

ACCOUNTABILITY IN PRACTICE:

SOCIAL AUDIT CASE STUDIES

From

FUVAHMULAH CITY,
ADDU CITY,
LAAMU GAN,
KULHUDHUFFUSHI CITY

MALDIVES
2023



ANTI-CORRUPTION COMMISSION

 **TRANSPARENCY
MALDIVES**
A Coalition for Integrity



The Anti-Corruption Commission of the Maldives (ACC)

The Anti-Corruption Commission of the Maldives (ACC) is an independent legal entity formed under the 2008 Constitution. ACC was established on 16th October 2008 with the ratification of the Anti-Corruption Commission Act 13/2008 (ACC Act) with the mandate of investigating corruption offences promoting integrity, prevention and combat corruption in all arms of the state.



Transparency Maldives

Transparency Maldives, the National Chapter of Transparency International in the Maldives, is a non-partisan organisation that promotes collaboration, awareness and undertakes other initiatives to improve governance and eliminate corruption from the daily lives of people. Transparency Maldives views corruption as a systemic issue and advocates for institutional change that will punish and prevent corruption.



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The SANCUS project helps ordinary citizens in 26 countries to call for greater accountability from governments and the institutions responsible for overseeing them. The SANCUS project in the Maldives focuses on strengthening the legal and regulatory framework of State-Owned Enterprises (SOEs), as well as improving the governance, functions and operations of SOEs.



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FOREWORD

Transparency is key to public accountability. This is a matter of great concern and priority to the ACC. In 2017, the Anti-Corruption Commission conducted the first community-led social audit in Maldives. The work was dedicated to the establishment of an eco-facility in Gn. Fuvahmulah.

This work was an important addition to that start of the social audit initiative of ACC. We would like to thank Transparency Maldives for its full cooperation with the ACC in this important work.

The ACC and Transparency Maldives aim to increase the involvement of civil society in social audit activities, enhance the accountability of state and government agencies and strengthen the governance of public institutions. We aspire to collectively work with the civil society and the government to build upon this endeavour.

Adam Shamil
President
Anti-Corruption Commission

The fight against corruption must be a collective effort. We are excited to have partnered with the Anti Corruption Commission of the Maldives, and four different communities to enhance and pilot a social audit toolkit, that can empower citizens to be more proactive in engaging with and holding to account those who are in positions of power. It provides opportunities for the citizens to work together with stakeholders in identifying corruption risks and systemic gaps, and work together to address these gaps. The four social audits conducted as part of this initiative sheds light to both systemic gaps that require institutional reforms, as well as immediate practices that can be adopted to ensure our resources are allocated equitably, fairly and transparently.

Transparency Maldives appreciates the opportunity to have worked with ACC on this important initiative. This also would not have been possible without those dedicated individuals and community based organisations who showed a keen interest to learn about the tools and supported in data collection. We also acknowledge the stakeholders who shared important information that provided insights around how the projects were being implemented. We hope this initiative highlights the need for continuous public engagement in development projects, and will promote greater public participation in decisions that affect the lives of their communities.

Asiath Rilweena
Executive Director
Transparency Maldives

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ABOUT

Transparency Maldives, the National Chapter of Transparency International in the Maldives, is a non-partisan organisation that promotes collaboration, awareness and undertakes other initiatives to improve governance and eliminate corruption from the daily lives of people. Transparency Maldives views corruption as a systemic issue and advocates for institutional change that will punish and prevent corruption. Transparency Maldives received formal registration from the Ministry of Home Affairs on 19 July 2007.

Transparency Maldives aims to be a constructive force in the Maldives by encouraging discussion on transparency, accountability, and the fight against corruption. Transparency Maldives seeks to engage with stakeholders from all sectors (government, business, politics, civil society and media, among others) to raise awareness of corruption's detrimental effects on development and society.

The Anti-Corruption Commission was established in response to the Maldives' new Constitution (2008), which mandated the establishment of a nonpartisan commission with the specific responsibility of eradicating and combating corruption from all governmental responsibilities. The Anti-Corruption Commission Act (13/2008) was approved in compliance with this legal need, outlining the functions and mandate of the Commission.

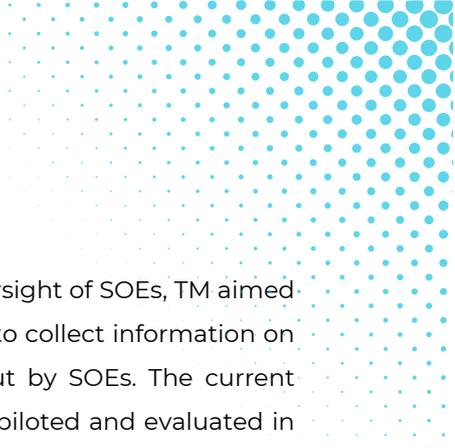
According to Article 21(h) of the Act, the Commission is required to undertake seminars, workshops, and other programs to educate the public about the laws against and methods for eliminating corruption. Additionally, Article 21(n) directs the Commission to develop relationships with non-governmental organisations, educate them about corruption, promote integrity, and work together to combat corruption.

The SANCUS project, implemented by Transparency Maldives, supports strengthening the vertical and horizontal accountability and governance mechanisms around State Owned Enterprises (SOEs) in the Maldives. SOEs are a powerful actor in the economy of Maldives with most SOEs receiving significant financial contributions from the state coffers.

Many SOEs drain the state budget and contribute to increasing levels of public debt[1]. According to a World Bank Report[2], while the Public Sector Infrastructure Program (PSIP) accounts for the majority of capital spending, capital injections to SOEs have increased significantly over the past years. As such, capital contributions to SOEs increased threefold from US\$33-36 million in 2017-2018 to US\$102 million in 2019. The report also highlights that fiscal risks, namely explicit risks, were estimated at US\$1.6 billion or 30 percent of 2019 in GDP, arising mostly from guaranteed and on-lent debt to SOEs.

[1] Masood, M.I. (2023). Transition committees note gov't companies' financial issues. [Transition committees note gov't companies' financial issues | SunOnline International](#)

[2] World Bank (2022). [Maldives Public Expenditure Review - Restoring Fiscal Health](#)
<https://documents1.worldbank.org/curated/en/099205108062235369/pdf/P174394036aa910c309ecf0fbecff0d7654.pdf>



As a key focus of the SANCUS project is on improving the accountability and oversight of SOEs, TM aimed to develop a toolkit that citizens and Civil Society Organizations (CSOs) can use to collect information on government awarded projects with a special focus on the projects carried out by SOEs. The current toolkit is built on ACC's Community-Led Social Audit Pilot Program, which was piloted and evaluated in Gn. Fuvahmulah City in 2017. It comprises extensive sets of questionnaires designed for the evaluation of projects within local communities. The data collected through these social audits aims to support citizens and CSOs in raising awareness and advocating for the performance, governance, accountability, and oversight of project-awarded parties, including State-Owned Enterprises (SOEs).

This report comprises the findings and recommendations derived from joint social audits conducted by TM and the ACC between May to August 2023. CSOs and citizens were trained from four atolls in the Maldives, where facilitators introduced social audit as a social accountability tool and used the toolkit to monitor government projects. Throughout, participants were able to experience engaging with stakeholders through interviews and meetings. As such they were equipped with skills that will be useful when conducting social audits or other accountability tools in the future. The findings are presented in the form of case studies for each social audit project which explains the background of selected projects and key issues highlighted.

Executive summary

The Anti-Corruption Commission and Transparency Maldives (TM), collaborated to conduct social audits, to enhance public and NGO engagement in the monitoring of the projects undertaken in the islands.

This initiative is supported by TM's SANCUS project of TM which focuses on strengthening the legal and regulatory framework of State-Owned Enterprises (SOEs), as well as improving the governance, functions, and operations of SOEs.

A social audit is a powerful social accountability tool to evaluate or audit the government's actions, policy decisions, and performance. It is a means to ensure social and vertical accountability, which includes actions and mechanisms used by citizens and civil society to hold the State accountable, apart from exercising their voting rights.

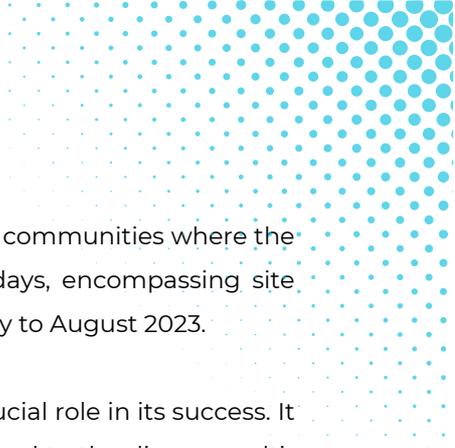
Four projects were identified to conduct the social audit. These four projects were selected from a list of national infrastructure projects obtained from the National Tender Board, which contained the project's name, location, budgeted amount, contracting party, and the kind of award. Based on this information and the project's location, type of award, and length, the following four projects were selected from different regions of the country.

1. Construction of a Quran Center in the city of Gn. Fuvahmulah

2. Construction of 12 classrooms at Seenu Hithadhoo Nooraanee School in Addu City

3. Design and build of L. Gan Coastal Protection Project

4. Construction of an Intensive Care Unit (ICU) at Kulhudhuffushi Regional Hospital is constructing an intensive care unit (ICU)



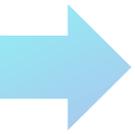
TM and ACC conducted joint training on how to conduct social audits in the four communities where the projects were being implemented. Each social audit training spanned three days, encompassing site visits and observations in each location. These trainings were carried out from May to August 2023.

Providing training to the community on how to conduct a social audit plays a crucial role in its success. It equips participants with a comprehensive understanding and knowledge to attend to the diverse multi-level processes and stakeholders involved in decision-making. Moreover, the exposure to various accountability tools also offers an opportunity to learn best practices in dealing with different actors and processes for effective accountability efforts.

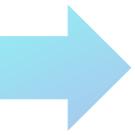
A total of 40 participants from four atolls were trained and represented local CSOs and interested individuals. The training equipped participants with the skills to conduct interviews with government agencies emphasised the value of collaboration and, the significance of accountability, and provided tools for holding authorities responsible. The site visits and interactions with contractors provided practical experience and insights, enabling participants to collectively identify potential project risks that may lead to corruption.



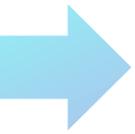
Key observations from the four social audits are highlighted below:



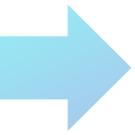
Infrastructure projects often commence without undergoing a thorough evaluation of their necessity or feasibility. Despite being part of the government's long-term plans and discussed with relevant ministries, the government proceeded without a proper needs assessment. Mega projects are often seen to be driven by political promises rather than genuine public requirements, potentially leading to unsustainable projects and inefficient resource allocation.



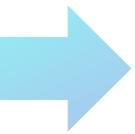
There was limited or no monitoring regarding quotations and materials provided by contractors. No observable mechanisms or practices were in place to assess the materials presented by contractors and the accuracy of their cost estimates.



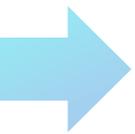
Public participation in decision-making processes was deficient. Opportunities for public involvement in various authorities were limited and poorly structured. The process is hindered by constraints on accessing information, inadequate inclusion of marginalised groups, insufficient political will for public participation, and restricted civic space for CSOs to contribute to decision-making.



The monitoring function was loosely managed, with the Councils often not having full authority to oversee projects unless specifically requested by the client/ministry. Some sites lack the necessary coverings, potentially leading to losses for the contractor and potentially compromising the quality of the final project outcome.



All the projects reviewed within the social audit program were behind schedule or not proceeding as initially planned, indicating a significant deviation from projected timelines.



There were noticeable gaps in communication between the relevant ministries and island councils. Councils were often not consulted on projects unless they were directly involved in the monitoring process. Additionally, payments to contractors are frequently delayed for various reasons, as observed in some of the projects under review.

Recommendations for each of the identified risks are given in the report. These recommendations will be forwarded to relevant authorities to ensure their enforcement.

INTRODUCTION TO SOCIAL AUDIT

A social audit is a powerful social accountability tool to evaluate or audit the government's actions, policy decisions, and performance[3]. It is often started and led by Non-Governmental Organisations (NGOs) that recruit, train, and mobilise the participation of citizens in the audit process[4]. This section looks at the concepts and broad themes surrounding social audits.

Accountability

Accountability is the obligation of power holders to take responsibility for their actions. Power holders include people who hold political, financial, or other forms of power and include officials in government, CSOs, private businesses, and financial institutions[5]. It describes the rights and responsibilities between people and institutions that carry an impact on everyday lives[6].

In a democracy, a fundamental principle is that people have the right to demand accountability and public officials have an obligation to account for their actions[7]. Therefore, accountability has a political purpose which is to check the abuse of power, and an operational purpose to ensure the effective functioning of government[8]. For accountability to be effective, there must be an obligation to provide an account and the right to obtain a response (answerability) and ensure that action is taken where accountability fails (enforceability)[9].

Accountability can be imposed externally on governments through civic engagement or electoral process, which is known as vertical accountability. On the other hand, it can also be imposed by governments by using institutional mechanisms for oversight, regulation, and checks and balances[10] (See Figure 1).

[3]Berthin, G. (2011). A practical guide to social audit as a participatory tool to strengthen democratic governance, transparency, and accountability. UNDP. <https://documents1.worldbank.org/curated/en/099205108062235369/pdf/P174394036aa910c309ecf0fbecff0d7654.pdf>

[4]Faraq, M. (2018). Social audit in 20 steps: lesson learned from fighting corruption in Guatemala, Peru, and Ghana. Transparency International. [1]Masood, M.I. (2023). Transition committees note gov't companies' financial issues. [Transition committees note gov't companies' financial issues | SunOnline International](#)

[5]Malena, C., Forster, R., & Singh, J. (2004). World Bank Social Accountability: An Introduction to the Concept and Emerging Practice. [World Bank Document](#)

