The Republic of Seychelles

Strengthening Quality of the Social Protection System

Program for Results (PforR)

Environmental and Social Systems Assessment (ESSA)

©Stakeholders Meeting

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This ESSA was undertaken by Salma Omar (Senior Social Development Specialist), Maminaina Rasamoelina (Natural Resources Management Specialist) and Erminio Jocitala (Consultant).
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EXECUTIVE SUMMARY

The “strengthening Quality of the Social Protection System” program in Seychelles will be financed by the World Bank through the Program-for-Results (PforR) instrument and implemented by the Agency for Social Protection (ASP).

The Program Development Objective (PDO) will assist the government of Seychelles to reform the social protection programs, and focus on three pillars: (i) support the government in developing a social information system to facilitate efficiency in the implementation of the social protection programs; (ii) reforms for improving efficiency on four main social protection programs- Home Care Program (HCP), Disability Program (DP), Social Welfare Assistance (SWA) and Retirement Pension (RP); and (iii) support the establishment of a policy coordination mechanism at national level while providing protocols for district level social protection programs implementation.

This Environmental and Social Systems Assessment (ESSA) assesses the institutional and organizational capacity of the program implementing agency (ASP) to achieve program objective against environmental and social risks associated with the proposed program activities. Where the implementing agency does not meet the Bank's requirements, such as lack of regulatory authority or organizational capacity to effectively manage environmental or social risks, complementary actions are proposed to strengthen the management system as well as additional measures to improve program performance. To do so, the ESSA 6 core ESSA for evaluation of environmental and social management systems as required for PforR financing. For each principle, the ESSA assesses a set of planning elements to assess the adequacy of existing system for implementation of the proposed program.

From environmental perspective, the PforR, as is currently designed is a Low Risk Program on the environmental aspects. There is no activity that is likely to cause significant negative impacts to the environment, either in terms of spatial scale, magnitude or in terms of duration. Furthermore, the Program does not involve any construction or any “development” activity (as defined under the EPA, 2016) planned, nor any activity to be undertaken in protected or ecologically sensitive areas.

However, Pillar 1 of the Program seeks to revise the design of the existing Social Protection Programs (pension, disability benefits, home care program, Social welfare assistance), including the revision of the eligibility criteria for those programs. One of the potential consequences of the review would be a change in both the number and composition of people who will be eligible for those programs. Those that become ineligible will need to be re-skilled or re-trained to remain productive and ensure earning opportunities for their households, as much as possible to contribute to the country’s economy. One of the most likely options to re-skill those people who were dropped from the SP programs would be to use the existing professional centers.

On the social side, the proposed program activities will have no major social impacts, as land acquisition and resettlement are not anticipated. Direct and indirect risks are associated with Core Principles 5 and 6. Under Core Principle 5, the program could adversely impact several vulnerable groups who were repeatedly highlighted as particularly vulnerable during the ESSA process. The groups consist of alcohol and drug users (estimated to be 5% of the population), teenage mothers, and female-headed households with intergenerational pattern of teenage pregnancy (no data

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1 Since this ESSA was drafted, the pillars and actions have been reorganized such that Pillar 1 now contains the efficiency reforms to the four programs listed above under Pillar 2, and Pillar 2 contains the reforms listed above under Pillars 1 and 3. This is merely an organizational change and does not affect any of the substance of the discussion.
The ESSA shows that the program will require a comprehensive understanding of the extent planned program activities are likely to impact on these groups and adopt measures to minimize/mitigate the expected risks and negative impacts and to enhance the positive ones.

Regarding Core Principle 6 on exacerbation of conflicts, the proposed program activities may directly trigger conflict between ASP and beneficiaries resulting from the rolling back of benefits from various social programs, especially in the context where approximately 50 percent of the population benefit directly or indirectly from various social programs. Institutional conflicts (Agencies and ministries and NGOs) could potentially be expected during implementation of activities under pillar 3. Indirectly, conflict between ASP and potential beneficiaries (SR) due to data privacy issues. Other risks include Gender Based-Violence that could emerge as part of implementation of planned activities, especially that relating to data collection and validation at district level.

While the overall environmental risk management system is robust, all the responsibilities for managing environmental lie under MEECC. In the case of the Program, articulations of institutional responsibilities and resources to support implementation plans need to be clarified: indeed, the key institutions for the implementation of the Program (i.e. Ministry of Family Affairs, Agency for Social Protection, Ministry of Social Affairs, Ministry of Employment, Immigration and Civil Status, etc.) do not necessarily have either the information to properly, nor the capacity to address environmental issues, even when they take place (e.g. case of disposal of fuel or discharge of pollutants in soil and streams).

The national social management systems to deal with vulnerability and conflict, broadly defined in chapter 3 of this report, are well defined and established. The country’s constitution recognizes the rights and need for protection vulnerable groups, but only makes explicit reference to the need of protection of children and young person, aged and disabled people. Though there is no reference to single mother as such, the constitution under section 30 provides for the rights of working mothers. It “recognizes the unique and natural maternal functions of women in society and undertakes as a result to take appropriate measures to ensure that a working mother is afforded special protection with respect to paid leave and her conditions at work during such a reasonable period as provided by law before and after childbirth”.

Also, the article 32 of the constitution on protection of families might be relevant for single mother. It states that “the State recognizes the family as the natural and fundamental element of the society and the right of everyone to form a family and undertakes to promote the legal, economic and social protection of the family”. There is no in the constitution, specific reference/provision of alcohol and drug user or teenage mothers. On the subject of conflict, the constitution does not explicitly make reference to conflict as such. It does refer though to mechanisms for resolving conflict/or grievances, such as the court system and appeal procedures; and grievance redress (ombudsman) in chapter 10. Other constitutional provisions relevant for the program relates to citizen participation and access to information.

Capacity assessment of PforR implementing agency to manage identified social risks was carried out. At the ASP level issues of vulnerability are highly recognized. For instance, the ASP charter outlines its mandate as one “to ensure the provision of comprehensive social security services and social relief against vulnerability within the constitutional and legislative framework of Seychelles”. It further states that its vision is “an empowered agency seeking excellence in service delivery with the aim of reaching the most vulnerable groups”. With respect to conflict, the ASP Customer Chart recognizes that for any reason, a person is not satisfied with its services and wish to complain, this is dealt with in a fair, thorough and timely manner. The ASP has an established complaint handling mechanism-
formal and informal. Evidence of policies or deliberate provisions for beneficiaries’ participation in programs and right to information could not be found.

The Agency has 84 staff mostly women (9 male staff members). The Agency has offices in each of 26 districts with 26 staff and 6 senior officers supervise each region. The structure of the Agency is presented in the chart—annex 1.

The Agency has adequate staff in place to handle case work but would benefit from some specialized functions such as on communication, stakeholder consultations, monitoring and evaluation. Staff interviewed by the ESSA Team both in the Head Office and regional offices showed a high level of commitment for their work. They receive applicants in both regional and Head Office and carry a heavy workload. Staff assess cases and provide information on the process of applications. They also provide information on social services that may be required by applicants. In regional offices, they are located within the same office as Social Affairs Department staff who can be easily approached to provide other support.

Staff stated that social welfare payments are the most complicated to process and consume a lot of time. Delays are caused by information that is sought from other departments or agencies and responses and staff need to follow-up often to receive a response. A linked information system through which they can access all the necessary details is an essential requirement.

The Agency supports its staff on training requirements. There is a training plan in place and the Agency provides financial support to undertake specialized qualifications in social work and other related disciplines. However, staff also identified the need to receive an orientation training on benefits and how these are assessed. While benefit assessment is undertaken through an online management system in which applicant data is filled in, they are often unable to provide answers as to why a benefit is calculated to a certain level. This aspect is learnt “on the job”.

Staff also identified the need for counselling support as they deal with stressful cases that take a toll on their mental and emotional health. Applicants discuss their family issues with staff for which specialized skills are required. Staff in Headquarters are overburdened and identified the need for extra support. Further, staff reported that they sometimes face abuse and threatening behavior from applicants who are dissatisfied with the benefits they receive.

Staff realize that many eligible people do not come forward to claim benefits. They identified that a robust communication and outreach mechanism for such areas and households is required but they neither have the means, resources or formal responsibility to do so. Communication function was handled by one staff member who has recently resigned. The Agency’s website is also not functional. The Agency reported that there are plans in place to establish a panel in each district to identify eligible households in order to register them for social welfare payments.

The Home Care staff oversees the program implementation by carrying out visits to recipients. Staff realize that monitoring of patients has reduced substantially over the years due to lack of personnel. Further, careers are not qualified and there are cases of disagreements and inappropriate behavior. In cases of complaints, beneficiaries can call the staff and discuss the arrangement.

From environmental standpoint, and as describe earlier, the Program’s main environmental risk rating is low, and potential risks are related to the re-skilling of people who will be dropped out of the Social Protection Programs because of the Program. The principal recommendations for each relevant ESSA core principle (1, 5 and 6) consist of the following:
Core principle 1: Environmental and social management procedures and processes are designed to: (a) promote environmental and social sustainability in the program design; (b) avoid, minimize, or mitigate against adverse impacts; and (c) promote informed decision making relating to a program’s environmental and social effects.

- Action 01: Develop environmental management capacity
- Action 02: Improve communication, collaboration and coordination between MEEECC and other entities
- Action 03: Establish and operationalize a communication unit
- Action 04: Update and improve existing Grievance Redress Mechanism
- Action 05: Build research capacity of Poverty Alleviation Department
- Action 06: Provide capacity support to the Program Steering Committee and the Technical Working Group

Core principle 5: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

- Action 01: Provide clear definition of vulnerability
- Action 02: Assess the impact of Social Welfare Programs
- Action 03: Regularly assess the impact of the revised eligibility criteria
- Action 04: Develop and implement Gender-Based-Violence (GBV)/Sexual Exploitation and Abuse (SEA) protocols
- Action 05: Establish and operationalize a Monitoring and Evaluation (M&E) System

Core principle 6: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

- Action 01: Carry out assessment of Non-governmental organizations (NGOs) and Civil Society Organizations (CSOs) to determine their role in the program, and implement and informed plan
**LIST OF ABBREVIATIONS AND ACCRONYMS**

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<tr>
<th>Abbreviation</th>
<th>Full Form</th>
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<tbody>
<tr>
<td>APDAR</td>
<td>Agency for Prevention of Drug Abuse and Rehabilitation</td>
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<td>CSOs</td>
<td>Civil Society Organizations</td>
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<td>DA</td>
<td>District Administration</td>
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<td>DLI</td>
<td>Disbursement Linked Indicator</td>
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<td>DP</td>
<td>Disability Program</td>
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<td>ESSA</td>
<td>Environmental and Social Systems Assessment</td>
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<td>GBV</td>
<td>Gender Based Violence</td>
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<td>GDP</td>
<td>Gross Domestic Product</td>
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<td>HCP</td>
<td>Home Care Program</td>
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<td>HIC</td>
<td>High-Income Country</td>
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<td>LTC</td>
<td>Long Term Care</td>
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<td>LUNGOS</td>
<td>Unit for Non-governmental organizations</td>
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<td>MFA</td>
<td>Ministry of Family Affairs</td>
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<td>MoCDSAS</td>
<td>Ministry of Community Development, Social Affairs and Sports</td>
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<td>MoE</td>
<td>Ministry of Education</td>
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<td>MoH</td>
<td>Ministry of Health</td>
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<td>MoL</td>
<td>Ministry of Labor</td>
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<td>MoU</td>
<td>Memorandum of Understanding</td>
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<td>NCE</td>
<td>National Council of Elderly</td>
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<td>NDP</td>
<td>National Development Program</td>
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<td>NDS</td>
<td>National Development Strategy</td>
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<td>NHRD</td>
<td>National Human Resource Development</td>
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<td>NHRDC</td>
<td>National Human Resources Development Council</td>
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<td>OJT</td>
<td>On-the-Job Training</td>
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<td>PforR</td>
<td>Program for Results</td>
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<td>SCCI</td>
<td>Seychelles Chamber of Commerce and Industry</td>
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<td>SDP</td>
<td>Skills Development Program</td>
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<td>SPSC</td>
<td>Social Protection Steering Committee</td>
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<td>SR</td>
<td>Social Registry</td>
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<td>SSA</td>
<td>Sub-Saharan Africa</td>
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<td>SWA</td>
<td>Social Welfare Assistance</td>
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<td>UBR</td>
<td>Unique Beneficiary Registry</td>
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<td>UNICEF</td>
<td>United Nations Children’s Fund</td>
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<td>UPMICS</td>
<td>Upper-Middle Income Countries</td>
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<td>URS</td>
<td>Unemployment Relief Scheme</td>
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<td>USS</td>
<td>United States Dollar</td>
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<td>WB</td>
<td>World Bank</td>
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<td>World Health Organization</td>
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1. INTRODUCTION

1.1 Context

Seychelles is one of the smallest countries in the world in terms of both its population and its land surface area. It comprises a total of 115 islands, but almost all of the population lives on the islands of Mahé (86 percent), and Praslin and La Digue (11 percent combined). Despite the challenges of its size, relatively isolated island nation, Seychelles is the only High-Income Country (HIC) in Sub-Saharan Africa (SSA) with a gross national income per capita equal to US$14,760 (2015, Atlas method). Services activity, led by tourism, accounts for about three-quarters of GDP. Industry contributes almost all of the rest of output, mainly fish processing. Primary sector activities account for only about 3 percent of output. Real GDP growth is above 4 percent, but it is expected to measure around 3.5 percent in coming years.

Extreme monetary poverty has been eliminated, but social inclusion is lagging, despite already generous social spending. Poverty in Seychelles, as defined for international comparison purposes, is very low: 2.5 percent at the US$3.10 per day (2011 Purchasing Power Parity, PPP) line. In contrast, the national poverty rate measured using a higher poverty line (US$13 per person per day in 2011 PPP dollars), indicates 39.3 percent of the population live below basic needs poverty line and 24.3 per cent below ultra-poverty line. Income inequality is significant, however, as measured by an income Gini coefficient of 0.47 (2012).

Although Seychelles has implemented a number of programs and developed several social protection instruments, these components remain fragmented. The Agency for Social Protection (ASP) under the Ministry of Family Affairs (MFA) is responsible for the implementation of most of the social protection programs, ranging from social pensions to social welfare for the poor, to programs targeting orphans and people with disability. Other smaller (both in terms of budget and scope) programs are run by different line Ministries, ranging from the Ministry of Community Development, Social Affairs and Sports (MoCDSAS) (foster care), Ministry of Education (dedicated fund and post-secondary bursaries), and Ministry of Transport (transport subsidies for seniors). Contributory pensions are managed by the Seychelles Pension Fund. Finally, the Ministry of Employment runs some active labor market programs addressing the poor and vulnerable but faces bottlenecks due to limited options for training and retraining low skilled workers.

Social protection spending has a significant impact on poverty relief, but it is skewed towards the elderly. As of 2015, Seychelles was spending as much as 3.3% of GDP on social protection, a level higher than the averages observed across SSA, small-state islands, and upper-middle income countries (UPMICs). It is estimated that, in absence of social protection programs, the poverty rate in Seychelles (estimated at national poverty line) would jump from 39 to 48 percent. Yet, social protection spending is significantly biased toward the old-age population. Elderly account for 9 percent of the population, yet they represent 22 percent of all the beneficiaries of non-contributory programs and receive as much as 42 percent of total benefits. In contrast, children account for 26 percent of the population,

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2 An island state in the western Indian Ocean,
4 Seychelles Social Protection Policy Note. World Bank, 2016. The perspective among HICs is different. If pension spending is included in the HICs, the total will be much higher than in Seychelles: average pension spending in the EU is more than 10 percent of GDP. The only difference is that Seychelles has chosen to finance a larger share of its pension spending from the budget than from contributions but Australia and New Zealand do the same.
but they are slightly sub-represented in terms of the proportion of the recipient population (23 percent). Only 13 percent of all non-contributory benefits are targeted to the new generation.

