



Kingdom of Tonga

MINISTRY OF INTERNAL AFFAIRS

Tonga Pathways to Employment and
Resilience Project (P181000)

STAKEHOLDER ENGAGEMENT PLAN

DRAFT

July 2024

Abbreviations and Acronyms

CESMP	Contractor Environmental and Social Management Plan
COC	Code of Conduct
CRPD	Convention on the Rights of Persons with Disabilities
CSU	Central Services Unit (MOF unit supporting WB Project implementation)
EA	Executing Agency
EHS	Environmental Health and Safety
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
E&S	Environmental and Social
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GOT	Government of Tonga
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IDA	International Development Association
ILO	International Labour Organization
MET	Ministry of Education and Training
MEIDECC	Ministry of Meteorology, Energy, Information, Disaster Management, Environment, Climate Change and Communications
MIA	Ministry of Internal Affairs
MOF	Ministry of Finance
MOI	Ministry of Infrastructure
MTED	Ministry of Trade and Economic Development
OHS	Occupation Health and Safety
P2ER	Tonga Pathway to Employment and Resilience Project
PAP	Project Affected People
PMU	Project Management Unit
PSC	Project Steering Committee
SEA/SH	Sexual Exploitation Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan

SET	Skills and Employment for Tongans (WB project)
TOR	Terms of Reference
TVET	Technical and Vocational Education and Training
WB	World Bank

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1. INTRODUCTION

The Government of Tonga (GOT) has requested funding for the Tonga Pathway to Employment and Resilience (P2ER) Project under the World Bank (WB) International Development Association 20 (IDA20) grant. The P2ER project aims to increase high school completion rates of poor and vulnerable youth, and to facilitate their transition to the labour market, and in case of an eligible crisis or emergency, respond promptly and effectively to it. It follows on from the Skills and Employment for Tongans (SET) which is currently under implementation and closing in December 2024.

The P2ER will comprise of four components:

- 1. Pathways to Jobs and Entrepreneurship for Vulnerable Tongan Youth** to provide opportunities to poor and vulnerable youths graduating from secondary school and their families (with eligibility restricted to CCT beneficiaries) to transition from school to the labour market, and comprises two subcomponents:
 - 1.1. Pathways to Jobs (P2J)
 - 1.2. Pathways to Entrepreneurship (P2E).
- 2. Improving Education Outcomes Among Vulnerable Tongan High School Students** which aims to ensure that about 2,500 beneficiaries of the cash transfer program supported under the Skills and Employment for Tongans (SET) can complete and graduate from upper secondary education, and comprises two subcomponents:
 - 2.1. Provision of cash transfers to conditional cash transfer (CCT) beneficiaries
 - 2.2. Providing accompanying services to CCT families.
- 3. Systems strengthening, Project Management and Monitoring and Evaluation** which aims to ensure the adequate management and monitoring of the proposed project while strengthening the government's capacity regarding the administration and management of social assistance information systems and disaster response and comprises two subcomponents:
 - 3.1. Systems strengthening
 - 3.2. Project Monitoring Unit (PMU) and Monitoring and Evaluation.
- 4. Contingency Emergency Response Component (CERC)** provides rapid access to non-committed resources of the project to support response to an eligible crisis or emergency.

The implementing agency (IA) for the project will be the Ministry of Internal Affairs (MIA) and the Ministry of Finance (MOF). MIA will implement components 1, 2, 3.1 and 3.2. Component 3.3 will be implemented by MOF. MIA is the central government agency responsible for social protection policies and programs in Tonga. MIA will also work with other technical agencies and under the auspices of Project Steering Committee (PSC). The PSC will oversee implementation with the following agencies: MIA, MOF, Ministry of Trade and Economic Development (MTED), and the Ministry of Education and Training (MET).

P2ER is structured to develop and implement activation measures for CCT households with youths entering the labour market.

The P2ER is being prepared under the WB Environmental and Social Framework (ESF).¹ Per Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure, the IA 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, or intimidation.

The social risk rating for the project have been assessed as moderate. The key social risks include real or perceived inequities in access to project-supported careers counselling workshops and trainings, participation in the apprenticeship program placements and entrepreneurship bootcamps, provision of entrepreneurial startup grants and in the allocation of conditional cash grants to new beneficiaries, labour and workplace health and safety risks including sexual exploitation and abuse and sexual harassment (SEA/SH) risks associated with on the apprenticeship program, and privacy and data protection risks associated with the consolidation of databases related to social protection beneficiary data. These risks are predicable, have a low probability of serious impacts to human health, and are readily managed through project design and standard social risk mitigation measures.

The environmental risk rating for the project has been assessed as low due to the limited scope of physical works and impacts. The key risks are related to worker health and safety for apprenticeship beneficiaries under job placements and waste management for procurement of any IT equipment or office supplies. Limited waste management facilities within Tonga will necessitate consideration of end-of-life waste management for procurement of ICT equipment to avoid pollution.

A Project Management Unit (PMU) will be housed within MIA and will have responsibility for the day-to-day operations and supervision of project consultants and contractors. The Central Services Unit (CSU) E&S Team to be financed under Component 3 will provide support to the implementation of World Bank funded projects across the portfolio in Tonga including the P2ER project.

