



MINISTRY OF FINANCE
Central Services Unit

STAKEHOLDER ENGAGEMENT
PLAN TCRTTP CERC - EAP

CSU Safeguards – MAY 2020



Australian Government
Department of Foreign Affairs and Trade

Contents

Abbreviations	ii
1. Introduction	1
2. Objectives	1
3. Stakeholder Engagement Activities.....	2
4. Stakeholder Identification.....	2
5. Stakeholder Engagement Program	3
6. Grievance Redress Mechanism	4
Annex 1. GRM webpage on MOH website.....	5
Annex 2 Proposed wording for Project description and website links to the Project	8
Annex 3 CSU Complaints Register	9
Annex 4. Proposed Wording for Press Release	10

Abbreviations

CERC	Contingency Emergency Response Component
COVID 19	Coronavirus Disease 2019
CSU	Central Services Unit with the Ministry of Finance (Supports WB Projects in Tonga)
EAP	Emergency Action Plan
E&S	Environmental and Social
ESMF	Environmental and Social Management Framework
GRM	Grievance Redress Mechanism
GOT	Government of Tonga
HCF	Health Care Facility
IPCP	Infection Prevention and Control Plan
MWMP	Medical Waste Management Plan
MOF	Ministry of Finance
MOH	Ministry of Health
MOI	Ministry of Infrastructure
SEP	Stakeholder Engagement Plan
TCRTP	Tonga Climate Resilience Transport Project
WB	World Bank
WHO	World Health Organisation

1. Introduction

An outbreak of COVID-19 caused by the 2019 novel coronavirus (SARS-CoV-2) has been spreading rapidly across the world since December 2019. On March 11, 2020, the World Health Organization (WHO) declared a global pandemic. Similarly, the Government of Tonga on March 20, 2020 declared at state of emergency because of the risks of COVID – 19. As of April 14, 2020, the COVID-19 global outbreak has resulted in an estimated 2,019,320 confirmed cases and 119,483 deaths in 213 countries¹. Tonga remains one of the less than 20 countries without a confirmed COVID-19 case, but the risks are high that COVID-19 could spread widely and rapidly, should the disease reach the country.

The global COVID-19 outbreak, if it reaches the Kingdom of Tonga, would place considerable constraints on an already challenged health system and cause possible loss of life. Health Services in Tonga are largely publicly funded and delivered by the Ministry of Health (MOH) through a network consisting of one National Referral Hospital, three outer-islands hospitals, and 24 lower level facilities. The Vaiola National Referral Hospital is a 200-bed facility based in the capital city Nuku'alofa, which is on the kingdom's main island, Tongatapu. Seventy three percent of the population of Tonga lives on Tongatapu and roughly a third (35%) of the population live in the greater Nuku'alofa area. Significant disruptions in global and regional supply chains, higher prices, and economic losses in Tonga's market countries will also be felt internally as Tonga relies heavily on imported goods and services. Border closures and travel restriction are also significantly affecting the tourism industry, which Tonga's economy relies on. Most Tongan businesses are small and medium-sized enterprises, which are especially vulnerable to economic disruptions. Given the current outbreak of COVID-19 pandemic worldwide, the Government of Tonga (GOT) has effectively closed its borders to prevent the virus from entering the country.

Tonga currently has limited ability to prevent, detect and control a COVID19 outbreak. To prepare the country for a possible outbreak of COVID-19 the GOT and World Bank (WB) have activated Component 4 of the Tonga Climate Resilience Transport Project (TCRTP – P161539) - the Contingency Emergency Response Component (CERC) to prepare the country for responding against COVID-19 and assist reduce the immediate impact of the health crisis and strengthen the health sector. An Emergency Action Plan (EAP) has been developed to assist, manage and direct the activities proposed under the CERC.

An Environmental and Social Management Framework (ESMF) was submitted to manage potential environmental and social (E&S) safeguards risks and impacts associated with any activities proposed in the EAP. This Stakeholder Engagement Plan (SEP) is a requirement of the ESMF to assist the management of information, advice and grievances associated with the implementation of the EAP (The CERC - EAP will hereafter be referred to as the "Project").

The Government of Tonga (GOT) through the Ministry of Finance (MOF) Central Services Unit (CSU) is implementing the Project in close coordination and cooperation with the Ministry of Health (MOH).

