE will be assisted by an Operations and Monitoring Support Unit (OMSU) consisting of a small team of full-time staff with expertise in project management and monitoring, procurement, financial management, and environmental and social safeguards. The Project will have a steering committee, chaired by the Minister of Education and comprising of the heads of the education agencies implementing project components, to facilitate project implementation at the policy level. The PPRD through the OMSU will coordinate the various agencies to forge synergy and establish consistency. The MoE will be assisted by the Atoll Education Offices and Teacher Resource Centers (TRCs) to provide operational support, and to implement and monitor the activities of the project, at island and school level.

School Level

The AEDP will follow the principal of subsidiarity, where power and responsibility are devolved to the maximum extent possible to the frontline service delivery agencies, in this case the schools. The key activities to improve school performance under the project, such as the improvement of English language, mathematics and science learning levels, increase in the participation of male students in higher secondary education, the quality assurance program and the professional development of teachers will be implemented mainly at the school level. The school heads and senior management teams will be responsible for the organization and management of these activities. The principals and senior management teams will also lead the internal self-evaluations of the quality assurance process. Further, they will lead the needs assessments of teacher skills and competencies in relation to the school development plans and organize the professional development programs required.

1.4 Objectives of the Stakeholder Engagement Plan

The Stakeholder Engagement Plan (SEP) is prepared for the Maldives Atoll Education Development Project (P177768) in accordance with the requirements of the World Bank's Environmental and Social Framework (ESF) and in particular with the Environment and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. Stakeholder engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of potentially affected or impacted individuals and groups, and building relationships based on trust. Therefore, stakeholder engagement is important for successfully addressing the environmental and social risks and impacts of the project.

The purpose of the present SEP is to explain how various stakeholders relating to the project will be engaged throughout the course of the project and which methods will be used as part of the process. The SEP also outlines the responsibilities of the OMSU, and other relevant government and private institutions in the implementation of stakeholder engagement activities, including the ways in which the OMSU will communicate with stakeholders; the mechanism by which people can raise concerns; provide feedback; and/or make complaints about the OMSU, other implementing partners and the project itself. Furthermore, the SEP will ensure that a consistent, comprehensive, coordinated and culturally appropriate approach to engagement will be undertaken for the project and for addressing environmental and social risks and impacts and that the approach fulfils all relevant legal and regulatory requirements of the Republic of Maldives and is aligned with World Bank's ESF. The involvement of the relevant stakeholders is essential for the success of the project in order to ensure smooth collaboration between project staff and other stakeholders including project beneficiaries to minimize and mitigate environmental and social risks related to the proposed project activities. SEP will identify stakeholders and mechanisms through which they will be included in the engagement process as part of project preparation and implementation and will serve as a record for the engagement process during the project preparation period.

The Project will help GoM to carry out a program of activities, including through the provision of sub-grants (school grants), designed to support measurement of school performance through quality assurance (QA) reviews consisting of both self-evaluation by schools and external evaluations by the Quality Assurance Department (QAD). The school self-evaluations will be conducted by stakeholders including principals, teachers, parents and local communities. This will enable extensive 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 development plans. The results of the quality assurance process will feed back into the school development plan, that would include the development of safe shelters in schools as part of the community disaster management plan, when necessary. The Project will provide school grants to enable schools to implement the recommendations of QA reviews to improve learning in the secondary and higher secondary grades. 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 school development plans. The relevant information on the implementation of these plans will be shared with the stakeholders. This QA process constitutes the citizen engagement mechanism for the Project. A Stakeholder Engagement Plan will be a key document for informing the QA process.

The Borrower prepared and will implement an inclusive Stakeholder Engagement Plan (SEP) proportional to nature and scale of the project and associated risks and impacts. The draft SEP will be disclosed as early as possible and prior to Appraisal. The Borrower will seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. NGOs, students, professional/workers' organizations (including education affiliation and organization), women's groups, teachers' unions, parents' associations/ local/ central/Atoll authorities and departments, universities, /or other donors, could be considered stakeholders. If major changes are made to the SEP, a revised SEP will be publicly disclosed. The

Borrower will engage in meaningful consultations with all stakeholders and establish procedures to ensure disclosure of information that will be accessible to all Maldivians as well as site specific disclosure within the atolls, local authority facilities, schools, and teacher resource centers. Information will also be disclosed on the World Bank website.

A GRM will be established as a part of project activities. Within the GRM, gender-sensitive measures will be put in place to address GBV or SEA/H reported cases. The project GRM will be included in ESMFs and Stakeholder Engagement Plans and accessible to all project affected persons and stakeholders. Labor Management Plans will include a GRM which focuses on Contractor, laborers, and workers' rights.

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

2. REGULATIONS AND REQUIREMENTS

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

2.1 National Requirements

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

Constitution of the Republic of Maldives

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

Decentralization Act (Act no: 24/2019)

Article 68 of the Decentralization Act requires for any development project undertaken in an island, to engage in consultation with the council and other relevant authorities established in the island. The same article also states that any EIA reports developed for any project needs to be shared with the council and information on the impacts and mitigation measures should be shared with the council.

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 inputs to the council regarding various development activities undertaken within the island.

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).

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

The Article 4 of Right to Information Act [1/2014], ratified on 17th January 2014, advocates that everyone who requests for information is entitled to the access of such information in accordance with the law. Article 07 of the law specifies the procedures for requesting for and disclosure of information from and by State institutes. Information must be disclosed within 21 days of such request. An institution may extend the period for 14 more days, if the requested information is of (a) a large quantity, or (b) extensive research is required to collect and disclose the information, or (c) where the work needed to disclose such information would substantially hinder the normal operation of the State body. Information needed urgently to prevent a threat to life or freedom of a person must be disclosed within 48 hours at most. Upon failure to disclose the information within the periods stipulated, the law deems such requests have been denied.

As per article 22, the state is not required to disclose information which, if disclosed would amount to an offense under law, or information if disclosed could cause legal action against the government for breach of confidence or which could prevent the government from receiving similar information in the future. And State institutions could withhold information, which if disclosed could affect the government's ability to manage and administer the economy of the country and information if disclosed prematurely could have a negative impact on a person or a group of people. The state can further withhold information that harms the immunities of the courts and the parliament, information from a closed court hearing and information that reveal details related to a minor, and victims of sexual abuse.