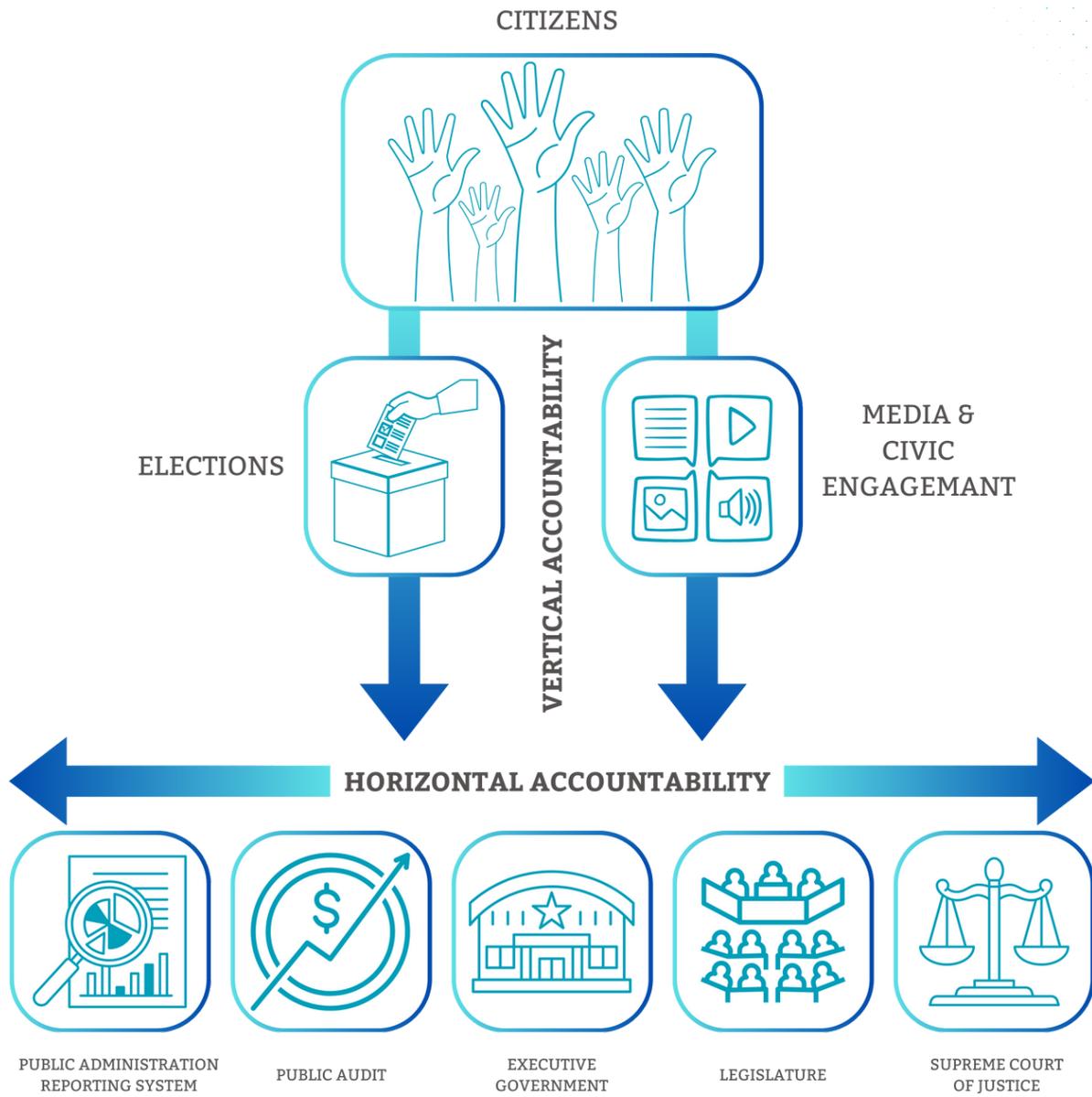
[6]UNDP (2015). Fostering Social Accountability: From principle to practise. [Fostering Social Accountability: From Principle to Practice | United Nations Development Programme \(undp.org\)](#)

[7]Malena, C., Forster, R., & Singh, J. (2004). World Bank Social Accountability: An Introduction to the Concept and Emerging Practice. [World Bank Document](#)

[8]Mark Schacter (2000): When Accountability Fails: A Framework for Diagnosis and Action. Policy Brief No. 9. Institute of Governance.

[9]Andreas Schedler (1999): 'Conceptualizing Accountability.' In *The Self-Restraining State: Power and Accountability in New Democracies*. Eds. Andreas Schedler, Larry Diamond, and Marc F. Plattner. Boulder, give an overview of definitions and the principles of social accountability. The later sections are CO: Lynne Rienner Publishers: 13–28.

[10]O'Donnell, G. (1998). 'Horizontal Accountability in New Democracies.' *Journal of Democracy*. 9(3):112-126.



**Figure 1: Vertical and horizontal mechanism of state accountability| Source: UNDP (2015).
Fostering Social Accountability: From principle to practise**

Social Accountability

According to the World Bank (2004), social accountability can be defined as the various actions and mechanisms used by the citizens, beyond voting, to hold the State accountable. This also includes actions taken by the government, civil society, media, and other actors that are part of this process. Social accountability is often demand-driven and operates from a bottom-up approach, as such initiatives help citizens be aware of and understand their civic rights and allow a more proactive role in exercising those rights and ensuring that the government acts in the best interest of the public. As such, it can provide extra sets of oversight and checks and balances on the government by exposing instances of corruption, negligence, and abuse of power that are unlikely to be addressed by horizontal forms of accountability[11].

While elections are the principal accountability mechanism in which the citizens engage, it has proven to be ineffective and weak in holding public officials accountable for their actions and decisions over time[12]. Under electoral processes, citizens are only offered limited choices, both in terms of candidates and political parties and it does not give the opportunity to express citizens voices on specific issues or to contribute to the public decision-making process effectively. Social accountability can operationalise accountability between citizens and the state and unlike elections, social accountability initiatives can be carried out on a continuous basis by engaging different actors and through various mediums including the media, public hearings, campaigns, and protests[13]. Social accountability initiatives can also complement and reinforce the accountability processes and mechanisms set by the government (Gaventa and Goetz 2001). These include:

- Political mechanisms such as separation of powers, parliament, independent bodies, and commissions.
- Fiscal mechanisms such as taxation, systems of auditing, and financial accounting.
- Administrative mechanisms such as hierarchical reporting, policies, and procedures regarding transparency and public oversight.
- Legal mechanisms such as the judiciary, anti-corruption agencies, and ombudsmen.

Formal and informal sanctions and rewards give power to social accountability initiatives. This includes creating public pressure through media coverage, protests, petitions, and campaigns and when necessary, by presenting evidence of corruption to relevant authorities or filing legal claims to the court. While these sanctions and rewards may be ineffective and inadequate in bringing real change, social accountability initiatives can reveal flaws and weaknesses in the system and thereby, lobby for reform or seek improvements through enhanced public participation. CSOs in particular, play a fundamental role in elevating the voice and concerns of the citizens to higher levels and enable citizens to hold the government accountable.

Examples of social accountability tools and mechanisms include social audits, participatory budgeting, citizen report cards, community scorecards, public expenditure tracking, and right to information acts.

[11] Malena, C., Forster, R., & Singh, J. (2004). World Bank Social Accountability: An Introduction to the Concept and Emerging Practice. [World Bank Document](#)

[12] Ibid

[13] UNDP (2015). Fostering Social Accountability: From principle to practise. [Fostering Social Accountability: From Principle to Practice | United Nations Development Programme \(undp.org\)](#).

Social Audit

Social audits are participatory and an ideal point of entry for citizen engagement in the political and decision-making process and the fight against corruption. It rests on the premise that the citizens have the right and want to know what the government does why, and how it impacts them and the government has obligation to account for and be transparent to the citizens[14]. When the actions and decisions of the government are watched and monitored closely, it builds pressure for the government to respond to the public's demand and have fewer incentives to abuse their power.

Social audits can be categorised into two types[15]:

- Compliance or procedural social audit: this type of social audit examines legal compliance by examining documents and records to check if they comply with the relevant laws and if there are any administrative or financial irregularities. This can also be carried out by comparing public documents and records with other sources of evidence such as interviews.
- Performance evaluation or substantive social audit: this type of social audit analyses the social impact of public institutions, services, and projects. The aim is to check whether public institutions are meeting their mandated functions or goals.

The main objective of a social audit is to monitor, track, analyse, and evaluate the performance of the government, thereby making public officials accountable for their actions and decisions[16]. It is distinguishable from other forms of citizen participation such as advocacy, lobbying, protests, and public demonstrations where the main purpose is to express the citizens' voice and to foster a more inclusive government. A social audit can therefore be considered as a mechanism of public oversight; that is the control exerted by citizens to track and monitor the government's performance to ensure public officials are accountable for their actions and decisions[17].

The success of social audits and other social accountability initiatives generally depends on the capacity and willingness of both the citizens and the government[18]. Therefore, social accountability initiatives should be conducted with caution as the success would depend on the existing conditions. As such, it is important for those engaged in the social audit process to understand how the policymakers operate. For instance, the capacity, needs, priorities, and willingness would differ for different stakeholders, thus requiring strategic initiatives from auditors. Additionally, expectations from such initiatives should be realistic as social audits and other social accountability tools cannot universally address corruption or lead to reform independently.

[14] Berthin, G. (2011). A practical guide to social audit as a participatory tool to strengthen democratic governance, transparency, and accountability <https://www.undp.org/sites/g/files/zskgke326/files/migration/latinamerica/Practical-Guide-to-Social-Audit.pdf>

[15] Faraq, M. (2018). Social audit in 20 steps: lesson learned from fighting corruption in Guatemala, Peru, and Ghana. Transparency International. https://images.transparencycdn.org/images/2018_Guide_SocialAudit20Steps_English.pdf

[16] Berthin, G. (2011). A practical guide to social audit as a participatory tool to strengthen democratic governance, transparency, and accountability. <https://www.undp.org/sites/g/files/zskgke326/files/migration/latinamerica/Practical-Guide-to-Social-Audit.pdf>

[17] ibid

[18] Faraq, M. (2018). Social audit in 20 steps: lesson learned from fighting corruption in Guatemala, Peru, and Ghana. Transparency International. https://images.transparencycdn.org/images/2018_Guide_SocialAudit20Steps_English.pdf

Importance of Social Audits:

BENEFITS FOR THE GOVERNMENT



a) Improves Transparency and Accountability: Conducting social audits lead to more transparency within authorities and allows citizens to scrutinise government actions. This can help build trust between the government and the public.



b) Improves Governance: Social audit is a way of confirming the commitment by the government to good governance and accountability, which can lead to more efficient and effective public administration and decision-making.



c) Means to Identify Areas for Improvement: Social audits can help identify areas where government programs or services need to improve further, allowing for targeted improvements.



d) Enhances Project Effectiveness: Social audits are a medium through which the government can receive valuable feedback on the implementation of projects, allowing for adjustments that can improve overall project outcomes.



e) Reduces Corruption and Irregularities: Social audits can uncover and deter corrupt practices or irregularities within government projects or services, leading to better designing of public projects, targeted improvements to service provision, and utilisation of public funds.



f) Increases Public Participation: Social audits are a tool that aids in increasing public participation in the civic space and fosters a sense of ownership and participation in governance. This can have a positive impact by having better-informed citizens who are more likely to engage with government initiatives and ensure to hold public officials accountable.



g) Strengthens Policy Decision-Making: Social audits generate data and insights that can influence policymaking, helping the government make evidence-based decisions.



h) Strengthens Public Trust and Confidence: The government's receptiveness to the feedback from the social audit ensures the commitment to accountability, which enhances public trust and confidence in the government's actions.

It's important to note that for these benefits to be realised, there must be a genuine commitment from the government to act on the findings of the social audits and make necessary improvements

BENEFIT TO THE COMMUNITY^[19]



a) It is a way to ensure that the national and local governments respond to the concerns of the community.



b) Empower citizens and CSOs to monitor projects within their communities and advocate for accountability and oversight functions.



c) Strengthen pathways to meaningful and inclusive engagement and citizen participation between citizens and public authorities.



d) Empowering marginalised groups.



e) Assist in building a responsive governance at a local and national level.

CONDUCTING A SOCIAL AUDIT

The Social Audit Guide published by Transparency International^[20] summarises 20 steps necessary to conduct a social audit. Before a social audit is initiated and conducted, a theory of change that establishes explicit links between the planned activities and the desired change needs to be developed. A theory of change has four levels: outputs, short-term outcomes, mid-term outcomes, and long-term outcomes. For instance, the desired outcome for a social audit could be a compiled report with findings and recommendations. A short-term outcome could be to increase the awareness of stakeholders on the transparency and accountability issues raised by the related social audit. A medium-term outcome could be for the government or relevant authority to take action to address the findings of the social audit leading to better accountability. The long-term outcome would be the formulation of better policies and the design of sustainable and effective development projects.

The 20 steps to conduct a social audit can be divided into four stages (Figure 2).

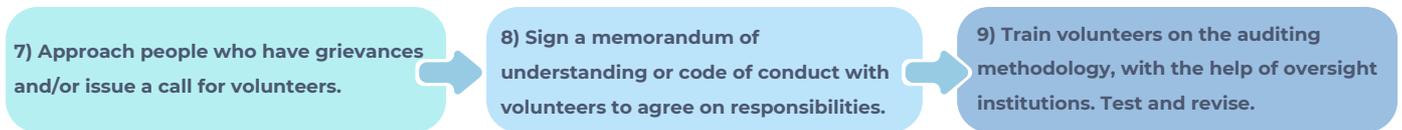
[19]ACC (2017). Community-Led Social Audit Toolkit Program. [Community led social audit program - toolkit - Anti-Corruption Commission \(acc.gov.my\)](https://www.acc.gov.my/images/2018_Guide_SocialAudit20Steps_English.pdf).

[20]Faraq, M. (2018). Social audit in 20 steps: lesson learned from fighting corruption in Guatemala, Peru, and Ghana. Transparency International. https://images.transparencycdn.org/images/2018_Guide_SocialAudit20Steps_English.pdf.

Stage 1: Initiate social audit



Stage 2: Recruit & train volunteers



Stage 3: Start the auditing process



Stage 4: Release findings & follow-up

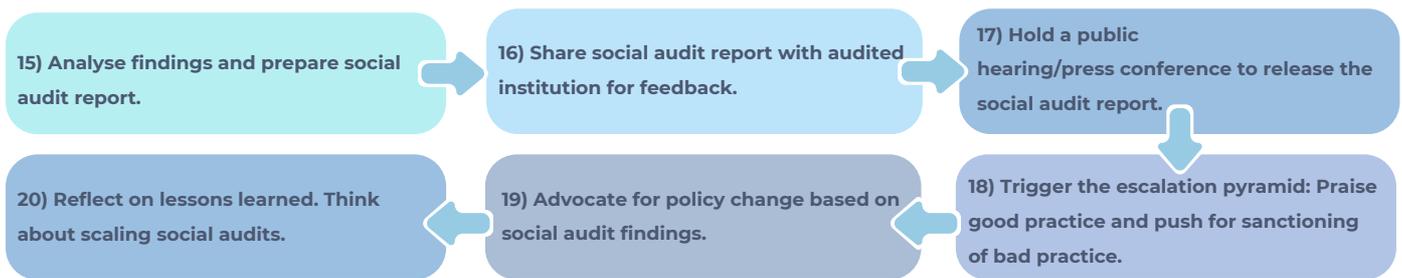


Figure 2: 20 steps to conduct a social audit | Source: Transparency International

Stage 1: Initiate Social Audit

Step 1: Set a goal of social audit

Before a social audit can be conducted, the purpose of the social audit needs to be set. The goal of social audit can be identified in two ways:

- Conduct a social audit on an existing issue that already concerns the citizens such as allegations of corruption or abuse of power. This offers the greatest likelihood for greater support and engagement by the citizens as the stake to fight corruption is correlated to enduring the negative impact of corruption. For this reason, subsidised healthcare or electricity are appropriate areas for social audit and other social accountability initiatives as citizens have a personal stake in ensuring that corruption is minimised. On the other hand, for public goods such as infrastructure projects, incentives and motivation to audit by the citizens may be lower.
- Use a set of objective criteria to decide where, when, and on which issue to conduct a social audit. The criteria below can be used as a guidance to undertake social audits (Figure 3). The first criteria is based on targeting institutions or sectors where corruption risks are higher. The second criteria is about the degree of openness of the public sector with regard to anti-corruption reforms and the level of receptivity of public officials to social audits. The third criteria is based on the potential for citizen engagement and the fourth criteria concerns logistical and financial considerations.

CRITERIA TO IDENTIFY THE GOAL OF SOCIAL AUDIT

You could use the four criteria below along with their indicators to decide on the goal of social audit.

Higher corruption risks

- 1 Municipalities, public institutions or sectors that are more corrupt than others (you can use data from national surveys on corruption or polls, as well as look at news on corruption scandals)
- 2 Higher level of public scrutiny exercised, for example via the media

Degree of openness of public sector

- 3 Efforts already underway to improve anti-corruption performance in the institution, municipality or sector
- 4 Level of transparency in the municipality or sector (comprehensive transparency)
- 5 Officials receptivity and openness to working with civil society (availability of influential reformers in the public sector, for example)³⁸

Potential for citizen engagement

- 6 Number of local NGOs or civil society groups with potential to become allies
- 7 Previous experience of local organisations in mobilising communities
- 8 Level of citizen involvement in public affairs and availability of volunteers

Logistical/financial considerations

- 9 Proximity to your location and to trusted/accountable local partner
- 10 Budget available to complete social audit

Figure 3: Criteria to identify the goal of social audit | Source: Transparency International

Step 2: Form an alliance with public and oversight institutions.

