

Republic of Moldova
Higher Education Project

INTERNATIONAL DEVELOPMENT ASSOCIATION
Stakeholder Engagement Plan (SEP)
Ministry of Education, Culture and Research
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TABLE OF CONTENTS

1.	INTRODUCTION.....	3
1.1.	Project Background	3
1.2.	Project Description	3
2.	REGULATORY CONTEXT	5
2.1.	Relevant Moldovan Stakeholder Engagement Legislation.....	5
2.2.	World Bank Requirements	6
3.	SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES	7
4.	STAKEHOLDER IDENTIFICATION AND ANALYSIS.....	8
5.	STAKEHOLDER ENGAGEMENT PROGRAM	12
6.	GRIEVANCE REDRESS MECHANISM.....	20
6.1.	Definition of GRM	20
6.2.	GRM scope and use.....	20
6.3.	Procedures	20
6.4.	Awareness building	22
6.5.	Staffing and capacity building.....	22
6.6.	Transparency, monitoring and reporting	23
	ANNEX A – GRIEVANCE/INQUIRY RECORD.....	24
	ANNEX B – LOG OF CONSULTATIONS HELD, FEEDBACK PROVIDED AND INCORPORATED.....	Error! Bookmark not defined.
	REFERENCES	25

ABBREVIATIONS AND ACRONYMS

ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GoM	Government of Moldova
HEMIS	Higher Education Management Information System
HEIP	Higher Education Improvement Program
LMIS	Labor Market Information System
LMP	Labor Management Procedures
MoECR	Ministry of Education, Culture and Research
MoF	Ministry of Finance
MoHLSP	Ministry of Health, Labor and Social Protection
NAQAER	National Agency for Quality Assurance in Education and Research
NEA	National Employment Agency
NQF	National Qualifications Framework
PDO	Project Development Objectives
PMT	Project Management Team
POM	Project Operations Manual
PP	Procurement Plan
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference

1. INTRODUCTION

1.1. Project Background

The Moldova World Bank Country Partnership strategy identifies an improved alignment of Moldova's education and training systems to the labor market as one of its priorities. Moldova's education system is characterized by low quality of services provided in pre-primary, basic and secondary education, with low transition from lower- to upper-secondary schools. Additionally, technical schools and vocational training suffers from a weak strategic framework, poor service delivery, and ineffective oversight. Vocational education graduates report significant mismatches between their training and jobs available in the labor market. There is also evidence of education-job mismatches among workers with higher education, with many employed in areas unrelated to their fields of study. While policies to better align the supply of skills with the demands of the labor market are being adjusted, more efforts are needed to enhance the quality and relevance of education and training at all levels. While the weaknesses of the basic and secondary education have been addressed by previous investment projects, including those by the World Bank, the challenges of the higher education system have been largely left unattended.

1.2. Project Description

The Project Development Objective is to improve the labour market orientation of selected higher education institutions and the quality assurance mechanisms.

The following **key results** are expected by the end of the Project:

- Share of students enrolled in Bachelor programs that are in high demand in the labor market.
- The status of the labor market information system.
- The status of the registration of National Agency for Quality Assurance in Education and Research in European Quality Assurance Register.
- The status of the higher education management information system.

The proposed Project would be implemented over a period of five years (from 2020 to 2025), organized around three components, which are described below, and financed by an International Development Association (IDA) Credit of US\$40 million. The Project design includes systemic interventions in the areas of higher education quality capacity, financing and management, as well as a targeted program to be implemented by selected universities and pedagogical colleges to address some of their most pressing needs in labour market orientation.

Even though the proposed Project would not finance the GoM's initiatives to consolidate the network of public universities, all planned project activities would be implemented in full alignment with these initiatives. No institutions that will be integrated into others' structure because of the consolidation shall benefit from the targeted interventions supported by the proposed Project (see description of Component 2 below).

Component 1 – Improving the Quality Assurance Mechanisms. This component aims to improve Moldova higher education system's quality assurance mechanism, which would also contribute to improve its labor market orientation. It comprises of three sub-components that support activities in higher education quality, financing and information systems (management and monitoring) which would benefit all public universities in Moldova. It would also benefit Moldovan citizens, including university graduates who struggle with lack of reliable information on labor market needs and job opportunities.

Sub-Component 1.1 National Qualifications Framework and Quality Assurance. This sub-component would finance relevant activities in higher education quality, which are expected to contribute to improving the overall management and monitoring capacity of the system in this area. These activities include the development and revision of qualification standards in alignment with the NQF, and the improvement of the QA mechanisms. The activities on the NQF would be implemented by the MoECR's NQF Directorate in close collaboration with the MoECR's Higher Education Department and the Information and Communication Technologies Center for Education. By the end of the implementation of the Project, it is expected that 300 qualification standards are developed, and teachers of all Moldovan public universities are trained for the implementation of these standards through the revision of the curricula. The development and revision of qualification standards would be done with the participation of relevant employers or their associations in each specific field. The involvement of the private sector in this important activity is currently limited in Moldova, but it would be boosted through this sub-component.