The largest social protection programs are the non-contributory Retirement Pension (RP), the Home Care Program (HCP) and the Disability Pension (DB). The Social Welfare Assistance (SWA), the main poverty targeted program, is much smaller both in terms of scope and budget. The RP provides a universal benefit equal to the minimum wage to all residents of Seychelles who are 63 or older. The HCP finances a half-time or full-time caregiver (or carer) to individuals that have demonstrated needs of caregiving, paid by the Government for those deemed to need some form of care and subject to a limited means-test. Under the current structure of the HCP, 70 percent of the carers are providing care in their own homes as they are family members of the beneficiary.

Disability benefits have recently been extended from working age adults to children born with disabilities, and provide cash benefits, but do not encourage a return to education in the case of children or to work in the case of adults. All three of these benefits are paid at the equivalent of minimum wage, SCR 5250 per month, although there is no legal requirement for this to be the case. The SWA is a poverty targeted benefit, supplementing household income up to the value of a basic consumption basket. Average SWA benefits are significantly lower than the minimum wage.

There is room for improved efficiency of the safety net system and to increase efficacy in poverty reduction. By design, two of the largest social protection programs, RP and HCP, do not explicitly target the poorest but still, 30 percent of the beneficiaries of the RP, and 50 percent of the beneficiaries of the HCP program, are in the lowest two quintiles. About 70 percent of the SWA beneficiaries are poor but with a limited coverage. Together, the spending analysis and the beneficiary incidence analysis suggest two important considerations: (i) in a context of rising inequality, the largest safety nets program need to ensure coverage among the poor; (ii) in a context of rapid aging, programs need to enhance labor force participation to exploit the human capital stock.

Active labor market programs have limited coverage of the poor and vulnerable. The Skills Development Program (SDP) provides an allowance to those aged 18-30 years with incomplete secondary education for their participation in on-the-job training (OJT) activities. The age restriction leaves out of the program a large mass of people and provides no accreditation of the OJT activity. The Unemployment Relief Scheme (URS) provides job search and labor intermediation services, with special attention to the poor, those receiving SWA, and other vulnerable groups. Still, uptake is low due to little interest in full time jobs. My First Job Scheme is a wage subsidy program that covers those graduates from post-secondary education. All these programs use eligibility criteria that exclude significant shares of the working age population due to age or program conditions. In addition, there are limited professional and technical training opportunities as most training relies on private sector on-the-job training opportunities, potentially causing detrimental impacts on increasing the productivity of the labor force.

In this context, the Government of Seychelles requested financial and technical support from the World Bank (WB) to improve the efficiency and quality of the social protection programs. In a context of growing inequality, the Government recognizes the paramount importance of improving the social protection programs to make it more redistributive towards the bottom 40 percent of the population income distribution. Furthermore, the rapid aging of the population poses a potential threat to spending on social transfers on one end, and productivity of the workforce on the other. A reform of

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5 The eligibility age is planned to be raised to 65 in 2023.
6 Announced to rise to 5750 in January 2020
7 HCP does means testing, and although it is not entirely perfect (no comprehensive outreach/intake), but it is targeted
the social protection programs is needed to achieve greater impact on the most vulnerable population, without further increasing the fiscal burden for the state. Finally, greater integration between the social protection programs and health, education and labor services will ensure delivering greater quality services to sustainably reduce vulnerability and increase productivity amongst the poorest population.

A Program for Results (PforR) lending instrument was chosen as the best-suited World Bank financing instrument for the proposed program. The choice of a PforR instrument relies on the following considerations: (i) the proposed reforms require a medium term effort that a PforR can support; (ii) the program will leverage the government’s existing social protection instruments and programs, to support the sustainability of reforms; (iii) the implementing agency’s installed technical capacity is high, and technical assistance is needed only on specific aspects of the reform; (iv) the Government has fiscal space to advance financial resources for set-up and operating costs; (v) the instrument contributes to a broader reform and expenditure programs; (vi) an approach based on specific results measured by performance indicators will help generate momentum for key policy reform actions to take place.

1.2 Program description

1.2.1 Program scope and activities

The World Bank proposes providing assistance to the Government of Seychelles through a Program for Results (PforR) to reform the social protection system. The Program is defined as the four largest cash transfer programs managed by ASP: RP, HCP, IDB, and SWA. The PforR aims at supporting the Government’s objectives above by concentrating efforts on two pillars: (i) Pillar 1 focuses on improving the efficiency of the programs, so that a higher percentage of social protection spending is allocated toward those in need, whether physical or financial, and including among the elderly; and (ii) Pillar 2 focuses on increasing the effectiveness of social protection programs by helping social protection beneficiaries access other services, providing home care beneficiaries better quality services, or timely delivering social assistance support during emergencies like the COVID-19 crisis.

Activities under Pillar I will include the need to legislate the new retirement age; undertake public information campaign to ensure citizens are aware of the, designing and putting in place systems to identify elderly in need who might need additional resources. Also, Home-Based Care will be made more efficient, and this will include establish new criteria, revising of means-test to help focus on those who might have greater needs rather than making the benefit widely available to most elderly. Activities under this pillar will also support reforms to the invalidity and disability pension, which presently use percentage of bodily impairment as eligibility criteria. Furthermore, the program will support reforms of the social welfare assistance benefit by broadening its criteria to cover socioeconomic needs, rather being focused exclusively on the difference between cash income and imputed expenditures.

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8 In 2017 the president decreed that age for receipt of the retirement pension will rise to 65 beginning January 1, 2023

9 Currently, many elderly and disabled qualify for home care on the basis of medical assessment which focuses on bodily impairment. The government is adopting the World Health Organization’s Disability Assessment Standard (WHODAS 2.0), which assesses the need for care on basis on the basis of functional limitations, not purely bodily impairment
Pillar 2 will finance activities that include support multi-sectoral policy preparation and monitoring of program implementation; establishment of an inter-ministerial committee on social protection with a Technical Working Group; review of District Authority Protocols where necessary to ensure cross-sector coordination at local level, with the District Administrator and the District Team, particularly the Social Protection Officer, providing a harmonized entry to social protection programs and support to the cross-sectoral referral processes; and establishment of consultation mechanisms which will lead to semi-annual Public Consultations on program implementation. Moreover, pillar 2 will support design and adoption of a unique household form, which will be used by all government services including the universal government-health care, which will enable household information to be gathered and shared with relevant MDA, when needed, with due attention to confidentiality; define inter-agency protocols for information sharing, including referral and counter-referral mechanisms. Pillar 2 will also support the effectiveness of the home care program by improving the quality of home care services through the establishment of a new Home Care Agency, with guideline, training requirement, and supervision of caregivers, and this will include the definition of training curriculum for full-time caregivers, and support the design of a grievance redress mechanism aligned with the ASP’s grievance and redress mechanisms. Pillar 2 include support timely delivery of social assistance emergency support, that is utilizing the social protection programs as mitigation mechanisms to partly offset the impact of emergencies caused by natural disasters, sector specific shocks (e.g. tourism, fishing), and others as defined by government emergency authorities. Under this pillar, the program will support operational adjustments of SP programs, and in particular, of the SWA to allow for temporary vertical and horizontal expansion.

The Table 1 below summarizes the proposed activities under the program, along with the related disbursement-linked indicators and verification protocols.
Table 1: Summary of proposed activities, disbursement linked indicators and verification protocols

<table>
<thead>
<tr>
<th>Pillar</th>
<th>Proposed activities</th>
<th>DLIs</th>
</tr>
</thead>
</table>
| **ONE:** Improving efficiency by allocating a higher percentage of social protection spending toward those in physical and financial need | 1.1 Demographic analysis to establish projected fiscal needs  
1.2 Revise eligibility criteria and HCP needs  
1.3 Establish revised protocols for Home Care services;  
1.4 Set up Home Care training programs; and  
1.5 Design Memorandum of Understanding (MoU) and operational design for training Home Carers;  
1.6 Revise SWA eligibility criteria based on socioeconomic needs;  
1.7 Establishing referral and counter-referral protocols between MFA/ASP and Ministry of Employment information system for referrals of ASP beneficiaries;  
1.8 Setting up operational arrangements to facilitate program participation of ASP beneficiaries;  
1.9 SWA: Revising SDP (employment) operational rules to increase intake of vulnerable population; and | DLI 1: Improved fiscal sustainability of the Retirement Pension  
DLI 2: Improved targeting and adequacy of social protection programs to those with the greatest physical and financial needs |
| **TWO:** Improving effectiveness of social protection spending by improving access to and quality of services and support in emergency situations | 3.1 Establish a Ministerial level social protection reform Steering Committee to reduce policy bottlenecks across ministries, departments, and agencies, this body will be twinned by a technical working group which will help raise issues which need to be resolved at the ministerial level; and  
3.2 Formally establish technical working groups  
3.3 Establish a Ministerial level social protection reform Steering Committee to reduce policy bottlenecks across ministries, departments, and agencies, this body will be twinned by a technical working group which will help raise issues which need to be resolved at the ministerial level.  
3.4 Define normative framework for social registry, including data collection, processing, access policy, confidentiality and others  
3.5 Implement data collection and validation protocols at district levels  
3.6 Implement data collection and validation protocols at district level  
3.7 Provide IT support to establish the ASP unique Beneficiary Registry (UBR)  
3.8 Provide IT support to establish interoperability protocols (ASP with NPD, Employment, Education, Health, etc.) | DLI 3 Adopt an interdisciplinary approach to social protection by coordinating across MDAs and establishing a social registry which can be used to coordinate services.  
DLI 4: Providing better quality services to social protection beneficiaries  
DLI 5. Social Protection provides temporary emergency support to ASP beneficiaries to mitigate the impact of natural- or man-made emergencies. |
2. METHODOLOGY AND APPROACH

2.1 Purpose and scope of the assessment

This ESSA is based on the WB policies for a PforR lending instrument, which employs a risk management approach to environmental and social management. For each proposed PforR operation, the Bank team assesses (at the Program level) the borrower’s (implementing agencies) institutional and organizational capacity to manage environmental and social risks associated with the Program. If the Bank team concludes that the borrower’s environmental and social management capacity does not meet the Bank’s requirements, such as lack of regulatory authority or organizational capacity to effectively manage environmental or social risks, complementary actions may be proposed to strengthen the management system as well as additional measures to improve program performance. The principles of ESSA are listed in Table 3 below:

Table 2: ESSA core principles

<table>
<thead>
<tr>
<th>Core Principles</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Core principle 1: Environmental and social management procedures and processes are designed to: (a) promote environmental and social sustainability in the program design; (b) avoid, minimize, or mitigate against adverse impacts; and (c) promote informed decision making relating to a program’s environmental and social effects.</td>
<td>Whether for design of new programs or program activities, or for support to existing programs or activities, the Bank will confirm that, as relevant, Program procedures do the following: • Operate within an adequate legal and regulatory framework to guide environmental and social impact assessments at the Program level; • Incorporate recognized elements of environmental and social assessment good practice, including (a) early screening of potential effects; (b) consideration of strategic, technical, and site alternatives (including the “no action” alternative); (c) explicit assessment of potential induced, cumulative, and trans-boundary impacts; (d) identification of measures to mitigate adverse environmental or social impacts that cannot be otherwise avoided or minimized; (e) clear articulation of institutional responsibilities and resources to support implementation of plans; and (f) responsiveness and accountability through stakeholder consultation, timely dissemination of program information, and responsive grievance redress measures.</td>
</tr>
<tr>
<td>Core Principle 2: Environmental and social management procedures and processes are designed to avoid, minimize, and mitigate against adverse impacts on natural habitats and physical cultural resources resulting from the program.</td>
<td>• Includes appropriate measures for early identification and screening of potentially important biodiversity and cultural resource areas; • Supports and promotes the conservation, maintenance, and rehabilitation of natural habitats; avoids the significant conversion or degradation of critical natural habitats, and if avoiding the significant conversion of natural habitats is not technically feasible, includes measures to mitigate or offset impacts or program activities. • Takes into account potential adverse impacts on physical cultural property and, as warranted, provides adequate measures to avoid, minimize, or mitigate such effects</td>
</tr>
<tr>
<td>Core principle 3: Environmental and social management procedures and processes are designed to protect</td>
<td>• Promotes community, individual, and worker safety through the safe design, construction, operation, and maintenance of physical infrastructure, or in carrying out activities that may be</td>
</tr>
</tbody>
</table>
Core Principles | Description
--- | ---
Public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards. | Promotes the use of recognized good practice in the production, management, storage, transport, and disposal of hazardous materials generated through program construction or operations; and promotes the use of integrated pest management practices to manage or reduce pests or disease vectors; and provides training for workers involved in the production, procurement, storage, transport, use, and disposal of hazardous chemicals in accordance with international guidelines and conventions. Includes measures to avoid, minimize, or mitigate community, individual, and worker risks when program activities are located within areas prone to natural hazards such as floods, hurricanes, earthquakes, or other severe weather or climate events.

Core principle 4: Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards. | Avoids or minimizes land acquisition and related adverse impacts: Identifies and addresses economic and social impacts caused by land acquisition or loss of access to natural resources, including those affecting people who may lack full legal rights to assets or resources they use or occupy; Provides compensation sufficient to purchase replacement assets of equivalent value and to meet any necessary transitional expenses, paid prior to taking of land or restricting access; Provides supplemental livelihood improvement or restoration measures if taking of land causes loss of income generating opportunity (e.g., loss of crop production or employment); and Restores or replaces public infrastructure and community services that may be adversely affected.

Core principle 5: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups. | Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

Core principle 6: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes. | Considers conflict risks, including distributional equity and cultural sensitivities.