Social audits, including other social accountability initiatives, may face resistance from some public officials and institutions. Building an alliance requires the public officials and the citizens to work together on the goal to be achieved thereby, giving credibility to the findings of the social audit. Government buy-in is even more essential in countries that do not have a Right to Information (RTI) legislation to ensure access to the necessary documents and information. Government buy-in could also be increased by conducting induction and sensitisation workshops and training for public officials at the institution or sector being audited.

Step 3: Develop an escalation pyramid

Conducting a social audit and publishing the findings should not be the end product. Developing an escalation pyramid early on will lay out the process for actions to be undertaken based on the findings of the social audit. If it is developed after the social audit, it might be too late to set up any follow-up mechanisms or miss important advocacy opportunities.

An example of an escalation pyramid is given below (Figure 4). It includes two parts: sanction and recognition, and each part is composed of a series of escalated actions, which would depend on the findings of the social audit. Both pyramids can be used at the same time, depending on whether the social audit findings uncovered both good and bad practices or irregularities.

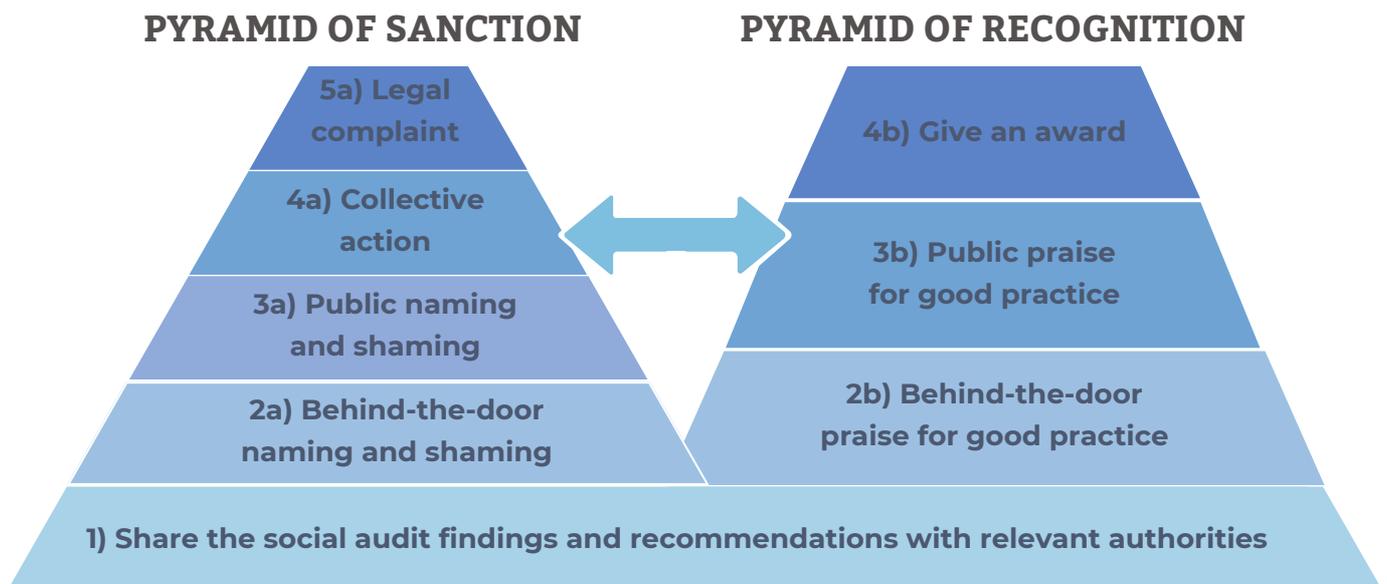
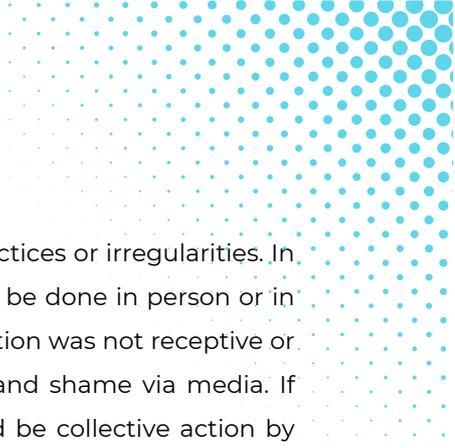


Figure 4: Escalation pyramid | Source: Transparency International



The pyramid of sanction will be used if the social audit findings uncover bad practices or irregularities. In this case, the next step would be behind-the-door name and shame. This could be done in person or in writing condemning the lack of response or inaction by institutions. If the institution was not receptive or received a negative response, then the next step would be to publicly name and shame via media. If there is still no response or the response is negative, then the next step would be collective action by signing petitions or organising protests. Collective actions signal the public support for the cause and if there is still no response or a negative response, the next step would be to file a complaint to the relevant oversight or regulatory institutions. Proceeding with legal action should be the last resort and should be done strategically. Similarly, the pursuit of any action under either pyramid would have to be strategic and highly dependent on the context and depending on the context, the tactics are subjected to differ.

Having a pyramid of recognition signifies that citizen and/or CSOs recognise governmental efforts and good practices. Recognition could be done informally in meetings or in writing, and it could also be shared in the media. Finally, integrity awards can also be used to recognise governmental efforts and good practices.

Steps 4 & 5: Collect relevant documents: identify documents needed for social audit and submit RTI requests to access documents.

This is the cornerstone of this process as accessing the relevant documents is crucial to conduct a social audit. The documents required will depend on the nature and context of the social audit. For documents that are not publicly available, RTI requests and appeals can be submitted to access the required documents.

Box 1: RTI in Maldives

The Right to Information Act (RTI) (Law Number 1/2014), came into effect on 12 July 2014 and guarantees every citizen's right to access information as a fundamental human right. Under this law, citizens can seek any information held and managed by state institutions and inspect their documents in any material or form. The RTI act includes clauses on Proactive Disclosure, RTI process, and Exemptions.

The RTI process has 4 main stages as shown below:

Step-by-step guide of RTI Process

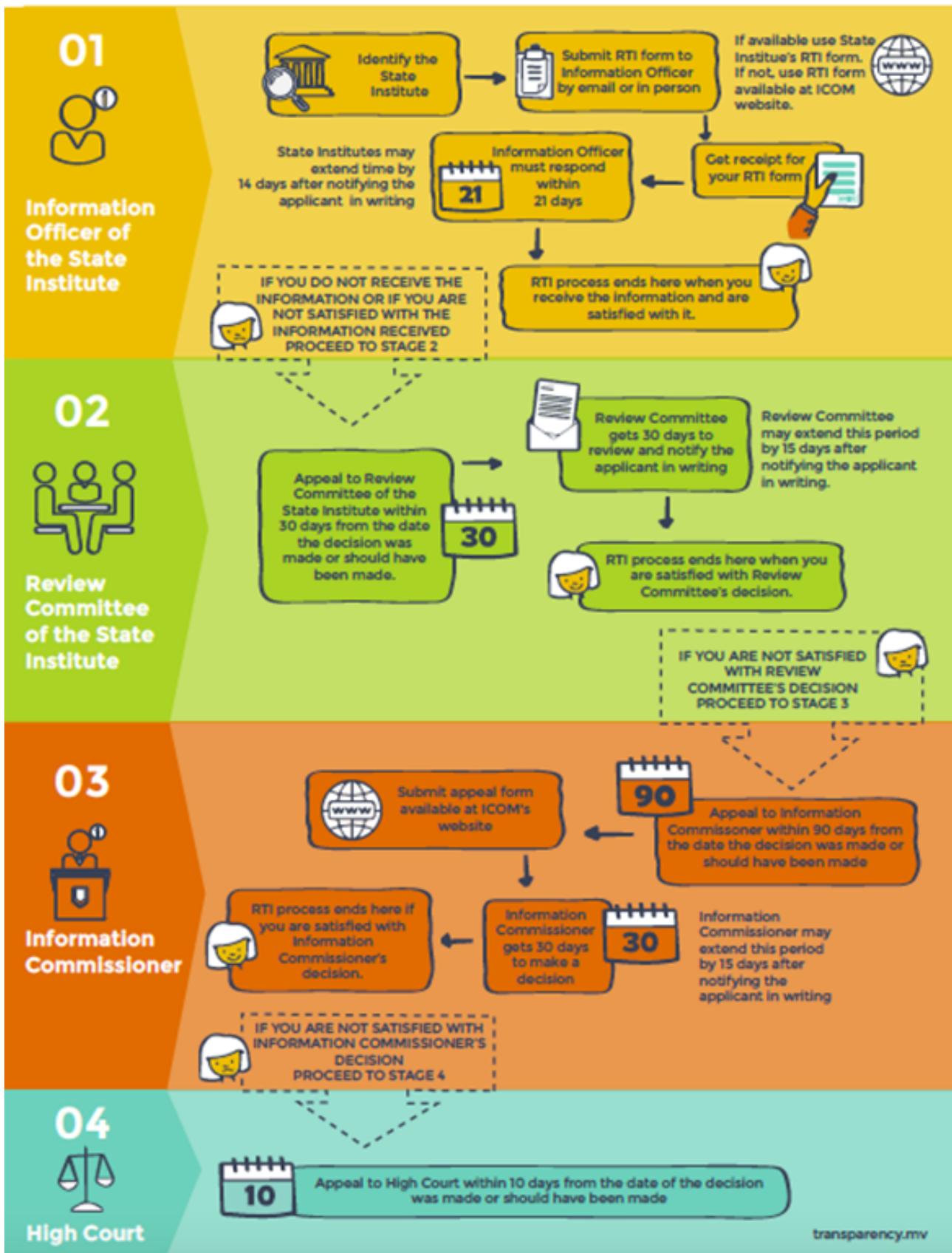


Figure 5: Step by Step guide of RTI process

Source: Transparency Maldives



If there is no RTI law, then the best course of action would be to approach the relevant institutions and request to sign an agreement such as a memorandum of understanding to access the required documents. If this fails, then the social audit scope has to be limited to available documents. Alternatively, the escalation pyramid can be triggered to advocate for access to information.

Step 6: Prepare training materials and social audit forms

Once the documents have been accessed, training materials and forms to be used in the social audit should be developed. Training must be tailored to the nature of the social audit and the types of documents that will be reviewed by the participants of the audit. If an alliance is formed with a public institution, training materials and forms can be developed in collaboration.

Stage 2: Recruit and Train Volunteers

Step 7: Call for volunteers or approach people who have grievances/issues

Issue a call for interested parties, including citizens and CSOs, to volunteer to conduct the social audit. If well-structured and mobilised groups exist within the community, such groups can be onboarded for the social audit. Similarly, if previous experience in civic engagement is lacking, the social audit can be conducted by partnering with interested CSOs. Material incentives should be considered such as providing meals during the social audit to attract more volunteers.

Step 8: Sign an agreement or code of conduct for volunteers

It is important to identify the roles and responsibilities of the people participating in the social audit. A code of conduct works better if the individual citizens are participating in the social audit. If a CSO or mobilised group is taking part, signing a memorandum of understanding would be an effective option.

Step 9: Train participants on social audit

Participants of the social audit must be trained well to understand the social audit methodology and to review public documents. The training should be participatory and practical, with information and exercises on social audit and other social accountability initiatives. If an alliance was formed with a public institution to conduct the social audit, the training could be co-facilitated.

Stage 3: Start the Audit

Step 10: Audit documents and identify red flags

Participants should review the required documents related to the social audit to uncover any irregularities or red flags. If questions or challenges arise in the review process, participants could resort to assistance from experts such as lawyers or public officials from the institution, sector, or project being audited.

Step 11: Conduct field visits

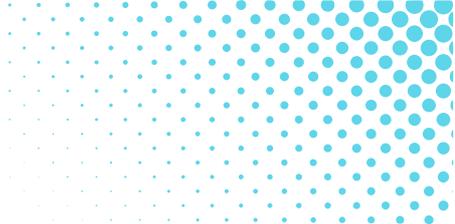
Field visits can be conducted to assess the validity and accuracy of the documents reviewed. This step also increases the level of scrutiny of social audits. Subject to budgetary and logistical constraints, this step could be optional as it would require money for field visits, and a larger organisational capacity will be required to train and supervise the fieldwork. In this step, the participants can also triangulate information with beneficiaries of a public project or a service.

Step 12: Assess transparency levels

Transparency is an integral component of social audit because timely disclosure of information will save time and smoothen the auditing process. The availability of required documents would mean the reliance on RTI requests would become less or not required. As part of this, an assessment can be conducted to check whether all documents required by the law are published for the public to access. This step is optional because it goes beyond the social audit process. Nevertheless, assessing transparency contributes to the greater goal of a more transparent and accountable government.

Step 13: Outreach activities (raising awareness on social audit and RTI)

Raising citizens' awareness on social audit and their right to information is an effective way to increase the impact of the social audit and its findings. This is an optional step as it goes beyond the scope of the social audit process.



Step 14: Sign petitions to support the adoption/amendment of RTI law

Participants can speak to the public about the challenges and difficulties faced when accessing public information and the importance of proactive and timely disclosure of information by the institutions. This step is particularly useful if there is no or a weak RTI law in existence. This is an optional step as it goes beyond the scope of the social audit process.

Stage 4: Publish Findings and Follow-up

Step 15: Analyse findings and preparation of social audit report

The analysis should focus on any irregularities or red flags, and outline recommendations to improve accountability and transparency. Similarly, good practices can be identified and highlighted to offer a balanced perspective. Participants of the social audit can be involved in the analysis process given that they have the time and capacity, and if their involvement would not delay the process. Once the analysis is complete, prepare the social audit report which should include the main findings, any irregularities or red flags, good practice, and recommendations. It is important to limit the number of recommendations and prioritise them as having multiple recommendations of equal importance could be unrealistic or overwhelming for the public institution being audited. In addition, consideration must be given to how the findings will be presented - lengthy text could be less interesting while visual elements such as infographics and pictures could be easier to grasp and follow. On top of this, a one-pager can be prepared listing the summary of the findings.

Step 16: Share the social audit report with the audited institution for feedback

Once shared, the audited institution can highlight any factual errors and provide feedback on the report. The findings and recommendations can be discussed via meetings and allow reasonable time for them to comment and share feedback. If substantial feedback is provided, the report can be revised to reflect this.

There are a number of benefits to sharing the social audit report with the audited institution: it signifies a genuine interest in hearing what the audited institution has to say, the audited institution cannot claim that the findings are factually wrong, and it can assist in building long term collaboration with the institutions to improve their accountability and transparency mechanisms.



Step 17: Publish the social audit report

The social audit report needs to be published and during the launch event, a public hearing can be organised where citizens can question the audited institution on their actions face-to-face. Such interactions between the citizens and the government can be more impactful and have the potential to enhance the citizen's civic capacity. If such an event is arranged, it is important to encourage the participation of more citizens. Alternatively, if the audited institution would not come on board for a public hearing, a press conference can be arranged with media coverage. A media kit can be shared in advance and the findings can be promoted on social media for advocacy and awareness.