2. Objective of the SEP

The overall objective of this SEP is to define a program for stakeholder engagement activities, including public information disclosure and consultation throughout the entire project cycle, ensuring participation and information sharing at all levels including within schools and communities, with the goal of supporting project decision making and implementation. 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 activities or any activities related to the project. It stresses the need for beneficiaries and other stakeholders to have opportunity to express their views on project objectives, activities and consequences.

ESS10 recognizes the importance of open and transparent engagement between the project and stakeholders as an essential element of good international practice. Effective stakeholder

¹ 2016. World Bank Environmental and Social Framework. World Bank, Washington, DC.
<https://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf>

engagement can improve the environmental and social sustainability, enhance project acceptance, and make a significant contribution to successful project design and implementation.

This SEP is a live document and can be updated periodically to meet the changing demands of the project and as further information becomes available.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

4.1 Methodology

To meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the P2ER 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 stakeholder feedback, and for analysing 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 that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- *Flexibility:* If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face- to – face engagement, the methodology should adapt to other forms of engagement, including various forms of internet, phone and radio base communication.

4.2 Affected parties and other interested partiesⁱ

To ensure relevant and meaningful engagement, project stakeholders can be divided into three main groups:

4.2.1 Affected Parties

Affected Parties include persons, groups, local communities, community members, and other parties who are directly influenced and that may be subject to direct impacts from the project and/or who are closely engaged in project development and implementation,

including decision-making on mitigation and management measure. Specifically, the following individuals and groups fall within this category:

- i. High school students who are current beneficiaries under the CCT program and potential new CCT beneficiaries, and their families and communities.
- ii. CCT high school graduates, inactive and poor youth who are beneficiaries of the CCT program and young adults living in CCT beneficiary households aged between 18-35 who are interested in benefitting from opportunities provided under the pathways to employment and entrepreneurship component
- iii. Private sector firms and civil society organizations engaged through the project to provide apprenticeship opportunities and who will benefit from an improved source of skilled labor as part of the P2ER, including Ma'Fafine Moe Familii, and Uluaki Faiako
- iv. Training providers for the provision of short-term skills training.

4.2.2 Other Interested Parties

The project's stakeholders also include parties other than the directly affected communities, including:

- Ministries involved in project implementation including Ministry of Education and Training (MET), Ministry of Trade and Economic Development (MTED)
- Tonga Chamber of Commerce and officers that assist in the placement of job seekers
- Civil Society Forum Tonga and all local NGOs and civil society organizations including those in the care sector, hospitality and businesses
- Government agencies with roles in implementing social protection and labor programs
- Participating schools in the CCT program, and other education providers
- Private sector firms and business owners who could provide opportunities to youth seeking employment
- Tonga National Qualifications and Accreditation Board (TNQAB), Tonga National University (TNU) and relevant competency certifying and regulatory entities
- Department of Foreign Affairs and Trade (DFAT) and Australia Pacific Training Coalition (APTC) office and other international CSOs and NGOs
- Education Directors Advisory Council
- International Labour Organization (ILO) in relation to apprenticeship placements
- School Principal Association
- TVET Association and other training providers
- Women's Division and Women's Group progressing gender equality, Women and Children Crisis Centre (WWWC)
- Banks - ANZ, MBF, BSP, TDB, Digicel

4.2.3 Disadvantaged/ Vulnerable Individuals or groupsⁱⁱ

The Project recognizes the need to reach and ensure the inclusion of vulnerable or disadvantaged groups which may have specific characteristics that places them at a higher

risk of falling into poverty and barriers to accessing information, or other project benefits. Within the project, vulnerable or disadvantaged groups may include:

- Female youth including female CCT beneficiaries
- Unemployed youth from poor households
- Unemployed youth with disabilities
- Unemployed youth who are sexual and gender minorities
- Poor households
- Remote communities
- Any other marginalized groups.

These persons/groups may require specific engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project, and participation in project benefits. Vulnerable groups within the communities affected by the project may be added, further confirmed, and consulted through dedicated means, as appropriate to ensure that these people are identified and meaningfully consulted.

5. STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Summary of stakeholder engagement done during the project preparation

Stakeholder engagements undertaken during SET preparation and implementation have been used to inform the design of P2ER.

Several focused-group stakeholder discussions had occurred through meetings between MIA with MET, TVET providers, MTED, civil society stakeholders, job seekers and others during the preparation mission in late November 2023 and May 2024. These discussions informed the design of the proposed operations for P2ER, and the proposed activities were discussed and agreed with the stakeholders through focused workshops held during the missions. (Refer to Annex 1 for more details). In these meetings the project followed a twin track approach discussed with the Government of Tonga Sustainability Group in 2022 and confirmed the elements of soft landing (transition from school to work) and sustainability (ensuring that all CCT students graduate from high school).

Targeted consultations will continue to be undertaken by the IA and PMU during the further design and during the implementation of the project which will also inform project design.