2. Objectives

The key objectives of the SEP are:

- To inform and build awareness of the people of Tonga as our key stakeholders of the project

¹ John Hopkins University & Medicine – Coronavirus Resource Centre (27 April 2020)

- To develop and maintain sound relationships with project stakeholders
- To enable stakeholders to access the necessary information required to mitigate any of the environmental or social risks associated with the project
- To support the CERC EAP objectives of strengthening Tonga’s ability to prepare for and respond to the COVID-19 pandemic

3. Stakeholder Engagement Activities

All existing WB Projects and their activities are disclosed on the various Ministries (Implementing Agencies - IAs) websites. The Project and the CERC – ESMF will be uploaded to the Ministry of Infrastructure website (MOI - as the CERC was initiated through this Project), the Ministry of Health (MOH – focal point for activities) and the Ministry of Finance (IA for the Project). Additional documents will be added, including:

- Infection Prevention and Control Plan (IPCP)
- Medical Waste Management Plan (MWMP)
- A webpage describing the Grievance Redress (GRM) mechanism for managing enquiries and complaints
- A GRM feedback Form for stakeholders to submit formal feedback/complaints
- This SEP

4. Stakeholder Identification

The Project activities primarily consist of medical procurement and the administrative management of the procurement. The Project activities will generate very low levels of environmental and social risk with regards to grievances and the need for extensive public consultation. Understanding and dissemination of the general messaging and communication for COVID-19 (already underway) is not the responsibility of this Project. Table 1 details the key stakeholder groups that will require access and awareness of the information relating to the Project activities.

Table 1 Key stakeholders

Stakeholder	Need for engagement
Ministry of Health	Key MOH staff need to have an understanding of the Project to respond to enquiries and for timely response to changes in Project activities. Additional knowledge of the ICP and the MWMP will be required by staff to facilitate implementation.
Ministry of Infrastructure	Key MOI staff related to the TCRTP need to understand the links between the Project and the TCRTP to guide enquires and to assist in any administrative issues related to the Project
Ministry of Finance/Central Services Unit	Key MOF/CSU staff need to have an understanding of the project to respond to enquiries and to quickly manage changes in the Project activities
Other GOT Ministries	Basic awareness of the Project to direct enquiries
Hospital medical staff	Hospital medical staff will need to know the basic information around the project activities to assist and direct any enquires regarding the Project. Responsibility for the use of the equipment lies with the MOH. Protocols around the use and disposal of the medical supplies purchased through the project will be managed through the IPCP and the MWMP. Staff need to be aware of these Plans and their protocols.
Allied health and hospital support organisations and staff	Allied health and hospital support staff (e.g. waste management staff) will need to know the basic origins of the Project to help direct any enquiries. Protocols around the use and disposal of the medical supplies

	purchased through the project will be managed through the IPCP and the MWMP. Staff need to be aware of these Plans and their protocols.
General public	Need to be aware of the Projects activities and have knowledge of and access to the information relation to the Project and access to the GRM

5. Stakeholder Engagement Program

Table 2 details the type of consultation/communication that will be required for each of the stakeholder groups for the Project. This should be seen as a guide and not a definitive list. Where opportunities present themselves for improved or additional communication or messaging these should be considered. Communication channels and messaging should be linked to existing and approved COVID-19 communication material and channels.

Table 2 Stakeholder engagement strategies

Stakeholder	Strategies for engagement
Ministry of Health	<ul style="list-style-type: none"> • MOH to nominate focal person/department for enquiries and complaints • All documents relevant to the Project to be made available on the MOH website including: <ul style="list-style-type: none"> ○ CERC – EAP ○ CERC - ESMF ○ IPCP ○ MWMP ○ CERC SEP (this document) • Clear link to documents and GRM on MOH Website • Where applicable, signs, fact sheets and public messaging to reference link to focal person/department • GRM Webpage (Annex 1) to be added to the MOH website
Ministry of Infrastructure	<ul style="list-style-type: none"> • Project Manager for TCRTTP to brief TCRTTP staff on the details of the Project through weekly staff meetings • Brief description of the activation of the CERC with link to the documents (including the GRM) on the MOH website to be uploaded onto the TCRTTP website (Annex 2)
Ministry of Finance	<ul style="list-style-type: none"> • CSU Program Manager to brief staff on the details of the Project through weekly staff meetings • CSU Programme Manager to brief MOF CEO and HODs on the details of the Project through the existing regular MOF briefings • Brief description of the Project with link to the documents (including the GRM) on the MOH website to be uploaded onto the CSU and MOI websites (Annex 2) • Clear link to documents and GRM on MOF website • GRM Webpage (Annex 1) on MOF website
Other GOT Ministries	<ul style="list-style-type: none"> • Where applicable brief description of the Project with link to the documents on the MOH website to be uploaded onto the TCRTTP website (Annex 2)
Hospital medical staff	<ul style="list-style-type: none"> • Hospital and MOI to brief medical staff on the details of the Project through normal staff meetings • Where applicable signs, factsheets and public messaging to include details of MOH focal point for enquiries and complaints
Allied health and hospital support organisations and staff	<ul style="list-style-type: none"> • Hospital and MOI to brief allied health and associated contractors on the details of the Project through normal briefings • Where applicable signs, factsheets and public messaging to include details of MOH focal point for enquiries and complaints

General public	<ul style="list-style-type: none"> • Where appropriate, signs, factsheets and public messaging to include details of MOH focal point for enquiries and complaints • Where appropriate radio and SMS messaging include contact (website) details for enquiries and complaints • Press release via radio and newspaper (Annex 4)
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6. Grievance Redress Mechanism

The Project GRM will be managed by the MOF CSU, however the focal point for receiving enquiries or complaints will be the MOH. The MOH will nominate a designated person or contact point to manage and action complaints or feedback through the process below.

