



Fiji Social Protection COVID-19 Response and System Development Project - Additional Financing

Updated Draft Stakeholder Engagement Plan

February 2022

Note: This Stakeholder Engagement Plan shall be updated and finalized to include the Component 4: Jobs for Nature 2.0 activities prior to finalization of the Component 4 Operations Manual and prior to implementation of Component 4 activities. This requirement is reflected within the project's Environmental and Social Commitment Plan.

This SEP shall furthermore be adopted within 60 days of the Project Effective Date.

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1. Introduction/Project Description

1. This Stakeholder Engagement Plan (SEP) was designed for the Fiji Social Protection COVID-19 Response and System Development Project P175206 (parent project) in December of 2020. This updated draft is prepared to include Additional Financing P177674. The parent project for the Additional Financing (AF) was approved on February 9, 2021 in the amount of SDR 34.8 million (US\$50 million equivalent). In August 2021, Government of Fiji requested the Bank to provide additional financing to the parent project in the amount of US\$50 million equivalent (IDA Credit) to continue supporting the unemployed and vulnerable affected by the COVID-19 crisis. This SEP combines the parent project and AF and thereby covers both projects and streamlines SEP activities within one document.
2. This SEP will be adopted within 60 days of Project Effective Date and updated to reflect stakeholder consultations on the draft SEP.
3. This SEP will need to be updated by MOE to reflect planned stakeholder engagement activities (including consultation of the updated SEP) and an updated grievance redress mechanism for Component 4; Jobs for Nature 2.0 scheme. At the time of updating this SEP, the operations manual for component 4 had not been initiated and hence, it was not possible to capture the details in this SEP version. The project's environmental and social commitment plan require the project to complete missing details and update this SEP before finalizing the operations manual for component 4 and initiating activity.
4. The Fiji Social Protection COVID-19 Response and System Development Project (parent and AF; henceforth 'the Project') will support unemployed and vulnerable affected by COVID-19 and strengthen the social protection system as a mid-term goal. The project will finance unemployment benefits through the government existing COVID-19 response package. The project will support technical assistance to develop integrated and adaptive social protection policies, strengthening the delivery of existing social welfare programs, and developing new cash-for-works and an unemployment benefits scheme. Project parent objectives will be achieved through Components one and two, and the AF has introduced an update to Component two, and the new components three and four:
 - **Component 1: Provide cash transfers to those made unemployed or underemployed by COVID-19 (USD 45 million).** This component will support cash payments to Fiji National Provident Fund (FNPF) beneficiaries who have lost their jobs or face reduced hours or reduced wages in the formal sector as a result of the COVID-19 crisis and Cyclone Harold. The rapid financing of this component will be disbursed against the expenses for cash transfers paid to three groups of beneficiaries under FNPF: (a) one-time benefits of up to FJD 1,000 to tourism sector workers and up to FJD 500 to those affected by lockdown restrictions; (b) recurring payments of up to FJD 220 per fortnight for those who have become unemployed during the COVID-19 crisis; and (c) recurring payments of up to FJD 220 per fortnight for those who have been on reduced hours or reduced wages during the COVID-19 crisis with a tentative allocation of USD 6.5 million. Note, the component will involve retroactive financing of cash transfers while also allowing the government to extend the timeframe for support.
 - **Component 2: Institutional strengthening (USD 5 million).** Component 2 will focus on strengthening the Fijian social protection delivery system and the relevant policy setting. Activities under this component will enable efficient and timely targeting of existing groups supported by social assistance benefits, as well as the inclusion of other groups of people heavily hit by COVID-19, focusing on workers in the informal economy as well as near-poor groups more broadly. The component will finance TA activities, study tours, workshop and consultative activities, the procurement of office equipment, hardware and software, as well as project management and monitoring and evaluation activities of the project.