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

Different engagement methods are proposed and cover different stakeholder needs as stated below:

- (i) Focus Groups meetings/ discussions: These will be undertaken with affected parties, in particular the vulnerable groups who may not have the resources or time to attend the official public consultations due to distance, time and/or cost. The sessions will elicit further understanding about any issues and concerns. It will be conducted in the local community (to reduce distance travelled) and be sensitive to the potential of

- influence (from government, church, elders) so as to reduce any feelings of intimidation, obligation or coercion.
- (ii) Community consultations: The project components have and will continue to promote meaningful public and stakeholder's participation in all activities with all relevant communities. This builds from the current SET components and has been continued through the assessment for P2ER. Meetings will be undertaken at all levels so that power differentials do not create feelings of coercion and intimidation. Particular attention will be paid to the vulnerable groups in the process so that they are more comfortable with the process and feel included.
- (iii) Formal meetings: These are the formal public information campaigns undertaken at the district or town level. They include presentations and discussions on environmental and social aspects of P2ER. The meetings are to be widely advertised in the media. Attendance is normally government agencies, informed and mobile affected persons and concerned citizens. Due to the distance from the meeting sites/venue, the vulnerable groups may find it difficult to attend and could be helped assist with fuel and transport costs. An attendance list for all consultations will be recorded.
- (iv) Vulnerable groups should receive additional support, assistance to ensure that they are well informed of project opportunities and criteria. In the next round of stakeholder engagements, they will have representations at meetings at the district and national levels. During next project stakeholder engagement activities, the PMU will assign resources to:
- Inform affected groups in advance, including women-headed households and vulnerable groups and beneficiaries.
 - Involve women of affected households and vulnerable groups in addressing the unanticipated social and environmental impacts during project implementation of P2ER project.
- (v) Public information brochure / booklet: A public information brochure/ booklet will be developed, outlining details of the project, locations, implementation timelines, the grievance redress mechanism, and answers to frequently asked questions. A Tongan version will be developed and made available at consultations for interested parties. It will be updated as the project progresses, incorporating new questions and more details on the implementation process.
- (vi) Templates and checklists – A consultation template and checklist to confirm meaningful consultations can be developed for the project.
- (vii) Other Materials- Consultation and communication materials will be prepared in English and Tongan, as appropriate, including:
- PowerPoint presentation
 - Radio announcements
 - Project Information Leaflet
 - Agendas (where appropriate)
 - Meeting minutes, attendees list (confidential information will not be included in distributed materials).

5.3 Stakeholder Engagement Plan

The projects stakeholder engagement plan is presented in the Table 1 below. The PMU will be responsible for stakeholder engagement activities with support from the CSU and in coordination with the relevant stakeholders including MET, MOF, MTED and TVET institutes.

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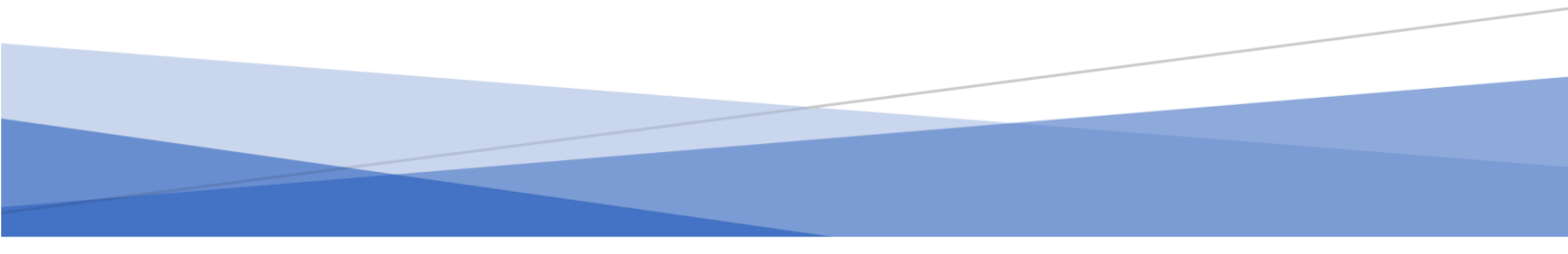


Table 1 Plan for stakeholder engagement

Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Component 1 Pathways to Jobs and Entrepreneurship for Vulnerable Tongan Youth				
Project Design & Preparation	Dissemination of project information on Component 1, scope and rationale, required E&S instruments, GRM. Regular updates on Project development.	Stakeholder meetings, communication information meetings, presentations, workshops,	Project implementing partners, Government agencies; Job providers, TVET providers, education sector.	PMU - with support from the CSU
	Dissemination of project information; consultation on project design, disclosure of project information and E&S instruments	Stakeholder meetings, presentations with CCT beneficiaries, radio broadcasts, social media Focus groups discussions; women-focused discussions	Private sector organizations, civil society organizations, chambers of commerce and business sector; ILO interested youth; women representative groups, vulnerable and disadvantage groups	PMU - with support from the CSU
Project Implementation	Project progress, E&S instruments implementation plans, GRM	Meeting, workshops, training on GRM for designated committee members	All stakeholders, Project implementing partners, government agencies; Job Providers, TVET providers, education sector, chambers of commerce and business	PMU with support from the CSU
	Participation in apprenticeship opportunities	Outreach activities including community consultations; disclosure of written information (brochures, social media, website), public announcements (radio)	Vulnerable and disadvantaged groups, Job seekers, employers/business community Civil society organizations	PMU with support from the CSU
	Apprenticeship recruitment	Information dissemination Meetings with families of selected apprentices	Prospective apprenticeship providers (private sector firms, CSOs) Selected CCT beneficiaries and their families	PMU with support from the CSU