Step 18: Trigger the escalation pyramid

The escalation pyramid can be triggered at this point where good practices can be praised and push for sanctioning of bad practices. Without such enforcement, social audits risk losing credibility if the audited institution and the relevant public officials are unlikely to face any consequences

Step 19: Advocate for policy change

Based on the social audit findings, advocate for policy change. Social audits are part of a broader and longer process of engagement between citizens and the government, and therefore should not be considered as a one-time exercise. Additionally, the findings of social audits across different sectors of institutions over time can contribute to the accountability and transparency of such institutions. Findings uncovered in social audits may not be illegal but rather administrative deficiencies or bad practices. Social audits can therefore identify loopholes in the system that could lead to corrupt practices and the findings of social audits can be used not just to push for legal actions but also to rectify such administrative deficiencies or bad practices. This would require advocacy and alliance with several stakeholders at various levels.

Step 20: Reflect on lessons learned

This step is about reflecting on the findings of the social audit, the progress made, and the lessons learned. Such reflection would highlight any changes necessary for the social audit process and ways to improve the process further. This can be done jointly with participants and public institutions, which could be helpful in organising and conducting further social audits. In addition, consideration should be given to scaling social audit and its impact. This can be done in three ways: scaling out (replicating social audits in additional sectors or institutions), scaling up (pushing for policy change based on the social audit findings), and scaling deep (changing behaviours that open the way to corruption by instituting integrity values). These three types of scaling should be carried out together to tackle the root causes of corruption and to prevent it.

FACTORS TO CONSIDER WHEN CONDUCTING A SOCIAL AUDIT

Barriers to obtaining relevant documents from the government

It is important to gather all the available information on the chosen project/service before initiating a social audit. However, required information (such as contracts, internal policies, bid documents, other records related to projects, etc.) is often unavailable on public domains/websites due to a lack of transparency. Furthermore, if the institution is not receptive to working with you, there may be delays in responding to requests and rejection to obtaining certain information such as contracts.

In such cases, you can limit the scope of the audit to information that is available online or focus on monitoring the implementation of the project/service. It is also useful to use tools such as Right to Information to obtain this information if it is not provided upon official requests.

It could also be useful to form a relationship with the institution through a memorandum of understanding to have access to the required information.

Citizen engagement

A social audit will usually revolve around an issue that concerns citizens. To get the participation of the community in a social audit, it is important to inform them of the concept of a social audit, how it is conducted, and areas where they can support the process (such as monitoring of projects beyond social audit, or to get support from experts in analysing documents and findings especially if they are not directly involved in the social audit process).

To ensure meaningful citizen participation it is important to explore potential CSOs within the community who can act as allies. CSOs who have experience in mobilising communities can play a key role in increasing citizen involvement in civic space and mobilising volunteers for the social audit process.

By involving citizens in the process, you can also identify complaints beyond the audited project where you can act as a mediator between citizens and public institutions. If you are conducting the exercise with other CSOs, they may also be able to support you in advocating such issues to related parties.

Work in coalitions

Building alliances between citizens and government/service providers is crucial when conducting a social audit and working together for change. A successful social audit process needs commitment from public officials, for example, to respond to information requests, provide information, and act on the findings of the social audit. Therefore, prior engagement with them would lead to creating better relations for a long-term commitment, especially if they are already informed of the objectives of conducting a social audit. It is important for the institution to understand that the organiser of the social audit provides key information crucial to them which is evidence-based.

Forming such an alliance would also give more credibility to the report of the social audit, as the institution would be a key participant in providing and validating information.

Identify Entry points

If there is reluctance from public institutions to support the social audit process, it is important to determine whether the institution is refusing to collaborate due to a lack of willingness/lack of political will or is strongly opposing reform. It is important for the organisers to be flexible when strategizing to overcome any changes or opposition that could arise.

In case of opposition from an institution, you can identify and approach a more responsive public official who is willing to support reform. They may not always be from the highest level of government and can include civil service workers or political advisors.

Framing and communication

As the social audit process leads to reform, communication is key for successful advocacy. It is important to align with the interest of state institutions and show how a social audit can provide evidence-based information that can highlight loopholes and ways to strengthen processes. Framing this is a way to show the mutual benefits to the citizens (which is to increase accountability of public officials) and for institutions to be able to cater more closely to the public needs which in turn can be favourable for them, will be strategic.

It is also extremely important to communicate with respect when dealing with stakeholders and to provide evidence-based information wherever possible.

Conducting Questionnaires and Surveys

As you conduct surveys it is important to be mindful of research ethics. This includes explaining the purpose of the interview, getting consent from responders, being respectful in asking questions, and being impartial and accurate in collecting responses.

There is also no one way of conducting a survey. To reach the larger community, it may be helpful to conduct it in various ways such as online forms, one-to-one interviews, and focus group discussions. While conducting interviews it is necessary to target different gender (men and women), age groups (youth, elderly), and people of different employment backgrounds (public, private, own work) to collect a variety of opinions.

Questionnaires may also not be standard to audit all projects. Depending on the implementation stage of the service or project, there could be slight differences in the questions. For instance, auditing a construction project at the early stages of implementation cannot focus on site visit results but must focus more on the documentation process. For a project that has been completed, an audit could focus on the result, such as monitoring whether the objectives of the projects stated in the documents are met.

Identify good practices and bad practices

The final objective of conducting a social audit is not to publish a report. As this process requires building relationships with other institutions and stakeholders it is important to highlight any good practices identified along with the red flags and recommendations. This type of presentation would reassure that a social audit not only focuses on finding irregularities and criticism of an institution but also provides balanced feedback and allows for constructive feedback for reform.

Continuous Advocacy

A social audit may not always uncover corruption or other illegal activities. Since it may uncover irregularities such as administrative deficiencies or loopholes that increase the risk of corruption, continuous monitoring, and advocacy is important to close these gaps. Through a long-term effort, this can strengthen the relationship between citizens and institutions to impact policy decisions and form more meaningful vertical engagement.

This can be not only done through traditional reports but also visualisation of main findings and recommendations and media.

METHODOLOGY

Project Selection

A list of projects from the National Tender Board was gathered in order to comprehend the list of infrastructure projects in the nation. The list included information on the project's name, location, budgeted amount, contracting party, and kind of award. Four distinct initiatives were chosen after carefully examining this data and considering the project's location, type of award, and length. They were:

- 1. Construction of a Quran Center in the city of Gn. Fuvahmulah**
- 2. Construction of 12 classrooms at Seenu Hithadhoo Nooraanee School in Addu City.**
- 3. Design and build of L. Gan Coastal Protection Project**
- 4. Construction of Intensive Care Unit (ICU) at Kulhudhuffushi Regional Hospital**

The social audit training spanned three days, encompassing site visits and observations in each location. These sessions were carried out from May to August 2023. A total of 40 participants from four atolls were trained (see Annex 2 for details). The training equipped participants with the skills to conduct interviews with government agencies emphasised the value of collaboration and, the significance of accountability, and provided tools for holding authorities responsible. Furthermore, participants joined with the facilitators to conduct interviews with stakeholders, site visits, and interactions with contractors which was intended to provide practical experience and insights, enabling them to collectively identify potential risks that may lead to corruption.



ACCOUNTABILITY IN PRACTICE:
CASE STUDIES

Social Audit: Construction of a Quran Center in the city of Gn. Fuvahmulah

Project Overview

The social audit program conducted in Fuvahmulah City focused on the construction of a Holy Quran Centre in the Hoadhadu district of the island. The project was announced by the Ministry of Islamic Affairs.

This project was awarded to the only bidder, Riser Pvt Ltd after the third announcement on 11 January 2022. The contractor won the bid for 12,036,084.19 MVR (USD 776,568.15) on 22 February 2022 under National Competitive Bidding. As evident by the letters exchanged between the Ministry of Finance and the Ministry of Islamic Affairs, and Riser Pvt. Ltd, the amount quoted by the Contractor is above what was budgeted for this project, though the amount budgeted is not clearly stated in any of the documents. However, as the only tender and the contractor's hesitancy to lower the price, this amount was concluded as the last price for this project.

It is to be noted that, while this project was to be completed within 365 days of site possession, the project had not been completed on 29th May 2023, observed so, during the social audit.

Key findings of the social audit on the Construction of a Quran Center in the city of Gn. Fuvahmulah:

- **Delay in meeting with the council despite prior commitment.**
- **There is a hesitancy for public institutions to engage with citizens, especially with the concept of social audit as well as citizens questioning.**
- **Poor public knowledge of the project. As such, this leaves the public uninterested in participating in civic activities as well as scrutinising decisions made at different levels.**
- **The construction site was not properly covered, and the only notice board was the board used to inaugurate the construction of the project, which only stated the name of the project.**

Interview with Ministry

Through the meeting with the Ministry of Islamic Affairs, who were the project organisers, it was understood that this project was planned under the state's PSIP (Public Sector Investment Programme) budget. Initially, it was included in the 2019 budget as a wing for the National Centre for the Holy Quran.

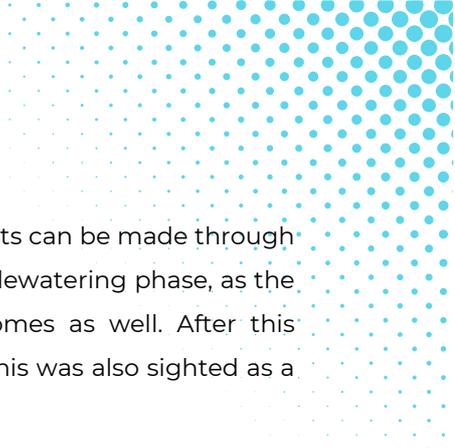
This project was initially announced for tender in 2019 and since then has been awarded to two different contractors. The initial contractor faced problems with the land arranged for the construction site, hence, there was a delay in the initiation of the works. The work with this contractor did not go as agreed and after proper warnings, the contract was terminated with this contractor.

After the termination, at the request of the ministry, the tender board opted to award the contract to another party from the initial bids as a way to accelerate the process. However, this party requested to increase their initial prices by 25% due to the change in global circumstances due to the COVID-19 pandemic. The project was re-announced in 2022 and awarded to Riser Pvt Ltd. Hence, some scope changes were brought to the initial project plan due to the change in project location as well.

The ministry highlighted that the council is always involved in such projects and the case of this project, were involved in the acquisition of the land for the project. The opinions of the citizens were not asked before the development of this project. However, according to the ministry, they receive feedback and suggestions from citizens in a lot of projects, which they try to incorporate into other projects.

The monitoring of the project mainly lies in the hands of the council, according to the ministry. They have signed an MOU with the council to ensure that the monitoring goes according to plan. Notably, as ministry offices are located in the capital city, it is not feasible for them to travel to islands to monitor the functioning of projects regularly. Therefore, they require an intermediary on-site to monitor the project delivery. The council is hence, required to complete a checklist and send photos of the work in progress, through Telegram. Under the MOU the council is required to send in monthly progress reports to the ministry. Meanwhile, the contractor is required to fill in daily logs of the work done, which has to be signed by the council.

The payment process for the project is arranged to be made according to the work schedule and the amount of work completed. Hence, the contractor sends the invoices for completed works to the ministry and they make arrangements to make the payments accordingly. It was observed that in PSIP projects, the whole amount of the contract is not included in the annual budget and the budget is planned according to the works to be completed. However, it is evident that the work does not go according to the planned schedule and therefore, the budget codes must have to be amended to make the necessary payments. According to the ministry, they ensure that the works for which invoices are billed are completed, through the council, before the payments are made.



There was no specific complaints mechanism for this project. However, complaints can be made through the council. According to the ministry, they received one complaint during the dewatering phase, as the dewatering of the area caused a depletion of groundwater from nearby homes as well. After this complaint was made, more efforts were made to adjust the work accordingly. This was also sighted as a cause because of which the works were delayed.

The maintenance for the building after completion of the project will be done by the ministry itself. As the Centre for Holy Quran will be responsible for the operations of the Quran Centre they will be overseeing the maintenance.

Interview with Council

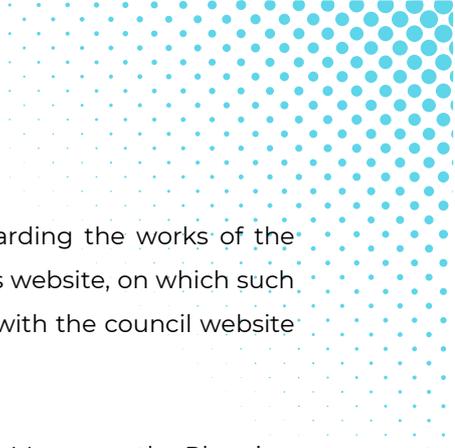
As the main body responsible for overlooking the various projects executed in the islands, the council has a prominent role in the monitoring of such projects. Hence, the Fuvahmulah City Council was interviewed during the social audit process.

According to the council their input was given to the ministry before the announcement of the project. However, the public was not directly consulted by the council either, before the project was designed. The council highlighted during the interview that as the council represents the people, their input is valid for the people of the community as well. The council was also consulted by the ministry during the acquisition of land for the project and was involved in the process.

The council is the main party responsible for the monitoring of this project. However, they were not involved in the designing or planning phases of the project. The council checks the progress of the works and reports to the ministry. Nevertheless, there is no monitoring plan under which they have to report to the ministry. According to the council, they check whether the works are completed according to the work schedule and ensure that there are no delays in the works. The council also corroborates with the people and ensures that the public does not have any complaints or face any difficulties due to the work of the project. Hence, they are in contact with both the public and the contractors and report to the ministry if any need arises.

The council highlighted that there are limitations to their monitoring works. It was noted that the ministry changed the plans for the project which the council was not privy to, which is a cause of concern for the council as the primary monitor for the project. Moreover, since the project has been moved past the deadline, the council was not informed of the change in deadline from the side of the ministry.

The monitoring activities of the council are aided by the Council's Road Unit staff, as they can be on hand most of the time and can observe the work in a more timely manner.



Information sharing for the public has been achieved to a limited extent regarding the works of the project, according to the council. This has been done with the aid of the council's website, on which such information is updated. However, the extent to which people view and interact with the council website is not clear.

Any complaints regarding the project are to be lodged with the Council by letter. Moreover, the Planning Section of the Council also has a form with which people can lodge complaints. The council is also currently working on an online platform to facilitate the complaints mechanism.

The council notes there were some challenges in the monitoring of the project. The initial delay in commencing the project works along with the problems in the land acquired for the project were highlighted by the Council as such obstacles faced. Moreover, not having access to important documents such as the work schedule and any changes brought to the schedule hindered the effective monitoring of the project.

Interview with Contractor

The contractor for this project, Riser Pvt Ltd, who won the project during the bidding process, was also interviewed during the social audit. Riser won the bid for the project for 12,036,084.19 MVR (Twelve million thirty-six thousand eighty-four rufiyaa nineteen laari), as the only tenderer for this project. The contractor did not hire any subcontractors for any work on this project.

According to Riser Pvt Ltd, some considerations were made for people with disabilities during the design process for this project. Hence, the building includes a ramp to the front access as well as lifts in the building.

The labour for this project is equally distributed between skilled and unskilled labour. Although the labour is not hired under any specific policy, the contractor assured that all the foreign labourers have the required work permits. The labourers do not have any specific code of conduct to adhere to and are paid on a monthly basis.

It was found from the interview that the project site does not have any safety boards in place to warn the public. However, the contractor assures that the labourers take the necessary safety steps like safety helmets and the necessary safety equipment.

The required permits for the project were obtained from the necessary offices including the State Electric Company (STELCO) and the City Council. The contractor also highlighted that heavy and loud machinery was being used between 5:30 pm and 7:30 pm with consideration given to the neighbourhood and the public.

The contractor also highlighted that the monitoring of the project was being conducted by the Council, which has been monitoring the progress of the works being completed.