The Act established an independent office of Information Commissioner who receives complaints, is empowered with ensuring compliance of the law, collecting information, conduct inspections, and investigations. Articles 11 and 42 of the Act further obligates an Information Officer in every office to attend to requests and is mandated with submitting an annual report to the Information Commissioner.

Education Act (Act No. 24/2020)

This Act establishes the legal framework required to ensure that the right to education enshrined in the Constitution of the Republic of Maldives is provided to its full extent, it determines the

fundamental pillars of the Maldivian education system, establishes the rights of pupils and educators in relation to education, establishes the responsibilities of the State, parents and educators and establishes various other general principles regarding providing education in the Maldives.

Chapter Nine Gathering, storing and dissemination of data and maintaining data 42. (a) The Ministry shall establish guidelines on the storage and maintenance of all education related data in accordance with the Regulation made under this Act and arrangements for compiling data in accordance with the Regulation. (b) With the exception of institutions that provide higher education, data collection and compilation of data at all other educational institutions in the Maldives shall be carried out by a person designated by the Ministry. Dissemination of information 43. (a) The Ministry shall publish the annual educational related statistics every year (b) Statistics required from schools and other educational service providers in the Maldives shall be provided in accordance with the guidelines determined by the Ministry. In the provision of such information, any information which could damage the reputation and character of any person shall not be published. (c) Statistics and data related to education and activities conducted at schools shall be provided by the parties obligated to conduct such activities, to the party designated by the Ministry, in accordance with the guidelines established by the Ministry. (d) Statistics and data related to education required by researchers and other parties shall be provided in accordance with the guidelines established by the Ministry.

Child Rights Protection Act (19/2019)

This act was enacted to provide for the rights available to children, the duties imposed on them, the responsibilities of family, community, state and other relevant parties with regards to Children. Further, consists of the guidelines relating to provision of care and protection to Children, in order to protect the rights of Children in Maldives.

Section 9 (a) states that every child who has the capability to form their own opinions shall have the right to express their opinions in all matters relating to them.

Section 21 (a) states that every child living in the Maldives has the right to education without any discrimination.

2.2 World Bank Requirements

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

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.

- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrowers 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 considered, or the reasons why it was not.” (World Bank, 2017: 98)

2.3 Stakeholder Engagement Plan and Disclosure

This SEP was consulted with key implementation partner and disclosed publicly 15 June 2022, prior to project appraisal. The objective is to establish a systematic approach for stakeholder engagement, maintain a constructive relationship with them, consider stakeholders’ views, promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle, and ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. The project will set up a project-specific Grievance Redress and Feedback Mechanism for people to report concerns or complaints if they feel unfairly treated or are affected by any of the sub-projects.

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

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

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

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

3. BRIEF SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The Ministry of Education commenced consultations with key stakeholder groups in May and June 2022. The consultations focused on identifying the issues, gaps and challenges in the education sector in the Maldives and eliciting the views and recommendations of the stakeholders. Summary outcomes of these consultations are presented in Table 1.

Table 1: Stakeholder engagements during project preparation

Venue	Date	Type/details of stakeholder/s	Key issues/challenges & assessment of status	Suggestions & recommendations
Virtual meeting and a physical meeting conducted at Kalaafaanu School	15-21 May 2022	Male' and atoll school principals and Male' school SEN leading teachers.	Challenges faced by schools in implementing English, Mathematics, and vocational education for the students, especially to those with complex learning profile (SCLP).	The libraries are too SCLP specialized learning materials need to be developed to cater for their learning needs and made readily accessible for the schools.
			Challenges in implementing Inclusive Education (IE) Policy, individualized curriculum plan (ICP).	
			Challenges faced due to lack of accessible learning resources for SCLP who are in secondary grades.	
			Learning barriers for students with complex learning profile due to	

Venue	Date	Type/details of stakeholder/s	Key issues/challenges & assessment of status	Suggestions & recommendations
			lack of accessible teaching and learning resources for SCLP.	
			Barriers to access for the SCLP due to lack of accessible infrastructure available in schools.	
			Barriers face by teachers and leading teachers in implementing assistive technology in learning due to unavailability of resources and training.	
MoE, Meeting room, Izzudhdeen School Library	22-29 May 2022	Leading Teachers, and SEN teachers of Male' City and Haa Alif DHidhdhoo school.	Aspects that need improvement to enhance students' participation in school activities.	
			Importance of having digital application / software for sign language interpretation.	All areas of accessibility need to be addressed to cater for the students with complex learning profile.
		(Leading teachers are staff of senior management that are direct supervisors of the teachers)	Aspects to improve students learning and participation	

Venue	Date	Type/details of stakeholder/s	Key issues/challenges & assessment of status	Suggestions & recommendations
			Public awareness of IE.	More programs need to be conducted to make the public aware of the ongoing programs.
			Applying accessible resources and student-centered pedagogy to improve students' participation and engagement in classroom activities	
MoE, Meeting room	26.05.2022	Javaabu Pvt.Ltd.	<p>Possibility in enhancing 'Filaa Portal' (The MoE's E-Learning Platform) to incorporate literacy skills of English language and numeracy skills of mathematics to make the schools more resilient to the uncertain periods like pandemic.</p> <p>Duration and the features to make it more interactive and effective.</p>	Enhance Filaa Portal
DoE, Meeting room	26.05.2022	IE Technical Committee	Building capacity of education specialists including DoIE and MoE professionals on	Build institutional capacity on assistive technology

Venue	Date	Type/details of stakeholder/s	Key issues/challenges & assessment of status	Suggestions & recommendations
			assistive technology.	
Virtual meeting	11.05.2022	School Principals and administrative heads of 6 schools from 6 different atolls of the Maldives.	Challenges faced by schools in areas of budget management, procurement management and management of other learning activities due to extremely controlled regulations.	Give proper guidance and assistance in managing the funds given to the disadvantaged schools in terms of human resource and management capacity.
MoE, Meeting room	26.05.2022	Vendors: suppliers of IT equipment and resources	It was noticed that during COVID many suppliers and vendors went bankrupt and also the remaining companies did not want to show interest to the project activities that were being advertised. This is still forecasted for the next one or two years as many of the manufacturers also have been affected and the provisions in the regulations and bidding process are not adjusted to these unforeseen circumstances.	Conduct market analyses to find out what kind of difficulties the vendors are facing in meeting the expectations of the procuring entities. This will avoid this stakeholder group from disengaging totally from activities conducted under the project.