- i. **Subcomponent 2.1** will finance i) TA to support development of an integrated Adaptive Social Protection Strategy in Fiji; ii) ensure specific design to address gender inequalities in social protection programs participation, including the design of a comprehensive grievance mechanism (GM) for gender-based violence (GBV) enabling the effective implementation of the government's action plan outlined in the Gendered Impacts of COVID-19 in Fiji; and (iii) activities to strengthen data sharing protocols (i.e. develop, adopt, and implement registry data governance framework, which will define principles, procedures, and responsibilities for data management following good practices in data privacy) and eventually system interoperability with other SP systems based on a unique identifier.
- ii. Subcomponent 2.2 will finance consultancies to provide TA for strengthening and developing social protection delivery systems in Fiji through the following activities:
 - 1. Enhancement of Department of Social Welfare's (DSW) existing delivery systems: TA will be provided to strengthen the linkages required with the ongoing DSW reforms and the development of the inter-government Adaptive Social Protection (ASP) strategy. The TA will include (i) a technical report on necessary changes in DSW SOPs to correspond to the ASP strategy; (ii) enhancement of information systems through procurement of office equipment and hardware and software to link with other SP systems and disaster risk management systems; and (iii) training provided to DSW staff in ASP systems. The TA will include financing for a resident in-house advisor, to be based in the Ministry of Women, Children and Poverty Alleviation (MWCPA) and provide coordination and technical assistance for activities in Subcomponents 2.1 and 2.2.
 - 2. Strengthening the capacity of the National Employment Centre (NEC) including a comprehensive review (functional areas, business processes, expenditures) of NEC with a special focus on existing incentives to register both vacancies and jobseekers, as well as a rapid evaluation of existing programs administered by NEC. It will also develop a report including recommendations on possible interventions (outreach activities, job-search assistance, career counseling, and improved private sector partnerships) to improve matching of registered jobseekers with vacancies; as well as the development of a management information system (MIS) to support improved delivery of employment support programs.
 - 3. Strengthening the impact and sustainability of FNPF cash transfers: The TA will comprise of (i) a technical report to include recommendations for improved targeting of beneficiaries; and (ii) a feasibility study – including an actuarial assessment and implementation roadmap for reforms towards a new unemployment benefit scheme to be introduced in Fiji;
 - 4. Strengthening the design and implementation of temporary employment program including (i) a rapid assessment of the ongoing Stronger Together intervention and a report incorporating lessons learned and recommendations for subsequent phases; and (ii) an operational manual to support the implementation of upcoming program implementation phases, including specific design inputs to strengthen a gender-inclusive implementation approach.
 - 5. Strengthening the delivery of self-employment and entrepreneurship support programs comprising of (i) a rapid assessment of the concessional loan scheme implemented by Ministry of Commerce, Trade Tourism and Transport (MCTTT) and a report incorporating lessons learned and recommendations; and (ii) trainings for MCTTT staff on improved delivery and monitoring of self-employment and entrepreneurship support programs provided in the context of COVID-response.
- iii. **Subcomponent 2.3** will finance monitoring & evaluation and project management including the establishment and operation of an effective project management unit (PMU) and strengthening the capacity of MOE to implement the proposed project.

- **Component 3: Unemployment assistance (US\$40 million)**

1. This component will support cash payments to the unemployed who lost jobs or livelihood in formal and informal sectors because of the COVID-19 pandemic. Eligible Fijians receive FJD 120 per month for a period of six months from August 2021 to January 2022. Eligible beneficiaries are those unemployed in the formal sector with zero FPNF General Account balances, or those affected in the informal sector in geographic locations affected by movement restrictions and business closures in Viti Levu, Fiji's largest island. Eligibility is restricted to beneficiaries that are not current recipients of other government supported transfers, including social assistance payments. The first payment of FJD 360 was made in August 2021 to cater for the three months period ending in October 2021 to eligible Fijians who opted to register for the program and have received their first dose of vaccination by August 31. The second payment of FJD 360 will be paid out in November to cater for the three months ending January 2022 to eligible Fijians who are fully vaccinated by October 31. Future payments with possible extension will be determined by GoF in view of the dynamically evolving situation. Since the Financing Agreement (FA) will be signed after the actual payments have taken place, this component will rely on retroactive financing.
2. The component is implemented in close partnership of government agencies working in close collaboration with the telecommunications sector. MOE signed cash transfer agreements with telecom companies (Vodafone and Digicel) who accept program applications through Unstructured Supplementary Service Data (USSD) for applicants in Viti Levu, and electronically transfer the grants to the individual mobile wallets (M-PAiSA and MyCash) for the approved beneficiaries. The telecom companies opened mobile wallets for applicants without existing accounts. Multiple government agencies have been involved in the program for data validation: Fiji Revenue and Customs Service (FRCS) verifies the identity of applicants using Tax Identification Number (TIN) and Birth Registration Number (BRN); Ministry of Women, Children and Poverty Alleviation (MWCPA), Tertiary Scholarship and Loans Board (TSLB), and FRCS identify the recipients of their respective programs for deduplication; and MOHMS verifies the vaccination status of the applicants.