While principles 1, 2, and 3 focus primarily on assessment of environmental aspects, principles 4, 5, and 6 are mainly concerned with social aspects. Nonetheless, principle 1 is equally relevant for social assessment as this relates to stakeholder consultation, information dissemination, and responsive grievance redress mechanism.
2.2 Summary of anticipated program benefits and risks

This section provides a preliminary assessment of program benefits and risks based on the principles above. The risk assessment showed that PforR is the right financing instruments as there no large scale negative social impacts, such as land acquisition and resettlement. The Table below briefly provides the program potential risks based on the ESSA Core Principles.
Table 3: Summary of program benefits and risks

<table>
<thead>
<tr>
<th>Pillar</th>
<th>Proposed activities</th>
<th>Social benefits and risks</th>
</tr>
</thead>
</table>
| **ONE:** Improving efficiency by allocating a higher percentage of social protection spending toward those in physical and financial need | 1.1 Demographic analysis to establish projected fiscal needs | • **Benefits:** clarity on present and future demographic trends and its impact on social protection spending  
• **Risks:** No exclusion risk associated with the activity. However, analysis needs to be supplemented with inclusion of aspects that underpin financial needs such as vulnerability aspects associated with drug abuse, increased number of single mothers, gender-based violence, aging population, education and skills development. |
| | 1.2 Revise eligibility criteria and HCP needs | • **Benefits:** Improved targeting  
• **Risks:** Households may stop receiving benefits- former beneficiaries may be left vulnerable |
| | 1.3 Establish revised protocols for Home Care services; | • **Benefits:** Better targeting and service delivery, expansion of coverage of services  
• **Risks:** No major risks. However, stakeholders should be consulted, and the changes clearly communicated. |
| | 1.4 Set up Home Care training programs; and | • **Benefits:** Improve coordination in delivering HC services/referral mechanism  
• **Risks:** No risks associated with exclusion. |
| | 1.5 Design Memorandum of Understanding (MoU) and operational design for training Home Carers; | • **Benefits:** Expansion of training programs coverage  
• **Risks:** No risk of exclusion is expected/anticipated |
| | 1.6 Revise SWA eligibility criteria based on socioeconomic needs; | • **Benefits:** Improve inter-institutional coordination and HC training implementation  
• **Risks:** No risk of exclusion is anticipated |
| | 1.7 Establishing referral and counter-referral protocols between MFA/ASP and Ministry of Employment information system for referrals of ASP beneficiaries; | • **Benefits:** improve targeting  
• **Risks:** some current beneficiaries may be left out |
| | 1.8 Setting up operational arrangements to facilitate program participation of ASP beneficiaries; and | • **Benefits:** improve the currently fragmented social protection programs  
• **Risks:** No risk of exclusion |
| | 1.9 SWA: Revising SDP (employment) operational rules to increase intake of vulnerable population | • **Benefits:** Facilitate participation of poor and marginalized groups  
• **Risks:** No immediate exclusion risk, but if the participation design does not consider vulnerability aspect, then it may exacerbate the existing exclusion |
| **TWO:** Improving effectiveness of social protection spending by improving access to and quality of services and | 2.1 Formally establish technical working groups | • **Benefits:** Address fragmented nature of the SP programs  
• **Risks:** No risks of exclusion, but action by the body could affect inclusion/exclusion of certain demographic or social groups, including Civil Society organizations (CSOs) |
<p>| | 2.2 Demographic analysis to establish projected fiscal needs; and | • <strong>Benefits:</strong> Expanded coverage |
| | 2.3 Establish a Ministerial level social protection reform Steering Committee to reduce policy | 17 |</p>
<table>
<thead>
<tr>
<th>Pillar</th>
<th>Proposed activities</th>
<th>Social benefits and risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>support in emergency situations</td>
<td>bottlenecks across ministries, departments, and agencies, this body will be twinned by a technical working group which will help raise issues which need to be resolved at the ministerial level.</td>
<td>• Risks: No immediate risks, unless the new intake criteria does not take into account all the aspects that lead to exclusion. Further, the Steering Committee must elicit participation of citizen groups and undertake consultations with the public especially marginalized groups.</td>
</tr>
</tbody>
</table>
| 2.4 Define normative framework for the social registry, including data collection, processing, access policy, confidentiality, among others; | • Benefits: beneficiaries with information on when and how to register for potential inclusion in social programs.  
• Risks: No immediate risks of exclusion. But the frequency through which the database is updated may be a factor for exclusion of potential beneficiaries whose social conditions may have changed during the intervals between two updates |                                                                                                                                                                                                                                                                                                                                                      |
| 2.5 Implement data collection and validation protocols at district level | • Benefits: Targeting improvement  
• Risks: Conflicts may emerge as the result of differences in interests among ministries and agencies involved. Privacy issues, GBV may also emerge as risk factor is gender sensitive data collection process is not used. Risk of exclusion should also be considered if activity implementation is not preceded by a strong and effective education of beneficiaries for adherence |                                                                                                                                                                                                                                                                                                                                                      |
| 2.6 Provide IT support to establish the ASP Unique Beneficiary Registry (UBR); | • Benefits: Enable cross-examination of data (across programs), lower errors  
• Risks: Exclusion not anticipated |                                                                                                                                                                                                                                                                                                                                                      |
| 2.7 Provide IT support to establish interoperability protocols (ASP with NPD, Employment, Education, Health, etc.) | • Benefits: Interface of programs; access through different ministries and agencies  
• Risks: Exclusion not anticipated, but vulnerability issues could emerge resulting from data privacy issues |                                                                                                                                                                                                                                                                                                                                                      |
3 DESCRIPTION OF NATIONAL SYSTEMS APPLICABLE TO THE PROGRAM

This chapter is concerned with the environmental and social systems relevant for the program. It is an attempt to provide country’s context with respect to relevant policies, laws, regulations and procedures as well as relevant institutions for the program. The information provided under this chapter will serve as the basis for analysis and assessment in subsequent chapters.

3.1 Environmental management systems

3.1.1 Legal and policy framework for environmental

The current legal system of Seychelles supports the Environmental and social assessment of programs and projects as part of the Environmental impact assessment and Environmental authorization. The main act related to the environmental and social assessment at the national level is the Environment Protection Act, 2016 (Act 18 of 2016), which is a comprehensive legislation and provides a legislative framework for protection, conservation, rehabilitation and improvement of the environment as well as the necessity to mitigate negative, unavoidable impacts to the environment and the people. The Act also provides for the coordination, implementation and enforcement of policies pursuant to the national objectives on environment protection.

3.1.2 Institutional framework for environmental management

In terms of Authority, the Ministry of Environment, Energy and Climate Change (MEECC) is responsible for administering the Environmental Protection Act, 2016 (Act 18 of 2016). The functions of the Ministry are established in Section 4 of the Act, as follows: (i) administer, implement and enforce the provisions of this Act; (ii) develop and implement policies, programs and guidelines in pursuance of the national objectives on environment protection; (iii) co-ordinate the activities of other agencies concerned with the protection of the environment ( under this Act; or under any other written law for the time being in force which relates to the objects of this Act); (iv) develop, evolve and where necessary adopt standards for the quality of the environment in its various aspects and for emission or discharge of environmental pollutants from any source whatsoever; (v) commission research and sponsor studies on problems relating to environmental pollution; (vi) examine such manufacturing processes, materials and substances as are likely to cause environmental pollution; (vii) identify areas in which any activity shall not be carried out or shall be carried out subject to certain safeguards; (viii) develop, evolve and where necessary adopt procedures and safeguards for the prevention of accidents which may cause environmental pollution and remedial measures for such accidents; (ix) collect and disseminate information in respect of matters relating to environmental protection; (xi) co-ordinate actions required in a state of environmental emergency or any other situation which may pose a serious threat to the environment; and (xii) prepare manuals, codes or guidelines relating to environmental protection and for the prevention, control and abatement of pollution.

Section 44 (1) of the Act establishes the requirement of an Environmental Authorization for any development defined in the Act (e.g., land subdivisions, reclamation works, construction of new roads or sea walls, etc.), any “prescribed project or activity” or any project or activity proposed in a protected or ecologically sensitive area. The Environmental Authorization is granted or denied based on the review of an Environmental Impact Assessment (EIA) Class I. Sections 45, 46 and 47 of the Act deals with EIAs. The MEECC manages the ESIA process in the country, specifically through the Environmental Assessment and Permit Section (EAPS) within the Department of Environment.

3.2 Social management systems

3.2.1 Legal and policy framework for social protection management
3.2.1.1 Constitution

The principles of the Seychellois Social Protection programs are well reflected in the country’s constitution. The 1996 constitution recognizes that “family is the natural and fundamental element of society, and the right of everyone to form a family and the state undertakes to promote the legal, economic and social protection of the family\textsuperscript{10}”. Furthermore, it recognizes “the right of every citizen to a decent and dignified existence and with a view to ensuring that its citizens are not left unprovided for by reason of incapacity to work or involuntary unemployment and undertakes to maintain a system of social security\textsuperscript{11}”. Other critical constitutional provisions include- the right to privacy (Article 20), the rights of children and young persons to special protection in view of their lack of maturity and vulnerability (Article 31), the right to participate and take part in conduct of public affairs [Article 24 (a)], the right to access official information (Article 28), and the rights of the aged and disabled (Article 36); and the provision on ombudsman\textsuperscript{12}. Also, the constitution states that “the State recognizes the right of the aged and the disabled to special protection and with a view to ensuring the effective exercise of this right undertakes to make reasonable provision for improving the quality of life of and for the welfare and maintenance of the aged and disabled”. The Civil Code of Seychelles, as a supplementary law to the Constitution, establishes several rules which protect the family, especially through the obligations of its members. It points out that “children shall be bound to maintain their father and mother or other ascendants who are in need and makes this obligation extensive to those who are relatives- in-law.

3.2.1.2 Agency for Social Protection Act

The Agency for Social Protection Act 2010 establishes the entitlements, procedures for determining the level of assistance and exclusion of persons, the calculation of supplementary income allowances, determination of means of a person, the powers to make payment for exceptional needs and the provision on goods and services as oppose to payment. It also includes description of application procedures for social assistance and mechanisms of complaints.

3.2.1.3 Social Security Act

The Social Security Act 2011 (SSA) gives the responsibility to the Minister responsible for finance the oversight of the SSA. The Act describes the persons eligible and the type of benefits and the governance structure of the social security fund. Additionally, it provides an annex containing payable rates for each benefits.

3.2.1.4 Unemployment Relief Act

Enacted in 1995, the Act provides employment on approved project to participate in the scheme. To be eligible one must be a citizen of Seychelles, unemployed, and registered with the Ministry of Labor as a person seeking employment. The Act provides detailed description of conditions/criteria under which one is eligible. Also, the Act establishes Unemployment Relief Fund and its governance procedures.

3.2.1.5 National Council for Disabled Persons Act

\textsuperscript{10} Constitution of the Republic of Seychelles, Article 32 (1)
\textsuperscript{11} Constitution of the Republic of Seychelles, Article 37
\textsuperscript{12} Chapter X of the Constitution of the Republic of Seychelles
The disabled persons Act of March 1994 establishes the National Council for Disabled Persons, its composition, functions and powers and it provides the mechanism for staffing and accommodation of the members of the council.

3.2.1.6 National Gender Policy

Gender Policy of 2012 is available. Gender Based Violence is common, and affects mostly women, with a study indicating at least 54% of women have experienced some form of intimate domestic violence. Also, the study indicates men tend to underreport GBV.

Nonetheless, the study found there are positive changes taking place resulting from the fact that women are currently venturing into once male dominated areas, and higher number of women are presently holding leadership positions within public and private sectors.

3.2.2 Upcoming National Policies

3.2.2.1 Aging and Home Care

Currently there are two relevant policies documents in draft form- the Policy on Aging (2016) and that on Home Care (2017). The draft policy on aging is seen as the basis for the mapping of the way forward for a coherent response to address challenges posed by an ageing population. It incorporates an idea for a better co-ordination and the creation of more effective networking and partnerships to ensure sustained economic growth and development as well as adequate and effective income maintenance and service provision. The Home Care Reform Policy aims to ensure the sustainability of the social protection programs in the context of increased aging of the population, which has resulted in escalation of cost for long term care (LTC).

3.2.3 Institutional framework for social protection management

The institutional framework for the social protection programs in Seychelles consists of a number of agencies involved in managing different social protection programs. The focus of the present PforR is limited to agencies/ministries/departments managing or playing role in three programs: Social Welfare Assistance; Home Care Program and Disability Program. The functions, structures and roles of these agencies/ministries/departments are presented in the following sub-sections.

3.2.3.1 Ministry of Family Affairs

The Ministry of Family Affairs (MFA) consists of three departments – Family Affairs, Social Affairs and Poverty Alleviation. The Ministry employs a total of 96 staff members.

Table 4: Number and staff requirements for the MFA

<table>
<thead>
<tr>
<th>Designation</th>
<th>Number of staff</th>
<th>Vacant posts funded 2018</th>
<th>Projected needs</th>
<th>Posts for creation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minister’s Secretariat</td>
<td>7</td>
<td>4</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>Poverty Alleviation</td>
<td>5</td>
<td>-</td>
<td>1</td>
<td>-</td>
</tr>
</tbody>
</table>

13 See https://genderlinks.org.za/pressreleases/seychelles-leading-way-promoting-gender-equality/
The Family Affairs Department’s mandate is “to oversee the country’s development process from a national social development perspective based on an integrated approach that recognizes the complexities of development that is pro-active and is based on research oriented activities and programs”. It consists of a Population Unit, Gender Secretariat, Programs development Section and Monitoring and Evaluation and Social Audit Section. The Family Affairs department is understaffed for its role especially in relation to social research. There is some research underway on gender and socially marginalized groups. However, the scope and scale of this work is limited. The link between existing research initiatives and social welfare programs would also benefit from greater integration. Further, the Department’s communication function also needs substantial improvement.

The Social Affairs Department has statutory responsibility to promote and safeguard the welfare of children under the Children Act. The powers vested in Social Services enable it to assume a coordinating role in the protection of children against all forms of abuse. It also has the responsibility to promote the wellbeing of children, families and disabled persons and other marginalized groups. It undertakes case work on social issues related to children and families.

The Poverty Alleviation department is tasked with supporting the elimination of poverty through sustainable grass root centered policies, strategies and interventions promoting growth, well-being and socio-economic inclusion of all Seychellois citizens. It aims to undertake surveys on multidimensional nature of poverty and as well as target interventions in poverty-stricken estates. The Department has only five staff. While it has collaborated with Bureau of Statistics on a poverty survey produced in 2019, its capacity to undertake monitoring, impact evaluation and other research is unclear.

Figure 1: Structure of Ministry of Family Affairs
Each department is composed of divisions/sections focuses on a separate function. The Table below provides a breakdown of tasks performed by each department.

**Table 5: Division of the MFA and its functions**

<table>
<thead>
<tr>
<th>Department of MFA</th>
<th>Division/section</th>
<th>Tasks/mandate</th>
</tr>
</thead>
</table>
| Social Affairs             | Residential Services    | - Promote well-being of children and families  
- Empowerment  
- Alleviate social problems  
- Mediation and counselling  
- Reports to the court and family tribunal  
- Attend court and family tribunal  
- Manage the child helpline  
- Identify foster and adoptive parents  
- Undertake work with foster and adoption cases |
| Community Social Work      |                         | - Societal function and alleviate social problems by providing necessary assistance  
- Safeguard the interest of weak and vulnerable groups  
- Provide support and counselling to families and children in the community  
- Cooperate with other sectors in the community in the education with individuals and families with regard to social forces which affects them  
- Provide assistance to senior citizens  
- Counsel families to take responsibility and care for their elderly parents  
- Empower service users to better fulfill their potential  
- Manage children’s helpline  
- Regular visits to schools, health centers, police stations etc...of the respective districts  
- Work with children and their families by providing services to dysfunctional families to restore social functioning  
- Counsel, support and guide families  
- Provide alternative placement for children and undertake after care work  
- Undertake case management and mobilize resources to help service users  
- Prepare reports for management, courts, and other agencies as required |
| Legal Services and Child Protection | | - Coordinate all activities relating to adoption and fostering  
- Deal with local and inter country/international adoption  
- Identify foster and adoptive parents  
- Facilitate the adoption process  
- Provide reports to the courts and the Family Tribunal in relation to custody, access, maintenance, guardianship, adoption, interdicted minors property and interdicted disabled adults and property cases  
- Provide guidance and counselling to parties regarding children’s issues  
- Work with children and their families by providing services to restore social functioning  
- Protect abused children and those who are at risk of harm through clear intervention plans |
<table>
<thead>
<tr>
<th>Department of MFA</th>
<th>Division/section</th>
<th>Tasks/mandate</th>
</tr>
</thead>
</table>
|                  |                  | - Work in close collaboration and partnership with child protection partners (Police, Health, Education, NCC, etc.) in accordance with the agreed procedures and the needs of children and their families  
- Empower children to protect themselves  
- Conduct preventive work regarding abuse of children  
- Maintain the child protection register which registers when a child has been identified as being at risk of significant harm |
| Family Affairs   | Population       | - Formulate, review and analyze national social development policies based on research-oriented activities;  
- Ensure that national, sub-national and sectoral development policies, plans and strategies take into account population, gender and HIV/SIDS issues and linkages  
- Ensure that development of effective and operational monitoring and evaluation mechanism for social development programs  
- Review development policies and strategies, taking into account results based practices in work activities  
- Propose recommendations to update and adjust policies, strategies and programs, as maybe necessary  
- Promote the development of an effective and active collaboration process with NGOs and CSOs  
- Initiate and carry out research on emerging social development issues  
- Develop and maintain and update national data-base on relevant social development issues  
- Assist and collaborate with other divisions of the department, national as well as international partners on relevant social development issues |
|                  | Gender           | - Initiate, strengthen and institutionalize the GMS  
- Overall coordination and monitoring GMS  
- Play a strategic and catalytic advocacy role, by introducing critical gender concerns into policies, plans, programs at all levels  
- Develop national policies and guidelines for gender mainstreaming  
- Ensure that key targets and indicators on the status of women and men are set, agreed upon and met  
- Manage the flow of information on gender issues and communicating policy changes and results  
- Facilitate capacity building for gender mainstreaming |
|                  | Programs         | - Ensure the inclusion of vulnerable groups in social protection programs  
- Ensure rehabilitation and reintegration of marginalized groups into mainstream society  
- Produce materials to inform, educate and sensitize target groups and families |
|                  | Monitoring, Evaluation and Social Audit | - Ensure development of effective and operational monitoring and evaluation mechanisms for the Ministry’s policies, plans and programs  
- Monitor and evaluate social development and inform government on emerging issues  
- Compile reports on national/regional/international instruments |
| Poverty Alleviation |                  | - To be completed. |

3.2.3.2 Agency for Social Protection

The ASP was established under Act 25 of 2011 as the leading institution that “delivers activities to promote active participation in the society through provision of income support, and other services for a range of audiences, including people in employment, unemployed people, and people with disabilities, careers and the elders upon reaching retirement age.” It was established to ensure efficient and effective management, administration and payment of social assistance. Key functions of the ASP are to:

(i) administer social assistance;
(ii) administer payment of benefits under the 2010 Social Security Act;
(iii) collect, collate, maintain and administer and analyze information necessary for the payment of social assistance;
(iv) maintain records for reconciliation of payments;
(v) maintain national database of all applicants for, and beneficiaries of social assistance; and
(vi) establish a compliance mechanism to ensure that the integrity of the social assistance system is maintained.