Venue	Date	Type/details of stakeholder/s	Key issues/challenges & assessment of status	Suggestions & recommendations
			<p>Poor planning (e.g. Poor specifications of procurement items) can lead to frustrations during and after the contract is over, leading to a barrier between both the parties; especially in a country where there are very few parties.</p>	
<p>School AV room, Jamaaluddin School</p>	<p>06.06.2022</p>	<p>Selected parents and teachers of students (selected based on the need. Eg. Dealing with students who are below average, average and high performing)</p>	<p>Challenges faced due to unavailability of learning resources especially for the numeracy areas for practical sessions. This is very important for students to understand abstract concepts and complex topics like bearing, simultaneous equations etc.</p>	<p>Prepare the list of goods needed for procurement based on the needs of the schools.</p>

Venue	Date	Type/details of stakeholder/s	Key issues/challenges & assessment of status	Suggestions & recommendations
MoE, Meeting room	06.06.2022	Zone coordinators of School Administrative Division	Discussion on how to provide certificate 3 level courses for those students who are pursuing skills education through the formal system in secondary schools.	Decided to propose the discussion to the Task Team of the World Bank.

3.1 Lessons Learned from Previous Consultations

The World Bank has supported several education and higher education development projects in the Maldives both in the past and the present. They include the Learning Advancement and Measurement Project, Integrated Human Development Project (IHDP) and the Enhancing Education Development Project (EEDP), and the ongoing Maldives Enhancing Employability and Resilience of Youth (MEERY) Project.

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 consulted and encouraged to participate proactively. Moving forward with the implementation of the AEDP, it is imperative that the GoM correctly identifies, rightly engage and responsibly address the inputs and concerns of all stakeholders. In addition, completion of tasks assigned to vendors according to the timeline of the project is crucial. A proper monitoring and evaluation is also a necessary component of a project to achieve its deadline. 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 the SEP as a living document and include the contractors and other workers in stakeholders’ engagement process once they are identified.

During the preparation stage of project development, it is crucial to engage key stakeholders to identify most needed areas in the education sector to enhance inclusive education and implement Inclusive Education (IE) Policy. Therefore, key stakeholders’ views and suggestions were considered in this project. Especially, the leading teachers who currently work with SCLP and IE teachers shared challenges such as unavailability of accessible learning resources for SCLP who are in secondary grades, challenges in implementing individualized curriculum plan (ICP), and barriers in implementing assistive technology due to unavailability of resources and training while implementing IE practices. Moreover, it is crucial to get technical support from consultants who work with the

Department of Inclusive Education so that activities can be designed in a more realistic way. Consultations with key stakeholders will continue throughout the project life-cycle.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

Table 2: Stakeholder identification and classification

Project affected parties	Other interested parties	Disadvantaged and Vulnerable groups
Male and female students of secondary education	Teacher Resource Centers	Children with complex learning profiles (CLP)
Male and female students of higher secondary education	National Institute of Education	Children from poor families with no support to education
Teachers assigned to teach Mathematics, Science, English, and Vocational Education	Department of Inclusive Education	Children from vulnerable families (broken families or families with no proper childcare)
Teachers assigned for teaching to CLPs	Tertiary education institutes	Demotivated students who are at the verge of dropping out due to low academic performance (should check from attendance records)
	Parents and local communities	
	Atoll education offices	
	Education specialists	
	School principals and senior management of schools	
	Education material and ICT equipment suppliers	
	Employers of tourism industry and related services	

	Parent-Teacher Associations	
	Women Development Committees	
	Non-Governmental Organizations	
	Youth Groups	
	Atoll Councils	

4.1 Project Affected Parties

‘Affected Parties’ are, persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as being most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Table 3 provides an assessment of the project’s risks and impacts on individuals, groups, local communities, and other stakeholders that may be directly or indirectly or positively or negatively affected by the project. This assessment further extends to analyse the level of influence that these different stakeholder groups can exercise over the project preparation and implementation processes.

Table 3: Project’s impact on affected parties and their level of influence

Project affected parties	Impact	Influence
Male and female students of secondary education	Moderate	Low
Male and female students of higher secondary education	High	Low
Children with complex learning profiles (CLP)	High	Low
Teachers assigned for teaching to CLPs	High	Moderate
Teachers assigned to teach Mathematics, Science, English, and Vocational Education	High	High
Existing and prospective schools that were/will be elevated to higher secondary levels	High	High
Staff of the Ministry of Education	Moderate	Moderate

4.2 Other Interested Parties

'Other Interested Parties' constitute individuals/groups/entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Table 4 presents the multiple interests of other parties and their level of potential influence over the Project.

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

Other interested Parties	Interest in the project	Influence
Teacher Resource Centers	To act as Training of Trainers (TOTS) of educational programs at the ground level.	High
National Institute of Education	To plan and execute the project interventions related to all components of curriculum diversification	High
Department of Inclusive Education	To plan and execute the project interventions related to vulnerable groups	High
Tertiary education institutes	To extend assistance in quality assurance activities when QAD conducts external school reviews	Low
QAD/ School inspectors	To extend assistance in quality assurance activities in enhancing internal QA and implementing them	Moderate
Parents and local communities	Ensure that their children receive continuous and quality education	Low
Atoll education offices	Responsibility over administration of the schools on the Atolls	Moderate
Education specialists	To contribute to the development of the sector and undertake research	High
School principals and senior management of schools	Responsibility over administration of the schools	High
Education material and ICT equipment suppliers	Support in upgrading the resources of the schools and ensuring their timely supplies	Moderate
Employers of tourism industry and related services	To attract highly skilled graduates	Low
Parent-Teacher Associations	To ensure quality education at the school level	Moderate
Women Development Committees	To ensure the rightful participation of females in all aspects of life including education & support the vulnerable children and their families	Moderate
Non-Governmental Organizations	To support the vulnerable children	Low
Youth Groups	To gain better competencies and skills	Low
Atoll Councils	To enhance the enrollment rates of students and their continuous education	Moderate

4.3 Disadvantaged/Vulnerable Individuals or Groups

‘Vulnerable Groups’ are persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status⁶, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. They would include the following groups.