The materials required for the project were obtained according to the amounts and standards specified in the BOQ. The contractor also stated that the materials were obtained in consignments according to the scheduled works. The contractor expressed the delay in the works and highlighted some of the issues they faced which led to the hold-ups. The initial delay in signing off the land had been an issue while the problems faced during dewatering caused the works to be delayed. Moreover, the ministry arranged for the Vice President (VP) of the country to inaugurate the project, which caused some delays as the timeline had to be moved to fit into the VP's schedule.

Site Observation

The social audit team visited the site of the project to gather how the project was progressing and to observe the overall works of the project.

With the initial observation, it was clear that the project site was not properly closed off to the public which proved to be a concern. Moreover, it was clear that the site did not have an information board that provided the basic information on the project and it did not display any safety boards.

Upon surveying the area, it was found that materials to be used in the construction were not properly stored and were kept out in the open. Furthermore, by interviewing some of the workers present on the site it was evident that some of the workers did not have the necessary work permit documents.

With only three months left for the extended deadline, it was clear that a lot of work for the project was still unfinished, with only the key structure done with no other finishings completed.

Public Perception of the Project

To gauge the public perception of the project being conducted on the island, a community survey was carried out as part of the social audit. A total of 40 respondents completed the survey, out of which 60% were male and 40% were female. The majority of the respondents were aged 26–36 years (42.5%) while 35% of the respondents were 37–47 years of age. 45% of the respondents were public sector employees while 30% were self employed.

Most of the respondents believed that the state's PSIP projects should be targeted toward the housing and healthcare sectors.

While 80% of the respondents were aware of the ongoing Quran Center project on the island, 20% had not heard of the project. Most of those who were aware of the project had gotten information about the project through the media (37.5%) and the public (30%).



For the purpose of the social audit, public perception and awareness about RTI were also gauged. The results indicated that most people (72.5%) know about the existence of the RTI Act. However, only 12% of the people had used the Act to gain access to certain information. Meanwhile, 67.5% of the respondents were aware of the rights given under the RTI Act.

It was clear that most respondents (95%) believe that this particular project is a beneficial project for the people of Fuvahmulah City and the creation of jobs and educational opportunities were highlighted as the main benefits from the project.

Eighty Seven percent of people also believed that this project would prove to be advantageous for the female population and the majority of the respondents went on to state that there would be a lot of job opportunities and educational opportunities for women as a result of the project. 82.5% of the respondents also believed that this project would provide a lot of opportunities for youth, most of them stating employment as the result.

Ninety percent of the people agreed that they were personally not consulted during the planning cycle of the project and 70% stated that they were not aware that the public opinion was gauged during the planning phase of the project. Additionally, 95% of the respondents said that they did not receive any information regarding the project from any stakeholders, while the other 5% stated that they received information regarding the project from the city council. The relevant information that was received included information about the project's benefits, the timeline, and just about the fact that this project is going on.

As the disclosure of information regarding developmental projects is crucial for public scrutiny and awareness, this aspect was considered for the public perception survey. Hence, it was found that 75% of the people were aware that information regarding such projects should be made available to the people.

The people (65%) also believed that it is the responsibility of the stakeholder institutions to provide the relevant information to the people regarding the project. Most respondents stated that they would report any complaints regarding the project to the Islamic Ministry and the City Council, while 5% also indicated that they would report to the Anti-Corruption Commission. The results showed that 5% of the respondents had reported a complaint regarding the project to authorities while 10% of the respondents had indicated that they were aware of illegal or negligent behaviour that occurred during the project.



Participants during the sessions of the Fuvahmulah Social Audit Training.



Participants at the site observation of Fuvahmulah Quran Center. The site was not properly enclosed.



Construction progress of Fuvahmulah Quran Center



The only notice board that could be found in the construction site of the Fuvahmulah Quran Center



Participants who completed the Social Audit in Fuvahmulah City

Social Audit: Construction of 12 Classrooms at Seenu Hithadhoo Nooraanee School

Project Overview

This project is the Construction of 12 classrooms in Seenu Hithadhoo Nooraanee School, where the primary client is the Ministry of Education.

The Ministry informed that the National Tender Board had opened for bid submission twice and did not receive any proposal or submission by the due dates, and hence, the decision was made to approach two parties; Nooradheen Investment and K&F Holdings Pvt. Ltd., to submit bids. The letters to these two parties were sent on the 12th of October 2022 and the submission due date was the 13th of October 2022. Allowing one day to submit bid documents is not a best practice in procurement, and it is unclear why the Tender Board allowed a tight deadline.

After the evaluation process, the project was awarded to Nooradheen Investment, and the agreement was signed on the 29th of December 2022 which demands the project to be completed in 365 days. The total amount agreed for the project was MVR 12,490,088.48 (USD 805,860.51).

Key findings of the social audit on the construction of 12 Classrooms at Seenu Hithadhoo Nooraanee School:

- **Public participation in civic activities was observed to be very poor in this atoll. Very little effort is undertaken by the council to enhance the engagement of the public.**
- **Council does not proactively check or engage with the ongoing projects in the atoll unless the function of monitoring is specifically assigned to them.**
- **From the social audit, it was unclear why the project awarding method was restricted tendering, and the justification for the price quoted for the project was not documented.**

Interview with Ministry

Considering that the project is focused on a school and all the schools in the Maldives are under the administration of the Ministry of Education, the respective Section related to the ministry was interviewed for this audit. The interview was conducted by the facilitators from ACC and TM based on the pre-compiled questionnaire. The outcome of the interview was shared with the participants afterward.

The ministry disclosed that before the announcement of the project, the Ministry had discussed the projects required by the school, and school expansion has been one priority given by Nooraanee School. As such, the construction of 12 classrooms in Seenu Hithadhoo Nooraanee School was included in the long-term plan of the ministry and was included in the yearly budget.

The ministry has standard structural designs for school classroom construction and this design was to be utilised in this project as well. Hence, there were no scope changes after the commencement of the project.

The monitoring function of the project was given to the school, and the school is to provide weekly updates and a monthly report of the progress is to be shared with the Council as well. For the convenience of all the parties involved in the project to communicate, a Viber group has been set up as per the Ministry.

The payment plan is as per progression and each progression is to be verified by the designated engineer by the ministry. An advance payment has been made and one interim payment is in progress during the time of the interview with the ministry for the purpose of this audit.

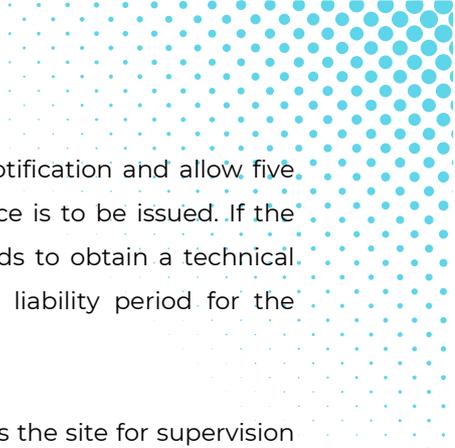
The progress and updates were to be recorded every Tuesday, by the Principal of Nooraanee School, and respective updates are fed to Isles.gov.mv, the website that maintains all the progress and updates of the projects undertaken by the government. However, about this project, the information updated on the Isles page (See figure 6 and 7), the total budgeted amount is MVR 8,278,564 and the total spent as of August 2023 stands at MVR 7,195,844.07. This does not match the agreed amount of MVR 12,490,088.48.

කටයුතු වැඩ පිටිය							
මුදල	2025	2024	2023	2022	2021	අයවැය	වර්ග
2,000,000.00	0.00	0.00	0.00	0.00	2,000,000.00	මුදල් සේවය	අධ්‍යාපන කටයුතු
6,278,564.00	362,592.00	2,417,279.00	2,148,693.00	1,350,000.00	0.00	මුදල් සේවය	අධ්‍යාපන කටයුතු
8,278,564.00	362,592.00	2,417,279.00	2,148,693.00	1,350,000.00	2,000,000.00		

Figure 6: Budget and Funding for Construction of 12 Classrooms at Seenu Hithadhoo Nooraanee School| Source: Isles Mv

කටයුතු			
මුදල	වර්ෂය	වර්ග	වර්ග
1,633,809.92	2022	සමූහ මධ්‍යම	අධ්‍යාපන කටයුතු - මුදල් සේවය
8,104.00	2022	විද්‍යා මධ්‍යම	අධ්‍යාපන කටයුතු - මුදල් සේවය
1,908,862.58	2023	විද්‍යා මධ්‍යම	අධ්‍යාපන කටයුතු - මුදල් සේවය
1,301,461.52	2023	විද්‍යා මධ්‍යම	අධ්‍යාපන කටයුතු - මුදල් සේවය
1,222,838.21	2023	විද්‍යා මධ්‍යම	අධ්‍යාපන කටයුතු - මුදල් සේවය
1,120,767.84	2023	විද්‍යා මධ්‍යම	අධ්‍යාපන කටයුතු - මුදල් සේවය
7,195,844.07			

Figure 7: Budget and Funding for Construction of 12 Classrooms at Seenu Hithadhoo Nooraanee School| Source: Isles Mv



If the contractor fails to perform as per the schedule, the ministry is to give notification and allow five days to gear up the work. If the contractor still fails to keep up, a second notice is to be issued. If the contractor continues to fail to abide by the agreed schedule, the Ministry needs to obtain a technical committee decision on the matter. For such cases, there is a 1-year defect liability period for the contractor.

Once the project is completed, an individual from the ministry physically attends the site for supervision and checks the completed work against the BOQ and design. If there are any areas to be improved or amended, these should be highlighted and communicated. A full report of the project is to be developed within 15 days of the final inspection.

Interview with Seenu Hithadhoo Nooraanee School

Since the construction of the 12 classrooms was going on in the premises of the Nooraanee School, and the school was assigned the primary monitoring function of the project, a separate interview was conducted with the Southern Education Coordinator, given that the Coordinator is the focal overseeing all the ministry projects in Addu Atoll. However, an additional interview with a representative from Nooraanee School was also conducted for this audit. The representative confirmed that all monitoring responsibilities were being carried out by the Southern Education Coordinator.

The school confirmed that the project was requested to be included in the yearly plan and thus, included in the Public Sector Infrastructure Program (PSIP) of the year 2021, and carried forward since the work could not be commenced due to disruption followed by COVID-19.

The decision to build 12 new classrooms, did not come after consultation with the parents of the school, but on the observation of the school management that it required more classrooms to cater to the growing needs of the school. The school confirms that it had requested the ground floor to be made accessible to students with disabilities.

The ministry assigned the responsibility of overlooking the progress of the project and signed the progress log every week to the Southern Education Coordinator, who also is the principal of Addu High School. The work is monitored every Monday of the week and shared with the ministry by the Southern Education Coordinator. Additionally, an engineer assigned by the ministry oversees the progress of the work onsite periodically.

The school informed them that they lacked the technical expertise to oversee the technical aspects of the construction, and because the project schedule was not shared with them, it was challenging for them to ensure that the project was as per schedule or not. As such, there was no monitoring plan or timeline by the school for this project.

There was also no third-party involvement in the monitoring of the project, and there was no role of the council in monitoring the project. Any concern regarding the project is to be reported to the specific section responsible for overseeing the work in the ministry, which is the 'G-Section', and the Southern Education Coordinator.

Interview with Addu City Council

Since the City Council is the responsible authority on the island to monitor the progress of the projects undertaken on the island by various stakeholders, the involvement of the Council in this project was inquired and assessed.

The Council informs that the Ministry of Education has not assigned the responsibility of monitoring the project nor were the documents about the project shared with them. In general, the Council has the technical capacity to oversee and monitor similar projects, and their normalcy practised monitoring is observed on a weekly and monthly basis.

Interview with the Contractor (Nooradheen Investment)

The Contractor, Nooradheen Investment confirms that the project was awarded via restricted tendering, to be completed in 365 days, as per the drawings provided by the ministry, for a total of MVR 12,490,088.48.

Since the drawing of the project came from the client, aspects like accessibility to individuals with disabilities were not finalised in consultation with the contractor, or to our knowledge by any needs assessment. As such, the contractor followed the accessibility specifications included in the design of the school such as ramps and all accessible toilets on the ground floor.

On the site of the project, 24 labourers are present, where 4 are Maldivians and 20 are foreigners. All the labourers had completed safety sessions from Maldives Red Crescent (MRC). They are provided accommodation by the contractor, and the Contractor claims there is a code of conduct to the assigned work and has been thoroughly informed to the labourers. The contractor further ensures that all the labourers have unexpired work permits.

The necessary permits to construct were obtained from the Ministry of Housing and Infrastructure. Safety equipment such as safety helmets was given to the labourers. The construction site was safely covered with identification notice boards and warning signs.

The project did not require conducting an EIA, and to clear the land area for the construction work, two palm trees were cut and they were handed over to the school.

The materials brought to the project are stored in a nearby warehouse from the site. All the debris and waste from the site are cleared with the help of WAMCO, Waste Management Corporation Limited.

Nooradheen Investment confirms that though the work started late, in February due to difficulty in obtaining some raw materials, it is on schedule.

The contractor has not opened any medium to lodge complaints regarding the project but has been informed that complaints are to be forwarded to the Ministry of Education. Monitoring of the work is being undertaken by the Southern Education Coordinator at the request of the ministry.

Public Perception of the Project

To understand the public perception and knowledge of the project, a survey was conducted, where 15 survey forms were filled, out of which 40 percent were males and 60 percent were females. The respondents were mostly 48 to 58 years of age followed by 26 to 36 years of age and 37 to 47 years of age respectively. 40 percent of the surveyed population worked independently, while 33 percent were public officials and 13.3 percent belonged to the idle group.

The respondents wanted PSIP to focus on road development, higher education, housing, community parks, and local tourism.

Of the respondents, 53 percent were aware of the specific construction project of 12 classrooms at Seenu Hithadhoo Nooraanee School, while 47 percent were not aware of it. Respondents who knew of the project received this information via the media, or from the public. Few learned of it through a public institution, and only one has physically seen the construction work.

Regardless of their uninformed state of the project, respondents believe that the project will be beneficial to the island as they believe that it would create more job opportunities improve the quality of the education and enhance the quality of education offered through Nooraanee School.

When inquired if women are at an advantage from this project, 53 percent believed that it would be beneficial to women, mostly because often, it is women who become teachers and hence, this would create job opportunities for them. Subsequently, when inquired if youth are at an advantage, respondents answered that they will benefit, however, they could not state what would be of specific advantage to the youth.

The respondents do believe that there should be more transparency regarding the project, and most of the respondents believe that information dissemination is poor. When inquired to which authority they would file a complaint regarding the project, the majority were not aware of the institution they should approach.

Regarding the project, the respondents are not aware of any illegal or unruly activities regarding the project, however, one respondent noticed that the contractor is the beneficiary of several projects on the island and had acquired so simultaneously and even though some materials are available from the island, the contractor is known to bring from neighbouring island.

Public understanding of the Right to Information Act

The majority of the respondents were aware of the existence of the Right to Information Act, and that the Act empowers the public to obtain information from the State. Except for one, no respondent has submitted an RTI so far.



Participants in the Addu Social Audit program interviewing contractor



Participants at the site observation of Hithadhoo Nooraanee School - Addu



Participants discussing the findings of site observation



Participants who completed the Social Audit Training Program in Addu

Social Audit: Design and build of L. Gan Coastal Protection Project

Project Overview

The social audit program conducted in Laamu Gan focused on the Design and build of the L. Gan Coastal Protection Project. This project was proposed by the Ministry of National Planning, Housing, and Infrastructure to protect and refill the severely eroded beach of Thundi Avah of Laamu Gan(See Figure 8).