![Figure 2: Structure of the Agency for Social Protection](image)

Basically, the ASP oversees all the programs under the present PforR: (i) Entitlement Benefits (retirement, sickness, maternity, injury, invalidity, disability, funeral, dependents, orphans, abandoned children); (ii) SWA (working poor, non-working poor, non-working medical); (iii) Home

14 ASP. Customer Charter. May 2019 page 2

Care Program (HCP). The ASP is implementing many other programs, namely (iv) Specialized Treatment for Children (overseas treatment medical); Senior Treatment Support Schemes (financial assistance for housing repair), as well as financing programs administered by other ministries, departments, and agencies, such as the Dedicated Fund for students in need, which is administered by the Education Ministry. The operations division is central to implementation of these programs.

The ASP is managed by a board of seven members appointed by the President of the Republic, and consists of: (i) representative of the Ministry of Family Affairs (MFA); (ii) Ministry of Finance, Trade Investment and Economic Planning; (iii) Ministry of Employment, Immigration and Civil Status; (iv) Representative of the Seychelles Chamber of Commerce and Industry (SCCI); (v) Representative from the civil society nominated by the liaison Unit for Non-governmental organizations (LUNGOS) and (vi) Two other members with good standing and reputation, nominated by the President of the Republic. Additionally, the President of the Republic appoints one of the board members as the Chairperson. The Chairperson and Board members hold office for a period of three years and they are eligible for re-appointment at the end of their term of office. The ASP has around 26 offices across the country, one in each district with a total of 84 members of staff.

The ASP Act also contains provisions for review of decision made by the agency. As such, a Review Panel is established, and any person aggrieved by any decision by the Agency may submit application to the Review Panel. The Panel is independent in its acts, and it is comprised of a Chairperson and two persons with good standing and reputation appointed by the President of the Republic.

Any Seychellois above the age of 18 years and resident in Seychelles is entitled to social assistance, as long as his/her means are inadequate to meet his/her basic household needs and may apply for welfare assistance. The ASP determines the level of assistance and the determination of the means for calculation of the assistance based on income/expenditure. The income side may include: (i) all income, in cash, including the cash value of non-cash earnings and the actual or estimated amount of any income as contributions to the expenses of the household or otherwise; (ii) any sums arising from the investments or profitable use of property; (iii) the value of any property belonging to such a person, which is invested or which, though capable of investment of profitable use, is not so invested or profitably used; (iv) all income and the value of all property which such person has directly or indirectly deprived himself in order to qualify himself for the receipt of social welfare assistance; (v) value of any benefit or privilege enjoyed by such a person. ASP takes the income and subtracts current or imputed expenditures in all the basic needs categories imputed based on household size and other characteristics to determine the level of assistance.

The Agency for Social Protection is the major institution which will be implementing the Program. The Social Welfare Agency Act 2008 lays down the structure of the Agency, its mandate and functions. This Act was supposed to be repealed and replaced by the Agency for Social Protection Act No. 25 of 2011. The Act to be repealed was however mistakenly described as the “Social Welfare Act”. The Social Welfare Agency Act is therefore technically still in force. In any event the subsidiary legislation under this Act was expressly preserved in force until repealed. Subsidiary legislation includes the following:

- Agency for Social Protection (Standard Measure) Regulations, 2013
- Agency for Social Protection (Standard Measure) (Amendment) (No2) Regulations, 2015
- Agency for Social Protection, (Standard Measure) (Amendment) Regulations, 2017

The Agency also produced a Citizen’s Charter in 2016 that lays out the functions of the Agency. It specifies the rights of citizens and Agency staff. An appeals process is laid out for both formal and informal complaints.

3.2.3.3 Health Care Agency

The Health Care Agency falls under the Ministry of Health (MoH), and it was established under the Health Care Agency Act 10 of 2013 with the aim of promoting, protecting and restoring the health of the public. The Agency plans, delivers and evaluates primary, secondary and tertiary health care services to the public in accordance with government policies, programs and requirements in the country. The Agency is equally tasked to take appropriate measures to prevent, treat and control illness and to prevent disability and death resulting from illness or other causes. While the Minister of Health may give directions in writing to the Agency on matters of policy and general administration, the Agency’s board is appointed by the President of Republic and consists of 13 members and it manages the execution of health policies, programs and plans.

3.2.3.4 Employment Promotion Division

The Employment Promotion Division within the Ministry of Employment, Immigration and Civil Status has the primary function of ensuring that all Seychellois have access to job opportunities, through provision of training schemes that enable job seekers to acquire the necessary skills to compete in the labor market. The division is running three employment programs - My First Job\textsuperscript{16}, Skills Development Program\textsuperscript{17} (SDP), and Unemployment Relief Scheme (URS)\textsuperscript{18}. Both the SDP and URS are targeting welfare claimants.

As part of the Employment Promotion Division’s functions, Employment Services are established at district level in order to capture jobseekers and ensure that they are steered through the process and procedures for employment opportunities, especially for persons applying for welfare. The Employment Services also assist Private Employment Agencies, District Administrator or ASP related to registration and placement of job seekers. Also the Employment Services conduct job counseling, facilitate access to employment, conduct close follow-up of welfare recipients referred for interviews, participate in initiatives to get jobseekers to register and assist with compilation of monthly statistics and submission to the Labor Department.

3.2.3.5 Ministry of Education

\textsuperscript{16} Encourages employers to recruit inexperienced students from professional education centers upon completion of studies. Under the scheme, the government funds 40% of the salaries of each graduate for a monthly salary up to SCR 7,000 (roughly USD 500)

\textsuperscript{17} It provides skills development to school dropouts and job seekers with secondary school level of education aged 15 to 30 years, and jobseekers with post-secondary level education, but with no work experience. In 2016 the program begun to include the school drop outs and unemployed individuals who have not searched for work for a minimum of 3 years (e.g. welfare claimants/recipient, ex-convicts, amongst other vulnerable groups

\textsuperscript{18} Provides unemployment relief for a maximum period of 12 months, a period in which the employer may opt to engage the person on a permanent basis. The person is registered through the Department of Employment, the District Administration or Private Employment Agencies as pre-requisite to benefit. The Ministry of Employment through the ASP subsidizes 70% of the allowance (not less than the minimum wage) and 30% is subsidized by the employer. A person under this Scheme is governed by the employment act, and is eligible for annual leave, sick leave, lunch breaks
The Ministry of Education (MoE) plays a significant role on issue of disability. Since 2015, the MoE has been implementing the Inclusive Education Policy, which ensures that children with disabilities and special needs study alongside their peers who have no disabilities. The policy was instituted against the background that the education system and school infrastructure had not provided adequate support for inclusive education to take place.

3.2.3.6 National Council for Disabled People

The Council consists of about 10 members, appointed by the Minister of Family Affairs, from amongst persons who, in the opinion of the Minister, represent the organizations connected with matters related to disabled persons.

The functions of the council are to: (i) Coordinate the activities of public or private organizations and other persons engaged in the welfare of disabled persons in collaboration with public or private organizations and other persons; (ii) provide care and assistance to disabled persons; (iii) promote, develop and organize services and programs for rehabilitation and employment of disabled persons; (iv) provide and secure employment for disabled persons; (v) cooperate with public or private organizations and other persons in furtherance of the welfare of disabled persons; (vi) assist public or private organizations and other persons in promoting and organizing projects and income generating activities for the benefit and welfare of disabled persons; (vii) advise the Government on education, sports, training programs, employment and vocational training courses for disabled persons; (viii) assist public or private organizations and other persons in organizing sporting activities for disabled persons; (ix) assist in the provision of facilities considered by the Council to be necessary or desirable for the welfare of disabled persons; and (x) undertake any other activities in furtherance of the functions of the Council.

3.2.3.7 Agency for Prevention of Drug Abuse and Rehabilitation

The Prevention of Drug Abuse and Rehabilitation Agency (APDAR) was established under the Prevention of Drug Abuse and Rehabilitation Agency Act 13 of 2017 aiming to ensure coordination of activities of various institutions and organizations engaged in the prevention of drug and alcohol abuse, treatment of drug users and rehabilitation of drug and alcohol addicts.

The primary function of the agency are to : (i) advise the government on matters of prevention and treatment of drug and alcohol abuse; (ii) formulate and review a National Drug Master Plan and a National Alcohol Policy, strategies and long term plans or prevention, treatment, harm reduction and rehabilitation of persons affected by drug and alcohol abuse; (iii) monitor, assess and ensure compliance with the national standards for prevention, treatment, harm reduction and rehabilitation of persons affected by drug and alcohol abuse; (iv) prepare and submit to the president a national progress report concerning prevention, treatment, harm reduction and rehabilitation of persons affected by drug and alcohol abuse; (v) coordinate collection of statistics on reported cases of drug and alcohol abuse and (vi) develop and maintain a national database for statistics on reported cases of drug and alcohol abuse.

The agency is led by a chief executive officer appointed by the president of the Republic, after proposal by the Board of the Agency. The board consist of: (a) a Chairperson appointed by the Secretary of State for Prevention of Drug abuse and Rehabilitation; (b) the Principal Secretary for Finance; (c) the Principal Secretary for Education; (d) Principal Secretary for Employment, and (e) the Principal Secretary for Family Affairs.

3.2.4 Summary of institutional framework and its relevance for the present PforR
The institutional framework for social protection in Seychelles is complex and involves a number of institutions - Ministries, Councils and Agencies. The overview below in Table 6 provides the role of each institution in relation to the three major programs under the present PforR.

**Table 6: Overview of functions of public institutions under the three SP programs supported by the PforR- HCP, DP and SWA**

<table>
<thead>
<tr>
<th>Institution/agency/Department</th>
<th>Functions under specific programs to be supported by PforR(^{19})</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>HCP</td>
</tr>
<tr>
<td></td>
<td>- Enhance social functioning of the society in Seychelles by promoting, empowering and supporting the functions and responsibilities of individuals and families</td>
</tr>
<tr>
<td></td>
<td>- Ensure the inclusion of vulnerable groups in social protection programs</td>
</tr>
<tr>
<td></td>
<td>- Ensure rehabilitation and reintegration of marginalized groups into mainstream society</td>
</tr>
<tr>
<td></td>
<td>- Produce materials to inform, educate and sensitize target groups and families</td>
</tr>
<tr>
<td>Ministry of Family Affairs</td>
<td></td>
</tr>
<tr>
<td>Agency for Social Protection</td>
<td>- Provide comprehensive social security services and social relief against vulnerability</td>
</tr>
<tr>
<td></td>
<td>- Administering the fund</td>
</tr>
<tr>
<td></td>
<td>- Means testing assessment of beneficiary immediate households’ members</td>
</tr>
<tr>
<td></td>
<td>- Payment of caregiver in household or institutions to help the recipient with his/her daily living activities;</td>
</tr>
<tr>
<td></td>
<td>- Conducting means tested assistance (housing, supplementation, utilities and transportation)</td>
</tr>
<tr>
<td></td>
<td>- Provide allowance to household whose means are insufficient to meet basic households’ needs;</td>
</tr>
<tr>
<td>Health Care Agency</td>
<td>- Health assessment(^{20}) of the recipient of HCP</td>
</tr>
<tr>
<td></td>
<td>- Service provision including community nursing services, occupational therapy, mental health services, health prevention services, and long-stay residential social care and nursing care services</td>
</tr>
<tr>
<td></td>
<td>- Medical board(^{21}) assesses the degree of incapacity for work and determines how long the pension is paid.</td>
</tr>
</tbody>
</table>

\(^{19}\) This does not imply the PforR will have to address and meeting all the departmental objectives outlined here.

\(^{20}\) Mental capacity assessment using the Global Assessment of Functioning (GAF) which is used to test mental functioning capacities; and a tailored means test for the Home Care program to assess household income. The means-test, based on a simple formula, takes account of income of all household members, but excludes pensions, child support payments, social welfare payments and assets such as land or property.

\(^{21}\) Appointed by the Seychelles pension fund.
<table>
<thead>
<tr>
<th>Institution/agency/Department</th>
<th>Functions under specific programs to be supported by PforR¹⁹</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>HCP</td>
</tr>
<tr>
<td>Employment Promotion Division</td>
<td>-</td>
</tr>
<tr>
<td>Ministry of Education</td>
<td>- N/A</td>
</tr>
<tr>
<td>National Council for Disabled People</td>
<td>- N/A</td>
</tr>
<tr>
<td>Agency for Prevention of Drug Abuse and Rehabilitation</td>
<td>- N/A</td>
</tr>
</tbody>
</table>

The table above shows the institutional complexity of the social protection landscape. The MFA is both a research body, a policy making and coordinating entity, but also it performs service provision functions. The ASP on the other hand, is the executing agency of social protection policy, strategies, programs and projects. The role of ASP is manifested across the three major programs under the present PforR, mainly payments to beneficiaries and provision of support services. The Health Care Agency is active in two programs (HCP and DP), where it mainly provides health assessment for people applying for Home Care and Disability. The Health Care Agency also provides specific health services. The Employment Promotion division is active under the SWA where it seeks to transition people on welfare to permanent jobs. The Ministry of Education is not directly involved in the DP, but it is implementing a national policy on disability, by making school environment and infrastructure friendly to students with disability. Also, the Ministry of Education provides stipends for students, and this would fall under the SWA category. The National Council of Disabled People provides assistance to disabled persons; the Agency for Prevention of Drug Abuse and Rehabilitation deals with people using drugs or under rehabilitation and some of the beneficiaries of its intervention are recipients of SWA.
4 ASSESSMENT OF PROPOSED ACTIVITIES AGAINST WORLD BANK POLICIES

This section presents detailed assessment of proposed program activities against WB policies. The assessment uses the ESSA core Principles to identify potential environmental and social risks associated with program implementation. Each proposed activity is assessed against ESSA principles, and where the outcome of the assessment is similar, the assessment combines more than one activity. Where possible, analysis is made of the of existing systems to address identified risks.