1. Children with complex learning profiles (CLP)
2. Children from poor families with no support to education
3. Children from vulnerable families (broken families or families with no proper childcare)
4. Demotivated students who are at the verge of dropping out due to low academic performance

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

Table 5: Engagement of disadvantaged/vulnerable groups/persons

Stakeholder Group	Key Vulnerability/disadvantage	Preferred means of notification/consultation	Additional Resources Required
Children with complex learning profiles (CLP)	Autism, visually impaired, hearing impaired	Notified through parents/guardians	Teachers working with CLP. Financial support for transportation etc. to the location of information dissemination
Children from poor families with no support to education	Lags in overall learning outcomes including literacy numeracy	Notified through parents/guardians	Resource persons, counselors, active participatory awareness sessions. Financial support for transportation etc. to the location of information dissemination NGOs and WDCs working in the field to facilitate and coordinate meetings

⁶ Vulnerable status may stem from an individual’s or group’s race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Children from vulnerable families (broken families or families with no proper childcare)	Abandoned, lack of guidance and support	Notified through parents/guardians	Resource persons, counselors, active participatory awareness sessions. Financial support for transportation etc. to the location of information dissemination NGOs and WDCs working in the field to facilitate and coordinate meetings
Demotivated students who are at the verge of dropping out due to low academic performance (should check from attendance records)	Lags in overall learning outcomes including literacy numeracy	Notified through parents/guardians	Resource persons, counselors, active participatory awareness sessions NGOs and WDCs working in the field to facilitate and coordinate meetings

4.4. Summary Stakeholder Needs

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

Table 6: Communication needs of stakeholders

Stakeholders	Key characteristics	Language needs	Preferred means notification/methods	Special needs
PROJECT AFFECTED PARTIES				
Male and female students of secondary education and higher secondary education	Ability to communicate in both English and Dhivehi languages; IT literate; mobile and internet available to most students	• Dhivehi and English	• Via their respective schools <ul style="list-style-type: none"> • Social media • Print and electronic media • Brochures/posters 	Information dissemination must be motivating and attractive for the youth.

Children with complex learning profiles (CLP)	Autism, visually impaired, hearing impaired Need special communication tools appropriate for each sub-group	Dhivehi & sign language	<ul style="list-style-type: none"> • Use of assistive technology • Communication via their respective schools, teachers, parents and guardians 	More current, efficient, and accessible assistive technology
Teachers assigned for teaching to CLPs, and the school management	Ability to communicate in both English and Dhivehi languages; IT literate; able to communicate in sign language; Have access to mobile and internet facilities	Dhivehi and English	<ul style="list-style-type: none"> • Phone, email, letters <ul style="list-style-type: none"> • Print and electronic media • Social media • Print and electronic media • • Formal meetings and group discussions • Workshops and seminars 	
Teachers assigned to teach Mathematics, Science, English, and Vocational Education	Ability to communicate in both English and Dhivehi languages; IT literate; have access to mobile and internet facilities	Dhivehi and English	<ul style="list-style-type: none"> • Phone, email, letters • <ul style="list-style-type: none"> • Formal meetings and group discussions • Social media • Print and electronic media • Workshops and seminars • 	
Staff of the Ministry of Education,	Ability to communicate in both English and Dhivehi languages; IT literate; Have access to mobile and internet facilities	Dhivehi and English	<ul style="list-style-type: none"> • Phone, email, letters • Formal meetings Workshops/seminars 	
OTHER INTERESTED PARTIES				

Tertiary education institutes and education specialists	Ability to communicate in both English and Dhivehi languages; IT literate; Have access to mobile and internet facilities	<ul style="list-style-type: none"> • Dhivehi and English 	<ul style="list-style-type: none"> • Phone, email, letters <ul style="list-style-type: none"> • Print and electronic media • Social media • Workshops/seminars 	
Parents, parent teacher associations and local communities	Mostly communicate in Dhivehi; literacy levels among some parents/community members will be low; low IT literacy	<ul style="list-style-type: none"> • Dhivehi 	<ul style="list-style-type: none"> • Print and electronic media <ul style="list-style-type: none"> • Posters and brochures • Social media • Communication via schools, NGOs & WDCs 	
Education material and ICT equipment suppliers	Literate in both Dhivehi and English; have access to IT facilities; keep alert to market demands and changes	Dhivehi and English	<ul style="list-style-type: none"> • Print and electronic media <ul style="list-style-type: none"> • Social media including Whatsapp group communications 	
Employers of tourism industry and related services	Literate in both Dhivehi and English; have access to IT facilities	Dhivehi and English	<ul style="list-style-type: none"> • Print and electronic media <ul style="list-style-type: none"> • Social media including Whatsapp group communications 	

Non-Governmental Organizations /Women Development Committees (WDC)	Literate in both Dhivehi and English; have access to IT facilities	Dhivehi and English	<ul style="list-style-type: none"> • Print and electronic media <ul style="list-style-type: none"> • Letters & brochures • Social media including Whatsapp group communications
Youth Groups	Literate in both English language and Dhivehi language; IT literate; mobile and internet available to most youth	Dhivehi and English	<ul style="list-style-type: none"> • Print and electronic media • Social media including Whatsapp group communications
Island Councils	Most of the council members are literate in Dhivehi language; mobile and internet available to most council members	Dhivehi and English	<ul style="list-style-type: none"> • Phone, email, letters • Formal meetings • Print and electronic media

5. STAKEHOLDER ENGAGEMENT PROGRAM

Purpose and Timing of Stakeholder Engagement Program

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

- To identify the roles and responsibility of all stakeholders and ensure their participation in the complete project cycle
- Establish a systematic approach to stakeholder engagements that will help the Project identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties
- Assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and implementation

- Promote and provide means for effective and inclusive engagement with project- affected parties throughout the project life cycle on issues that could potentially affect them.
- Ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format with special consideration for the disadvantaged or vulnerable groups.
- Provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the Project to respond to and manage such grievances.
- To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder.
- To allocate budgetary and other resources in the project design, project implementation, and Monitoring and Evaluation (M&E) for stakeholder engagement and participation

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

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

5.1 Information Disclosure

During project preparation and planning, information related to project scope and schedule will be shared with project affected persons and other stakeholders during consultations.