The MOH will:

- Receive and record any enquiries complaints and acknowledge the enquiry or complaint within 24 hours.
- Generally, most complaints or request for information can be dealt with immediately by being courteous and providing the required information through immediate discussion. The complaint/inquiry should be recorded by the MOH focal point. Where the person wants to submit a formal complaint, they should be directed to the GRM webpage (Annex 1).
- Where a formal complaint has been made these will go to the CSU to manage further action.

The MOF CSU will

- Receive formal complaints from the MOH focal point
- Forward the feedback to the relevant agency for assessment and action as necessary, including MOF and MOH (within 3 days)
- Respond to the stakeholder with the agreed response or action, then confirming adequacy (within 10 days)
- Settle the grievances via consultation with all stakeholders (within 14 days)
- Forward any unresolved cases to relevant authorities.

Many grievances will be minor and these should be resolved on site by the MOH focal point or operational staff, who should adopt a good-faith and flexible approach. Concerns relating to personal or community safety should be given high priority with the MOH adopting a precautionary approach wherever practicable. All complaints whether informal (i.e. resolved by the MOH focal point) or formal (lodgement of complaint Form A) will be passed onto the CSU to be logged in the Complaints Register (Annex 3).

It is vital important that appropriate signs are erected at the sites of all activities providing the public/internal stakeholder with relevant information. If the grievance is not remedied to the acceptance of the complainant, the MOF CSU shall convey the complaint details for escalation as appropriate. If in-house escalation does not resolve the issue, the complainant will have recourse to the Tongan legal system and the World Bank Grievance Redress Service (<http://www.worldbank.org/grs>). Details of the GRM to be made available on the MOH and MOF websites.

Annex 1. GRM webpage on MOH website

Enquiries and complaints

All World Bank projects require a Grievance Redress Mechanism (GRM) that allows affected people/beneficiaries, project staff/volunteers and other stakeholders to provide feedback or to seek satisfactory resolution to grievances they may have in relation to implementation of the Project and its activities. The GRM helps to ensure that the rights and interests of affected people/beneficiaries are protected, and concerns are adequately addressed. The grievance process is based upon the premise that it imposes no cost to those raising the grievances (i.e., complainants); that concerns arising from project implementation are adequately addressed in a timely manner; and that participation in the grievance process does not preclude pursuit of legal remedies under national law. It acknowledges the World Bank's commitment to "do no harm".

The grievance mechanism involves the following:

Stage 1: Any person seeking further information or has a complaint can make enquiries directly to the Ministry of Health (MOH) focal point ([insert hyperlink to contact details](#)). The MOH will seek to provide the relevant information or discuss the issue directly. Response to general enquires and low-level complaints that have not gone to Stage 2 should be responded to within 3 days.

Stage 2: If the information received or the resolution of the complaint is not satisfactory the person can submit a formal complaint/enquiry utilising the Form A ([insert hyperlink to complaint form](#)). This Form will be elevated to the Ministry of Finance (MOF) Central Services Unit (CSU) for action. A response from the CSU with proposed strategies to resolve the issue or with the required information will be sent to the person within 10 days of receipt by the CSU.

Stage 3: If the person is not dissatisfied with the stage 2 process, the CSU Programme Manager will establish a review committee to assess and discuss the issue with the person making the complaint or enquiry to develop an agreed resolution. Discussions and resolution to be undertaken within 14 days of receipt.

Stage 4: If the aggrieved person is still dissatisfied following review by the grievance committee, the case may be referred to legal proceedings in accordance with national laws and procedures.

Contact details for enquiries or complaints details are provided ([inert hyperlink to MOH focal point](#))

Form A

Name of Person Making the Complaint <i>(information is optional and always treated as confidential)</i>
Address or contact information for Person Making the Complaint <i>(information is optional and confidential)</i> E-mail Phone Address
Location where complaint/problem occurred <i>(write in)</i> Date Time
Brief Description of Complaint <i>(provide as much detail and facts as possible attach additional pages if required)</i>
Please include any other information that you consider relevant, other matters or facts, including supporting documents <i>(attach additional pages if required)</i>
Do you request that your identity be kept confidential?