4.1. Environment

4.1.1. Core principle 1

In its current design, no activity under the Social Protection PforR program is expected to have any high magnitude, large scale or irreversible environmental adverse impacts, or is planned to be undertaken in or near any protected or ecologically sensitive area. The environmental risk related to the program is low.

However, some indirect potential adverse impacts could be related to the eventual use of professional centers to re-skill people after they are dropped off from the current HCP program, due to the revision of the eligibility criteria (which is part of the Program’s activities: see activity 1.2 in table 3).

Several professional centers, potentially to be used for “re-skilling” people were visited and none had proper environmental management system/plan or manual for good practice of any sort, developed for mitigating existing negative environmental impacts on site. None received clear guidance, or training from the MEECC on how to handle existing environmental issues on their respective site.

Some examples of the lack of environmental risk management at those professional centers include: (i) release of polluted effluent directly in the soil or in the waterways without any prior wastewater treatment, (ii) collection and storage of used motor-oil without the proper infrastructure to store them (e.g. tanks overflowing) or any plan to dispose of them properly, or Personal Protection Equipment to handle them; (iii) storing refrigerant gas without the proper infrastructures in place, etc.

A list of the existing pieces of legislation that can eventually be pertinent to the Program include the following:

- Environment Protection Act of 2016
- Energy (Consumer Rights and Obligations) Regulations of 2014
- Environment Protection (Noise Emission Standards) Regulations of 1999
- Environment Protection (Environment Impact Assessment) Regulations of 1996
- Environment Protection (Standards) Regulations of 1995

An integral list of all pieces of legislation regarding Environmental matters in the Seychelles is provided in the Annex of the present document for reference.

The core principle 1 is equally incorporates some relevant social dimension of assessment., given the fact that it recognizes the need to promote informed decisions related to the Program’s social impacts, and the need for responsiveness and accountability through proper stakeholder consultation/participation, dissemination of program information and grievance redress measures in place. These aspects are covered in the Seychelles’ Constitution. Citizen participation in
government is covered in Article 23 of Chapter III while Article 28 of Chapter III provides the right to official information. Grievance redress measures are reflected in Chapter 10 of the Constitution relating to ombudsman.

At the level of the ASP, aspects of consultation, dissemination of information and grievance redress measures are covered under various guiding documents. Participation is provided in the Customer Charter, which states that ASP shall adopt a collaborative approach through consultation with partners to ensure synergy, efficient and effective service delivery. This is equally covered in the ASP Payment and Receipts Handbook, which sets governance of financial management as one of its goals.

Dissemination of information is missing in the revised ASP documentation. Grievance Redress Measures on the other hand features in the Act 25 of 2011. This Act describes the conflict resolution mechanisms aggrieved persons by ASP decisions can use. It describes the application process and procedures for grievance resolution and the composition of the review panel. The Customer Charter details the operations of the grievance redress measures while differentiating two types of complaints - informal and formal complaints. The informal complaints are less serious in nature, resolved/investigated by ASP staff. Formal complaints require thorough investigation, and they are lodged in writing (either by post or email) but verbally lodging of complaints is also acceptable.

In terms of practice, there is little compelling evidence to suggest the existence of a systematic approach to beneficiaries’ participation, dissemination of information and handling of grievances at least on the process side. Ad-hoc and informal approach to these issues appeared to be a dominant feature. There is some evidence of dissemination practices. At present, dissemination of information takes place through door-to-door campaigns by the Department of Employment. Staff reported undertaking such dissemination exercises after their regular work hours. Information about Social Welfare is also disseminated on television although several people interviewed stated that either this dissemination took place too late at night or it was presented too quickly to note all the details and contact information. With regards to the Home Care Program, all recipients interviewed for the ESSA reported finding out about it through their medical practitioners. Notably, there are no guidelines or designated staff functions for public consultations on the design of the Program or on any changes that may be introduced. Nonetheless, District Authorities have been identified as playing a leading role in connecting to citizens, needs assessment, referring to sectoral services and engaging CSOs in addressing local needs. Thus, the PforR will have to ensure that DAs play a central role in promoting citizen participation, GRM and disseminating information locally.

A Grievance Redress process is in place for the Social Welfare Program. An Appeals Panel is in place to assess any outcomes that are contested by potential beneficiaries. Information about approaching the Panel is also provided in letters sent out to people. However, there is no GRM for complaints related to the way staff attitude or process of handling SWA recipients. Staff reported that aggrieved members of the public can approach their supervisors but this is not a formal and well communicated means for addressing process-related grievances.

4.1.2. Core principle 2

Specific provision is included in the EPA, 2016 related to historical sites and areas surrounding national monuments: e.g. the area within a radial distance of fifty meters around each of the National Monuments which are protected by a declaration order under the National Monuments Act (Cap 140)

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22 This is further reflected in the Local Government Act 2015, which establishes elected district councils to ensure citizens participation in the local governance and development.
or any other law and around those sites, buildings and monuments which are listed under A3, with a few exceptions, in which case the radial distance shall be 30 meters instead of 50 meters.

4.1.3. Core principle 3

Occupational safety and health in Seychelles have since 1978 been governed by the OSH Decree, which has progressively been amended to maintain its relevance and objectives with the socio-economic context of the country and with international Conventions. In addition, and as part of the Government’s objectives to uphold the ILO’s decent work agenda, the main ILO’s Conventions on occupational safety and health were ratified in 2005, namely the Labor Inspection Convention,1947 (no.81), Occupational Safety and Health Convention 1981 (no.155), Occupational Safety and Health (Dock Work) Convention 1979 (no.152) and the Occupational Health Services Convention 1985 (no.161). In 2007, a national policy on HIV/AIDS in the workplace was also introduced, and most recently, the EPA (2016) also introduced provisions on exposure to toxic/hazardous substances (Part III).

Accordingly, the national OHS framework has progressively improved with much emphasis on OHS awareness, capacity building, and learning of best practices and ownership of workers’ safety by organizations. Through this Policy, it is emphasized that safety in workplaces is a shared responsibility of the Government, employers and workers, with a scope that covers all sectors of the country’s economy, being private, public or parastatal, all employers and workers in the country, including self-employed people and migrant workers, and those on apprenticeship, informal economy and domestic holdings. Safety and health create a conducive and sustainable working environment that increases productivity and contributes to employability and national competitiveness. A draft of the policy is available and should be finalized in the coming months. The policy, along its regulatory framework administration and implementation falls under the Authority of the Ministry of Employment, Entrepreneurship, Development and Business Innovation.

4.2. Social

4.2.1. Core principle 4

Core Principle 4 of the ESSA provides that natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.

The country has market for land and a policy for sustainable land management (sale of state land for different uses) in place. The policy is aimed to provide the process of land management in a transparent manner and ensure that state land is managed in a sustainable manner with good governance practices. This policy covers aspects such as application process, selection criteria, land assigned or designated as reserves, payment for land, plot selection and allocation process, and others. There no provisions on land acquisition for any purpose.

Risk Assessment and screening of proposed PforR activities against this Core Principle has shown that neither limited access to natural resources nor land acquisition and resettlement is expected to take place as a result of the program implementation. There will be no new ASP construction of offices or any kind of civil works with impacts on land, as such this Core Principle is not relevant for the present ESSA.
4.2.2. Core principle 5

Description of The Core Principle 5 states that due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups. 23

**Pillar I: Improving efficiency by allocating a higher percentage of social protection spending towards those in physical and financial need**

**Activity 1.1: Demographic analysis to project fiscal needs**

The implementation of demographic analysis to project fiscal needs seeks to address structural challenges facing the social protection programs, marked by sustainability issues due to the increased costs for the government. Therefore, the proposed activity is meant to further understand the present and future demographic dynamic, and its implications on the social protection spending in order to derive policy directions to ensure sustainability of the social protection programs.

While the overall implementation of the proposed activity may not lead directly to exclusion of vulnerable groups, there will be a need to ensure that the analysis incorporates structural vulnerability factors such as drug addiction, increased number of single mothers, gender-based violence, aging population, education and skills development.

**Activity 1.2: Revise eligibility criteria and HCP needs**

The HCP is a means tested program supporting home care for people that demonstrate caring needs, including children. It aims to support these groups of people to remain in their family and communities. Beneficiaries of HCP receive full day or half-day support. HCP beneficiaries pick out their caregiver who is often a member of the family/community, and he/she is paid the equivalent of a national minimum wage plus all the benefits as provided by the country’s labor legislation. Short-falls of the current HCP were identified during this ESSA. They include poor targeting and limited ASP institutional capacity to manage the program. Critical issues include oversight, the need to improve targeting and the professionalization of caregivers. The recently established Council for the Elderly, which is meant to provide management and oversight role of HCP, is still in its early stage of operations and its contribution to the program could not be fully established.

The proposed revision of eligibility criteria and HCP needs is meant to change the Home Care System towards a Needs Based System, which means moving away from the current simplistic model of having just two categories- Half and Full day care based on hours needed to two categories targeted to the needs of the individual- Primary Home Care and Basic Care. The former will be provided by full-time domiciliary-care workers who have a minimum level of qualifications and years of work experience; the latter will be provided by part-time workers who are not required to have a qualification because they will be offering care to those whose needs have been identified as “Low” to “Moderate”. The proposal also recognizes the relevance of family members in providing basic home care and not primary care.

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23 Since this ESSA was drafted, the pillars and actions have been reorganized such that Pillar 1 now contains the efficiency reforms to the four programs listed above under Pillar 2, and Pillar 2 contains the reforms listed above under Pillars 1 and 3. This is merely an organizational change and does not affect any of the substance of the discussion.
Persons who wish to apply for Home-Care must apply to the MoH. Two tests will be administered: (i) The WHO DAS 2.0— to determine the level of need and corresponding level of care. A care package will be developed; (ii) Means-Test- to assess the capacity of the applicant to contribute to their care. Means-testing will be done based on the incomes of the recipients and any children living in the same household. Tests will be conducted by the MoH and ASP, respectively. Once the applicant’s needs and capacity to contribute to their home care has been assessed and their package of care developed, he/she will be referred to the Home Care Agency where the necessary formalities to provide the allocated package of care will be completed.

These changes may potentially lead to negative impact on the current HC households who may stop receiving benefits and face a reduction in their benefits, therefore, it is critical that a continuous assessment and fine tuning are conducted to ensure that former beneficiaries are not left out vulnerable.

**Activity 1.3: Establish revised protocols for HC services (adequate to the needs)**

Presently, multiple entities (governmental and non-governmental) are involved in the provision of home care services both at community and institution levels. The development of protocols for HC services will help standardize the approach to provision of HC services, including accreditation mechanisms of caregivers, but most importantly, improve oversight and quality control that have been missing in the program. Besides the oversight role, the newly established National Council for the Elderly has the mandate to train and provide accreditation of nurses and caregivers both in institutions and at community.

Critical social aspects for consideration in the revised protocols that came out from field observations for ASP HC services relate to poor referral and coordination mechanism, lack of specialized services to beneficiaries (especially psychosocial support), and limited quality control and oversight. In addition, caregivers do not have a proper or any training at all, and they also seemed in need some form of support (psychosocial) because they experience psychosocial distress, especially those with limited care giving capacity. Thus, the protocols should make provision for routine screening and treatment of psychosocial distress among caregivers.

The assessment of the proposed activity against ESSA Core Principle 5 has shown that the activity may not lead to exclusion of vulnerable groups, but vulnerability aspects may possibly be left out if a full assessment of HC services is not conducted and its implications are not taken into account in the design of new protocols.

**Activity 1.4: Establish HC training program (fit the protocols)**

The protocols for HC services, mentioned above (activity 4), will serve as the basis for the formulation of training programs. Training is currently one of the aspects that has been missing for caregivers, and by the time this ESSA was conducted, of the 3,500 caregivers, only 500 had been trained. The development of training programs will allow the expansion/coverage of trainings and improve significantly the quality of HC services. In designing training programs, it is crucial to consider the binomial training resources vs. training effectiveness, meaning that the design of training programs should be such that it optimizes resources (time and financial resources), while ensuring improved and positive results. Also, training programs should be tailored/designed to meet the needs of a diverse audience— e.g. caregivers with/without/with limited academic formal education, learning preferences and their social and cultural background. It worth noting that the issue leading to the low number of trained caregivers relate to the challenge that full time careers have in finding a replacement while they take training. Thus, future plan is to train a pool of professional carers who can serve as substitutes while the current carers are being trained.
The assessment of the proposed activity against ESSA Core Principle 5 has shown that the activity, may not potentially lead to exclusion of vulnerable groups. Nonetheless, vulnerability aspects identified in the training protocols (established above), should be taken into consideration in designing and implementation of training programs.

Activity 1.5: Establish MoU and operational design for training HC

The provision of HC services involves mainly three institutions (See Table 6 for details). The implementation of HC services has been marked by constraints associated with limited management capacity of ASP, lack of coordination among institutions in HC services implementation, and poor oversight and quality assurance. Through the Social Security Act 2010 and the Agency for Social Protection Act 2012, HC services have moved to ASP, and most recently, oversight and quality control issues have been transferred to the Council for the Elderly.

The establishment of a MoU and the operational design of the training program in HC services will potentially contribute to the improvement of inter-institutional coordination and the provision of HC training implementation. However, achieving such an objective will depend on several factors, the overarching factor being the definition and scope of the MoU. The MoU will not be able to achieve its objectives if it does not clearly identify the areas for inter-institutional cooperation and coordination, as well as the scope for coordination. At the same time, given that the MoU is in nature not legally binding, the implementation of the MoU will largely depend on the goodwill of involved institutions, therefore a legally binding instrument would be appropriate to ensure MoU effectiveness.

The assessment of the proposed activity against ESSA Core Principle 5 has shown that the activity, may not potentially lead to exclusion of vulnerable groups. Nonetheless, vulnerability aspects identified in the training protocols (established above), should be taken into consideration in designing and implementation of the MoU.

Activity 1.6: Revise SWA eligibility criteria based on socioeconomic needs

The SWA is a poverty targeted benefit. It supplements household income up to the value of consumption basket. Eligible households include those in which: 1) household head is working, but the household remains poor; 2) the household head is unemployed; and 3) the household is poor and the household head cannot work on medical grounds. The household size, income and expenses inform the level of benefits.

The need to revise the SWA eligibility criteria based on socio-economic needs is based on the fact that other (non-monetary) poverty dimensions are not taken into account, and the outreach constraints that SWA faces. Approximately one third of SWA beneficiaries are not poor, and, and 15% belong to the richest households in the country resulting in sub-optimal impact on poverty reduction.

Revised SWA eligibility criteria may potentially have negative impact on existing beneficiaries, especially those who will no longer be eligible under the new criteria. Continuous engagement with present and future beneficiaries will be necessary to ensure the decision on the new criteria is informed by those who will potentially be affected, and the vulnerable are not left out.

Activity 1.7: Establish a referral system and counter referrals between MFA and Ministry of Employment on information system of ASP beneficiaries
The MFA (through the ASP) and the Ministry of Employment manage ASP beneficiaries. The ASP beneficiaries are required to register with the Ministry of Labor (through the Division of Employment Promotion) as a proof they are looking for employment. Additionally, the Ministry of Labor supports beneficiaries with job placement. Through Unemployment Relief Scheme (URS), SWA beneficiaries are paid the equivalent to the statutory minimum wage by ASP (50%) and the company of placement (50%) for a maximum period of twelve months. In the process, other institutions are involved, especially the Agency for Prevention of Drug and Abuse (APDAR), as some of the SWA beneficiaries (about 5%) are alcohol and drug users.