- **Component 4: Supporting employment opportunities for green, resilient, and inclusive growth (US\$9 million)**

1. This component will support job opportunities through public works for vulnerable Fijians residing in rural areas. Activities will be developed and implemented through interventions aimed at protection, restoration and rehabilitation of natural resources developed with community participation and building on the government's Jobs for Nature initiative. To achieve this objective, the component will finance the labor costs related to the implementation of small grants by village cooperatives, community groups (womens groups, youth groups) selected by MOWE and MOE based on a transparent Expression of Interest process and to be paid to community members in relation to the implementation of eligible activities. A preliminary list of activities that the cooperatives will carry out includes (a) wetlands protection: mangrove planting, seagrass planting, restoring waterways, waste and wastewater management; (b) riverbank rehabilitation and coastal bank protection: mangrove planting, vetiver grass planting; and (c) enhancing biodiversity: forest restoration, land degradation through native tree planting, coral reef protection. Labor costs will be provided for pre-identified job profiles to be carried out under public works, including low-skilled physical labor, administrative tasks, transportation, and care provision for children of female workers. Employment opportunities will be identified with a view to ensure participation of female workers in the program to the extent possible.

2. The implementation of the component will be carried out through a partnership between MOE and MOWE, as well as village cooperatives and community groups. Participating village cooperatives and community groups will be selected by MOWE and MOE through an Expression of Interest (Eoi) process. Grant agreements will include conditions related to the identification, training, selection, and employment of community members in the implementation of activities on the basis of pre-identified job profiles (e.g., low-skilled manual labor, administrative tasks, and organized care for children of employed mothers). Contracts between MOE and village cooperatives will be developed in compliance with the environmental and social framework. The implementation of this component will be supported by technical assistance to be financed under Component 2 through trainings for workers employed by the project as well as an economic inclusion framework to ensure prioritization of vulnerable beneficiaries of social assistance and unemployment support (particularly women) for participation in employment opportunities created by the projects.
5. The Project is being prepared under the World Bank's Environment and Social Framework (ESF). As per the Environmental and Social Standard ESS 10 Stakeholders Engagement and Information Disclosure, the implementing agencies should 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.
6. The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project and any activities related to the project.

2. Stakeholder identification and analysis

7. Project stakeholders are defined as individuals, groups or other entities who:
 - are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and,
 - may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.
8. In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:
 - Openness and life-cycle approach: information sharing and public consultations for the project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
 - Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
 - Inclusiveness and sensitivity: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders, at all times, are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly and the cultural sensitivities of diverse ethnic groups.
9. For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties** – 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 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;
- **Other Interested Parties** – 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; and
- **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

2.2. Affected parties

10. Affected Parties include formal and informal workers, unemployed and underemployed and other parties that may be subject to direct impacts from the Project. Specifically, the following individuals and groups fall within this category:
- Formal workers who have lost their jobs, reduced hours or reduced wages as a result of the COVID-19 crisis and Cyclone Harold.
 - Family members and dependents of workers (formal and informal) who have lost their jobs, had reduced hours or reduced wages as a result of the COVID-19 crisis and Cyclone Harold.
 - Informal workers, including underemployed and unemployed informal workers.
 - Near-poor, women and other groups that are unemployed and underemployed.
 - People at risk of losing their job, having hours or wages reduced as a result of the COVID19 crisis.
 - Village cooperatives wishing to avail of grants under the Jobs for Nature 2.0 program.
 - Persons seeking employment opportunities under the Jobs for Nature 2.0 program, including disadvantaged and vulnerable persons as well as potentially marginalized groups such as women.

2.3. Other interested parties

11. The projects' stakeholders also include parties other than the directly affected communities, including:
- General public
 - Traditional media
 - Participants of social media
 - Politicians
 - Community leaders, including spiritual and faith-based organizations, youth organizations and sporting groups
 - Business sector, including business associations and groups.
 - Other International non-governmental organizations (NGOs)

¹ 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.