To address the challenges with the QA of Moldova's higher education system, this sub-component would support activities aimed at strengthening NAQAER's capacity as the key external QA authority, as well as universities' capacity in this area. These activities would be implemented by the MoECR's Higher Education Department in close collaboration with the NAQAER. By the end of the implementation of the Project, it is expected that the NAQAER is registered as a member of the EQAR.

Sub-component 1.2 – System Management and Monitoring. This sub-component would finance activities to improve the higher education system's management and monitoring capacity. It would finance the development and implementation of three *information systems* (see below) and a higher education system-wide *graduate tracer study* that would use data from various information systems (including the three mentioned below) and surveys to inform plans and decisions at the central (MoECR) and universities levels.

It would support the development and installation of the following information systems: (i) unified electronic higher education admission system (e-Admission), (ii) unique Higher Education Management Information System (HEMIS), and (iii) LMIS. These information systems would produce data that would be used to inform plans and decisions at the system and institutional levels. The installation of these information systems would imply an extensive capacity building program to train staff of the MoECR, Ministry of Health, Labor and Social Protection (MoHLSP) and universities in the operation of these tools and utilization of their data for planning and decision-making. It would benefit these institutions, university students, upper secondary education students (in their applications), as well as job seekers (including university graduates) and employers (through the LMIS).

The activities on the development of these systems would be implemented by the MoECR's Higher Education Department in close collaboration with the MoECR's ICT Department, the Information and Communication Technologies Center for Education, as well as the MoHLSP.

Component 2 – Improving the Labor Market Orientation through Targeted Interventions. This component would finance the design and implementation of an institution- and needs-based program (Higher Education Improvement Program - HEIP¹) aimed to improving the labor market orientation of Moldova's higher education institutions. It would also support the research done at the level of universities, given the possibility of financing the improvement of laboratories. This program may primarily benefit **nine public universities** in the areas of **pedagogy, information technologies, engineering and health (medicine)**, as well as **six pedagogical colleges**. Universities and colleges to benefit from this program would not be those institutions closed as a result of the consolidations of the network of universities.

¹ Even though pedagogical colleges would also benefit from this program, it's called HEIP for the sake of simplicity.

Sub-component 2.1 - HEIP Preparation. This component would finance technical assistance for the (i) preparation of improvement programs by selected universities and colleges, including the development of guidelines for beneficiaries, (ii) evaluation of the proposed programs, and (iii) carrying out of the fiduciary tasks (procurement and financial management) at the implementation stage of the HEIP. It would help with mitigating the risk associated with the limited fiduciary capacity of some HEIP beneficiaries.

Sub-component 2.2 – HEIP Implementation. This sub-component would finance the implementation of the HEIP’s awarded proposals. All nine public universities in the areas of pedagogy, information technologies, engineering and health (medicine), as well as six pedagogical colleges would be eligible to benefit from this stage. These institutions should prepare proposals for addressing their needs in labor market orientation, research and learning.

Component 3 – Project Management. This component would *support the day-to-day management and monitoring of the proposed Project* through the establishment and maintenance of the Project Management Team (PMT). The PMT would provide managerial, fiduciary and technical support to the implementation of the proposed Project for its full duration. This component would also finance: (i) *project monitoring studies or surveys*, (ii) *the required annual project audits*, as well as the (iii) *design and implementation of a project-specific Grievance Redress Mechanism (GRM)*. The project’s GRM should be able to capture grievance through various channels including telephone and Internet-based applications for computers and smart phones. The results of the Project’s GRM should be made public by the MoECR.

Purpose and Objective of the Stakeholder Engagement Plan

The purpose of the Stakeholder Engagement Plan (SEP) is to ensure appropriate stakeholder consultation and information disclosure in the context of Moldova. The goal of the SEP is to help decision-making and facilitate project implementation by involving beneficiaries and other stakeholders in a way that gives these groups the opportunity to provide feedback and express their views on intended project outcomes, benefits and potential adverse consequences. The SEP is a useful tool to manage communication between the project and its stakeholders.

The main objectives of the SEP are the following:

- To understand the stakeholder engagement requirements of the Moldovan legislation
- To identify key stakeholders that are affected, and/or able to influence the Project and its activities
- To develop a stakeholder’s engagement process that gives stakeholders the opportunity to participate and influence project design and implementation
- To define the information disclosure provisions under the project
- To establish a formal Grievance Redress Mechanism under the project
- To define roles and responsibilities for the implementation of the SEP
- To define the monitoring arrangements to ensure that the SEP remains an effective and up-to-date tool for stakeholder engagement

2. REGULATORY CONTEXT

2.1. Relevant Moldovan Stakeholder Engagement Legislation

Moldova has the following citizen/stakeholder engagement legislation that relates both the right to access information and participation in policy development and decision-making:

Access to Information

- The right to information is guaranteed by the Constitution of the Republic of Moldova in Article 34 while the Access to Information Law has been granting access to public data since 2000. Article 5 of the Law on Access to Information stipulates that the direct subjects of this Law are both Central and Local Public Administration Authorities. The Law on Access to Information (adopted in 2000), restricts public access to state secrets, confidential business information submitted to public institutions under conditions of confidentiality, and personal data, the disclosure of which may be considered interference in one's private life.