The proposed activity under the PforR aims to address the lack of a formal referral and case management system. Presently, the system is fragmented with no proper objective checks in place and limited follow up and support for retention and progression, especially among the most vulnerable SWA beneficiaries. The establishment of a referral system and case management will help an appropriate and effective response, especially in identifying the most vulnerable groups (e.g. drug addicts, people with disability, etc.) and addressing their needs.

The implementation of a referral system and case management will only be effective if the complexity of vulnerability that characterizes the SWA is well understood, not only in identifying key vulnerable groups (unemployed, drug and alcohol dependency), but also, and perhaps most notably, understanding its drivers, including issues relating to female headed households with intergenerational pattern of early pregnancies, community dependency on welfare, gender-based violence (GBV), and intimate partner violence.

Activity 1.8: Establish operational arrangements to facilitate program participation of ASP beneficiaries

The proposed activity aims to facilitate participation of the poor and marginalized groups, who are potentially excluded in social protection programs design and implementation through instituted participation platforms. A potential risk associated with the proposed activity is related to the relationship between the design and its effectiveness. It is fundamental that the design does not limit the participation of vulnerable groups (women, people with disability). The design should encourage participation of (potential) beneficiaries through participatory instruments, meetings with the poor and vulnerable groups, instituted mechanisms of information sharing with beneficiaries that takes into account aspects of their vulnerability, and the adoption of monitoring and evaluation systems that promote participation of beneficiaries, especially the poor and vulnerable groups.

Activity 1.9: Revision of skills development program (SDP) operational rules to increase intake

The SDP has been implemented since 2010 by the Ministry of Labor, and it provides skills development and re-skilling opportunities for job seekers, especially school dropouts and job seekers with secondary school level education aged 15 to 30 years of age, and job seekers with post-secondary level education, but with no prior job experience. In 2016 the SDP expanded to include school dropouts and unemployed individuals who have not actively searched for job for a minimum of 3 years, including welfare recipients, other vulnerable groups, and those with skills which are no longer in-demand. The revision of the SDP will bring about considerable benefits as it will be expanded to various groups. It will contribute to inclusion of people who previously had been excluded based on criteria set for intake. However, the expansion of the SDP may also generate demand and potentially lead to limited intake capacity of the Ministry of Labor.
The assessment of the proposed activity against ESSA Core Principle 5 has shown that the activity, may potentially lead to exclusion of the poor vulnerable groups, if the intake criteria does not consider aspects of inclusion- including age, gender, and other social and cultural considerations.

**Pillar TWO: Improving effectiveness of social protection spending by improving access to and quality services and support in emergency situations**

Activities under pillar 2 are broadly presented in section 1.2 as well as in Table 1. Central to these activities is the establishment a mechanism for social protection policy coordination and implementation. The establishment of a policy coordinating will allow adequate political endorsement for the proposed PforR reforms, and policy coordination and referral activities. The proposed activities attempt to address the fragmented nature of the social protection programs and the limited coordination that results from that fragmentation.

In assessing whether the proposed activities are likely to result in exclusion of vulnerable people, this ESSA does not anticipate this risk. However, policies, protocols enacted by the coordinating body may potentially undermine the inclusion of certain demographic groups including vulnerable people. It is therefore critical that forms of representation are well understood to ensure various groups are represented through designated CSOs.

**Activity 2.1: Formally establish technical working group attached to the SP policy coordination**

**Activity 2.2 Demographic analysis to establish a projected fiscal needs**

**Activity 2.3 Establish a ministerial level social protection reform steering committee to reduce policy bottleneck across ministries, departments and agencies, this body will be twinned by technical working group which will help rise issues which need to be resolved at the ministerial level**

The risk of institutional conflict between various agencies is a potential risk of both institutional arrangements. It is important that clear responsibilities and roles are agreed between institutions with a focal point/committee within each agency to ensure that the decisions and steps taken by a Steering Committee are followed up.

**Activity 2.4: Define normative framework for social registry, including data collection, processing, access policy, confidentiality, among others.**

The definition of a normative framework for social registry will potentially bring a range of benefits, and they may include that potential beneficiaries will have the knowledge of when and where they can register for potential inclusion in various programs, the process and its requirements; they will be able to know their application status, file complaints, and receive notification of eligibility decisions. Above all, the social registry will reduce transaction costs associated with potential beneficiaries having to navigate the bureaucracy if they have to apply for multiple social programs.

From a management standpoint, the social registry will have the potential to provide different agencies managing social programs reach out as many beneficiaries as possible, promote better information management in terms of registration, information and documentation collection from potential beneficiaries, assessing eligibility for each social program, managing complaints and grievances.

In sum, the social registry will ensure clarity in identifying beneficiaries, comparing information across demographic groups and social programs, improving the management of issues affecting vulnerable groups, informed planning and, above all, improvements in program governance through induction of transparent and accountable practices.
Presently the social protection system/information is managed across multiple agencies (see description in Table 6). The SWA requires beneficiaries to register with the Employment Promotion Division at the Ministry of Employment, Immigration and Civil Status. The ASP checks beneficiaries’ income and expenses from multiple agencies/institutions (e.g. Immigration Department, Revenue Authority, Pension Fund) as part of means testing. The ASP utilizes the Social Welfare Information System (SWIS) for processing and managing welfare assistance. Recent Auditor General Report on the SWA efficiency and effectiveness indicates that there was no permanent check on the effectiveness of the SWIS, and in case of problems with SWIS, these would only be solved centrally by the Head Office. Moreover, SWIS occasional failure has resulted in manual processing of welfare applications and later update and entry into the SWIS, causing unnecessary delays with negative impacts on beneficiaries. The auditor’s report equally found that there were no policy and procedure manual at ASP providing guidelines of the application process and the time frame within which an application should be processed.

Additionally, despite automated cross-check system for various agencies (Labor, Revenue Authority, Labor, and Pension Fund), the system is not entirely automated. Respective agencies do not communicate directly, they need to download databases and manually transfer the information required by the ASP as part of the means testing process. The SWIS does not even perform all the functions the program requires. To sum up, the system is not automated, it is labor intensive and prone to errors.

In fact, fieldwork conducted by the World Bank team as part of this ESSA confirmed some of the issues, which were raised in the Auditor General’s Report. The SWIS continues to be marked by occasional failure due to limited internet, and this was reported to take place at least once in a month. Under such circumstances application process is done manually until the system is restored. Delays in the processing/approval were also reported at national level. This delay is mainly linked to overstretched staff and unclear division of labor (besides payment, ASP staff are involved in service provision, including counselling beneficiaries). During fieldwork it was also reported that the inefficiency of the SWIS is exacerbated by the fact that other agencies are not integrated in the platform making referral system and cross-examination of data lengthy and prone to discrepancies, delays and errors.

The definition of a normative framework for social registry will potentially lead to the following risks: (i) unclear roles and responsibilities among different government agencies and stakeholders in handling the social registry would potentially lead to its ineffectiveness due to significant requirement for cross-program and sector coordination; (ii) power relations among agencies and stakeholders, (iii) non-harmonized (ASP has no data privacy and access policy) practices relating to data privacy and access policies; (iv) limited management capacity if the management of the social registry is decentralized; and (v) limited personnel, including capacity building initiatives (trainings);

There are no major risks of the proposed activity when assessed against ESSA Core Principle 5 either in the short and long term. Nonetheless, risks may be associated with the implementation of the social registry system, especially the frequency the registry is updated. For instance, the collected information may become outdated, and possibly exclude households and individuals whose condition may have significantly changed over a period of time, and they may become eligible, but the system is unable to capture such change. This could be exacerbated in cases of limited administrative and financial capacity to carry out a continuous update of the social registry. Also, the risk of exclusion may also take place in events where households and individuals may opt to stay out of registering.

**Activity 2.5: Implement data collection and validation protocols at district levels**
The implementation of data collection, validation protocols at district levels is actually the operational side of the social registry. It will entail in-depth information collection that will be used to determine beneficiaries’ access to social programs. The data collection exercise will ensure that the Program can collect information on potential beneficiaries and refine targeting.

However, the implementation of data collection and validation at district level is likely to lead to a set of risks. It may lead to conflict among the promoters (ASP and other agencies directly involved in implementing the social registry) of the initiative due to differences of interest on the manner and form in which the required information will be collected. This risk would be mitigated through the harmonization of information forms that share a common household module that is the basis for SR. Other risks would be associated with issues of privacy of beneficiaries who may decline providing information deemed personal/sensitive. Issues of shame may also emerge as potential risk to be considered during the implementation of this activity.

There is also a risk of Gender Based Violence related to provision of household information to official agencies. This risk needs to be considered to ensure that data collection process does not marginalize potential recipients and lead to further problems for them.

The assessment and screening of proposed PforR activity against ESSA Core Principle 5, has shown that the activity may not impact on indigenous people as there is no such group in the country. Nonetheless, the activity may indirectly lead to exclusion of vulnerable groups if the implementation of the proposed activity is not preceded by a strong campaign of communication and social mobilization of beneficiaries, a systematic outreach protocols supported by DAs, and the establishment of a strong and functional GRM. Further, the data collection exercise should be designed to ensure that impacts on people’s privacy are minimal.

**Activity 2.6: Provide IT support to establish the ASP Unique Beneficiary Registry (UBR)**

The implementation of UBR is an important step towards social programs integration. The UBR will enable cross check of data across programs, the programs will “communicate” to each other, and lower the risk of beneficiary double entry. Major risks associated with the proposed activity may include connectivity availability, especially at district level, capacity of district and local structure managing the system, limited technical assistance.

The assessment of the proposed activity against ESSA Core Principle 5 has shown that the activity may not lead to any direct risks.

**Activity 2.7: Provide IT support to establish interoperability protocols (ASP with NPD, Employment, Education, Health etc.)**

The establishment of interoperability protocols across key social programs agencies is central to integration of these programs. It will enable interface of programs, access through different agencies, and information exchange with limited restriction. Broadly, it will allow data to be managed by multiple agencies. Critical risks associated with the proposed activity may include issues of data privacy, conflicts among agencies involved due to limited institutional cooperation, and between beneficiaries and involved agencies over issues of privacy.

The proposed activity may not lead to exclusion of vulnerable groups but poses risks of vulnerability due to data privacy aspects as referred above.

4.2.3. Core principle 6
This Core Principle relates to conflict resolution. It provides that where a PforR is implemented, it should avoid exacerbating conflict, especially in fragile states, post conflict areas, or areas subject to territorial dispute. Because the Republic of Seychelles is not under dispute nor is a post conflict area, the assessment is based on the potential of proposed PforR activities to exacerbate social conflicts. Under this principle, summary of proposed activities and baseline information are not provided as these are already provided above. Therefore, the assessment of proposed PforR activities against Core Principle 6 is limited to description of anticipated risks per pillar and discussion on country’s systems against the World Bank Policies.

Pillar ONE: Improving efficiency by allocating a higher percentage of social protection spending towards those in physical and financial need

Activity 1.1: Demographic analysis to establish financial needs
Activity 1.2: Revise eligibility criteria and HCP needs
Activity 1.3: Establish revised protocols for HC services (adequate to the needs)
Activity 1.4: Establish HC training program (fit the protocols)
Activity 1.5: Establish MoU and operational design for training HC
Activity 1.6: Revise SWA eligibility criteria based on socioeconomic needs

The above activities are likely to pose a risk of conflict between the Social Protection Agency and beneficiaries whose benefits may be rolled back or reduced because of new eligibility criteria. This will significantly impact vulnerable groups, especially women who are the overwhelming majority of recipients of benefits as the table below indicates:

Table 7: Data on beneficiaries of SWA

<table>
<thead>
<tr>
<th>Type of social welfare support</th>
<th>Male recipients</th>
<th>Female recipients</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supplementary benefit</td>
<td>37</td>
<td>919</td>
</tr>
<tr>
<td>Medical</td>
<td>83</td>
<td>1,074</td>
</tr>
<tr>
<td>Unemployment</td>
<td>36</td>
<td>94</td>
</tr>
</tbody>
</table>

Source: Social Welfare Agency Government of Seychelles

Not only is the rollback of benefits likely to increase conflict, it may also lead to financial strain for people who face a reduction in income. There needs to be a consultative and gender sensitive approach applied to beneficiaries whose benefits will be rolled back. In such cases, ASP would benefit from adopting a strategy to inform, consult and provide support for such beneficiaries to ensure that they graduate from benefit roll back without an increase in vulnerability that may lead to grievances. While the risk of active protest may not be very high, grievances are expected to rise as a result. The new criteria must be transparently decided and disseminated with the effected people and society at large.

Activity 1.7: Establish a referral system and counter referrals between MFA and Ministry of Employment on information system of ASP beneficiaries
Activity 1.8: Establish operational arrangements to facilitate program participation of ASP beneficiaries
Activity 1.9: Revision of skills development program (SDP) operational rules to increase intake

The above activities are expected to increase institutional coordination and increase inclusion of potential beneficiaries. They are not expected to lead to conflict but, as mentioned above, need to be
undertaken in a manner that does not lead to public identification of people who may not wish to be identified as welfare recipients.

Pillar TWO: improving effectiveness of social protection spending by improving access to and quality of services and support in emergency situations

Activity 2.1 Formally establish working groups
Activity 2.2 Demographic analysis to establish projected fiscal needs
Activity 2.3 Establish a Ministerial level social protection reform steering committee to reduce policy bottlenecks across ministries, departments, and agencies, this body will be twinned by a technical working group which will help raise issues which need to be resolved at the ministerial level
Activity 2.4: Define normative framework for social registry, including data collection, processing, access policy, confidentiality, among others.
Activity 2.5: Implement data collection and validation protocols at district levels
Activity 2.6: Provide IT support to establish the ASP Unique Beneficiary Registry (UBR)
Activity 2.7: Provide IT support to establish interoperability protocols (ASP with NPD, Employment, Education, Health etc.)

The risk of conflict under Pillar 2 is discussed in relation to all activities as the conflict is expected to involve the same stakeholders. The key stakeholders at the “supply side” of the equation for these activities include ASP, NPD24 and Departments of Employment, Education and Health. All current and future beneficiaries of social welfare are potential stakeholders on the “demand side” particularly SW Beneficiaries, recipients of Home Care and school children who benefit from stipends. The process of data collection, verification, exchange and maintenance can potentially cause conflict if it is done in a manner that is not sensitive to the cultural and gender-based norms of society. Consultations with NGOs indicated that there are some eligible households that do not choose to access social welfare benefits due to social shame of being “seen” as poor. One incident that was reported by a Social Welfare staff person was of a household that chose to register for benefits from a different area/district in order to not be publicly identified as a welfare recipient. While the scale of prevalence of such attitudes cannot be determined without rigorous qualitative research, the ESSA recommends that data collection and verification should allow for such households to approach the authorities in a discreet manner. In particular, lack of a gender-sensitive approach can potentially lead to Gender Based Violence (GBV) not just for women but also men as often notions of masculinity are often tied up with accessing welfare payments. This is corroborated by research undertaken by the Gender Secretariat within the formerly Ministry of Social Development25 that showed that 54% women and 35% men reportedly face intimate partner violence.

The Program’s inclusion of data confidentiality is a robust step. However, in addition to preventing data leaks and access by unauthorized parties, the Program must also focus on training Social Welfare staff to maintain confidentiality and to use, extract and circulate data with utmost discretion. The Program should also publicly communicate the data safety protocols in place to ensure that people have confidence that their personal information will not be misused.