2.4. Disadvantaged / vulnerable individuals or groups

12. It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups. Disadvantaged or vulnerable groups often do not have a voice to express their concerns or understand the impacts of a project. Therefore, the project will ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be adapted to account for such groups or individuals' particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.
13. Within the Project, the vulnerable or disadvantaged groups may include, and are not limited to, the following:
 - Poor and near poor
 - Elderly
 - Illiterate people
 - Vulnerable groups working in informal economy
 - People with disabilities
 - Female-headed households
14. Vulnerable groups within the communities affected by the Project will be further confirmed and consulted during the update of the SEP and any different modes of communication to reach vulnerable groups, including people with special needs identified. The project will further ensure ethnically and culturally sensitive communication approaches are developed as needed. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

3. Stakeholder Engagement Program

3.1. Summary of stakeholder engagement done during project preparation

- **Components 1 & 2**
15. Stakeholder engagement activities during project preparation have involved a wide range of information sharing and consultations with members of the unemployment benefit scheme (via FNPF) and with the general public. As the project contributes funds toward the existing scheme, stakeholder engagement activities have been ongoing and include information shared with the scheme members and the public via the FNPF website, Facebook page, mobile app and media releases (newspaper, radio and television). Member and public consultations are being held via live webinars, workplace visits by FNPF officers, questions received and answered via Facebook and the FNPF webpage, and face to face consultations at any of the eight FNPF offices across the country. If a member or the general public have questions about the unemployment scheme or wish to lodge a complaint, they do so via the FNPF webpage, mobile app, FNPF toll-free grievance number, via fax, email or phone at any of the FNPF offices. FNPF also have a page for whistleblowers to lodge anonymous complaints of any nature, such as corruption or sexual assault/harassment or abuse.
 16. Assessment of public forums and stakeholder interviews indicates the presence of two key issues about the employment benefits scheme; confusion about how the scheme works and when payments will be made. These concerns have been captured as part of the project social assessment and relate to the risk of misinformation. This SEP responds to these concerns by mapping out the various platforms and methods that are being used by the project to continuously clarify how the scheme works and inform the public about the timing of payments and other information.

- **Components 3 and 4**

17. Stakeholder engagement during the preparation of the proposed project activities were undertaken 6-16 December 2021 with related Government of Fiji agencies. Stakeholder participating in the consultations included Ministry of Economy; Ministry of Water and Environment; Department of Environment; Fiji Revenue and Customs Service; Fiji National Provident Fund; Ministry of Women, Children and Poverty Alleviation; Tertiary Scholarship and Loans Board; Ministry of Health and Medical Services; Ministry of Communications; and mobile service provider companies (Vodafone and Digicel). General discussion topics included overall design of the project, project activities and financing. For component 3, key topics of discussion included implementation arrangements and financial management related matters. For component 4, key topics included proposed project activities and implementation arrangements. Consultations related to environment and social considerations included assessment of environmental and social assessment of operation of the conditional unemployment assistance program as well as that of the GoF operation of the Jobs for Nature Program. The consultations also provided discussion and presentation of draft environment and social instruments required for the project under the ESF, including the ESMF, SEP, LMP and ESCP.
18. This initial SEP was developed and disclosed prior to project appraisal, as the starting point of an iterative process to develop a more comprehensive stakeholder engagement strategy and plan. It will be updated periodically as necessary, with more detail provided in the first update planned after project approval.