Information about each component and phase of the Project will be provided to the public through media briefings, targeted media articles, information sessions, television/radio programs. The Project will also provide up-to-date information on the website of MoE.

At the appraisal stage, safeguard instruments including Environmental and Social Commitment Plan (ESCP), and SEP and E-Waste Management Plan prepared for this project will be disclosed on the website of MoE and on the World Bank’s external website, after their clearance by the government and the Bank. Additionally, copies of the referenced documents will be kept at the MoE for public reference. Any changes to the approved ESCP, SEP and E-Waste Management Plan would have to follow the same clearance/ approval procedures and disclosure.

During project implementation, project specific safeguard instruments will be publicly disclosed in-country as well as on the World Bank’s external website. The documents and plans to be disclosed include:

- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement Plan (SEP)
- Labour Management Procedures (LMP)

- E-Waste Management Plan (EWMP)
- Monitoring activities undertaken as per ESCP, SEP, LMP, EWMP
- Project quarterly reports and annual reports

Translations of executive summary of all documents prepared by the project in Dhivehi will also be made available to the public through the website of MoE. Information can also be disseminated through digital platform (where available) like Facebook, Twitter, WhatsApp/viber groups, and traditional means of communications (TV, newspaper, radio, phone calls and e-mails) with clear description of mechanisms for providing feedback via mail and / or dedicated telephone lines. All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions.

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

Table 7: Information disclosure plan

List of information to be disclosed	Proposed methods	Timetable/ Location Dates	Target stakeholders	Responsibility
PROJECT PREPARATION AND PLANNING PHASE				
Environmental and Social Commitment Plan, Environmental and Social Review Summary and Stakeholder Engagement Plan	Display of the reports. Public to be informed of the availability of reports via newspaper advertisements published in Dhivehii and English languages and public notices, project website and through other direct communication channels such as mobile/telephone calls, SMS, etc. Online/ virtual consultations to be organised when required.	Website & physical display at the OSMU, MoE. Reports to be disclosed 3 months prior to the commencement of the project and will continue throughout the project period	Affected parties, other interested parties and vulnerable groups	OMSU & MoE

List of information to be disclosed	Proposed methods	Timetable/ Location Dates	Target stakeholders	Responsibility
Project designs, feasibility studies, implementation plans prepared for each component/subcomponent of the project, Labor Management Procedures and E-Waste Management Plan	Display of the documents. Public to be informed of the availability of documents via newspaper advertisements published in Dhivehi and English languages and public notices, project website and through other direct communication channels such as mobile/telephone calls, SMS, social media etc. Online/ virtual consultations to be organised when required.	Website & physical display at the OMSU and MoE as and when they are available	Affected parties, other interested parties and vulnerable groups	OMSU & MoE
Grievance redress mechanism including places to report sexual harassment, and gender-based violence	E-Brochures/ Brochures of GRM in Dhivehi and English, social media, mainstream medias, etc.	Within 03 months of commencement of the project and will continue throughout the project period	Affected parties, other interested parties, and vulnerable groups	OMSU
Project partner agencies contributing to project implementation and their roles and responsibilities	List of agencies published in the websites of MoE, NIE, MoHE, DoIE, mainstream media, social media	Throughout the project period including operational phase	Affected parties, other interested parties, and vulnerable groups	OMSU
PROJECT IMPLEMENTATION PHASE				
Progress reports of the project prepared by	Website/ social media of MoE	Continuously and as and	Affected parties, other	OMSU

List of information to be disclosed	Proposed methods	Timetable/ Location Dates	Target stakeholders	Responsibility
OMSU & other partner agencies and video clips related to project performance	and via emails to stakeholders	when they are ready	interested parties, and vulnerable groups	
Summary outcomes of consultation meetings	Website of MoE	Continuously	Affected parties, other interested parties, and vulnerable groups	OMSU
Status/progress of grievance resolution	Website of MOE	Continuously	Affected parties, other interested parties and vulnerable groups	OMSU & MoE
Capacity building training programs and awareness raising programs planned & conducted	Website of MoE, NIE, MoHE, TRCs, and DoIE, print and electronic media, social media, mainstream media	Continuously	Affected parties, other interested parties and vulnerable groups	OMSU & MoE
Project's key deliverables e.g., subject curricula, project's targeted schools, facilities provided, teacher capacities	Websites of MoE, NIE, MoHE, TRCs, and DoIE, print and electronic media, social media	Continuously	Affected parties, other interested parties and vulnerable groups	OMSU & MoE
Feedback from project beneficiaries and other interested parties on project implementation modalities	Websites of MoE, NIE, MoHE, TRCs, and DoIE, print and electronic media, social media	Continuously	Affected parties, other interested parties and vulnerable groups	OMSU
PROJECT OPERATIONAL PHASE				
Project's achievements, drawbacks, challenges, any remedial measures adopted	Website of MoE	Continuously	Affected parties, other interested parties and vulnerable groups	OMSU

List of information to be disclosed	Proposed methods	Timetable/ Location Dates	Target stakeholders	Responsibility
Feedback from project beneficiaries and other interested parties on project's impacts	Websites of MoE, NIE, MoHE, TRCs, and DoIE, print and electronic media, social media	Continuously	Affected parties, other interested parties and vulnerable groups	OMSU

5.3 Proposed Strategy for Stakeholder Engagement

The project will continue to consult the project affected parties; other interested parties and the vulnerable and disadvantaged groups, specifically on themes listed below, to elicit their views and feedback. Individual and group meetings, mini workshops/focus group discussions, virtual meetings, feedback surveys, social media, community monitoring, etc. will be used to facilitate the consultations on the following:

- Selection of schools for project interventions
- Scope of curricular/syllabi for mathematics, science, English, VE and STEM education
- Resources including ICT facilities to be provided for selected schools
- Guidance to be provided for students
- Teacher capacity development needs
- Measuring school and system performance and engagement of key stakeholders
- Quality assurance for school improvement and engagement of key stakeholders
- Project's impacts on vulnerable/disadvantaged groups
- Stakeholder feedback on project's deliverables, implementation procedures and outcomes

In addition to the above-mentioned topics, stakeholders will also be engaged in consultations on specific environmental and social requirements of the project as shown in Table 8 below.