24 Not yet defined
4.3. Overall Program Level Risk Assessment

From environmental perspective, the ESSA mission conducted in July 2019 confirmed the initial assessment that the PforR, as is currently designed is a Low Risk Program on the environmental aspects. Indeed, from discussions with the key Ministries that will be involved during the implementation of the Program, there is no activity that is likely to cause significant negative impacts to the environment, either in terms of spatial scale, magnitude or in terms of duration. Furthermore, the Program does not involve any construction or any “development” activity (as defined under the EPA, 2016) planned, nor any activity to be undertaken in protected or ecologically sensitive areas.

However, Pillar 1 of the Program seeks to revise the design of the existing Social Protection Programs (pension, disability benefits, home care program, Social welfare assistance), including the revision of the eligibility criteria for those programs. One of the potential consequences of the review would be a change in both the number and composition of people who will be eligible for those programs. Those that become ineligible will need to be re-skilled or re-trained to remain productive and ensure earning opportunities for their households, as much as possible to contribute to the country’s economy. One of the most likely options to re-skill those people who were dropped from the SP programs would be to use the existing professional centers.

On the social side, the proposed program activities will have no major social impacts, as land acquisition and resettlement are not anticipated. Direct and indirect risks are associated with Core Principles 5 and 6. Under Core Principle 5, the program could adversely impact several vulnerable groups who were repeatedly highlighted as particularly vulnerable during the ESSA process. The groups consist of alcohol and drug users (estimated to be 5% of the population), teenage mothers, and female-headed households with intergenerational pattern of teenage pregnancy (no data available). The ESSA shows that the program will require a comprehensive understanding of the extent planned program activities are likely to impact on these groups and adopt measures to minimize/mitigate the expected risks and negative impacts and to enhance the positive ones.

With regards to Core Principle 6 on exacerbation of conflicts, the proposed program activities may directly trigger conflict between ASP and beneficiaries resulting from the rolling back of benefits from various social programs, especially in the context where approximately 50 percent of the population benefit directly or indirectly from various social programs. Institutional conflicts (Agencies and ministries and NGOs) could potentially be expected during implementation of activities under pillar 3. Indirectly, conflict between ASP and potential beneficiaries (SR) due to data privacy issues. Other risks include Gender Based-Violence that could emerge as part of implementation of planned activities, especially that relating to data collection and validation at district level.
5 CHAPTER FOUR: CAPACITY ASSESSMENT FOR MANAGING ENVIRONMENTAL AND SOCIAL EFFECTS RELATED TO THE PROGRAM

This chapter relates to capacity assessment for addressing environmental and social issues associated with the program, focusing on the implementing agency. The assessment deals with the identified risks, while asserting the country’s systems, the implementing agency and other institutions capacity to address identified risks. The risks are identified in previous chapter. The capacity assessment focus primarily on the implementing agency, the Agency for Social Protection. Nonetheless, general information on other ministries/agencies and CSO directly/indirectly involved is provided in order to establish the links and implications on overall program implementation.

5.1 Environmental systems

5.1.1 National level

The national Environmental management system, under the EPA is comprehensive of any environmental risk that can arise directly or indirectly from the program, more specifically potential pollution from effluent, and storage and disposal of hazardous substances26. The institutional arrangement is also clear, with the Ministry of Environment, Energy and Climate Change (MEECC) being the key institutional authority responsible for administering the EP. The MEECC has the mandate to develop, evolve and where necessary adopt standards for the quality of the environment in its various aspects and for emission or discharge of environmental pollutants from any source whatsoever.

The Environmental Assessment Permit Section (EAPS) of the Department of Environment is in charge of ensuring environmental good practices that comply with the World Bank requirements: i) collecting and assessing data on the state of the environment and physical nature resources; ii) assessing and planning applications, provide pre-planning advise and input on project proposals; iii) supervising and providing assessment for projects or development that are likely to have an impacts on the environment and iv) undertakes appraisal of ad-hoc Environmental Impact Assessments and recommendations for the Town and Country Planning Authority, the Project Appraisal Committee and other government organizations.

The waste management and Standard section within the Ministry has standards officers who ensure compliance with the EPA regulation standards related to waste, and discharge effluents as well as managing risk related to storage and disposal of hazardous materials. The Landscape and Waste Management Agency (LWMA) is responsible for monitoring the disposal of waste in all forms including liquid, solid and gas.

5.1.2 Program implementation level

While the overall environmental risk management system is robust, all the responsibilities for managing environmental lie under MEECC. In the case of the Program, articulations of institutional responsibilities and resources to support implementation plans need to be clarified: indeed, the key institutions for the implementation of the Program (i.e. Ministry of Family Affairs, Agency for Social Protection, Ministry of Social Affairs, Ministry of Employment, Immigration and Civil Status, etc.) do not necessarily have either the information to properly, nor the capacity to address environmental

\[26\] Potential risk for some of the Professional centers that will potentially re-skill/re-train individuals because of the Program.
issues, even when they take place (e.g. case of disposal of fuel or discharge of pollutants in soil and streams).

5.2 Social management systems

5.2.1 National level

The national social management systems to deal with vulnerability and conflict, broadly defined in chapter 3 of this report, are well defined and established. The country’s constitution recognizes the rights and need for protection vulnerable groups, but only makes explicit reference to the need of protection of children and young person (Article 31), aged and disabled people (Article 36). Though there is no reference to single mother as such, the constitution under section 30 provides for the rights of working mothers. This article “recognizes the unique and natural maternal functions of women in society and undertakes as a result to take appropriate measures to ensure that a working mother is afforded special protection with respect to paid leave and her conditions at work during such a reasonable period as provided by law before and after childbirth”.

Also, article 32 on protection of families might be relevant for single mother. It states that “the State recognizes the family as the natural and fundamental element of the society and the right of everyone to form a family and undertakes to promote the legal, economic and social protection of the family”. There is no in the constitution, specific reference/provision of alcohol and drug user or teenage mothers. On the subject of conflict, the constitution does not explicitly make reference to conflict as such. It does refer though to mechanisms for resolving conflict/or grievances, such as the court system and appeal procedures; and grievance redress (ombudsman) in chapter 10. Other constitutional provisions relevant for the program relates to citizen participation and access to information. The former is covered in article 23, while the latter is contained in chapter 28.

5.2.2 Ministry of Family Affairs

The MFA will play a fundamental role in the program implementation because its role in policy making and coordination on matters relating to the functioning of the society and empowerment of individual and families. The MFA is particularly relevant for the program given its mandate in: (i) Rehabilitating and reintegrating marginalized groups into mainstream society; (ii) Sensitizing and educating target groups and families; (iii) Integrating gender into policies; (iv) Safeguarding the interest of weak and vulnerable groups; and (v) Providing support and counselling to families and children in the community.

The MFA is structured around three departments – Family Affairs, Social Affairs, and Poverty Alleviation. The most recent strategic plan 2018-2022 highlight critical challenges and opportunities facing the MFA, and the ESSA has highlighted relevant aspects in the context of the proposed PforR. These challenges are equally important in the context of lack of human resources, inadequate budget, staff turnover, unclear mandate, insufficient monitoring and inexistence of guidelines/structures nationally on social issues are some of major issues highlighted in the document. The opportunities include the need to institutionalize Social Impact Assessment (SIA27), networking with civil society and collaboration with NGOs and other Ministries.

5.2.3 Agency for Social Protection

27 Specifically, Gender Research and vulnerability had been highlighted in the meeting with the MFA
Among other institutions, the Agency for Social Protection (ASP) is one of the most important in the technical execution and implementation of the proposed program. Main functions of ASP include: (i) administer social assistance; (ii) administer payment of benefits under the 2010 Social Security Act; (iii) collect, collate, maintain and administer and analyze information necessary for the payment of social assistance; (iv) maintain records for reconciliation of payments; (v) maintain national database of all applicants for, and beneficiaries of social protection; and (vi) establish a compliance mechanism to ensure that the integrity of the social protection programs is maintained.

At the ASP level issues of vulnerability are highly recognized. For instance, the ASP charter outlines its mandate as one “to ensure the provision of comprehensive social security services and social relief against vulnerability within the constitutional and legislative framework of Seychelles”. It further states that its vision is “an empowered agency seeking excellence in service delivery with the aim of reaching the most vulnerable groups”.

With respect to conflict, the ASP Customer Chart recognizes that for any reason, a person is not satisfied with its services and wish to complain, this is dealt with in a fair, thorough and timely manner. The ASP has an established complaint handling mechanism- formal and informal. Evidence of a policies or deliberate provisions for beneficiaries’ participation in programs and right to information could not be found.

The Agency has 84 staff mostly women (9 male staff members). The Agency has offices in each of 26 districts with 26 staff and 6 senior officers supervise each region. The structure of the Agency is presented in the chart- annex 1.

The Agency has adequate staff in place to handle case work but would benefit from some specialized functions such as on communication, stakeholder consultations, monitoring and evaluation. Staff interviewed by the ESSA Team both in the Head Office and regional offices showed a high level of commitment for their work. They receive applicants in both regional and Head Office and carry a heavy work load. Staff assess cases and provide information on the process of applications. They also provide information on social services that may be required by applicants. In regional offices, they are located within the same office as Social Affairs Department staff who can be easily approached to provide other support.

Staff stated that social welfare payments are the most complicated to process and consume a lot of time. Delays are caused by information that is sought from other departments or agencies and responses and staff need to follow-up often to receive a response. A linked information system through which they can access all the necessary details is an essential requirement.

The Agency supports its staff on training requirements. There is a training plan in place and the Agency provides financial support to undertake specialized qualifications in social work and other related disciplines. However, staff also identified the need to receive an orientation training on benefits and how these are assessed. While benefit assessment is undertaken through an online management system in which applicant data is filled in, they are often unable to provide answers as to why a benefit is calculated to a certain level. This aspect is learnt “on the job”.  

Staff also identified the need for counselling support as they deal with stressful cases that take a toll on their mental and emotional health. Applicants discuss their family issues with staff for which specialized skills are required. Staff in Headquarters are overburdened and identified the need for extra support. Further, staff reported that they sometimes face abuse and threatening behavior from applicants who are dissatisfied with the benefits they receive.
Staff realize that many eligible people do not come forward to claim benefits. They identified that a robust communication and outreach mechanism for such areas and households is required but they neither have the means, resources or formal responsibility to do so. Communication function was handled by one staff member who has recently resigned. The Agency's website is also not functional. The Agency reported that there are plans in place to establish a panel in each district to identify eligible households in order to register them for social welfare payments.

The Home Care staff oversees the program implementation by carrying out visits to recipients. Staff realize that monitoring of patients has reduced substantially over the years due to lack of personnel. Further, careers are not qualified and there are cases of disagreements and inappropriate behavior. In cases of complaints, beneficiaries can call the staff and discuss the arrangement.

5.2.4 Ministry of Employment, Immigration and Civil Status

The Employment Promotion Division within the Ministry ensures that all Seychellois have access to job opportunities. This includes providing training schemes that will enable jobseekers to have the necessary skills to compete on the labor market. The main factions of the Employment Promotion Division include: (i) Promoting the implementation of the National Employment Policy in relation to Employment Promotion matters; (ii) Promoting goals of decent work; (iii) Managing the employment of non-Seychellois workers; (iv) Ensuring the proper management of Employment Schemes; (v) Monitoring the services of all registered Private Employment Agencies.

Two main initiatives are undertaken in collaboration with Social Welfare Agency. These include (i) employment for beneficiaries receiving social welfare payments and (ii) skills development training.

A revamped Employment scheme was introduced in 2018 because there was an increase in people on social welfare and people faced difficulties in finding employment. The initiative targets all beneficiaries but also focuses especially on marginalized groups such as ex-convicts, disabled welfare recipients and people recovering from substance use. Job placements take place through employment agencies. The Scheme gets beneficiaries profile from Agency for Social Welfare, and assesses their skills to place them in employment.

Staff stated that awareness about the Scheme is low. Staff undertake aware-raising campaigns after normal work hours and go door to door to propagate the program. Targeting is undertaken in consultation with the Department of Poverty Alleviation who use surveys to pinpoint where they should visit. Staff consult the District Administrator and meet the social welfare officer at the district level. A plan is developed to cover districts on a monthly basis. Staff undertake these visits outside their normal work hours.

5.2.5 Agency for Prevention of Drug Abuse and Rehabilitation

Details on APDAR mission and primary focus are presented in section 3.2.2.7 above. Essentially, APDAR works on drug prevention, treatment and habilitation. Currently, APDAR runs two fully equipped rehabilitation centers in Mahe, but the organization does also conduct treatment/outreach (day care detox) activities in identified hotspots. During interviews single parenthood, broken society and families, changing society and geographic location were mentioned as the leading causes for drug and alcohol addiction in the country.

This section deals with the assessment of the capacity of APDAR in the area linking the organization to the proposed PforR. The link between APDAR and the program is mainly through the SWA also described previously (see Table 7), mainly because about 5% of APDAR program clients (drug or alcohol addict in rehabilitation) are equally welfare recipient. APDAR liaises with a range of entities as
part of implementation of its mandate. These entities include the Ministry of Health, MFA, Ministry of Education (MoE) and the Department of Employment Promotion within the Ministry of Employment, Immigration and Civil Status.

Assessing the capacity of APDAR proved challenging, mainly because it is relatively new institution with less than two and half years of existence at the time the ESSA was conducted. Despite this, the most pressing challenges were highlighted- (i) job placement for its beneficiaries; (ii) relapsing clients; (iii) outreach capacity; (iv) poor referral system; and (v) qualified staff.

5.2.6 Civil Society organizations

Civil society organizations (CSOs) play a significant role in social protection in Seychelles. They are actively involved in poverty and social programs (human rights, social development, family and parenting) targeting various demographic groups, including those covered by the proposed PforR. CSOs have history of a successful implementation of social programs (employment and skill development) after the country embarked in structural adjustment measures in 90s. The abilities of these organizations with respect to efficiency, innovation and reaching communities needs to be carefully examined in order to define its contribution in program implementation.
6 SUMMARY OF CONSULTATION MEETINGS

One of the Bank team role in the preparation of this ESSA was to ensure that consultation with program’s stakeholder is conducted, and results and recommendations of the assessment are disclosed. Both the stakeholder consultation and disclosure of results and recommendations are seen as critical component to improving World Bank financed operations.

During the preparation of this ESSA, the Bank team conducted a series of technical meetings with representatives of relevant government institutions, Civil Society Organizations, development partners, and program beneficiaries. These meetings assisted the team to understand the country’s context social context (policy, legal and institutional) and its relationship with the proposed PforR program.

Besides these technical meetings, the Bank team facilitated a multi-stakeholder consultation meeting aiming at collecting opinions and feedback on major findings and recommendations of the draft ESSA, and identify additional recommendations. Ahead of the multi-stakeholder consultation meeting, the Bank team prepared and shared a power point presentation containing key components of the draft ESSA- (i) ESSA context within the Bank, definition and rationale; (ii) ESSA core principles; (iii) Preliminary ESSA risk assessment; (iv) ESSA process and methodology; (v) Key findings (risks and impacts) by each ESSA core principles; (vi) Existing capacity to manage identified risks; and (vii) Recommendations.

Generally, stakeholders expressed support of the PforR and agreed with the ESSA findings and recommendations, but most notably because the PforR brings in the much needed reforms to the social protection programs in the country. Also, stakeholders agreed with the proposed program activities, and they expect to be part (directly/indirectly) of the implementation. Much of the feedback and opinions from stakeholders, are not necessarily related to the ESSA findings, but rather, to the social programs delivery and efficiency in the Seychelles, which in a way, the PforR intends to resolve.