3.2. Summary of project stakeholder needs and methods, tools and techniques for stakeholder engagement

19. The MOE aims to apply the following principles in preparing for, and responding to, the unemployment and underemployment crisis resulting from COVID19 and Cyclone Harold, in order to lessen or reduce the impact of the event on affected communities:
 - Announce early: Announcing and proactively providing information early about available social protection benefits and programs is critical in alerting the affected population and minimizing impact of unemployment and under employment. Failure to announce early will damage the relationship of trust and can intensify the risk.
 - Be transparent by proactively providing timely, complete information on what, who and how social protection benefits will be dispersed and managed.
 - Be in a form and language easily understandable to stakeholders. Language requirements of targeted beneficiary stakeholders need to be taken into consideration, such as using English, Itaukei and Hindi to ensure the information is accessible to all.
 - Actively listen and engage with the community during the project period and beyond to ensure that information is being correctly interpreted and concerns are responded to quickly. Listening also ensures that the emergency response is appropriate to the community's need and context.
20. For Component 1, this strategy and its accompanying communications products will be utilized to quickly and effectively implement a communications and community engagement response in response rising unemployment and underemployment. This strategy adheres to the principles described above and takes a multi-hazard, multi-sector approach to communication activities. The following table outlines the overarching aim of the stakeholder engagement approaches, indicators for measuring stakeholder engagement and potential data sources.
21. For Component 4, this strategy and its accompanying communications products are aimed at ensuring that potentially eligible communities and their village cooperatives are aware of the Jobs for Nature 2.0 program and how to apply for a grant. For the communities of the recipient village cooperatives, the communication strategy aims at ensuring they know of the employment opportunities, and priority beneficiary categories for employment as well as their rights under the program.

3.3 Stakeholder engagement plan

22. This draft SEP will be updated as part of ESCP actions to outline how project stakeholder needs, methods, tools and techniques will be implemented for the Project components. Consultations will be done on the final version of the SEP.

3.4 Proposed strategy for information disclosure

23. In terms of methodology, it is important that the different activities are inclusive and culturally sensitive, thereby ensuring that the vulnerable groups outlined above will have the chance to participate in the Project benefits. Stakeholder engagement will include household-outreach in addition to village consultations, the usage of different languages (as needed), the use of verbal communication or pictures instead of text etc.
24. The following communications mediums are anticipated to be used for project information dissemination under Component 1. The MOE and FPNF are already using the following platforms to disseminate information about the unemployment scheme:

Communication Medium	Type
Electronic and digital media	MOE (Government) and FPNF websites MOE (Government) and FPNF Facebook page MOWE and DOE (Government) websites TV Radio Webinars FNPf Mobile Application Email distribution
Print media	Newspaper Posters Flyers Billboards Press releases
Interpersonal communication	Community outreach: workplace information sessions FNPf Offices (eight offices, drop-ins welcomed) Annual FNPf Members Meeting (November 2020)
Other	Toll-free information and complaints line

3.5 Future of the project

25. Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the SEP and the grievance mechanism.

4. Resources and Responsibilities for implementing stakeholder engagement activities

4.1. Resources

26. The MOE is the Leading Agency responsible for implementation of the project, including overall coordination, results monitoring and communicating with the World Bank on the implementation of the project. MOE have a contractual relationship with the FNPf who are responsible for distribution of the unemployment scheme under Component 1. MOE Environmental and Social Specialist will document and report on activities undertaken as part of the SEP. Both MOE and FNPf have a dedicated communications unit that disseminate information pertaining to the project objectives and outputs. The operations manuals for Components 3 and 4 are currently being prepared by the MOE and will include provisions for stakeholder engagement activities following the principles outlined within this SEP. This SEP will be updated to reflect final stakeholder

engagement consultation and information sharing activities planned for Components 3 and 4 prior to commencement of activities.

27. The SEP expenses are primarily covered through existing MOE, FNPF and DOE communication unit budgets. The project has allocated USD \$25,000 towards implementation of SEP activities for Components 1 and 2; additional budget will be allocated for stakeholder engagement activities under the Component 4 'Jobs for Nature 2.0' Operations Manual; which will be prepared and finalized prior to activities commencing. Information sharing and meaningful consultation with beneficiaries (affected people) and the public form part of the existing activities of the MOE, FNPF and DOE. MOE will allocate sufficient financial resources to cover the costs of the SEP throughout the project implementation period as per their commitment in the ESCP.