Project Stage	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
	Participation in entrepreneurship outreach and entrepreneurship bootcamps	Outreach activities including community consultations; disclosure of written information (brochures, social media, website), public announcements (radio)	Vulnerable and disadvantaged groups, Job seekers, employers/business community Civil society organizations	PMU with support from the CSU
Component 2 Improving School Retention and Graduation among Vulnerable Tongan High School Students				
Project Design & Preparation	Dissemination of information on component 2; scope and rationale, required E&S instruments, GRM. Regular updates on Project development.	Stakeholder meetings, communication information meetings, presentations, workshops	Project implementing partners, Government agencies; participants in panel reviewing business plans for small grants	PMU - with support from the CSU
	Dissemination of information on component 2; information on GRM	Meeting, workshops, training on GRM for designated committee members, disclosure of written information, school assemblies (social media, website, school brochures),	High school students and families including potential prospective new CCT beneficiaries; Vulnerable and disadvantaged groups including women	PMU - with support from the CSU
Project implementation	Project updates, participation in CCT program; information on GRM	Meeting, workshops, disclosure of written information (brochures, social media, website	High school students and families including potential new beneficiaries; vulnerable and disadvantaged groups including women	PMU - with support from the CSU
Component 3 Systems Strengthening, Project Management, Monitoring and Evaluation, and Centralized Support				
All stages	Overall project information	Stakeholder meetings, workshops, presentations	Project implementing partners, Government agencies related to the social protection data registry	PMU - with support from the CSU
	CSU design	Meetings workshops, consultations	Project implementing partners including MIA, MOF; CSU	PMU

5.4 Reporting back to Stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

All stakeholder engagement meetings will have minutes, which will be stored in the project stakeholder engagement database; this will be to ensure that (i) there are records that can be referred to and that all views raised are taken into consideration, and (ii) commitments made are delivered upon.

For P2ER, a six-monthly E&S performance reporting is required for WB; it includes the performance of stakeholder engagement, disclosure activities and GRM implementation performances.

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

6.1 Resources

The PMU will be in charge of stakeholder engagement activities. The stakeholder consultation and disclosure activities for the P2ER will be covered by the respective Components of the project. The PMU will allocate adequate budgetary resource for the implementation of the SEP throughout the project period.

SEP preparation and implementation will largely be coordinated and undertaken by PMU. Any additional costs for stakeholder engagement according to this plan would relate to incidental costs associated with meetings and preparation of materials for circulation. Incidental costs would include catering, venue hire, media, materials and staff travel. A provisional budget allocation for Stakeholder Engagement is: USD 150,000 (TBC).

The SEP implementation success requires the appointment of personnel who will assume implementation and management responsibilities. The PMU with the support of the project staff will be responsible for implementing stakeholder engagement and coordinating SEP activities during the project's implementation period.

6.2 Management functions and responsibilities

The MIA as the IA is primarily responsible for implementation of the Project, excluding subcomponent 3.2, together with MET and MTED through the PMU, with support from the CSU. The following positions will be responsible for the implementation of this SEP:

- The PMU Project Manager (PM) is responsible for overseeing and coordinating all activities associated with the Project.
- PMU E&S Officer supporting the P2ER is responsible for implementing this SEP and any associated community engagement activities, with support from the CSU E&S unit
- PMU Procurement Officer and Contract Manager are responsible for communicating proposed contract opportunities to industry and members of the general public that include required E&S obligations.

PMU PM

The PMU Project Manager will be responsible to develop and maintain relationships whilst communicating with Government ministries and departments and the media. Media engagements may be required throughout the Project's life and decisions taken as a result of these engagements could potentially impact IA relationships with communities.

Stakeholder engagement activities may influence the activities of other departments or require their inputs. The PMU PM is to facilitate communication with the managers of other projects, ministries and departments to keep them informed on the stakeholder engagement process. The flow of information from these managers to the PMU PM is also important as activities that they may be undertaking can impact project outcomes and create risk.

PMU E&S Officer

The PMU E&S Officer is responsible for managing and facilitating all stakeholder engagement. Responsibilities of the PMU E&S Officer including to:

- Support the development, implementation and monitoring of all stakeholder engagement activities for P2ER and the implementation of this SEP
- Manage the GRM as described in Section 6.
- Facilitate the public disclosure of ESMP documents and collate and analyse public responses to these and facilitate changes to ESMP, SEP and any other relevant E&S documents from public comments.
- Liaise with other WB Project Managers and E&S Specialists/consultants to confirm that stakeholder engagement requirements/protocols are understood
- Identify stakeholders, project risks, impacts and opportunities and inform the PMU PM to facilitate the necessary planning to either mitigate risk and impacts or take advantage of opportunities.

PMU Procurement Officer and Contract Manager

The PMU Procurement Officer and Contract Manager will be required to facilitate the necessary terms and conditions for E&S commitments in bidding documents and contracts. There is also a need for these positions to manage the opportunities for contracts and contractor's employment as these can become key issues with industry and the community if not seen to be open, fair and transparent. There are sensitivities around local employment and contracting that need to be managed with appropriate messaging. This requires clear and transparent contracting processes be adhered to and clearly communicated to the communities.