Table 8: Strategy for stakeholder engagement

Target stakeholders	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
PROJECT PREPARATION AND PLANNING PHASE				
Project implementing agency, members of the project steering committee, and key implementing partner agencies	<ul style="list-style-type: none"> • Overview of environmental & social requirements of the project • Introduction to E & S documents • Stakeholder engagement & information disclosure 	Consultative workshop with ppt. presentations, and a document summarizing the key aspects of the topics to be covered for circulation	At MoE Prior to the commencement of the project activities	OMSU & MoE

Target stakeholders	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
(NIE, TRCs, MoHE, DoIE, QAD etc.)	<ul style="list-style-type: none"> • E & S monitoring and reporting 			
Staff of OMSU, principals and senior management of target schools, and relevant staff of MoE	<ul style="list-style-type: none"> • E&S requirements of the project • Introduction to E & S documents • Stakeholder engagement, Information disclosure & consultations • Labour management procedures • Grievance handling procedures • E & S monitoring and reporting 	Consultative workshop with ppt. presentations, and a document summarizing the key aspects of the topics to be covered for circulation	At MoE Prior to the commencement of the project activities	OMSU & MoE
Project contractors and consultants	<ul style="list-style-type: none"> • E&S requirements of the project • Labor management procedures • E-Waste Management Plan (EWMP) • Occupational Health and Safety Management Plan (OH&SMP) • Community Health and Safety Plan (CH&SP) 	Consultative workshop with ppt. presentations, and a document summarizing the key aspects of the topics to be covered for circulation	At OMSU office Prior to the commencement of the project activities	OMSU
PROJECT IMPLEMENTATION PHASE				

Target stakeholder s	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
Project implementing agency, members of the project steering committee, and key implementing partner agencies (NIE, TRCs, MoHE, DoIE, QAD etc.)	<ul style="list-style-type: none"> • Review of E & S management in the project • Review of stakeholder engagement • Identifying gaps & issues • Recommendations for E & S strengthening 	Review workshop	At MoE Bi-annual workshops	OMSU & MoE
Staff of OMSU, Principals and senior management of target schools, relevant staff of MoE	<ul style="list-style-type: none"> • Review of E & S management in the project • Review of stakeholder engagement • Identifying gaps & issues • Recommendations for E & S strengthening 	Review workshop/meetings	At MoE Quarterly workshops/meetings	OMSU & MoE
Project contractors and consultants	<ul style="list-style-type: none"> • Review of E & S management in the project • Identifying gaps & issues • Recommendations for E & S strengthening 	Review workshop/meetings	At OMSU office Quarterly workshops/meetings	OMSU
Project beneficiary groups and other interested parties (refer Table 2)	<ul style="list-style-type: none"> • Project benefits and impacts • E & S risks and impacts • Project implementation procedures 	Consultative meetings (physical/virtual)	At the offices of individual agencies and other appropriate places such as social centres Bi-annual	OMSU

Target stakeholder s	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
	<ul style="list-style-type: none"> • Enhancing school and student performance • Suggestions Recommendations to enhance benefits and minimize risks 			
PROJECT OPERATION PHASE				
Project implementing agency, members of the project steering committee, and key implementing partner agencies (NIE, TRCs, MoHE, DoIE, QAD etc.)	Review and monitor the establishment and functioning of project's outputs, outcomes, and impacts	At pre-arranged and invited meetings	Quarterly	OMSU & MoE
Staff of omsu, Principals and senior management of target schools, relevant staff of MoE	Review and monitor the establishment and functioning of project's outputs, outcomes, and impacts	At pre-arranged and invited meetings	Quarterly	OMSU & MoE
Project beneficiary groups and other interested parties (refer Table 2)	Feedback on project's operational modalities, project's outcomes and impacts	Consultative meetings (physical/virtual) and feedback surveys	At the offices of individual agencies and other appropriate places such as social centres and surveys via social media/postal questionnaires	OMSU & MoE

Target stakeholder s	Topic(s) of engagement	Method/s used	Location/frequency	Responsibility
			Bi-annual	

5.3 Proposed Strategy/Differentiated Measures to Include the Views of and Encourage Participation by Vulnerable Groups

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

Table 9: Strategy for the engagement of disadvantaged/vulnerable groups

Vulnerable/Disadvantaged group	Strategy
Children with complex learning profiles (CLP)	<input type="checkbox"/> Individual meetings accompanied by parents or their care givers. <input type="checkbox"/> Group meetings in their respective schools. <input type="checkbox"/> Use of audio-visuals and sign language interpreters. <input type="checkbox"/> Establishing help desks in suitable places. <input type="checkbox"/> Engagement of Women’s Development Committees (WDCs) and NGOs working on related fields.
Children from poor families with no support to education	<input type="checkbox"/> Targeted social media and mainstream media posts <input type="checkbox"/> Establish help desks in suitable places. <input type="checkbox"/> Focus group discussions to attain views of the children and their parents. <input type="checkbox"/> Engagement of Women’s Development Committees (WDCs) and NGOs working on related fields.
Children from vulnerable families (broken families or families with no proper childcare)	<input type="checkbox"/> Establish help desks in suitable places. <input type="checkbox"/> Focus group discussions to attain views of the children and their parents. <input type="checkbox"/> Engagement of councils and NGOs working on related fields.
Demotivated students who are at the verge of dropping out due to low academic performance (should check from attendance records)	<input type="checkbox"/> Establish help desks in suitable places. <input type="checkbox"/> Focus group discussions to attain views of the children and their parents. <input type="checkbox"/> Engagement of councils and NGOs working on related fields.