There is a guide for journalists on legal access to government information developed by Access Info Europe and the Network for Reporting on Eastern Europe. It provides very detailed guidance on access to information, data security, and how to submit a request for information among others. There is another guide for public servants and journalists developed in 2015 by the Moldovan Independent Journalism Center and Civil Rights Defenders, which provides a clear illustration of how the Law on Access to Information should be implemented, with specific tips for public servants and journalists.

The Citizen Engagement Legislation

- The Law on Transparency in Decision-Making Processes #239 of 2008 defines how the consultation process with the civil society takes place. It identifies the following phases in ensuring the transparency of the decision-making process: a) informing the public about the initiation process of the decision drafting; b) making the draft decision/policy available to stakeholders; c) consulting citizens, associations and other stakeholders; d) reviewing the citizens and other stakeholders' recommendations; e) informing the public about the decision taken.
- The above law had been supplemented by Government Order #967 of August 8, 2016 on the exact consultation mechanisms with civil society. This order sets the framework for consultation, describing the step by step tasks, roles and responsibilities of the authorities, including deadlines, consultation methods, and transparency of the adoption of decisions. It also recommends that local public administrations update their internal procedures related to the transparency of the decision-making process. Article 16/1 of the Law on Transparency in Decision-making mentions that for the infringement of the respective law, the persons bear disciplinary and administrative responsibility.
- The Government Order # 11 as of January 19, 2010 created the National Participation Council as an advisory body to the Prime Minister's office, involving the civil society in the policy decision-making process. However, the operation of the National Participation Council has not been regular.

Moldova currently does not have clear national legislative provisions on the citizen and stakeholder engagement in the more specific investment programs and projects. In those cases, it relies on the relevant provisions of the donor organizations.

2.2. World Bank Requirements

The World Bank has a long history of multi-stakeholder engagement and strategies to promote effective project preparation, project implementation and project monitoring, which entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key enablers to achieving results.

In August 2016, the World Bank's Board of Executive Directors approved the Environmental and Social Framework (ESF), which went into effect in 2018 and progressively replaced the Bank's Safeguards. The ESF protects people and the environment from potential adverse impacts that could arise from Bank-financed projects and promotes sustainable development. Within the ESF, ten Environmental and Social Standards highlighted responsibilities for Borrowers. The Standards are designed to help Borrowers manage project risks and impacts as well as improve environmental and social performance, consistent with good international practice and national and international obligations.

The Environmental and Social Standard on Stakeholder Engagement and Information Disclosure defines the requirements for stakeholder engagement which are the following:

- Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them
- Assess stakeholder interest and support for the project and enable stakeholders' views to be taken into account in project design
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle
- Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner

3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

Consultations Prior to this SEP

The analytical underpinnings of the project are based largely on the Country Economic Memorandum: Rekindling Economic Dynamism, which had a special chapter dedicated to the required improvements in the relevance and efficiency of the higher education in Moldova to facilitate technology absorption by the Moldovan economy. The findings of the Country Economic Memorandum were discussed at the World Bank office and involved important stakeholders, such as the Ministry of Education and Research, Ministry of Finance, Ministry of Economy and Infrastructure as well as private sector representatives.

Consultations on the Proposed Project Design/Components

Although the SEP was still under development, the World Bank Project Teams and the Ministerial teams engaged in extensive consultations with all relevant stakeholders during each visit in the project preparation process, including Ministry of Finance, Chamber of Commerce and business associations. The discussions focused on options to foster the engagement of citizens in the preparation and implementation of the proposed Project. The teams agreed upon further discussing how to support citizen engagement by: (i) promoting the participation of employers in the development of occupation standards under Component 1; (ii) developing dialogue platforms to genuinely engage university communities on project implementation; (iii) engaging employers in participatory planning and designing of HEIP-supported activities (e.g. internship programs and career guidance); and (iv) facilitating participatory monitoring and evaluation of Project activities and helping with laying the foundation for institutions that are responsive to feedback from a range of stakeholders. Finally, the World Bank team advised the MoECR to consider developing and maintaining a website with Project materials, open for public review. The teams also agreed that measurable beneficiary feedback indicators that would provide information to enhance project processes and outcomes should be considered for the project results framework. Last, but not least, in May 2019, the preparation teams held a roundtable with the management of Moldovan universities where the teams presented the proposed project design and components and sought their views and input into the design of the project.

The table below summarizes the institutions and agencies consulted and the topics of engagement during the project preparation visits.