4.2. Management functions and responsibilities

MOE will be responsible for carrying out stakeholder engagement activities; working closely together with the FNPF communications unit, DOE and other key stakeholders including local government units and media outlets. A Project Management Unit (PMU) housed in MOE will be set up and operated in an efficient, effective and inclusive manner. The PMU will be responsible for the day-to-day work on project management, coordination, financial management, procurement, monitoring and reporting, environmental and social (E&S) safeguards and project grievance redress. The PMU will coordinate the World Bank implementation support mission twice a year, prepare annual work plan and budget, and prepare semi-annual progress report, and the project MTR report and the government completion report. The MOE will recruit a part-time designated international E&S specialist to oversee coordination and implementation of E&S commitments as per the Environment and Social Commitment Plan (ESCP) and one or more E&S officer(s) from the Climate Change Department will be assigned to support the E&S Specialist. The E&S Specialist will have previous experience working with development agencies (ideally with the World Bank) and a key component of their role will be to build capacity of the supporting Climate Change Department E&S officer(s). Both Specialists will be recruited no later than 60 days after project effective date. There are designated communications units in both the MOE and FNPF that are doing ongoing stakeholder engagement and information sharing. MOE will collaborate with DOE for communications on the Jobs for Nature 2.0 Program, including outreach to the public regarding dissemination of the program information and application process. DOE will work directly with grant recipient village cooperatives and their communities to provide detailed information about the operation of the program, including beneficiary participation requirements, labor standards requirements set out in the LMP and the grievance mechanism. The designated ES project staff will work closely with the existing communications units to monitor and document SEP implementation.

5. Grievance Mechanism

28. The main objective of a Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GM:
- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
 - Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
 - Minimizes the need to resort to judicial proceedings.
29. Due to the differences in the programs, affected persons and institutional arrangements, separate grievance mechanisms are established for Components 1/2 and 4. The grievance process that has been in place for Component 3 is described separately in the Social Audit, annexed to the ESMF, for that activity. The AF will not fund any future payments under Component 4, hence no further elaboration of the GRM for that component is provided within this SEP.

5.1. Description of Grievance Mechanism for Components 1 and 2

30. The Project will use the established FNPF complaints and feedback system to receive, resolve and document all project related grievances. The established grievance mechanism is linked to all project activities, and is widely publicized through the FNPF website (<https://myfnpf.com.fj/index.php/home>) and Facebook (<https://www.facebook.com/Fiji-National-Provident-Fund-106148259555839>). Reference to the mechanism is also linked to the MOE government website (<http://fiji.gov.fj>) and Facebook page (<https://www.facebook.com/FijianGouvernement>).
31. Project beneficiaries and the general public can file grievances relating to the Project activities via the following mediums:
 - Letter, facsimile or through secured email;
 - In person (at our service counters, or with the Complaints Management Officer directly);
 - Through the Fund's toll-free complaints line **11 22 77**;
 - Through the contact form available on the Fund's website;
 - Through any of the Fund's official social media channels.
32. The overall GM will be managed by FNPF staff in collaboration with the PMU Environmental and Social (ES) Specialist. The ES Specialist will work closely with the FNPF Human Resources unit who are responsible for managing the complaints and feedback system. Details about the complaints management system are available on the FNPF website:
<https://myfnpf.com.fj/~myfnpf38/index.php/complaints?highlight=WyJncmlldmFuY2VzIl0=>
33. The GM includes the following steps:
 - Step 1: Member lodges complaint
 - Step 2: FNPF receives/accepts the complaint.
 - Step 3: Complaint will be acknowledged (within 24 hours or on the next working day)
 - Step 4: Complaint will be assigned to respective Business Unit and shared with the Project the ES Specialist.
 - Step 5: Complaint resolution
 - Step 6: Complaint resolved
 - If the complaint is not resolved, the applicant may escalate the complaint through the Fund's Review of Decisions Scheme, provided that it meets the Review of Decisions Scheme guideline. If the complaint is not eligible or the applicant is not happy with the decision of the Review of Decisions Scheme Committee, they have the option of raising concerns with the Reserve Bank of Fiji. Once all possible redress has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.
34. GM timeframe. The process of grievance resolution is not expected to take longer than 5 working days for normal complaints. Complaints that require changes to the system or further investigation may take longer.
35. Confidentiality and complaints of a sensitive nature. All complaints are treated with the utmost confidentiality and any information provided is used strictly for the purposes of resolving grievances. FNPF retain professional counselors within the human resources unit, for staff, members of the general public. Complaints received pertaining to gender-based violence, sexual assault or harassment are referred to these trained professionals.
36. A separate whistleblower scheme is also available to the public to report grievances relating to accountability and integrity. Project stakeholders are invited to report concerns relating to fraud, theft, use of inside information, bribes, and gifts (etc), inappropriate disclosure of confidential information, conflicts of interest and illegal acts. Details on how to lodge a complaint through the whistleblower scheme are available here:
<https://myfnpf.com.fj/index.php/about-fnfpf/become-a-whistleblower?view=form>

The National Environmental and Social Officer designated within the PMU will track and classify project related grievances and liaise with the grievance mechanism managed by FNPF.