CIU E&S Unit

The CSU E&S Unit are responsible for supporting the PMU with the implementation of the SEP including the GRM, providing E&S training on SEP and GRM responsibilities to the PMU and project workers, and to assist with SEP reporting.

7. GRIEVANCE MECHANISM

The WB ESS 10 outlines standard requirement for grievance mechanism (GM). The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

The P2ER GRM will be a central part of stakeholder engagement and the environmental and social safeguards processes. It is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination), within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local, project level. P2ER GRM aims to:

- Register, Categorize, and prioritize grievances
- Respond and address the grievances via consultation with all stakeholders
- Forward any unresolved cases to the relevant authority.

The GRM sets out the steps to be taken to resolve grievances and its management will be under MIA's responsibility through the PMU and should ensure implementation with support from the CSU and project stakeholders. The details, steps, and objective of the GRM need to be fully integrated into stakeholder engagement and communications of P2ER.

Any person or group of people who have a relationship with the project or are affected by its activities can raise a question, grievance, or complaint.

7.1 Description of GM

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	<p>Establishment mechanism for different levels- Project Level and Community Level and a of GRM Committee for the P2ER.</p> <p>P2ER GRM Committee – Project Manager, MTED, MET, MIA-Local Governance Desk, Civil Society Representative, Youth Council Representative, CSU Representative. Meets quarterly/ on a need basis.</p> <p>Project Level GRM – A GRM focal point at each of MIA, MTED, MET and PMU receives and log grievances, feedback, issues through multiple channels and can be resolved by the PMU and MIA. Any unresolved issues will be brought up to the P2ER GRM Committee.</p> <p>Community Level – existing pathway for the community GRMs, where people raise and resolve issues and disputes triggered directly/indirectly by the Project and other issues in the community.</p>	Before Project Implementation	<p>PMU to ensure committee meets at least once per quarter.</p> <p>PMU/MET/MIA/MTED/CSU</p>

Step	Description of Process	Time Frame	Responsibility
	<p>At community level – The Town Officer, District Officer and People’s Representatives to Parliament receives grievances, complains and feedback from the people they serve. MIA has existing committees and has access to platforms where issues raised through these roles as the responsible Ministry for Local Governance. MIA will discuss and resolve issues raised regarding P2ER. PMU will facilitate any TPERP related information required information/resources through MIA. All grievances to be logged by MIA and PMU.</p> <p>Any unresolved issues will be brought up to the P2ER GRM Committee.</p>		
Grievance uptake	<p>Grievances can be submitted via the following channels:</p> <ul style="list-style-type: none"> • Toll-free telephone hotline/Short Message Service (SMS) line • E-mail • Letter to Grievance focal points and Community Councils/ Town/District Officers. • Complaint form to be lodged via any of the above channels. • Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box • Any other convenient mechanism for disadvantaged and vulnerable groups 	Throughout Project Implementation.	PMU to disclose channels and details.
Sorting, processing	Any complaint received is logged by GRM focal points and shared with PMU.	Upon receipt of complaint	Local grievance focal points
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by the GRM focal point.	Within 3 days of receipt	Local grievance focal points
Verification, investigation, action	Significance assessed and grievance recorded in GRM database/book.	Within 10 working days	<p>P2ER GRM Committee – Project Manager, MTED, MET, MIA-Local Governance Desk, Civil Society Representative, Youth Council Representative, CSU Representative.</p>

Step	Description of Process	Time Frame	Responsibility
	Grievances concerning SEA/SH should be treated as confidential, only the nature of the complaint and the processing outcome should be recorded. WCCC contacts will be communicated during stakeholder activities of the project. Investigation of the complaint is led by MIA PMU. A proposed resolution is formulated by the GRM committee/relevant stakeholders and communicated to the complainant by PMU.		
Monitoring and evaluation	Data on complaints are collected by PMU and reported to the Project Steering Committee every Quarter/ when PSC is held.	On going	PMU
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by the PMU.	With in 10 days	PMU
Training	Training for GRM focal points, and PMU officers on project level GRM.	As per needed basis	CSU

It is critical that stakeholders understand that all grievances lodged, regardless of the Project phase or activity being implemented, will follow this process. The GRM described in this section is distinct from the grievance mechanism to be used by the Project's workforce as detailed in the Project's Labor Management Procedures (LMP).

The GRM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaints have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse. .

Beneficiaries in the apprenticeship program will receive awareness raising on how they can submit any workplace related grievance, as part of the beneficiaries' induction trainings and orientation. Existing grievance mechanisms of the employer will be utilized, otherwise the beneficiary will be able to access the project GRM. PMU GRM focal point will monitor all recording and resolution of grievances, and report these to the PMU in their monthly progress reports. There will be a separate referral pathway for project-related grievances in relation to SEA/SH, which will be referred to the Women and Child Crisis Council (WCCC).

8. MONITORING AND REPORTING

Monitoring and evaluation (M&E) are essential to ensure successful implementation of this SEP and will be undertaken as a part of overall Project implementation. The SEP will be

periodically reviewed and revised by the PMU E&S Officer, as needed, to adjust for it to remain effective and relevant.