Table 1: Summary of Stakeholders and Issues Discussed

Stakeholder	Main topics discussed
Ministry of Education, Culture and Research (MECR); National Agency for Quality Assurance in Education and Research (NAQAER)	<ul style="list-style-type: none"> • Goals/objectives the MECS wants to achieve with the project • Tentative design of the project components to meet the expectations of the MECR • Strategies to achieve the goals • Indicators the MBSSE wants to use to measure attainment of the goals (results framework) • Monitoring mechanism for the project • Implementation arrangement for the project • Project preparation timeline and the documentation required, such as the environmental and social management plan, the stakeholder engagement plan and the compliance with gender requirements of the World Bank
Ministry of Health, Social Protection and Labor; National Employment Agency,	<ul style="list-style-type: none"> • Consultations on potential synergies and cross-sectorial collaboration on the overlapping issues and the potential inclusion in the project design
Ministry of Finance	<ul style="list-style-type: none"> • Alignment of the project with national strategy • Investment viability of the project • Sustainability considerations in the project design • Contribution of the project to the county’s economic development, poverty reduction and shared prosperity • Contribution of the project to enhanced human capital.
University Rectors/Management/Adult Training Providers	<ul style="list-style-type: none"> • Seeking feedback on proposed project components and activities • Input on the university improvement program; determination of the training and equipment needs • Input on the university funding scheme
Chamber of Commerce, Business Associations;	<ul style="list-style-type: none"> • Input on how the project address the skills required by the businesses in Moldova • Input on the practical collaboration arrangements during implementation

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

There are several groups of people and social groups who are interested in the Project on different levels. For this Project, these may be identified as following:

- People, social groups and organization who will be directly or indirectly be affected by the project: This group mainly includes universities and their management boards, students and lecturers who will benefit from the proposed investments or be affected by the funding formula.
- People, social groups and organizations who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project. This group mainly

includes governmental entities such as the Ministry of Finance, Ministry of Economy and Infrastructure, the business community from various sectors, the National Employment Agency.

- Vulnerable and disadvantaged groups - The Ministry of Economy, Culture and Research identified the following vulnerable categories:
 - biological and social orphans;
 - children with severe physical and sensory disabilities;
 - children whose parents have physical and sensory disabilities;
 - children whose parents participated in the Moldovan war for territorial integrity and independence as well as those who participated in the liquidation of Chernobyl nuclear disaster;
 - households with more than four children;
 - graduates of high schools and technical colleges from Transnistria who completed their education according to the educational programs approved by the Moldovan authorities;
 - Roma communities;
 - youth who completed their military service.

The Ministry of Education, Culture and Research has the following policies in place to address the needs of these vulnerable groups. Fifteen percent of the total higher education spots that are funded by the state budget are allocated to biological and social orphans and to the disabled children. Every year, approximately 736 scholarships to higher education institutions are offered to representatives of the vulnerable groups mentioned above. It is expected that the number of the vulnerable groups benefiting from state support will increase as a result of the project. The Ministry of Education, Culture and Research will reach out to these groups and associations representing these groups to raise awareness about the benefits of the project and to ensure an inclusive approach to project implementation.

The main groups of stakeholders identified so far are listed in the table below. The list can be updated and modified during Project development or implementation.

1. Ministry of Education, Culture and Research
2. National Agency for Quality Assurance in Education and Research
3. Higher education institutions (universities and pedagogical colleges)
4. Teaching staff of universities and colleges
5. Rayon education authorities
6. Sectoral business associations
7. High school graduates and students
8. Representatives of the vulnerable groups identified above
9. National Employment Agency
10. Ministry of Finance
11. Ministry of Economy and Infrastructure
12. ODIM
13. Ministry of Health, Social Protection and Labor
14. Ministry of Agriculture

- **Summary of Stakeholder Interest in and Influence over the Project**

The table below summarizes the potential role, interests and influence for each of the above-mentioned stakeholders.

Table 2: Role, Interest and Influence of Stakeholders

Stakeholder	Potential Role of Stakeholder	Interest	Influence
MoECS	It is the main driver and implementer of the reform	High	High
MoF	Changes in the funding formula for higher education institutions; efficient use of the higher education investment program	High	High
HEI	Impacted by the financing formula, recipients of the investment facility	High	Medium
National Agency for Quality Assurance in Education and Research (NAQAER)	Provide the quality assessment framework and methodology	High	High
Sectorial NGOs and Think Tanks	Provide additional policy advice and input	Medium	Low
Multilateral and bilateral donors	Provide investments in similar areas and need to coordinate to avoid overlap and maximize impact	High	Medium
High school and university students, including vulnerable groups	Benefit from improved education which may affect their life-long earning potential	High	Low
Parents	Interested in ensuring an improved higher education for their children	High	Low

The table below summarizes the stakeholders involved in each project component and sub-component for ease of reference:

Table 3: Stakeholders Involved in Each Component

Project Component	Target Stakeholders	Area of Interest by Target Stakeholders	Other Interested Parties
Component 1: Improving the quality Assurance Mechanisms			
1.1: National Qualifications Framework and Quality Assurance	MECR, NAQAER; university and college management; university teaching staff; business community from the sectors where the qualification framework will be changed; relevant line ministries	Improvements in the National Qualifications Framework; Modernization of the Quality Assurance System;	MoF, sectoral NGOs; Trade Unions; think tanks; National Employment Agency; ODIM; Academy of Sciences