Specific topics discussed during the meeting are summarized below:

- ASP and M&E monitoring capacity
- MFA restructuring as an opportunity for improving M&E
- Impact assessment of social programs best suited for an outsider?
- M&E and the need to include structural social themes to inform decisions on social policy options – e.g. GBV, single mother, welfare and substance abuse
- The second wave of public sector reform and the need to take advantage for integrating M&E in all ministries and agencies? If an M&E entity is an independent one, then this should come strong in the report
- The Ministry of Finance does the monitoring of budget expenditure but that does not include social aspects- would the MFA be the better host of a possible M&E unit?
- M&E and the need for Technical Assistance (TA)
- If an M&E unit for social program is established, also there will be a need for regular research and funding to inform future policy options for social programs- funds could possible come from the WB or any other development agency
- Capacity assessment limited to ASP, and not expanded to other PforR implementing agencies
- ASP and its reactive nature and weak coordination with CSOs
- Whether the project will provide support for specific skills development for employment access
- Since both the Ministry of Education and Ministry of Labor are involved in some form of skills development activities, which of the two is best suited?
- Systematic presentation of recommendation (in sequential manner)

Box 1: Issues emerging from the multi-stakeholders meeting

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28 Technical meetings were carried out in two rounds- from 23rd -26th April 2019 and from 11-16th August 2019
29 Held on August, 20th, 2019
From the topics above, it is clear that much of the stakeholders’ opinions and views on the ESSA focused on the following: (i) Monitoring and evaluation of social programs; (ii) Capacity of other agencies involved in the PforR implementation; (iii) ASP capacity and its relationship with CSOs in delivering social programs. Detailed information on the discussion, and answers from the Bank team is provided under the Table 8 below:

**Table 8: Summary of discussions from multi-stakeholders meeting**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Participants’ account</th>
<th>World Bank response</th>
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<tbody>
<tr>
<td>Monitoring and evaluation</td>
<td>The issue of M&amp;E was raised on basis of a concern that impact of social programs as a whole is unknown, and decisions made are not always strongly supported by field dynamics. The ongoing organizational restructuring within the MFA is seen as a potential for inclusion of M&amp;E unit. This unit should not only deal with M&amp;E, but also research on impacts and structural aspects (also through research) e.g. women in welfare; single mother situation; gender based violence; factors leading to substance abuse (drug addiction). Nonetheless, stakeholders also acknowledged that the country lacks capacity on these aspects and Technical Assistance (TA) from the World Bank would be required/needed not only in setting up M&amp;E unit and systems, but also training personnel on these themes. Further discussions were placed of such unit, and whether that would not constitute more departments/agencies, and hence cause further financial constraints to the state/government. Despite these discussions and different point of views, stakeholders agreed that M&amp;E is central to improving delivery and efficiency of social programs in the country.</td>
<td>The Bank team agreed that M&amp;E is critical to quality delivery of social programs and this would be made visible in the report and recommendations, and will also include the TA needs.</td>
</tr>
<tr>
<td>ASP capacity and relationship with CSOs in the area of social programs</td>
<td>Stakeholders agreed that ASP has limited capacity in some areas – e.g. Oversight, monitoring and evaluation of programs. In most cases ASP is reactive. Also, it appeared consensual that the relationship between ASP and CSOs in delivering social programs should be enhanced. It became evident that a collaboration between the two requires institutionalization.</td>
<td>The Bank team agreed with the assessment of ASP capacity and the limited relationship with CSOs organizations in delivering social programs. The Bank team stressed that this was also finding in the ESSA report and specific recommendations for that were made. Also the team indicated that, the PforR in itself anticipate under pillar III activities aiming to improve coordination, that CSOs would</td>
</tr>
<tr>
<td>Sequencing recommendations</td>
<td>The list of recommendation should be presented in a sequential manner, and a tentative timeframe need to be attached to it for smooth implementation.</td>
<td>The Bank team agreed to provide the list of recommendation in a sequential manner</td>
</tr>
<tr>
<td>MFA and ASP mandates at local level</td>
<td>The boundary of mandates between MFA and ASP at local level gives prominence to ASP</td>
<td>The Bank team also agreed with the opinion, and this was well noted during fieldwork</td>
</tr>
</tbody>
</table>
Picture 1: Multi-stakeholder meeting for presentation of ESSA findings and recommendations

Picture 2: Technical meeting with CSOs representatives


7 RECOMMENDATIONS

Overall: The Program would benefit from including a separate Disbursement Linked Indicator to capture the progress of interventions proposed under the ESSA. An Action Plan to address social risks identified in the ESSA is outlined below, and based on ESSA key principles:

<table>
<thead>
<tr>
<th>Core principle 1: Environmental and social management procedures and processes are designed to: (a) promote environmental and social sustainability in the program design; (b) avoid, minimize, or mitigate against adverse impacts; and (c) promote informed decision making relating to a program’s environmental and social effects.</th>
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<tr>
<th>Action 01: Develop environmental management capacity</th>
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As described in section 4.1, the existing Environmental system is robust and comprehensive the Program’s main environmental risk rating is low and potential risks are indirect, related to the re-skilling of people who will be dropped out of the Social Protection Programs because of the Program. The inconsistencies between the existence of a strong environmental regulatory framework on the one hand, and the lack of proper implementation at the professional centers on the other hand (see section 5.1.2) represents a weakness of the system even if the risks are not directly related to the activities of the program.

The principal recommendation consists in identifying the professional centers that will be used to re-skill people who would be dropped off the HCP (because of the Program implementation: changing the eligibility criteria) and provide them with adequate support for developing and implementing the necessary Environmental Management plan to mitigate the environmental impacts related to their activities. Indeed, currently, none of the Professional centers whose activities have negative impacts on the environment has any form of environmental management plan/mitigation plan, and none received any clear guidance, or capacity building/training from the MEECC on how to handle the environmental issues they currently have.

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<tr>
<th>Action 02: Improve communication, collaboration and coordination between MEECC and other entities</th>
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Improving communication, collaboration and coordination between the MEECC and the Program’s different implementing entities would be needed to identify unexpected potential environmental risks during implementation, and to adequately mitigate them. This can include: i) awareness campaign, ii) capacity-building on specific matters (e.g. identifying and managing specific environmental risks), iii) capacity for implementing environmental management plan, or regular monitoring of the Program involving the MEECC.

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<th>Action 03: Establish and operationalize a communication unit</th>
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Establish a Communications and Consultation Unit in the Agency for Social Protection. This Unit should be staffed with adequate resources and capacity to undertake an overview of all stakeholder consultation requirements and overall communication requirements of the Program. The Unit should work in close collaboration with the staff of the Agency and assist them in reaching out to existing and potential beneficiaries as well as general public.

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<tr>
<th>Action 04: Update and improve existing Grievance Redress Mechanism</th>
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</table>
Core principle 1: Environmental and social management procedures and processes are designed to: (a) promote environmental and social sustainability in the program design; (b) avoid, minimize, or mitigate against adverse impacts; and (c) promote informed decision making relating to a program’s environmental and social effects.

Update the Grievance Redress Mechanism with clear protocols on complaints related to process of application handling. Ensure that the GRM is widely communicated and easily accessible. Ensure that it is structured to handle cases of Sexual Exploitation and Abuse (SEA) and Gender Based Violence with clear referral mechanism to qualified service providers.

**Action 05: Build research capacity of Poverty Alleviation Department**

Strengthen the research capacity of Poverty Alleviation Department under the Ministry of Family Affairs to undertake research on both quantitative and qualitative aspects.

**Action 06: Provide capacity support to SC and WG**

The ESSA can support a secretariat attached to the SC and WG that liaises with and convenes consultations with civil society, marginalized groups and their representatives and technical specialists. There must be evidence that consultations have taken place by technical committees and civil society views have been assessed in any recommendations. Civil society, technical specialists and marginalized groups are consulted meaningfully during the policy making process.

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Core Principle 2: Environmental and social management procedures and processes are designed to avoid, minimize, and mitigate against adverse impacts on natural habitats and physical cultural resources resulting from the program.

The implementation of the program is not expected to have any adverse impacts on either natural habitats or physical cultural resources. If unanticipated potential risks are identified during implementation, provisions of the EPA under 4.1.2 of this ESSA have to be complied with.

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Core principle 3: Environmental and social management procedures and processes are designed to protect public and worker safety against the potential risks associated with (a) construction and/or operations of facilities or other operational practices developed or promoted under the program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.

In section 4.1.3 of this ESSA, it was found that the existing regulatory framework is comprehensive: no activity to be implemented under the program would fall beyond the scope covered by the existing national regulatory framework. However, it is crucial to ensure consistency between the texts and their application. One important point to ensure is efficient communication and coordination between the different institutions involved in the effective implementation of the OHS decree and the other texts covering OHS matters in the country.

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Core principle 4: Land acquisition and loss of access to natural resources are managed in a way that avoids or minimizes displacement, and affected people are assisted in improving, or at least restoring, their livelihoods and living standards.

In section 4.2.1 of this ESSA, it was found that neither limited access to natural resources nor land acquisition and resettlement is expected to take place as a result of the program implementation. There will be no new ASP construction of offices or any kind of civil works with impacts on land, as such this Core Principle is not relevant for the present ESSA.
Core principle 5: Due consideration is given to cultural appropriateness of, and equitable access to, program benefits giving special attention to rights and interests of Indigenous Peoples and to the needs or concerns of vulnerable groups.

This principle seeks to ensure that program interventions are informed by consultations with indigenous peoples and to check to what extent the program has community acceptance; and ensures that indigenous peoples participate and share in the benefits of exploiting customary and indigenous resources and there is consent to the provision of information. More importantly, the principle gives special attention to groups vulnerable, including the poor, disabled, women and children and ethnically marginalized groups. There are several vulnerable groups that were repeatedly highlighted as particularly vulnerable during the ESSA process, and that would adversely be impacted by the program. These consist of alcohol and drug users (estimated to be 5% of the population), teenage mothers, female-headed households with intergenerational pattern of teenage pregnancy (no data available) - see analysis under section 4.2.2. The proposed action to address identified risks include:

Action 01: Clear definition of vulnerability

The Program would benefit from a clear definition of vulnerability (not just income poverty) and undertake research, especially qualitative research, to better understand the drivers of vulnerability for such groups (e.g. female headed-households, intergenerational pattern of early pregnancies, community dependency, especially women on welfare, GBV and IPV). While social welfare benefits play a key role for these groups, they also require other types of support (psychosocial, life skills, technical skills, awareness raising, family counselling and community support). Some worthy initiatives to date include the work of ABDAR, support for teenage mothers to re-enter schools and skills training. However, rigorous research on the underlying causes that push people into these situations would help target preventive and supportive initiatives.

Action 02: Assess the impact of welfare programs

Another key area of investigation related to vulnerability concerns the impact of welfare programs. The ESSA found little or no evidence of impact evaluation to assess how vulnerable and poor households were benefiting from the initiatives. Rigorous quantitative and qualitative assessments are important to assess if welfare payments have had an impact on vulnerabilities particularly for groups facing multiple vulnerabilities.

Action 03: Regularly assess the impact of the revised eligibility criteria

The changes in eligibility criteria of SWA and HCP may lead to negative impact on current beneficiaries who may see their benefits rolled back. It is critical that a continuous assessment and fine tuning are conducted to ensure that those with benefits rolled back are not left vulnerable.

Action 04: Develop and implement GBV/SEA protocols

Develop protocols and material on for gender-based violence, sexual abuse and other negative behavior for carers under the Home Care program and provide them comprehensive training on these aspects.

Core principle 6: Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.
**Core principle 6:** Avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

**Action 01: Carry out capacity assessment of NGOs to determine roles in the program, and implement an informed program**

Undertake a capacity assessment of Non-Governmental Organizations to determine their role in the Program. Based on this assessment, produce a Plan (including financial resources) for upgrading capacity and engaging them in Program initiatives with clearly specified deliverables especially awareness raising and family support for marginalized groups. After capacity building, the Program will earmark resources (such as in the form of a dedicated fund) to engage civil society to undertake programs on awareness raising, relevant applied research, family and community support and support to marginalized groups. The Terms of Reference for this engagement should be developed and financial resources secured by the beginning of year 2. Awareness should also target people whose benefits may be reduced or rolled back. This must include a plan for involving various relevant departments and a system of monitoring progress.
Annex 1: Structure of ASP

[Diagram of the structure of the Agency for Social Protection, including the Board of Directors, Review Panel, Chief Executive Officer, Deputy Chief Executive Officer, Management Information Systems Unit, Appeals & Investigation Unit, Programme Strategy, Research & Development Unit, Human Resource Management and Administration Division, Home Care Section, Senior Registration & Monitoring Section, and Principal Benefits & Welfare Section.]
Annex 2 - List of people consulted

*Multi-stakeholder meeting*

<table>
<thead>
<tr>
<th>Name</th>
<th>Designation</th>
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<tbody>
<tr>
<td>Mrs. Linda William-Melanie</td>
<td>Principal Secretary, Social Affairs Department</td>
</tr>
<tr>
<td>Mr. Marcus Simeon</td>
<td>CEO, Agency for Social Protection</td>
</tr>
<tr>
<td>Mrs. Roma Edmond</td>
<td>Deputy CEO, Agency for Social Protection</td>
</tr>
<tr>
<td>Mrs. Debbie Celtel</td>
<td>Director of Operations, Agency for Social Protection</td>
</tr>
<tr>
<td>Ms. Geralda Desaubin</td>
<td>CEO, Agency for the Prevention of Drug Abuse &amp; Rehabilitation</td>
</tr>
<tr>
<td>Mr. Alvin Laurence</td>
<td>Principal Secretary, Poverty Alleviation Department</td>
</tr>
<tr>
<td>Ms. Bella Henderson</td>
<td>Principal Policy Analyst, Ministry of Health</td>
</tr>
<tr>
<td>Mr. Joel Edmond</td>
<td>Senior Policy Analyst, Ministry of Health</td>
</tr>
<tr>
<td>Ms. Francoise Mein</td>
<td>Ministry of Education and Human Resource Development</td>
</tr>
<tr>
<td>Mr. Mario Dupres</td>
<td>Senior Policy Analyst, Employment Department</td>
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<tr>
<td>Mrs. Marie-France Pereira</td>
<td>CEO, National Council for the Elderly</td>
</tr>
<tr>
<td>Mrs. Francoise Larue</td>
<td>Representative of Citizens Engagement Platform Seychelles (CEPS).</td>
</tr>
<tr>
<td>Mr. Julius Joubert</td>
<td>Economist, Ministry of Finance, Trade, Investment and Economic Planning</td>
</tr>
<tr>
<td>NAME</td>
<td>ORGANISATION / SCHOOL</td>
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<tr>
<td>Pr. Abel Ntey</td>
<td>Lighthouse Bokrafa Castle</td>
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<tr>
<td>Ms. Ivy Hall</td>
<td>Northern Protection Centre</td>
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<tr>
<td>Linda Philae</td>
<td>Family Action Yemen</td>
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<tr>
<td>Justin Aumoni</td>
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<tr>
<td>Lucie Alexander</td>
<td>Les Le Vin</td>
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<td>Joseph Brown Jr.</td>
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<td>Nathalie Antoine</td>
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<td>Margaret Maillet</td>
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<td>John Odie</td>
<td>UP Brigade</td>
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<td>Marguerite Kihindo</td>
<td>Father Diptyp Campanal for Girls</td>
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<tr>
<td>Francine Farin</td>
<td>Commissariat Byzant</td>
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<td>Francoise Grill</td>
<td>MIF</td>
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List of Regulations of the Ministry of Environment, Energy and Climate Change

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