Monthly summaries and internal reports will be collected by the E&S officer in the PMU and referred to the IA covering the stakeholder engagement activities conducted, records of the grievance register, planned stakeholder engagement activities planned for the next month.

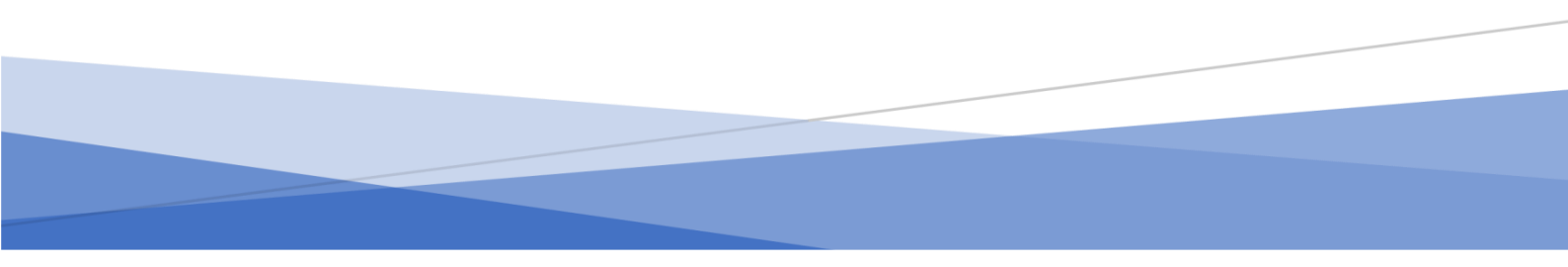
Information on public engagement activities undertaken by P2ER will be conveyed to the stakeholders in the E&S section of the normal reporting cycle for the project as determined in the POM.

Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, not limited to the frequency and type of public engagement activities and number of attendees and number and type of communication outlets.

Annexes

1. Summary of stakeholder engagement
2. GRM FORMs

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Annexes

1. Summary of stakeholder engagement

P2ER mission 6th – 17th May 2024

Component 1 Discussions

Key design elements of the proposed interventions on skills training, employment intermediation, and provision of microgrants to poor CCT high school graduates were discussed and agreed upon with MTED and MIA with the understanding that operational arrangements will build on existing interventions to the extent possible. The mission agreed with government counterparts for both interventions to target CCT beneficiary high school graduates primarily, with the possibility of expanding to their young adult (ages 18 through 34) family members living in the same households. To this end, the component will support both **existing** and **new** interventions, building on MTED's experience with developing and implementing labor market programs (e.g., apprenticeship and entrepreneurship interventions). Activities will also include referral pathways from employment services to social service providers to ensure access to essential services by the most vulnerable.

- *Under subcomponent 1.1*, the teams confirmed the previously established arrangements, i.e., (i) *skills development* will combine existing on-the-jobs trainings currently provided by employers with certificate-track trainings offered by TVET providers; (ii) beneficiaries will be receiving stipends for the duration of their trainings and their tuition fees are also expected to be covered by the project; (iii) following the training, the beneficiaries will be placed in employment with private sector firms or NGOs currently working with the government on social service provision (MFF and UF); (iv) the combined duration of training and employment will not exceed one year for each beneficiary; (v) wages are expected to be disbursed in the form of block grants by MIA to private sector or civil society employers and will follow existing fiduciary arrangements of apprenticeship programs to the extent possible. **Next steps:** the teams will discuss business processes in detail and record them in a draft Project Operations Manual (POM) during the course of project appraisal.
- *Under subcomponent 1.2.*, the teams reached agreements that (i) the interventions will include training and entrepreneurship support activities, and will draw on the MIA youth division's prior experience with business training and mentoring conducted in the course of a pilot targeting disadvantaged youth; (ii) during appraisal, the teams will conduct a review of the training material to also include business training components from ILO's Start and Improve Your Own Business (SYOB) and contextualized soft skills interventions such as the Personal Initiative Training (PIT); (iii) the approximate microgrant size will be TOP 3000 and will require a business plan to be submitted by aspiring entrepreneurs by the end of the training; and (iv) disbursements will follow existing fiduciary arrangements of MTED's and MIA's currently operating microgrant programs. **Next steps:** the teams will discuss business processes in detail and record them in a draft Project Operations Manual (POM) during the course of project appraisal.

Component 2: Conditional Cash Transfers (CCT)

2. The objective of component 2 is to continue to support the CCT intervention under the Skills and Employment for Tongans Project (P161541). To achieve this objective the project will finance the cash transfers to the existing CCT beneficiaries of the SET project until school completion (sub-component 2.1). It will also finance costs associated to *accompanying services to CCT families*, such as

communication strategy, parenting sessions/outreach and information systems support (sub-component 2.2).

3. Key project design features and implementation arrangements were agreed upon with MIA counterparts, with a mutual understanding that project operational arrangements will be the same under Skills and Employment for Tongans (SET) project. The implementation of the CCT program will be based on the same parameters defined under the SET project to ensure a smooth transition to the new operation.
4. The mission discussed lessons learned on the past CCT implementation and how to improve in this operation. It highlighted the importance of outreach activities targeted at schools, parents, students and teachers through school and community visits. It was also agreed that the Government would continue to carry out these visits with CCT officers in collaboration with MET Truancy Division. The only change highlighted was the recommendation to apply the 80 percent school attendance condition over quarterly periods rather than monthly. This adjustment would reduce the risk of suspending students for temporary absences, even if they have regular attendance over a longer period.