1.2: System Management and Monitoring	MECR; University and college management; high school graduates; parents of high school graduates; relevant line ministries	The operation and usability of the new/online admission system	MoF, Ministry of Economy and Infrastructure; sectoral NGOs and think tanks; National Employment Agency
1.3: Higher Education Financing	MECR; university and college management boards; MoF; other relevant ministries because they usually fund their sectoral higher education institutions	The impact of the proposed financing changes on the financial flows to the universities; the use of guidelines by ministry staff	Sectoral NGOs and think tanks; Academy of Sciences; National Employment Agency; Ministry of Economy and Infrastructure
Component 2: Improving Labor Market Orientation through Targeted Interventions			
2.1 and 2.2: HEIP Preparation	MECR; university and college management boards; Teaching staff of universities; students; parents of students; relevant ministries	University management interested in the requirements and criteria for acceptance to the university improvement program; Teaching staff who will benefit from training and teaching materials/goods to improve the pedagogical process; Students interested in an improved teaching process	MoF; sectoral NGOs and think tanks; National Employment Agency; Academy of Sciences
Component 3: Program Management			
3.1 Program Management and coordination Monitoring and Evaluation	MECR; MoF	Oversight and evaluation Capacity building	Ministry of Economy and Infrastructure; National Employment Agency;

5. STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an inclusive process that must be conducted throughout the project life cycle. The table below presents key stakeholder engagement activities to take place during the project preparation stage through to implementation and closure.

- **Stakeholder Engagement Action Plan – Preparation Phase**

Target Stakeholders	Stakeholder Engagement Actions	Expected discussions/decisions	Timing	Communication methods				
				Round-tables	Individual Meetings	Letters	Document Disclosure	Information Campaign
Project Preparation Phase								
All	Agreement on/Disclosure of the SEP	Stakeholders have been consulted and informed on the SEP and GRM process	July 2019					
All	Agreement on/Disclosure of the GRM		July 2019					
All	Update of SEP		monthly					
Higher-education institutions, MECR management; sectoral business associations; NAQAER, raion education authorities; associations representing vulnerable groups	Discussion of the qualification standards framework	<ul style="list-style-type: none"> • Agreement on the need for the qualification framework; • Agreement on the process for improving the qualifications framework; • Agreement on the timetable for standards update 	July-August 2019	Yes	Yes	Yes	Yes	Yes
Higher-education institutions' management; sectoral business associations; NAQAER	Modernization of the Quality Assurance System	<ul style="list-style-type: none"> • The need and expected benefits of the QAS modernization • Agreement on the process and timetable for the implementation of the quality assurance system 	July-August 2019	Yes	Yes	Yes	Yes	Yes

Higher-education institutions; student associations; raion education departments; associations representing vulnerable groups	Admissions and Management Systems	<ul style="list-style-type: none"> • Seek input on the functionalities and usability of the admissions and management system • Discuss the tentative process and timetable for the development and roll-out of the system • Discuss the promotion campaign required to educate the graduates about the switch to the online admissions system 	July-August 2019	Yes	Yes	Yes	Yes	Yes
MECR; university and college management boards; MoF; associations representing vulnerable groups	Higher Education Financing	<ul style="list-style-type: none"> • Stakeholders understanding why the system will be changed, the expected benefits and the process of change. • Inclusive process for designing and agreeing on the changes of the system • Discuss the process and expected timetable of pilot and roll-out 	July-August 2019	Yes	Yes	Yes	Yes	Yes
	University Improvement Program	<ul style="list-style-type: none"> • Stakeholders understanding the essence and phasing of the program. • Stakeholders providing input on the content of the program and mix of software/hardware required • Stakeholders understanding the eligibility and proposal requirements for a successful award 	July-August 2019	Yes	Yes	Yes	Yes	Yes

MECR, MoF; associations representing vulnerable groups	Project Management and M&E	<ul style="list-style-type: none"> How to monitor the project activities and achievement of results framework 	July-August 2019	Yes	Yes	Yes	Yes	Yes
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• **Stakeholder Engagement Action Plan - Implementation Phase**

Target Stakeholders	Stakeholder Engagement Actions	Expected discussions/decisions	Timing	Communication methods				
				Round-tables	Individual Meetings	Letters	Document Disclosure	Information Campaign
Project Implementation Phase								
All	Report on Implementation of SEP	Stakeholders have been informed about the outcome of the SEP implementation and GRM reviews and they had the opportunity to provide feedback into the process and assess how previous feedback was incorporated; discuss the dissemination of the GRM and SEP implementation	Semi-annually and on need basis					
All	Report/Disclosure of the GRM		Semi-annually and on need basis					
Higher-education institutions, MECR management; sectoral business associations; NAQAER, raion education authorities; associations representing vulnerable groups	Discussion of the qualification standards framework	<ul style="list-style-type: none"> Discussion of the progress made and implementation corrections required Discussion of the immediate results after the introduction of the framework for specific sectors 	Semi-annually and on need basis	Yes	Yes	Yes	Yes	
Higher-education institutions' management; sectoral business associations;	Modernization of the Quality Assurance System	<ul style="list-style-type: none"> Implementation progress and corrections required Feedback on the accreditation process of 	Semi-annually and on need basis	Yes	Yes	Yes	Yes	