5.5 Public Comments and Feedback/Reporting to Stakeholders

Public/stakeholders will be given a period of 2 weeks to review and submit their comments on the E & S documents disclosed. Such submissions can be made to a designated focal point at the OMSU either verbally or in writing including emails, social media messages etc. Verbal communications either via telephone or in person will be recorded by a member of the OMSU. All

comments received by the project will be reviewed by the OMSU and any decisions made based on public/stakeholders' comments will be communicated to all relevant stakeholders within 05 days after the review meetings. If the project had not been able to make any decision in response to public/stakeholder comments, same will be communicated to the relevant stakeholders with explanations as to why a decision cannot be made.

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

6.1 Resources

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

6.2 Implementation Arrangements

The MoE will be in overall charge of the project. The MoE will implement the project through its institutions, such as the Policy Planning and Research Division (PPRD), the National Institute of Education (NIE), the Quality Assurance Department, the Human Resource (HR) and School Administration (SA) sections, and the Physical Facilities Development Division. The coordination activities in the MoE will be assisted by an Operations and Monitoring Support Unit (OMSU) consisting of a small team of full-time staff with expertise in project management and monitoring, procurement, financial management, and environmental and social safeguards. The OMSU will be headed by a Project Director (PD). The OMSU is responsible for overall implementation of the project ensuring that all environmental and social safeguard requirements are met in accordance with the requirements of the World Bank's Environmental and Social Framework. The Environmental and Social Safeguards Specialist of the OMSU will be responsible for the overall coordination, implementation and monitoring of the SEP including the GRM. In addition, a project officer would be there in the OMSU to support the Environment and Social Safeguards Specialist.

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

Table 10: Responsibilities of key stakeholders in SEP implementation

Stakeholder	Responsibilities
Operations and Monitoring Support Unit (OMSU)	<ul style="list-style-type: none"> • Overall coordination and implementation of the SEP • Provide adequate financial resources for SEP implementation

	<ul style="list-style-type: none"> • Coordinate and collaborate with project partner agencies, other stakeholders, consultants and contractors and ensure their proactive participation in SEP implementation • Maintain regular communications with all relevant stakeholders • Design and produce relevant communication tools and materials • Organize and conduct or facilitate stakeholder engagement activities including meetings and discussions, surveys, awareness raising campaigns etc. • Ensure efficient functioning of the GRM and manage the grievance resolution processes • Document all stakeholder engagement activities and their outcomes, and maintain a systematic database • Review feedback received from all stakeholders, make appropriate decisions in collaboration with project partners and report back to the relevant stakeholders and concerned parties • Monitor and report on the progress of SEP implementation including operations of the GRM • Undertake periodic reviews of SEP and update and disclose whenever necessary
<p>Project implementing Partner Agencies (National Institute for Education, Quality Assurance Department, Department of Inclusive Education, Policy Planning and Research Division, the Schools)</p>	<ul style="list-style-type: none"> • Organize and conduct or facilitate stakeholder engagement activities including meetings and discussions, surveys, awareness raising campaigns etc. with their respective sub-departments, institutions etc. • Document all stakeholder engagement activities and their outcomes, and maintain a systematic database • Review feedback received from all stakeholders, make appropriate decisions in collaboration with project partners and report back to the relevant stakeholders and concerned parties • Undertake periodic reviews of SEP in relation to the aforementioned activities and update and disclose whenever necessary • Devise appropriate methods and tools to disseminate project related information to their respective clients • Conduct stakeholder consultations on project interventions, implementation procedures, anticipated benefits and impacts and timeframes • Participate in the resolution of public grievances • Provide feedback on project related documents disclosed for public scrutiny • Monitor and evaluate the information disclosure programs and stakeholder consultations

Project affected parties	<ul style="list-style-type: none"> • Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities • Use GRM to report grievances and complaints and ensure their satisfactory resolutions • Assist the relevant authorities to develop and implement appropriate mitigation measures • Participate and support the implementation of stakeholder engagement activities in the SEP, ESCP, etc. • Provide feedback on project related documents disclosed for public scrutiny • Provide feedback on project deliverables and outcomes
Other interested parties	<ul style="list-style-type: none"> • Participate in consultations and information dissemination programs, and raise issues and concerns with relevant authorities • Assist the project affected parties to raise their grievances and concerns with the relevant agencies • Assist the project to sustain transparency and anti-corruption measures throughout project implementation and its operations • Assist the relevant authorities to develop and implement appropriate mitigation measures • Provide feedback on project related documents disclosed for public scrutiny • Provide feedback on project deliverables and outcomes

6.3 Estimated Budget

The costs associated with the implementation of the SEP will be provided by MoE. A budget for SEP implementation over a period of 05 years is presented in Table 11. The project will review the SEP every six months to determine whether any changes to stakeholder classification or engagement are required including the project implementation period. If any significant changes were observed, the SEP will be updated and disclosed, and the budget will be revised accordingly.

Table 11: Estimated budget for SEP implementation

No.	Activity	No. Units	Unit Cost (MVR)	No. Months/ Units	Total Amount	
					In MVR	In USD
1	PERSONNEL					
1.1	Environmental and Social Safeguards Specialist/SEP Coordinator	1	34,000	60	2,529,600	163,200
1.2	Monitoring and Evaluation Specialist/GRM Coordinator	1	34,000	60	2,529,600	163,200

2	INFORMATION DISCLOSURE					
2.1	Development of communication tools, methods and materials (animations, e-brochures, e-leaflets, information booklets, posters, display boards, etc. for content creation, editing, layout and printing)			60	775000	50,000
2.2	Newspaper advertisements (in three languages), radio announcements, TV programs, Maintaining Websites etc.			60	387500	25,000
3	STAKEHOLDER ENGAGEMENT					
3.1	Meetings/workshops/FGDs (hiring of venues, refreshments etc.)			60	775000	50,000
3.2	Implementation of Grievance Redress Mechanism					-
3.3	Surveys for monitoring and evaluation of SEP (questionnaire design, printing, questionnaire administration, data processing and analysis etc.)			60	387500	25,000
3.4	Travel Logistics			60	1550000	100,000
	TOTAL				8,934,200	576,400

7. GRIEVANCE REDRESS MECHANISM

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

7.1 Scope of the GRM

Project related GRM will be available for project stakeholders including project affected persons, to submit complaints/grievances, questions, comments, and suggestions, or provide any form of feedback on all project-funded activities. The GRM will be easily accessible to the aggrieved parties irrespective of their ethnicity, religion, gender, and other social and economic differences. Moreover, it will ensure its transparency, efficiency and accountability in grievance handling and responding while winning the confidence of the complainants. The GRM will endeavour to resolve

the grievances locally, and to avoid lengthy court procedures. The GRM will be managed and coordinated by the OMSU to be set up for the Project. The Environmental and Social Safeguards Specialist for the project will act as GRM focal for the project.