Figure 8: Project Location: Thundi, Laamu Gan

Source: EIA for proposed design and build of coastal protection of L.Gan

The project funded by the government of Maldives cost MVR 11, 527, 669.60 (USD 1,094,415.09), and was directly awarded to the Maldives Transport and Contracting Company (MTCC) on 24th November 2021. The project is to be completed within 180 days (See Figure 9).

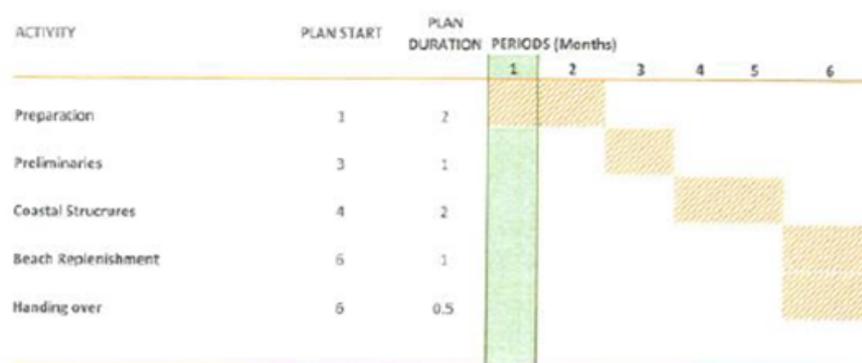


Figure 9: Detailed work schedule

Source: EIA for proposed design and build of coastal protection of L.Gan

Under the project activities, in addition to excavation and beach replenishment, shore protection structures will be constructed. The project components include dredging sand needed to fill the beach, construction of 2 groynes, and revetment. Moreover, the upgrading of Thundi Harbour is also an ongoing project in the area (See Figure 10).

For the social audit, several documents were requested from the Ministry of National Planning, Housing, and Infrastructure. The ministry provided the proposal sent by the contracting company, the Engineers statement, and documents on financial evaluation. Award letter, project plan, and the Environment Impact Assessment (EIA). Since this was directly awarded, there are no bid documents, announcements, or evaluation reports.

At the time of conducting this social audit in Laamu from 18-20 June 2023, no physical work has commenced for this project



Figure 10: Concept and design details

Source: EIA for proposed design and build of coastal protection of L.Gan

Key findings of the social audit on the Design and build of L. Gan Coastal Protection Project:

- The EIA report highlights 3 Environmentally Sensitive Areas and 2 Environmentally Protected Areas located within a 10 km distance of the project location. However, given that the EIA was conducted within a very short period, it is difficult to ensure that no impact would fall on these locations.
- The island council is not informed of its role in the grievance mechanism stated in the EIA report. In the interview, the contractor also mentioned a different complaints mechanism, and this was different from the one mentioned in the EIA report.
- The timeline for the project shared is very vague, it just specifies 6 months. Therefore, it cannot be deduced from this timeline the exact day the project must begin.

EIA report

The EIA report for this project was prepared as per the Terms of Reference (ToR) finalised and approved by EPA on 10th May 2022. However, according to additional information provided by the Ministry of National Planning, Housing, and Infrastructure on the EIA, a renewed ToR was issued on 29th May 2023. The report was completed and shared with the EPA on 30 May 2023. The EIA scope included the shore protection works for Thundi Avah to be completed in 180 days.

Component	Justification
Groyne Type 1 (210m) Groyne Type 2 (50m)	To stop the sediment movement from the beach during changing seasons
Revetment (30m)	To stabilize the area adjacent to the harbour
Beach filling (10,007cbm)	To reclaim or replenish the eroded area for shore protection

Table 1: Project components and justification | Source: EIA for proposed design and build of coastal protection of L.Gan

MAIN HIGHLIGHTS FROM THE EIA REPORT:



The EIA was based on the data collected from field investigation trips made in October 2022 by a team of MTCC and from existing literature. The project components include dredging sand needed to fill the beach, construction of 2 groynes, and revetment.



According to the EIA report, 10,007 CBM sand is required, which will be dredged from a burrow point. The excavated sand will be sieved before being used to fill the beach.



There are 3 Environmentally Sensitive Areas and 2 Environmentally Protected Areas located within a 10 km distance of project location:

There are:

- **Environmentally Protected Areas**

1. L. Maabaaidhoo Koaru Area
2. L. Gan Bodufengandu

- **Sensitive Areas**

1. Kalhaidhoo
2. Maandhoo
3. Bodufinolhu

Table 1: Project components and justification | Source: EIA for proposed design and build of coastal protection of L.Gan



An Environmental Management Plan and an Environmental Monitoring Plan was created.



EIA highlighted increased sedimentation during excavation and replenishment as a main environmental impact with associated impacts on the surrounding marine habitats.



Consultations were conducted for the proposed project during October 2022. The main stakeholders consulted included the island council, the Maldives Marine Research Institute, and the National Disaster Management Authority. The community of Gan was also consulted through a Google form.

Key issues highlighted regarding conducting of Environmental Impact Assessment in the Maldives

- EIAs are often prepared within a very short time frame. As such it often lacks long term and comprehensive data which means collected data may not be the most accurate. This was also reflected in this EIA report.
- Due to the limited timeframe, EIAs do not collect the information from grass root level specifically from the people who live at the location. There is neither a greater effort to engage with the community either by the client ministry or the EIA consultants other than through an online form, as observed from this EIA report.

Interview with Laamu Gamu Council

The interview with the Laamu Gamu Council was conducted to understand their role in monitoring the Design and build of the L. Gan Coastal Protection Project. During the interview, the council stated that they had very limited information on the monitoring aspect of the project and had only received information on the design of the project. They also highlighted that the council lacks the technical capacity to monitor projects and stated that a consultant would be hired at the request of the Ministry. However, the council was also open to including CSOs in the monitoring process should they be interested. The council also confirmed that the monitoring role and scope would be clearer once the project implementation begins and the timeline is shared.

According to the Environmental Impact Assessment (EIA), for this project, consultations were conducted in October 2022, with key stakeholders including the island council, Maldives Marine Research Institute, and National Disaster Management Authority. Additionally, a consultation was held with the council on 27 November 2022, along with the EIA consultant and MTCC engineers to discuss detailed project and potential scope changes. The council noted that they were not consulted during the design phase of the project. However, during this meeting, they proposed an additional groyne at the end of the groyne field at the northern end (similar to the concept in Haa Dhaal, Hoarafushi), and to increase the width of the beach fill area. However, it is not clear whether this is reflected in the final project design.

The council informed that the island community was not consulted regarding this project. According to the EIA report, the community was consulted through a Google form where 19 responses were recorded between 16-19th May 2023. During the interview, it was highlighted by the participants that the guesthouses operating near the project area were not consulted at all.

When the council was asked how they relay information to the public, the council stated that it is done through the general community meetings. However, attendance at these meetings is very low.

When inquired whether there is a grievance and redress mechanism in place for the said project, the council stated that there is a general complaints box within the council as well as a focal point contact. However, the EIA report has detailed a two-tier grievance and redress mechanism for the project (See Figure 11) where the island council plays a significant role. According to the plan, project site-level complaints by locals and NGOs are to be filed with the Island Council. A formal complaint logbook is to be maintained at the site. In case complaints are not resolved after communication with the Contractor, they can be brought to the Project Management Unit at the Ministry of National Planning, Housing, and Infrastructure.

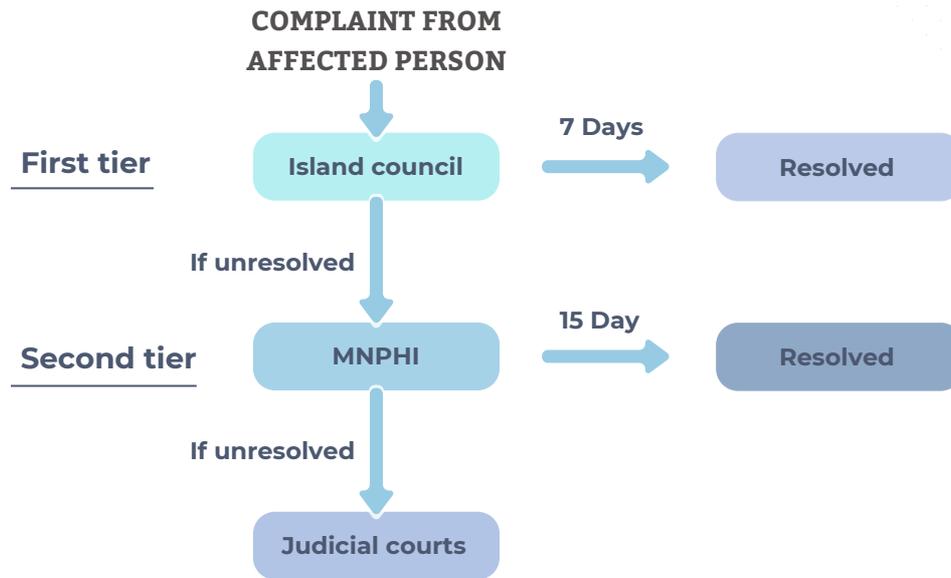


Figure 11: Grievance mechanism flow chart
Source: EIA for proposed design and build of coastal protection of L.Gan

This project is being implemented under the government's long term plan. The council stated that frequently the development plans of the government do not reflect the needs of the island communities or the activities planned by the councils. As such, the council has to reprioritize its plans accordingly. The council also noted that there are difficulties in communicating with the contractor as the Focal point (often a project manager or site manager) changes.

At the end of the interview, participants urged the council to oversee the process of beach filling as the extracted sand would need to be carefully sieved to match the current state of sand on the beach.

Interview with the Contractor (Maldives Transport and Contracting Company Plc (MTCC))

The contractor for this project, the Maldives Transport and Contracting Company Plc (MTCC), confirmed that the project was awarded to the company through direct selection to be completed within 180 days. As required, the proposal submitted by the contractor includes drawings and preliminary concepts for the project. When inquired regarding the accessibility requirements related to this project the contractor stated that no such requirement was identified for this project.

On the project site, only MTCC staff will be working on the project. They specified that 12 labourers will be used where 20-25 percent will be Maldivian. While the contractor was open to recruiting labourers from the island, they noted that additional recruitment may not be necessary as they already have an ongoing project on the island with the Upgrading of Thundi Harbour. The contractor stated that all labourers are to complete safety training prior to work. Furthermore, all employees go through an orientation where they familiarise themselves with the company policies. Employees also have a handbook on the code of conduct. Accommodation for staff is provided by the contractor and all labourers will be paid on a monthly basis. The contractor also reiterated that all foreign labourers hold valid work permits.



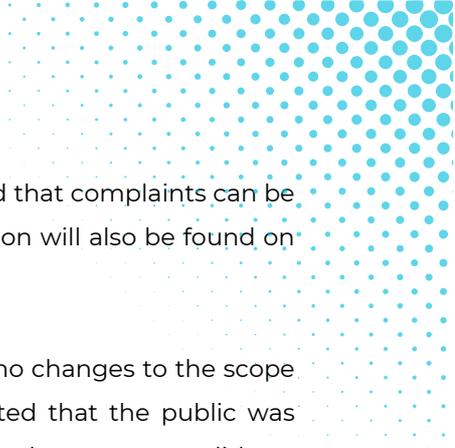
The necessary permits required for this project have been obtained from the Ministry of National Planning, Housing, and Infrastructure. However, the contractor noted at the time of the interview (20th June 2023) that although the EIA report had been submitted, the Environmental Protection Agency had yet to issue a decision statement on the report. However, when inquired from the Environmental Protection Agency (EPA) regarding the status of the decision statement for this project, the agency shared that both the decision statement and the Permit for Reclamation and Dredging of Islands and Lagoons of Maldives was issued on 09th July 2023. It is also worth noting that the Permit for Reclamation and Dredging of Islands and Lagoons of Maldives was issued for the period 20 July to 17 September 2023, which means it is no longer valid.

The EIA report for this project details that the contractor assured that the waste generated will be collected and transferred to the Thilafushi Waste Management Facility. Should any environmental damage arise from excavation the contractor stated that they will be following a risk mitigation plan that is in place. When asked about the chemicals that would be used on site the contractor clarified that fuel is the only chemical that would be used. The EIA report also has measures in place to control sediment due to excavation and replenishment through geobag/sandbags. They are not anticipating any decline in the underground water or removing any trees from the project area. All safety measures including warning signs, and safety equipment will be ensured under the safety plan.

Rock boulders that are needed for the project will be sourced from overseas in batches. The contractor assured the audit team that these boulders would last a lifetime. The contractor reiterated that they have not been able to commence with the project as per the timeline as the decision statement of EIA has not been passed and with the delays in getting rock boulders needed for the project.

The monitoring of project implementation will be done in three stages which will be submitted to the engineers. This includes weekly and monthly reports on work progress and Interim Surveys as required. Inspections are also carried out before commencement, during, and after completion of revetment works through Pre-construction surveys, Intermediate surveys, post construction surveys, and final surveys. There was no assigned monitoring function assigned to the island council, highlighted through this interview.

The project EIA includes an extensive Environmental Monitoring Plan (EMP) which is a framework for the monitoring and mitigation of impacts. The key parties involved in this plan include the Ministry of National Planning, Housing and Infrastructure, MTCC, EIA consultant, and EPA. The EMP also recommends carrying out monitoring during the construction phase and at least 4 years after completion of construction. During the operational stage, it also stated that marine water quality, coral reef health, condition of shore protection structures, and shoreline changes must be monitored bi-annually for 2 years. A comprehensive construction monitoring report is to be submitted to EPA upon project completion, and a yearly monitoring report is to be submitted during operation. The proposed quotation by the contractor also included MVR 180,000 under item EIA and Environmental Mitigation and Monitoring.



When asked about the mechanisms in place for complaints the contractor stated that complaints can be filed through the hotline number 1650, or to the project manager. This information will also be found on the site board.

The contractor confirmed that while changes were proposed by L. Gan council, no changes to the scope have been confirmed or communicated by the client. The contractor also stated that the public was consulted through Google Forms. However, the number of responses shared by the contractor did not match the number stated in the EIA report. While the contractor stated that 27 responses were received, the EIA report only recorded 19 responses.

Site Observation

Site observation could not be conducted as the project has not yet been initiated.

Public Perception of the Project

To understand the public perception and knowledge of the project, a survey was conducted, where 20 survey forms were filled, out of which 85 percent were males and 15 percent were females. The respondents were mostly 26 to 36 years of age followed by 37 to 47 years of age and 48 to 58 years of age respectively. 45 percent of the surveyed population worked as public officials, while 25 percent worked independently and 20 percent were fishermen.

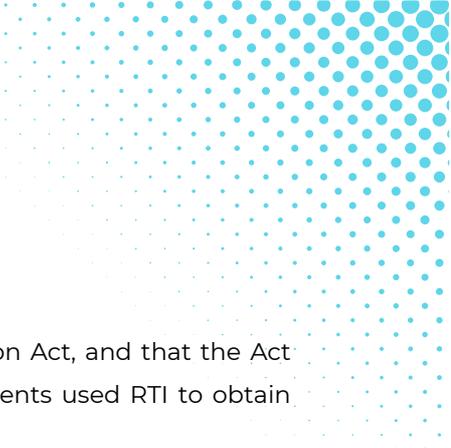
The respondents wanted PSIP to focus on road development, housing, coastal protection, and local tourism.

Of the respondents, 95 percent were unaware of the “Design and Build of the L. Gan Coastal Protection” project, while 5 percent were aware of it. Respondents who knew of the project received this information via the media, or from a public authority.