Yes No

Have you previously raised your complaint?

Yes *(if YES, please provide the following)*

- When, how and with whom the issues were raised

- Please describe any response received from and/or any actions taken by the MOH. Please also explain why the response or actions taken are not satisfactory

No *(if NO, why not?)*

Signature of the person making the complaint

Signature

Date:

Please send the complaint to

Grievance Redress Mechanism
CSU *(insert appropriate Project and address)*

Email *(insert)*

Phone *(insert)*

Complaints may be submitted by phone, e-mail on our website *(insert URL)* or hand delivered

Annex 2 Proposed wording for Project description and website links to the Project

1. Proposed wording for the TCRTTP website link to the Project on MOH/MOF website

To assist prevent, but also to prepare the country for a possible outbreak of COVID-19 the Government of Tonga and World Bank have activated Component 4 of the Tonga Climate Resilience Transport Project (TCRTTP – P161539) - the Contingency Emergency Response Component (CERC) to immediately assist strengthen the health sector and reduce the possibility or impact of the health crisis.. For the CERC Project documents and contacts please go to [\(insert hyperlink to document on MOH webpage\)](#)

1. Proposed wording for the MOF website link to MOH

To assist prevent, but also to prepare the country for a possible outbreak of COVID-19 the Government of Tonga and World Bank have activated Component 4 of the Tonga Climate Resilience Transport Project (TCRTTP – P161539) - the Contingency Emergency Response Component (CERC) to immediately assist strengthen the health sector and reduce the possibility or impact of the health crisis. This Project is being implemented by the Ministry of Finance (MOF) through by the Central Services Unit [\(insert hyperlink to CSU\)](#). The Ministry of Health is the focal point for the Project and all project documents and information can be found at [\(insert hyperlink to document on MOH webpage\)](#)

Annex 3 CSU Complaints Register

GRIEVANCE REDRESS MECHANISM (GRM) DATABASE																		
No.	Grievance Record No.	Name of the Complainant (Can be anonymous also)	Gender (Male = M and Female = F)	Date the complaint was Received	Year	How was complaint received (in-person by letter, phone, fax,	Date the complaint was	Date the complaint was	Nature of Complaint (brief description)	Was the case resolved? (Yes = 1 and No = 0)	If resolved, within how many days was the case resolved?			Case under Investigation (Yes = 1 and No = 0)	Case not resolved (total of columns N, U, and P should be equal to cases under P)			Remarks (if any)
											30 days or less than 30	Between 31-60 days	Over 60 days (put 1 if Yes)		Not resolved for 30 days (put 1 if Yes)	Not resolved for 60 days (put 1 if Yes)	Not resolved for over 60 days (put 1 if Yes)	
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TOTAL										0	0	0	0	0	0	0	0	
GENDER SUMMARY																		
Cases by Gender		Number of cases % by Gender																
1. Male		0 0																
2. Female		0 0																
Total		0 0																
SUMMARY BY YEAR																		
	Year	Number of Cases	% by Year															
	2019	0	0															
	2020	0	0															
	2021	0	0															
	2022	0	0															
	2023	0	0															
	2024	0	0															
	2025	0	0															
	Total	0	0															
SUMMARY RESULTS																		
	Case Status	Number of Cases	% by Cases															
	I. Resolved																	
	- 30 days or less than 30 days (put 1 if Yes)	0	0															
	- Between 31-60 days (put 1 if Yes)	0	0															
	- Over 60 days (put 1 if Yes)	0	0															
	Total Resolved	0	0															
	II. Under investigation																	
	- Not resolved for 30 days (put 1 if Yes)	0	0															
	- Not resolved for 60 days (put 1 if Yes)	0	0															
	- Not resolved for over 60 days (put 1 if Yes)	0	0															
	Total Under Investigation	0	0															
	GRAND TOTAL OF CASES	0	0															

Annex 4. Proposed Wording for Press Release

In response to the COVID-19 pandemic, the Government of Tonga has requested the World Bank to trigger the Contingency Emergency Response Component under the Tonga Climate Resilience Transport Project and allocate approximately US\$ 2.9 million from unallocated funds in the project to strengthen Tonga's health systems.

Activities to be financed will be coordinated and implemented in accordance with World Bank and the Tonga National Health Strategic Plan and the COVID 19 National Action Plan developed by the Ministry of Health. The Ministry of Health will be implementing the activities with the Ministry of Finance's Central Services Unit managing the Project. An Emergency Action Plan has been developed to procure and distribute essential medical equipment and material to help prepare Tonga for a possible outbreak of COVID-19. More information and details of the activities are on the Ministry of Health and Ministry of Finance Websites.