Additionally, the GRM will also include special provisions for reporting and responding to the grievance and complaints related to sexual harassment, sexual exploitation and abuse, and gender-based violence. Apart from the GRM, project staff shall also be made aware of the avenues available for victims of sexual harassment, sexual exploitation and abuse, and gender-based violence such as reporting to the Sexual Harassment Prevention Committee at the MoE, established under Prevention of Sexual Harassment Act (16/2014).

7.2 Grievance Redress Committee (GRC)

The MoE will establish a Grievance Redress Committee (GRC) for the AEDP comprising representatives from the (i) project steering committee; (ii) implementing partner agencies; (iii) local councils; (iv) OMSU; and (v) NGOs/Civil Society organizations. Additionally, a legal officer will be appointed to the GRC. Adequate female representation and participation in the composition of the GRC will be ensured.

7.3 Process for Reporting Grievances

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

7.3 Focal Points for Receiving/Recording Grievances

The monitoring and evaluation specialist will be the main focal point for receiving the grievances related to the project. He/She will also be the GRM coordinator. Additionally, there will be designated focal points in each of the project implementing partner agencies. Records of grievances should be maintained online through a grievance log data sheet that should be shared with all implementation partners of the project. Names of the focal points together with their contact phone numbers, and email addresses will be posted at visible locations and other strategic locations and will be visible on all awareness material prepared for the project.

7.4 Screening, Acknowledgement and Closure of Grievances

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

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

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

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

7. 5 Appeal process

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

7.6 Awareness raising on GRM

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

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

7.7 Monitoring and Reporting

7.7.1 Project Level Reporting and Monitoring

The OMSU will assess the functioning of the GRM. The OSMU will be responsible for regular reporting of the GRM status including those grievances received, resolved, and pending. The GRM coordinator will: (i) ensure accurate entry of GRM data into the online log-sheet (data base); (ii) include details of GRM on project quarterly reports; and (iii) review the status of complaints to track which are not yet resolved and suggest any needed remedial action.

The quarterly and annual progress reports will include updated information on the following:

- Status of establishment of the GRM (procedures, staffing, training, awareness building, budgeting etc.).
- Quantitative data on the number of complaints received, the number that were eligible, and the number resolved
- Qualitative data on the type of complaints and answers provided issues that are unresolved
- Time taken to resolve complaints
- Number of grievances resolved and raised/appealed to higher levels
- Summary of resolutions/decisions made
- Satisfaction with the action taken
- Any issues faced with the procedures/staffing or use
- Factors that may be affecting the use of the GRM/beneficiary feedback system
- Any corrective measures adopted

7.7.2 Reporting to the World Bank

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

7.5 GRM Contact Information

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

Name of the Project	Atoll Education Development Project (AEDP)
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Project Agency	Implementing	Ministry of Education
Address		Ministry of Education, Velaanaage 9 th Floor, Ameer Ahmed Magu, Malè
Email		<i>waleeda.mohamed@moe.gov.mv</i>
Website		www.aedp.moe
Telephone		+(960) 3341115

8. STAKEHOLDER ENGAGEMENT PLAN MONITORING AND REPORTING

8.1 Involvement of Stakeholders in Monitoring Activities

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

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

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

Table 12: Monitoring requirements of SEP

No.	Monitoring Indicators	Methods	Timeframe	Responsibility
1.	No. of affected parties, other stakeholders and vulnerable groups engaged in SEP implementation	Review of reports on consultations and progress reports	Quarterly	Environment & Social Specialist and project implementing partners
2.	Type of information shared/disclosed	Review of information material shared and their content	Quarterly	Environment & Social Specialist and project implementing partners

3.	Type of methods used for information dissemination and their effectiveness	Review of communication methods used observations and feedback interviews and consultations with information recipients	Quarterly	Environment & Social Specialist and project implementing partners
4.	Accessibility to information and language used for communication	Records of persons who sought information; observations and feedback interviews and FGDs with stakeholders, feedback survey (annual)	Quarterly	Environment & Social Specialist and project implementing partners
5.	Level of awareness among affected parties, other stakeholders and vulnerable groups on project implementation procedures and potential impacts	Focus group discussions and individual interviews with a cross-section, feedback survey (annual)	Bi-annually	Environment & Social Specialist and project implementing partners
6.	No. consultations conducted with affected parties, other stakeholders, and vulnerable groups	Review of reports on consultations by project and its partners	Bi-annually	Environment & Social Specialist and project implementing partners
7.	Type of issues/concerns raised and discussed at consultative meetings	Review of reports on consultations	Quarterly	Environment & Social Specialist and project implementing partners
8.	Type of decisions made based on consultation outcomes	Review of progress reports	Quarterly	Environment & Social Specialist and project partners
9.	Feedback sessions conducted with affected parties, other stakeholders, and vulnerable groups to report on the decisions made	Review of progress reports, and focus group discussions and individual interviews with a cross-section	Bi-annually	Environment & Social Specialist and project implementing partners
10.	Level of satisfaction among APs, other stakeholders and	Feedback surveys, focus group discussions and	Annually	Environment & Social Specialist and

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

8.2 Reporting Back to Stakeholder Groups

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

8.3 Reporting to the World Bank

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

References

1. Draft Environmental and Social Commitment Plan (ESCP) of the Atoll Education Development Project
2. Draft Appraisal Environmental and Social Review Summary (A-ESRS) of the Atoll Education Development Project
3. Draft Project Appraisal Document (PAD) of the Atoll Education Development Project