Regardless of their uninformed state of the project, respondents believe that the project will be beneficial to the island as they believe that it would resolve the issue of beach erosion and replenish the beach area. When inquired if women and youth are at an advantage from this project, 45 percent believed that it would be beneficial to women and youth, as they also would benefit along with the overall community in using the beach area for different purposes.

The respondents do believe that there should be more transparency regarding the project, and most of the respondents believe that information dissemination is poor in this project. When inquired to which authority they would file a complaint regarding the project, the majority were not aware of the institution they should approach.

Regarding the project, the respondents are not aware of any illegal or unruly activities.



Public understanding of the Right to Information Act

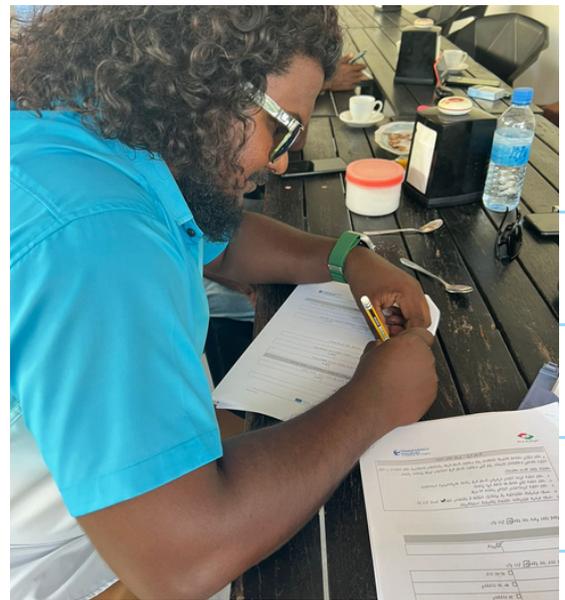
Most of the respondents were aware of the existence of the Right to Information Act, and that the Act empowers the public to obtain information from the State. Only three respondents used RTI to obtain information.



Participants at the social audit training program in Laamu Gan.



The area allocated to build the coastal protection in Laamu Gan.



Participants conducting public perception survey.



Participants interviewed the Gan Council on their involvement in the project of coastal protection project of Laamu Gan.



Social Audit: Incorporation of the ICU to the upgrading project of the H.Dh. Kulhudhuffushi Regional Hospital

Project Overview

The Social Audit conducted in H.Dh. Kulhudhuffushi City focused on Kulhudhuffushi Regional Hospital's ICU upgrading project. When this project was initiated, the Kulhudhuffushi Regional Hospital was already undergoing a different project which was the construction of two two-storey building to accommodate 30 beds which was awarded to Maldives Transport and Contracting Company (MTCC). The ICU upgrading project was a later addition to the already ongoing project, but as a separate project, and hence the bid process was independent of the ongoing project.

The ICU upgrading project was awarded to Maldives Transport and Contracting Company (MTCC) under single source procurement detailed under Public Finance Regulation Article 25 d. (3) which states that single source procurement could be utilised to maintain the standard and compatibility of the work that is already being conducted, and or to continue the ongoing work.

The project was awarded on the 4th of March 2021 with an award price of MVR 16,962,416.14 (USD 1,094,415.09). The project was to be concluded in 60 days.

The primary client for both the projects carried out in the Kulhudhuffushi Regional Hospital was the Ministry of Health.

During the social audit conducted from the 7th to the 9th of August 2023, ICU was already in service, although provisionally. Additionally, the hospital reported that the project was handed over in January 2023.

Key findings of the social audit on the Incorporation of the ICU to the upgrading project of the H.Dh. Kulhudhuffushi Regional Hospital:

- **Council does not assume any responsibility for monitoring the project, however, provides technical support to the regional hospital when required and requested.**
- **Kulhudhuffushi city council has introduced different mechanisms to engage the public to reach them and exchange dialogues and concerns. The city council was also found to be supportive of the activities conducted by the Women Development Committee of Kulhudhuffushi.**
- **Kulhudhuffushi Hospital management was also observed to be very receptive towards the questions and were very accommodating to the participants and their questions.**
- **Documents requested for further evaluation from the ministry and the contractor were not received.**

Interview with Ministry

The interview with the Ministry of Health confirms that the project is part of the long-term plan of the government, which targets to upgrade regional hospitals to tertiary level and establish self-governing bodies to administer these hospitals (Addu Atoll, Gaafu Dhaal Atoll, Laamu atoll, Raa atoll, and Haa Dhaal). Hence, the budget for the project came from the government. Since the Ministry believed that services could be enhanced alongside the infrastructural development, no need assessment was conducted, and furthermore, the Ministry states that it is challenging for them to conduct need assessment given their limited resources.

For the development of the H.Dh. Kulhudhuffushi Regional Hospital, the initial project was the expansion of the hospital with a two-storey building to accommodate 30 beds. The expansion of the ICU was incorporated later on.

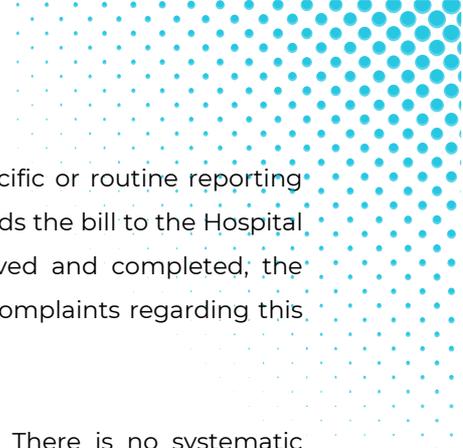
The tender document by the Ministry of Finance records the initial project as a “renovation” rather than an expansion of the hospital, and hence this conveys misinformation as the initial project was the construction of a two-storey building. The ICU project was agreed to take place as a third floor to the initial project and to be developed to facilitate an Intensive Care Unit. The Ministry confirms that the initial plan did not have the ICU relocation, however, was later identified as a need and incorporated as a separate project alongside the initial project.

In hindsight, the Ministry agreed on the importance of the need assessment and highlighted that since the Kulhudhuffushi Regional Hospital caters to the population of four atolls, the expansion would allow to minimise the referrals that needed to be made to Male'. Furthermore, the opinion of the community, the patients, the council, and the hospital itself was obtained for this project.

No scope change was brought to this specific project. However, there were two additions made to the initial BOQ of the ICU project, which consisted of the flooring finish to vinyl flooring and the transportation of individuals from ministry in Male' to the Hospital.

When inquired on the high cost of some items, such as the windows and window panes which was quoted MVR 1 million, the Ministry stated that the system does not review individual items, but the total cost of the items is considered. There were a few components in the project which were outsourced, and the ministry was well informed on the outsourced party and approved the products they had utilised including the air-conditioned system and oxygen system in the hospital. The monitoring function of the project was handed over to the Kulhudhuffushi Regional Hospital, and a final inspection report was done by the Ministry, Hospital, and Council. Even though the Council has no responsibility assigned to them, it is noted that they were involved in the final inspection.

In the proposal MTCC was to submit 4 reports based on the progress of the work and those 4 reports and the ministry informs that these reports were submitted.



As for the reporting mechanism, the ministry informs that there were no specific or routine reporting mechanisms involved in this project. Once MTCC submits a bill, the ministry sends the bill to the Hospital to verify the work of the contractor. Once the verification process is approved and completed, the payment for the respective bill is processed. The Ministry did not receive any complaints regarding this specific project.

The Ministry did not receive any complaints regarding this specific project. There is no systematic complaint registration system regarding the project. However, the ministry has received the complaint of water leaking from the windows and MTCC was attending to the issue at the moment of the conversation. This work is being attended through a local party (island party) that works with aluminium. The work was being done during the time of COVID and the Ministry had difficulties in physically reaching out to the location. However, the hospital management was efficient in aiding in the matter.

The project was due in 60 days, and it has taken more than the agreed time frame to complete the project. The Ministry informs that there are penalties agreed upon in the agreement detailing actions to be taken if delayed. However, there are pending payments from the government that are owed to the contractor as well. The ministry informs that this is a huge challenge that is being faced currently and this causes a detrimental impact to small contractors.

The maintenance of the new building, including the ICU facilities, will be arranged by the hospital since the hospital is managed under a board.

Upon completion of the interview, new supporting documents were requested for further evaluation, however, these documents are yet to be received.

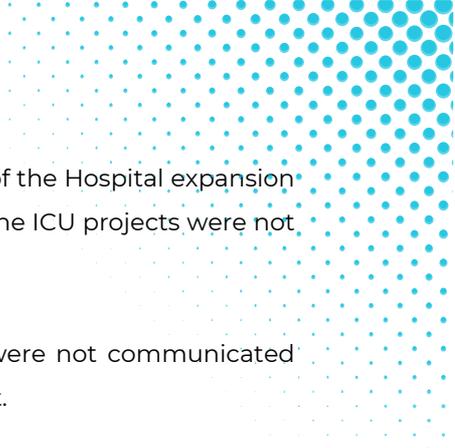
Interview with the Council

A separate interview with the Kulhudhuffushi Council was conducted to inquire about their role in the ICU project that was being carried out in the Kulhudhuffushi Regional Hospital.

They informed that even though there is a responsibility of the island council to monitor and coordinate PSIP projects budgeted above 5 million rufiyaa that are being carried out on the island, under the 8th amendment (Act No. 24/2019) to the Decentralization Act (Act No. 7/2010), very few ministries follow this and keep the council informed of the projects that are being carried out. The council also noticed that, so far only one project has been assigned to them as such, and the ICU project of Kulhudhuffushi Regional Hospital was not communicated with them to be monitored.

The council informs that the Ministry's decision not to involve the Council could be that since the Hospital expansion and the ICU project are being carried out in the land of the Hospital, and since the Hospital is under the administration of the Ministry of Health, it becomes easier for the Hospital to monitor and report back to the Ministry.

However, even though the Council is not involved, the Council receives requests to technically assist projects, and the Council has extended its expertise to the Hospital in supervising the progress of the project upon request.



As per the construction guideline, the required permission for the initial project of the Hospital expansion was obtained by the Ministry from the Council. However, documents regarding the ICU projects were not shared with the Council.

Prior to the commencement of the project, the Council confirmed that they were not communicated with and were not informed if the public was briefed or not regarding this project.

Generally, when monitoring projects, the Council makes weekly visits to the site with the project team. The Council highlights that even though not under the title their workforce includes individuals with expert knowledge of architecture and engineering, whose assistance they deploy during these monitoring rounds. During such rounds, the Council checks on the quality of the work specifically if the concrete and reinforcement works are up to standard, and subpar works are notified to the respective ministry. Meanwhile, the Council did highlight the lack of technical skill in the labour force of the Council.

When inquired on the frequency of involving the public in the decisions of the council and to keep them informed, the Council stated that there are frequent meetings with the public, including quarterly meetings to update on the progress of the PSIP projects and inquiries on the current events of the island. Furthermore, with the inception of the City Council, there is weekly face-to-face Monday Meetings referred to as “Raiyyithunge Adu Gaathun” which translates to ‘Public Voice Closely’. These meetings do not require an appointment but any individual can walk-in to share their concern or if they want to communicate with the Council. Sometimes, regarding specific projects, the Council holds Focus Group Discussions.

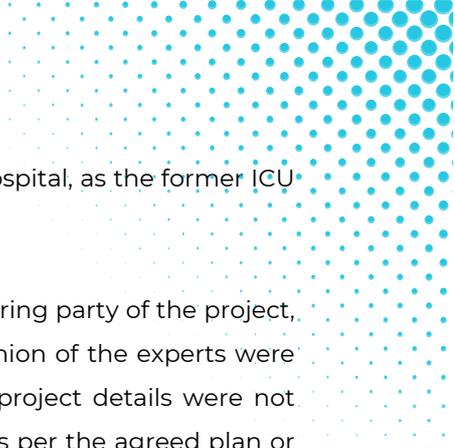
Interview with the Hospital

As the project undertaken for this social audit consists of a hospital building, an initial meeting was held with the Hospital management. Through this meeting, the purpose of running a social audit and the expected outcomes from conducting such an audit were conveyed to the management. This was particularly beneficial as the hospital was willing to make the necessary arrangements and provide assistance in the site visit with the participants, given that the ICU is a restricted area.

The interview with the hospital confirms that the hospital upgrading project was in the long-term plan of the government and the Ministry of Health initiated and conducted all the communications that needed for the project to be completed.

Currently, the hospital caters to 4 atolls with an approximate population of 72000. The upgrading of the hospital has already seen a decrease in the number of referrals made to Male’, whereas prior to the expansion and upgrading almost 70 percent of the patients needed to be sent off to Male’ for further observation and treatments, as per the Hospital.

Prior to the decision of awarding the ICU project, the Hospital confirmed that their opinion or the public opinion on the project was not inquired. However, the hospital's opinion was inquired for the design of the ICU, but no opinion was inquired for the initial expansion project.



The addition of an ICU to the expansion project was an adamant effort by the Hospital, as the former ICU with 3 beds was not sufficient to cater to the target population.

During the construction and installation phase, the Hospital acted as the monitoring party of the project, and where the Hospital's expertise was lacking, assistance and professional opinion of the experts were obtained from the Council's architect. However, the Hospital reports that the project details were not shared with them for them to confirm whether the progress was being made as per the agreed plan or not. For the final observation, a thorough report was conducted by the Hospital with the assistance of the Council, and this report has highlighted the issues that have been observed. The main issue was water leaking from the west side as the windows and their panes were too large and did not withstand the monsoon rain. This is consistent with the entire new building, and this has been highlighted to the Ministry who has communicated the issue with MTCC.

Following the interview, participants also shared the experiences of the public, which were captured through the public perception survey. This included feedback such as:

- The need for more visible hospital signage, especially as the hospital provides service to people from 4 atolls.
- Concerns about the hospital doctor's schedule.
- Poor awareness of the public on how to lodge complaints

The hospital was very receptive to this information. Furthermore, the benefits of the hospital conducting simple surveys to rate focused services and improve them were highlighted.

Interview with the Contractor and site observation

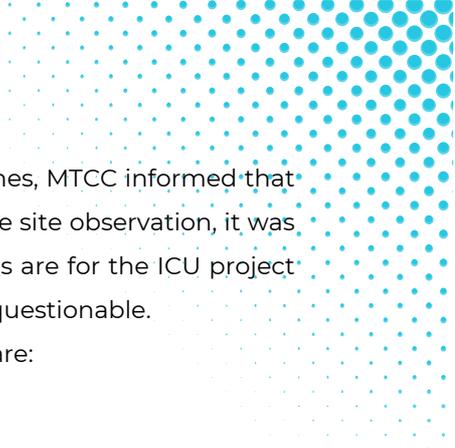
Maldives Transport and Contracting Company (MTCC) was inquired regarding the ICU project at the Kulhudhuffushi Regional Hospital. MTCC confirms that it was an additional component to an already undertaken project of the Hospital with the main client being the Ministry of Health. The project commenced in July 2021 and was to be completed in 60 days. However, MTCC confirms that the project could not be completed on a timely basis and the reasons behind the delay were communicated with the Ministry in writing.

There were five components outsourced in this project as per MTCC and they were:

- a) Installation of fire hydrant
- b) CCTV installation
- c) Air-conditioning
- d) Door and window installation
- e) Installation of medical oxygen.

All the outsourced work was done by the respective third party.

Additionally, MTCC informed that they had a meeting with the Ministry regarding the amounts quoted in the BOQ of the ICU project. After this discussion, changes were brought and ICU beds were agreed to be removed from BOQ.



When inquired about the large amount quoted on the windows and windowpanes, MTCC informed that this could be because there are a lot of windows on the floor. Similarly, during the site observation, it was noted that there were a lot of windows. However, given that these specific BOQs are for the ICU project only and the ICU covers only one floor of the building, the amount quoted is still questionable.