P2ER mission 27 November – 1 December 2023

(taken from the P2ER Mission AM November 2023)

Preparation mission workshop

Component 1: Conditional Cash Transfers (CCT)

1. The mission met with Deputy CEOs of MIA and MET Liahona High School's representative to discuss how this project can support gap areas and improvements from the previous SET CCT implementation:
 - *Outreach, consultation, and communication:* The Government and the Bank agreed that the new project continues to include outreach activities targeted at schools, parents, students and teachers through school and community visits. It was also agreed that the Government would continue to carry out these visits with CCT officers in collaboration with MET Truancy Division. They would continue to use media outreach, parent conversations, Tala Talanoa meeting, and meetings with principals and directors.
 - *Compliance – MIA and MET collaboration:* there is a good collaboration between MET and MIA agencies regarding the process to verify compliance with co-responsibilities by beneficiaries. One of the main issues identified in some schools was the delay in payments resulting in them not being able to enroll students after a certain period of time or in parents informally borrowing to pay for high school fees. The mission and the Government agreed that timely payment is an essential feature of the program despite recognizing the challenges of payment with accounts being closed and different school fee payment dates.
2. *Opportunity for Digital Payment pilot:* MIA and MET manifested interest in supporting a pilot for digital payments under the Project. This pilot would provide families with more options to utilize funds through EFTPOS, internet banking and mobile wallets. During this discussion, the importance of promoting financial literacy and implementing behavioral change campaigns to encourage the use of digital and mobile payments was raised as a significant complementary activity. The mission reached an agreement that a Digital Payment pilot and accompanying services related to financial literacy would be included as part of the project.

3. MIA and MET (Truancy) requested the project to provide capacity building for staff involved in its activities, such as training in counselling and social services to better support students to return to high school and their families in their complex needs. The Bank team is favorable of including these requests as part of the project but more details on these activities will be explored in the next mission.

Component 2: Pathways to jobs and entrepreneurship for vulnerable Tongan youth

4. Discussions under Component 2 and the PMU were also conducted with MIA, MET, MTED, Civil society groups and the Chamber of Commerce.

Component 3.1: Systems strengthening – National Social Registry & Project Management Unit

5. The mission met with representatives of MIA, Prime Minister's Office (E-Gov services) and Tonga Statistics Department to discuss the implementation of the National Social Registry (NSR). The group discussed the importance of the National Social Registry Taskforce (NSRT)² to establish the NSR, as a whole-of-government approach.

Project Aspects Discussed and People met at Workshops during May 2024 mission.

Topic	Participants
All project components – component design, fiduciary aspects including E&S; design of PMU; Labour Market Assessment	MTED, MIA, MoF, MET, PMO-P&P, PMU
Discussion on design of Component 1	Meeting with Maa Fafine moe Famili (MFF) Uluaki Faiako (UF) PINE: Job Seeker Consultation
National Social Registry Taskforce (NSRT) Workshop	MIA, PMO, MoF, MoJ, NRBF, NRDMO, MET, WB, MoJ, NRBF, NRDMO, MET, TSD, WB (and other IT developers in Government)
National Social Registry	MIA, MET, PMO, NDRMO, MoF, PMU, CSU, WB

² The National SR Taskforce is comprised of Ministry of Finance, Resilient Development and Financing Division; Ministry of Internal Affairs; Social Protection and Disability Division; Prime Minister's Office, Digital Transformation Department; Tonga Department of Statistics, Social Statistic Division; Ministry of Meteorology, Energy, Information, Disaster Management, Environment, Climate Change and Communications (MEIDECC), National Disaster Risk Management Office; National Retirement Benefit Fund (NRBF); Ministry of Education; and Ministry of Health.

List of people met during the mission 27th November – 3rd December 2023

The purpose of the meetings was to discuss on project design.

Ministry of Finance	
Ms. Kilistina Tuameiapi	CEO
Mr. Nick Lavemaau	Senior Officer, Aide Management
Ms. Elizabeth Baker	Communications, CSU
Ms. Ana Fakaola Lemani	FM Accountant, CSU
Ministry of Internal Affairs	
Ms. Akanesi Polotu Fakafanua-Paunga	Acting CEO, HoD, WAGE
Ms. Luisa Manuofetoa	HoD, SPDD
Ms. Sita Polota-Tu'ihalamaka	HoD, OED
Ms. Silia Ahio	MIA/SET PMU
Ministry of Trade and Economic Development	
Ms. Kolotia Fotu	HoD, Labour Division
Ms. Tangini Tuifua	Senior Officer, Labour Division
Ministry of Education and Training	
Ms. Kalolaine Moeaki	HoD, Development Projects
Mr. Kalafitoni Latu	Truancy
Mr. Senioli Inoke	OPENEMIS Consultant
Prime Ministers Office/EGOV	
Mr. Andrew Toimoana	Hod, EGOV, ICT
Mr. Siosifa Palelei	IT, EGOV
Mr. James Topui	Project Coordinator, EGOV
Tonga Department of Statistics	
Ms. Lusia Kaitapu	Senior Officer
Ma'a Fafine mo e Famili, Home Based Aged Care Services and Gender	
Ms. Betty Blake	Director
'Uluaki Faiako, Early Intervention Services	
Ms. Manu Vehikite	Director
Parents and Child Beneficiaries	UF Clients
St Joseph Business College	
Ms. Sinalelei Feau	Principal
Ms. Kilisitina Tai	Secretary
Tonga Chamber of Commerce	
Mr. Sam Vea	President
Ms. Aloma Johanssen	Vice-President
Mr. Siosifa Pomana	CEO