NAQAER; associations representing vulnerable groups		<ul style="list-style-type: none"> bachelor, master and PhD degrees Progress on the accreditation of higher education institutions 						
Higher-education institutions; student associations; raion education departments; associations representing vulnerable groups	Admissions and Management Systems	<ul style="list-style-type: none"> Progress on the implementation and roll-out of the system Progress of the promotion campaign required to educate the graduates about the switch to the online admissions system 	Semi-annually and on need basis	Yes	Yes	Yes	Yes	
MECR; university and college management boards; MoF; associations representing vulnerable groups	Higher Education Financing	<ul style="list-style-type: none"> Implementation progress of the new funding system Discussion of the preliminary results, feedback and corrections required. 	Semi-annually and on need basis	Yes	Yes	Yes	Yes	
	University Improvement Program	<ul style="list-style-type: none"> Discussion of the launch of the program Discussion on the outcome of the awards granted; Updates on the implementation progress of individual university programs 	Semi-annually and on need basis	Yes	Yes	Yes	Yes	
MECR, MoF; associations representing vulnerable groups	Project Management and M&E	<ul style="list-style-type: none"> Report on the progress and outcome indicators of the project and the corrections required. 	Semi-annually and on need basis	Yes	Yes			

• **Information Disclosure Approach**

The table below provides a preliminary summary of the suggested information to be disclosed based on the project design and topics that might be of interest to stakeholders. The table is a living document that may be modified and changed following input and suggestions from project stakeholders:

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
All	Proposed Project Design; PAD (check the WB requirements for PAD disclosure)	Ministry of Education website; distribution via email to stakeholders, universities/school websites or information boards	Before project effectiveness	All	Ministry of Education, Culture and Research/WB team
All	ESMF documentation that is required for disclosure by the WB, including Stakeholder Engagement Plan, GRM description	Ministry of Education website; distribution via email to stakeholders, universities/school websites or information boards	Before project effectiveness	All	Ministry of Education, Culture and Research/WB team
Component 1: Improving the Quality Assurance Mechanisms					
Subcomponent 1.1 National Qualifications Framework and Quality Assurance	Report on Proposed Improvements in the National Qualifications Framework; Report on proposed Changes in the the Quality Assurance System;	Post on ministerial website; emails with the information or linkages to information; roundtables and workshops	After proposed improvements are developed After the report on proposed changes is finalized	University and technical college management/ raion educational authorities; MoF/think tanks and NGOs; Ministry of Health, Social Protection and	Ministry of Education, Culture and Research/PMU

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
Subcomponent 1.2 System Management and Monitoring	Video presentation on the functionalities of the new online system admission system Proposed functionalities and delivery of the HEMIS Proposed functionalities and delivery of the LMIS	Post on ministerial website; roundtables and workshops with relevant stakeholders	Once the online admissions system becomes operational Management of universities Ministry of Health, Labor and Social Protection, National Employment Agency	University and technical college management/ rayon educational authorities; MoF/think tanks and NGOs	Ministry of Education, Culture and Research/PMU
Subcomponent 1.3 Higher Education Financing	Report on the proposed changes in the financing	Post on ministerial website; emails with the information or linkages to information; roundtables and workshops	After the proposed financing changes have been developed		Ministry of Education, Culture and Research/PMU
Component 2: Improving Labor Market Orientation through Targeted Interventions					
HEIP	Eligibility and participation criteria for HEIP	Post on ministerial website; emails with the information to stakeholders or linkages to information; roundtables and workshops	After the HEIP parameters are developed	University and college management who are expected to benefit from the programs	Ministry of Education, Culture and Research/PMU
Program Management and coordination Monitoring and Evaluation					
Program Management, Coordination and Monitoring and Evaluation	Project Progress Reports ESMF, SEP and GRM Monitoring Reports	Ministry of Education website; distribution via email to	Quarterly, semi-annually or annually as appropriate for the type of reporting	All stakeholders	Ministry of Education, Culture and Research/PMU

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
		stakeholders, roundtables			

- **Timeline for Provision of Feedback**

The Ministry of Education, Culture and Research and the PMU will provide appropriate background and relevant technical information to stakeholders' whose feedback is sought on various project issues with sufficient advance notice (5-10 business days) so that the stakeholders have enough time to prepare to provide meaningful feedback. The PMU will collect, review and report back to stakeholders on how the comments were incorporated or the rationale for not incorporating them within 10 to 30 working days from the stakeholder engagement event.

- **Resources and Responsibilities for SEP Implementation and Monitoring**

The overall coordination role in the implementation of the SEP will be carried out by the MoECR. The MoECR has experience with the implementation of projects financed by international development organizations, including the World Bank. At present, it is the main implementing agency for the Moldova Education Reform Project (Credit No. 6181-MD).