5.2. Description of Grievance Mechanism for Component 3

The grievance process that has been in place for Component 3 is described separately in the Social Audit for that activity. The social audit is located within the Project's Environmental and Social Management Framework; as the component is entirely financed retroactively, the social audit provides an assessment of the existing GRM; no future cash payments will be made under Component 4.

5.2. Description of Grievance Mechanism for Component 4

The following section must be updated once the Component 4 Operations Manual for Jobs for Nature 2.0 is under preparation. This commitment is reflected in the project's ESCP.

The project has established a grievance mechanism within MOE and DOE to receive, resolve and document all project related grievances related to the Jobs for Nature 2.0 program. Potential complaints may be of three main categories.

(i) **Complaints related to the social and environmental impacts of the Jobs for Nature 2.0 program works.**

These complaints will be received and addressed by DOE. Grievances may be lodged through the following means:

- By Phone: [Monica Lal, Principal Environment Officer and 3311699]
- By email: [Monica Lal, Principal Environment Officer and monika.lal@govnet.gov.fj]
- In person: [Monica Lal, Principal Environment Officer and 318 Toorak Rd, Suva]

(ii) **Complaints related to operation of the Jobs for Nature 2.0 program.**

These complaints will be received and addressed by MOE. Related grievances may include such matters as the selection of and approval of grant applications and operation of the village cooperatives in relation to awarded grants. The latter may include issues such as distribution of benefits within recipient communities and use of grant funds. Grievances may be lodged through the following means:

- By Phone: [Monica Lal, Principal Environment Officer and 3311699]
- By email: [Monica Lal, Principal Environment Officer and monika.lal@govnet.gov.fj]
- In person: [Monica Lal, Principal Environment Officer and 318 Toorak Rd, Suva]

37. The GM includes the following steps:

- Step 1: Complainant lodges complaint
- Step 2: DOE or MOE receives/accepts the complaint.
- Step 3: Complaint will be acknowledged (within 24 hours or on the next working day)
- Step 4: Complaint will be assigned to respective unit or office within DOE or MOE and shared with the Project the ES Specialist.
- Step 5: Complaint resolution
- Step 6: Complaint resolved
- If the complaint is not resolved, the applicant will be provided with additional options to escalate the complaint. Details of complaint escalation will be confirmed during the next update of this SEP. Once all possible redress has been proposed and if the complainant is still not satisfied then they should be advised of their right to legal recourse.

38. GM timeframe. The process of grievance resolution is not expected to take longer than 10 working days for normal complaints. Initial assessment of the complaint will seek to confirm if the issue is related to the project funded activity and confirm other relevant details. Complaints that require further investigation may take longer, in which case the complainant will be advised.
39. Confidentiality and complaints of a sensitive nature. All complaints are treated with the utmost confidentiality and any information provided is used strictly for the purposes of resolving grievances. Complaints received pertaining to gender-based violence, sexual assault or harassment are referred to trained professionals in the Ministry of Women (arrangement to be confirmed in next SEP update).

(iii) **Complaints related to labor conditions of workers by village cooperatives and community groups that have been awarded grants under the program.**

These complaints will be referred to the grievance mechanism for workers described separately in the Project Labor Management Procedures.

The operation of the project's Grievance Mechanism will be regularly monitored. Patterns of complaints will be assessed for required adjustments or corrections to the project's operation or requirements.

6. Monitoring and Reporting

40. The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP.
41. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by the ES Specialist and referred to Project Manager. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.
42. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:
 - Publication of a standalone annual report on project's interaction with the stakeholders
 - Key Performance Indicators (KPIs) will be developed and monitored by the project on a regular basis, the KPIs will be included in the finalized in the updated and final SEP.

Further details will be outlined in the Updated SEP, to be prepared within 60 days of effective date.

7. Disclosure

The ESCP, ESMF, LMP and SEP are publicly disclosed on the websites of the World Bank and MOE. Award of grants for Jobs for Nature 2.0 will be disclosed on the DOE website within 30 days of award.