As mentioned in the proposal, 4 documents were provided to the ministry. They are:

- a) Pre-Construction Survey
- b) Intermediate check-survey
- c) Post-Construction Survey
- d) Final Inspection Report

Upon completion of the project, it has been reported that there is a water leakage problem through the windows and this issue is being rectified through an independent party from the island. Additional costs will be incurred to correct this design flaw.

Since the ICU project is an addition to the initial project of the Hospital, no environmental observations were made.

MTCC updated that they were not informed of any official third-party monitoring. However, they worked closely with the Hospital, informing, and updating them of the project updates.

Since the ICU was already in use when the site was visited for the Social Audit, the inside of the ICU was not observed given the medical protocols. However, the Hospital stated that floors beneath the ICU were of the same structure and the same materials were used. Certain walls indeed were covered with windows that had mirror window film (people on the outside could see their reflection, whereas people inside could see full view outwards). Since it was not a rainy day, areas of water surging through from these windows could not be observed.

After the interview, additional supporting documents were requested from the contractor, and as of now, these documents have not been shared.

Public Perception of the Project

To understand how informed the public was regarding the ICU project at Kulhudhuffushi Regional Hospital, a survey was conducted. The survey collected 32 responses where 53.1 percent were males and 46.9 percent were females. Most of the respondents belonged to the age group of 37 to 47 years of age followed by 26 to 36 years of age, 18 to 25 years of age, and 59 to 64 years of age respectively. From the surveyed population percentage of individuals who worked independently and those who worked at government jobs equaled 21.9 percent. While 15.6 percent of the surveyed population were studying, another 15.6 percent opted not to answer this question.

The surveyed population considered road construction including the completion of roads that had begun, installation of ice plants, housing, medical care, and a mechanism to offload the fish in the harbour.

Fifty three percent of the surveyed population were aware of the ICU project at Kulhudhuffushi Regional Hospital while 46.9 percent were not aware of it. Out of the 53.1 percent who were aware of the ongoing project, they were informed of the project via media, through a friend, or because they had been to the hospital recently. One individual reported that they came to know of the project through the Council.

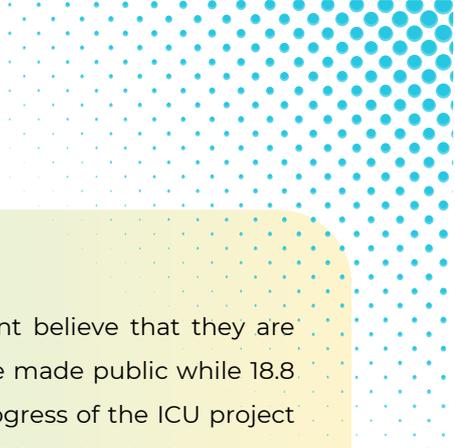
Regarding the ICU upgrading project, 90.6 percent of the survey respondents believed that the project would be of benefit to the island, while 9.4 percent particularly did not feel so. Those who believe that the project is beneficial identify that the project will enable the Hospital to provide efficient and speedier service, and it will reduce the Male' tours for medical purposes. They also believed that the upgrade would allow the hospital to treat more patients simultaneously.

When questioned if their own opinion was inquired for the project 90.6 percent of the respondents stated that their opinion was not inquired, and only 9.4 percent responded having to have provided their opinion to the project. When inquired if they knew public opinion was obtained for the project 81.3 percent stated that they were not aware of it and 18.8 percent stated that there was no public opinion inquiry.

When questioned if the Ministry of Health had given any information regarding the project, 87.5 percent stated that they had not received information from the ministry, and 12.5 percent of the surveyed population stated that the ministry had given information, and this was seen through the Hospital's Facebook page, and Media while the other two answers were indeterminate. From this shared information, the respondents were able to identify the need of the project, and the contractor of the project.

To understand the perception of the impact on women regarding the upgrade, 56.3 percent believed that it would have an impact, and that would involve having to stay with the family getting the treatment, and not having to go to Male' for medical purposes. Moreover, it was highlighted that the expansion of space would mean that women could have privacy. 43.8 percent believed that no specific impact would be on women due to the project.

Likewise, the surveyed population also believed that the project would be of benefit to the youth population as this would also mean that they could get treatment from the island without having to go to Male', and that would also increase the job opportunities for the youth.



To assess the public perception of the transparency of the project, 81.3 percent believe that they are aware that information on projects that are undertaken on the island should be made public while 18.8 percent were not aware of this. None of the respondents perceived that the progress of the ICU project was made public or was transparent about the project. When inquired on to which authority they are to lodge complaints, most believed that it was the Ministry of Health, Hospital, Council, Anti-Corruption Commission, and the Police. There were a few respondents who stated that they did not know whom to report to.

To understand public knowledge of any unlawful activity during the project, 96.9 percent stated that they were not aware of any unlawful activity during the project. None of the surveyed population reported that they had filed a report regarding the project to any government authority.

When assessing the knowledge on the Right to Information Act (RTI ACT) 81.3 percent of the respondents knew of the existence of the Right to Information (RTI) Act, and 18.8 percent were not aware of it. However, 71.9 percent knew that the Act gave them rights and 28.1 percent of the surveyed population were not aware of it. Except for one individual, none of the surveyed population had submitted an RTI request.



The ICU area of Kulhudhuffushi Regional Hospital



Participants interviewing hospital management of Kulhudhuffushi Regional Hospital.



Participants at the Social Audit training at H.DH. Kulhudhuffushi



Participants interviewing Kulhudhuffushi city council inquiring their involvement in the project of upgrading ICU at the Kulhudhuffushi Regional Hospital.

FINDINGS AND RECOMMENDATIONS FROM THE SOCIAL AUDITS

1. Infrastructure projects are being undertaken without a need assessment or a feasibility assessment:

Although all the projects reviewed under the social audit program come from governments long-term plans, with the conversations from the respective ministries, it was observed that the projects were designed and confirmed to proceed without an analysis of a need assessment. Mega infrastructure projects often are associated with political promise rather than the actual need or preference of the public. As such this leads to the implementation of unsustainable projects, wastage of resources, and government funds.

Recommendation:

- Conduct a needs assessment prior to the project award and in the assessment, include the following but not limited to:
 - 1.Public Perception towards such a project
 - 2.Analysis of demand and identify potential users and land use plans developed by councils
 - 3.Potential Geographical preferences for the location of the project

2. Poor or lack of due diligence on BOQ and materials provided by the contractor:

It is unclear on the due diligence process employed in the projects by the bid committees at the ministries and the National Tender Board when evaluating the proposals. For instance, it was observed from the list of tendered projects obtained from the Tender Board that the cost of similarly designed projects has price variations with different contractors. For instance, the construction of 12 classrooms at S.Hithadhoo Nooraanee School costs MVR 12,490,088.48 while the construction of a 04 storey 12-classroom building at Hdh. Kulhudhufushi (Hdh. Atoll Education Center) by Wee Hour Investment Pvt Ltd only costs MVR 8,134,794. Projects related to schools are constructed with similar designs provided by the Ministry of Education.

Recommendation:

- Ensure compliance of due diligence protocol during the evaluation of bidding documents by bid committees and the National Tender Board. These are to be reflected in a technical audit conducted by the contractor and supervised by the client
- The Client to conduct compliance audits to ensure that procedures are adhered to during the bid evaluation process.

3. Poor public participation:

It was observed from all social audits that the opportunities and public participation mechanisms in various authorities are poor and limited. The process itself is weak with the restrictions in the availability and ease of information, poor inclusion of marginalised groups, poor political will that support public participation, and narrowed civic space for CSOs to contribute to the decision making process.

Often ministries collect feedback from the public through online forms on already designed and finalised projects where it is harder to bring scope changes. As for councils they face challenges in attracting crowds to the community meetings for various reasons, such as the public lacking proper information to contribute to such discussions, meetings being used by councils for one way communication, and poor addressing of concerns by communities in these meetings. As such, public trust in the participatory process by these institutions is very low thus leading to poor participation.

None of the social audits revealed that there was an intended meaningful public participation at any stage of these projects. Communities were poorly informed, and most were unaware of the ongoing projects on their islands. Hence, their say or opinion regarding the projects are not reflected in the projects which they are to use.

Recommendation:

- Enable the civic space for CSOs to contribute to the decision-making process by facilitating public participation by collecting information and informing the public regarding projects.
- Ensure timely and proactive disclosure of information on institutions as well as on projects that are at various stages of implementation.
- Identify specific causes for poor participation in community meetings and communicate with the public to encourage participation and increase public trust.
- Ensure incorporation of the public perception in the need assessment.
- Inform the public on the information the council receives on projects including the progress of the projects
- Establish complaint mechanisms and make the public aware of these avenues.

4. The monitoring function is loosely handled:

It was observed that councils are not often given the full power to monitor the projects unless the client/ministry specifically requests them directly. In such cases, timely information related to the project may not be shared or fully disclosed with the council. This leaves a gap in accountability since the council is not able to get actively involved or may not be interested in being involved. However, even when the monitoring component is undertaken by councils, they often do not have the technical capacity or manpower to track projects.

The monitored information is directly shared with the client ministry and is not available for public scrutiny. With the lack of information the public has on the project, there is often no involvement from the public in ensuring accountability or monitoring the projects.

Furthermore, the scope of technical monitoring function should be able to identify potential and actual issues that could arise. For instance, it was observed in the Kulhudhuffushi Regional Hospital that water seeps in between the window and window panes during rain. However, this issue was not flagged by the monitoring party during the construction or handing over of the project.

Recommendation:

- Ensure adherence to monitoring requirements in place and review the current monitoring process to strengthen the function.
- Establish a rule for independent third-party/CSO monitoring of projects.
- Maintain and publicise the monitoring records and actions taken to identify issues.

5. Weakly marked site territory:

It was observed that some sites did not have the required site boundary. This in turn leads to loss to the contractor and may impact the quality of the outcome of the project. Moreover, some sites did not have the required indicative notice board detailing the project name, client, contractor, and duration of the project. This information is critical for citizens, especially for public scrutiny or to exercise accountability.

Recommendation:

- Incorporate a clause in the agreement that comes into force in a situation where regulations at the construction site are not maintained.
- Ensure the safety requirements at construction sites including the boundary wall are in place during the monitoring process as indicated in the safety requirements under the functional requirement F5.3.2 of Building Code 2019/R-1020, Clause F5 _ Construction and Demolition Hazards[21].
- Client to take necessary actions in the event the contractor does not abide by the safety measures.

[21]Building Code (2019/R-1020)

6. Project progress not being up to the project schedule:

The projects in the social audit program showed that most of the projects were not proceeding or had gone as planned. This delay was caused by several factors, some of which were administrative difficulties, material shortages, and environmental difficulties.

Recommendation:

- Establish a realistic timeline when confirming the project's time frame, which would account for any potential delays including unforeseen circumstances that may arise during the course of the project.
- Include compulsory clauses in the agreement detailing actions to preclude in the event of a delay resulting due to action of either party; the client, the contractor and/or nature.
- Ensure the contracts drafted between clients and contractors adhere to the best practices of contracts depending on the nature of the contract.
- Implement actions agreed upon in the event of a delay.

7. Poor communication between the respective ministries and island council and little to no involvement from the Council:

Councils are not consulted regarding projects if they are not included in the monitoring component. In such cases, councils do not receive enough information regarding the progress of such projects. Some councils also do not proactively obtain information regarding the projects implemented in their communities. Lack of involvement leads to weak accountability from both public officials and citizens.

Recommendation:

- For projects that are being held in the islands, ensure that the councils are well communicated and informed about the project.

8. Contractor payments being delayed:

It was observed that some of the projects undertaken are not being paid to their agreed payment timeline due to various reasons. Some of these projects have already completed the handover process and are in use. During an interview with a ministry, it was noted that projects are awarded to SOEs because it gives the government leeway to delay the payments. However, this in turn creates cash flow issues within the SOEs and impacts the profitability of SOEs. According to the transitional committee formulated on 5th October 2023, many government companies highlighted this issue during meetings held during the transition process. Similarly, some private contractors have also raised complaints about the delays in receiving payments for government projects.

Recommendation:

- Ensure issuance of payments as agreed in the contract.
- Ensure sufficient and efficient communication between client and contractor

Conducting social audits may not always uncover evidence of corruption. However, it can help identify administrative deficiencies and other irregularities. For instance, the social audits conducted in Addu City, Fuvahmulah City, Laamu Atoll, and Kulhuduffushi City found that citizens are not aware of the projects implemented in their islands especially due to poor communication and lack of transparency. There is also weak public participation in all stages of projects. These eventually lead to designing poor unsustainable projects that do not meet the needs of the community.

CONCLUSION

A social audit is a powerful tool that scrutinises the decisions, actions, and performance of the government. This report highlights the findings and experience of social audits conducted in four locations of the Maldives outlining the 20 key steps detailed in the Social Audit Guide published by Transparency International. This social audit program was initiated under the collaboration of Transparency Maldives and the Anti-Corruption Commission of the Maldives, by training CSOs and leading them through the actual auditing process. As such, one key goal of this social audit program is to empower CSOs to take the lead and initiate such social audits within their communities. This toolkit can be an effective tool to highlight the concerns of the communities in a structured manner and identify corruption. Moreover, it is a useful tool to identify irregularities, either administrative, legal, or financial as a social audit may not always uncover corruption but rather risks to corruption which in turn discourages negative practices. It was seen from the social audits conducted in the Maldives, that there are more irregularities flagged rather than actual corruption. For instance, all the social audits highlight the poor communication of information at all levels, whether it is between the public authorities as well as to the public. In the case of the L. Gan Shore Protection Project and the construction of 12 classrooms at Seenu Hithadhoo Nooraanee School in Addu City, the councils were not informed of any role they would play in monitoring the project. It was also seen that there is a great deficiency in ensuring actual meaningful public participation in any of these projects. As such, there is a need for public authorities, councils, and citizens to identify mechanisms to overcome this barrier and to encourage more participation. As seen from the conducted social audits, there are also barriers to ease of access to public information. This barrier could be faced by future community-led social audits as there is a culture of secrecy in the Maldives especially on disclosure of information. This can directly impact the effectiveness of a successful social audit as information is key. A collective effort must be made to ensure that information related to the public is made available in the public domain. Furthermore, the use of the RTI Act in the Maldives is a great tool for the public to access information that may be more difficult to obtain through normal requests. Conducting a social audit cannot be concluded by a report. Transparency Maldives and the Anti-Corruption Commission of the Maldives believe that a continuous advocacy effort is needed with regard to the findings and implementation of the recommendations. Through this toolkit, it is hoped to leave a strong accountability tool that the public can use to eradicate the risks of corruption in the Maldives.

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5.5 5.5 ގައި ވާ ސަބަބުތައް ބޭނުންކޮށްގެން ވަނީ ސަރުކާރުގެ ފަންޓު ބޭނުންކުރަން ފެށިފައެވެ?

ހުރި	ނުހުރި
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5.6 5.6 ގައި ވާ ސަބަބުތައް ބޭނުންކޮށްގެން ވަނީ ސަރުކާރުގެ ފަންޓު ބޭނުންކުރަން ފެށިފައެވެ?

6.1 6.1 ގައި ވާ ސަބަބުތައް ބޭނުންކޮށްގެން ވަނީ ސަރުކާރުގެ ފަންޓު ބޭނުންކުރަން ފެށިފައެވެ?

ހުރި	ނުހުރި
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6.2 6.2 ގައި ވާ ސަބަބުތައް ބޭނުންކޮށްގެން ވަނީ ސަރުކާރުގެ ފަންޓު ބޭނުންކުރަން ފެށިފައެވެ?

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