A PMU has been established within the MoECR for the management of the implementation of this Project. This PTM has a good track record of project implementation and ensures compliance with the applicable World Bank procedures. Its staff are hired as part-time individual consultants, financed through the mentioned Project. It includes a Project Coordinator, one Procurement Specialist, one Procurement Assistant and one Financial Management Specialist. Given the nature of the proposed package of interventions to be funded by the Project and the new Environmental and Social Framework applicable to the Project, the PMU will include one Environmental and Social Specialist and one Citizen Engagement and Grievance Redress Specialist who will ensure compliance with the World Bank's ESF guidelines and implementation of this SEP. In addition, to these professionals, the MoECR will be allowed to hire as many individual consultants as needed to help with the implementation of specific project activities over the course of the project, including for raising awareness and SEP implementation.

The Project Coordinator would be the liaison officer between the MoECR and the World Bank and will be held accountable for the compliance with ESF guidelines agreed upon under the project. He or she should report to the Project Director (MoECR's staff) who will be appointed by the Minister of Education, Culture and Research. The MoECR will play an important role in the implementation of the proposed Project include those responsible for (i) higher education, (ii) NQF, and (iii) information, communication and technologies.

The PMU would be responsible for day-to-day project management activities, including monitoring and reporting on project progress to all the relevant stakeholders (please see the table on Information Disclosure). For this purpose, the PMU will organize, at regular intervals, workshops involving representatives of all stakeholders to present project progress and seek stakeholder input. The costs for all these activities are budgeted under the Project Management component and may be increased should there be a need.

6. GRIEVANCE REDRESS MECHANISM

Transparency and accountability are core elements of the Moldova Higher Education Reform Project (MHEP). For this purpose, the project will include a Grievance Redress Mechanism (GRM) that is already used in a different project funded by the World Bank. The goal of the GRM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities. The GRM is a mechanism that allows for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GRM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as an important feedback and learning mechanism that can help improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

6.1. Definition of GRM

For the purposes of this SEP, a Grievance Redress Mechanism is a process for receiving, evaluating, and addressing project-related complaints from citizens and affected communities at the level of the project.

The terms ‘grievance’ and ‘complaint’ are used interchangeably.

6.2. GRM scope and use

SCOPE: MERP’s Grievance Redress Mechanism will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

GRM’s users: Project beneficiaries, project workers, project affected people (i.e. those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry can use the GRM for the above purposes (see Scope).

GRM’s management: The GRM for Moldova Higher Education Project is managed by the MHEP’s Project Coordination Unit, under the direct responsibility of MHEP’s Executive Director.

Submission of complaints: Complaints can be expressed at any time throughout project implementation.

6.3. Procedures

Channels to make complaints

MERP establishes the following channels through which citizens/beneficiaries/Project Affected Persons (PAPs) can make complaints regarding project-funded activities:

- a. By Email
 - MECR/MHEP: merp@edu.md,
- b. Internet:
 - MECR’s website: MHEP’s section, GRM rubric
- c. In writing:
 - MECR/MHEP: Letter addressed MHEP’s Executive Director at 180 Stefan cel Mare boulevard, 13th floor, office 1305, 1307, Chisinau city

- d. By phone:
 - MECR/MHEP: [022-23-25-02]
- e. By fax:
 - MECR/MERP: 022-23-25-02
- f. Other: Written complaints or phone calls to project staff at MECR/MHEP.

The project shall ensure flexibility in the channels available for complaints, as well as ensure accessibility to the contact information for individuals who make complaints. MERP's Executive Director must be informed of all complaints received.

Confidentiality and conflict of interest

Complaints may be made anonymously and confidentiality will be ensured in all instances, including when the person making the complaint is known. For this reason, multiple channels to submit complaints have been established and conflicts of interest will be avoided.

Receipt and recording of complaints

The person receiving the complaint will complete a grievance form (see Annex A) and will record the complaint in the Register of Complaints, kept under MHEP. Then, the complaint is to be submitted immediately to MHEP's Executive Director.

Within one week of receiving the complaint, MERP's Executive Director must have forwarded the complaint to the department/individual expected to address it. In consultation with the Project Coordinator, MERP's Executive Director is responsible for determining who to direct the complaint to, whether a complaint requires an investigation (or not), and the timeframe to respond to it.

When determining who will be the investigating officer, the Executive Director should ensure that there is no conflict of interest, i.e. all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.

Once the investigation process has been established, the person responsible for managing the GRM records enters this data into the Register of Complaints, and informs the complainant that his/her grievance was received and the timeframe expected for the response.

The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications. Once a month, the Project Coordinator should submit to MHEP's Executive Director a list of all complaints received, the follow-up required, and the status of complaints from the previous month ("on-going" or "addressed").

Investigation

According to the National Law on complaints no. 190 dated July 19, 1994, with further amendments, the complaints shall be examined within 30 working days of the receipt of the grievance. The person responsible for investigating the complaint will gather facts in order to generate a clear picture of the circumstances surrounding the grievance. The investigation/follow-up can include site visits, review of documents and a meeting with those who could resolve the issue.