2. GRM Complaint Form

Complaint Form (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 is made /problem occurred (<i>Please Explain</i>)				
Mode of Complaint in category				
<input type="checkbox"/> Environmental safeguards, including waste, noise, dust and water runoff/pollution	<input type="checkbox"/> Social Safeguards including gender, labour, community health and safety (including traffic) and child safety	<input type="checkbox"/> Grievances regarding worker health and safety and behaviour of workers on-site	<input type="checkbox"/> Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns	<input type="checkbox"/> Grievances regarding abuse of power/intervention by project or government officials
<input type="checkbox"/> Other (describe)				
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 (*attach additional pages if required*)

Do you request that identity be kept confidential? (Please Tick the box below)

Yes No

Have you previously raised your complaint with the on-site Manager or others?

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 NCU level grievance mechanism. Please also explain why the response or actions taken are not satisfactory

No (*if NO, why not?*)

Complaint Recipient (*names will be disclosed as needed, in order to ensure transparency*)

Name	Position/Organization	Contact number	E-mail address

Signature of the person making the complaint
Please send the complaint to

Signature

Grievance Redress Mechanism

PMU (*insert appropriate Project and address*)

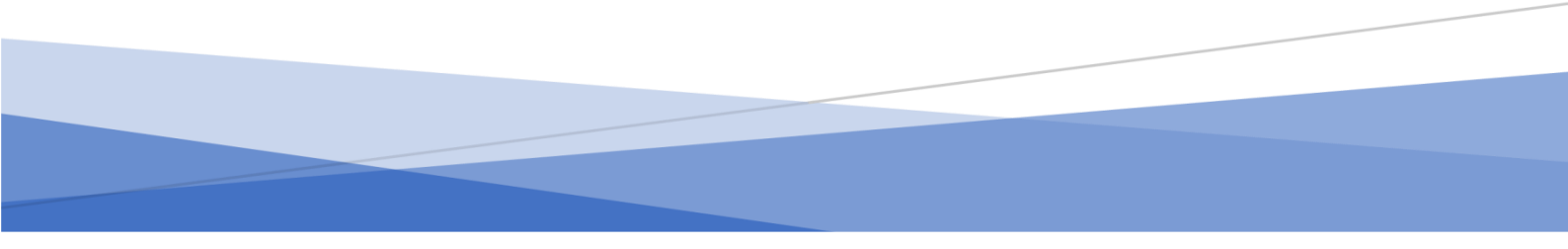
Email (*insert*)

Date:

Phone (*insert*)

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

DRAFT



GRIEVANCE ACKNOWLEDGEMENT (Form B + letter)

This form is to be completed by the GRM focal person and delivered to the complainant with a standard relevant Ministry letter

Date grievance received	Initial contact for complaint				
Grievance log #					
Was Form A completed? (check <input checked="" type="checkbox"/>) <input type="checkbox"/> Yes <input type="checkbox"/> No					
Grievance Received (check <input checked="" type="checkbox"/>) <input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Project Website <input type="checkbox"/> Other If other describe					
Mode of complaint in category					
<input type="radio"/> Environmental safeguards, including waste, noise, dust and water runoff/pollution	<input type="radio"/> Social Safeguards including gender, labour, community health and safety (including traffic) and child safety	<input type="radio"/> Grievances regarding worker health and safety and behaviour of workers on-site	<input type="radio"/> Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns	<input type="radio"/> Grievances regarding abuse of power/intervention by project or government officials	<input type="radio"/> Environmental safeguards, including waste, noise, dust and water runoff/pollution
<input type="checkbox"/> Other (describe)					
Name of complainant (<i>information is optional and always treated as confidential</i>)					
Contact information for the Person Raising Grievance: (<i>information is optional and confidential</i>)					
Address					
Phone					
Email					
Deadline for Response (<i>15 days from date grievance received</i>)					

Reference No.: *Type reference number*

Date: *Type the date*

Type recipient's name.,

Type recipient's title.,

Type recipient's address.

Type the salutation,

Re: *Your complaint received insert date regarding insert issue*

Type body of letter.

“All correspondences shall be as courteous, brief and concise as possible. Simple and everyday words shall be used where possible. Previous relevant correspondences or any relevant law, regulation, ruling shall also be quoted” (PSC Policy Manual, 2006)

Type closing,

Type your name

for CEO for *Insert*

Endnotes

ⁱ 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.
- **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status; and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.
- It is important to note that sometimes projects have different components with very different sets of stakeholders for each component. Those different stakeholders should be considered in preparing the SEP.

ⁱⁱ It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project, and to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with 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 into the overall process are commensurate with those of other stakeholders.