The results of investigation and the proposed response to the complainant will be presented for consideration to MHEP's Project Coordinator who will decide on the course of action. Once a decision has been made and the complainant informed, the investigating specialist describes the actions to be taken in the grievance form (see Annex A), along with the details of the investigation and the findings, and submits the response to the corresponding Executive Director for signing.

Responding to Complaints

The complainant will be informed about the results of verification via letter, email or by post, as received. The response shall be based on the materials of the investigation and, if appropriate, shall contain references to the national legislation.

The deadline for investigating the complaint may be extended by 30 working days by the corresponding Executive Director, and the complainant is to be informed about this fact, whether:

- a) additional consultations are needed to provide response to the complaint;
- b) the complaint refers to a complex volume of information and it is necessary to study additional materials for the response.

6.4. Awareness building

Information provided in an accessible format

Information about the Grievance Redress Mechanism will be available at the Ministry of Education, Culture and Research's website (MERP's section) and Moldova Social Investment Fund's website, and will be included in communications with stakeholders and in events organized under the project. The Ministry of Education, Culture and Research will also inform via email all the Local Education Departments, and beneficiary schools of all project activities, with instructions that the information be publicly displayed. The information about the GRM will also be included as part of the communication campaign about the project.

The MERP will include information provided on the scope of the GRM, the eligibility criteria to make a complaint, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints.

6.5. Staffing and capacity building

Tasks and responsibilities of MERP's teams on the GRM

The responsibilities for the management of the GRM system include the following and may be updated from time to time in consultation with the ministerial management team and the World Bank task teams:

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording complaints
- Notification to the complainant on the receipt and timeline to review a complaint
- Sorting/categorization of complaints

- Thorough examination of the issues, including the causal link between project activities and alleged damage/harm/nuisance
- Decision-making based on such examination
- Processing appeals or continuous communication with complainants with the purpose to resolve issues amicably
- Publishing responses to complaints, unless otherwise is requested by complainants due to privacy or other concerns (see above 4.2)
- Organization and implementation of information materials and awareness campaigns
- Reporting and feedback on GRM results

6.6. Transparency, monitoring and reporting

Transparency

Policies, procedures and regular updates on the GRM system, the complaints made and resolved, will be available on the Ministry of Education, Culture and Research's web page, MERP's section. They will be updated quarterly.

Regular internal monitoring and reporting

The Executive Director will assess quarterly the functioning of the GRM in order to:

- Provide a monthly/quarterly snapshot of GRM results, including any suggestions and questions, to the project team and the management.
- Review the status of complaints to track which are not yet resolved and suggest any needed remedial action.
- In the case of MSIF, as part of its regular implementation reports to MECR/MHEP, it will inform the Project Coordinator about the complaints received and their status.

During quarterly MERP's meetings, the project team shall discuss and review the effectiveness and use of the GRM and gather suggestions on how to improve it.

Reporting in half-yearly and annual progress reports submitted to the World Bank

In the semi-annual project implementation reports submitted to the World Bank, MERP shall include a GRM section, which provides updated information on the following:

- Status of establishment of the GRM (procedures, staffing, awareness building, etc.);
- Quantitative data on the number of complaints received, the number that were relevant, and the number resolved;
- Qualitative data on the type of complaints and answers provided, issues that are unresolved;
- Time taken to resolve complaints;
- Number of grievances resolved at the lowest level, raised to higher levels;
- Any particular issues faced with the procedures/staffing or use;
- Factors that may be affecting the use of the GRM/beneficiary feedback system;
- Any corrective measures adopted.

ANNEX A – GRIEVANCE/INQUIRY RECORD

GRIEVANCE/INQUIRY RECORD (Form A)				
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project's file. Attach any supporting documentation/letters as relevant.</i>				
Date Grievance Received:		Name of Staff Completing Form:		
Grievance Received (check <input checked="" type="checkbox"/>): <input type="checkbox"/> National <input type="checkbox"/> Oblast <input type="checkbox"/> Rayon <input type="checkbox"/> Village				
Mode of Filing Inquiry or Grievance (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"/> Website <input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____				
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>				
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	Oblast:	Rayon:	Village:	
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				
	Category 1	Social Safeguards		
	Category 2	Environmental Safeguards		
	Category 3	Grievances regarding violations of policies, guidelines and procedures		
	Category 4	Grievances regarding contract violations		
	Category 5	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns		
	Category 6	Grievances regarding abuse of power/intervention by project or government officials		
	Category 7	Grievances regarding MERP staff performance		
	Category 8	Reports of force majeure		
	Category 9	Grievance about project interventions		
	Category 10	Other		
Who should handle and follow up on the grievance:				
Progress in resolving the grievance (e.g answered, being resolved, settled):				

REFERENCES

Moldova Higher Education Project Appraisal Document – as of November 16, 2019

Republic of Moldova Handbook on Transparency and Citizen Participation, Council of Europe, December 2017

The World Bank Environmental and Social Management Framework, The World Bank, 2017

ESS10 Guidance Notes, The World Bank, 2017

Moldova Country Partnership Framework for the period FY18-21

Moldova Country Economic Memorandum: Rekindling Economic Dynamism, World Bank, 2019