

CASH TRANSFER OPERATIONS MANUAL

FIJI SOCIAL PROTECTION COVID-19 RESPONSE AND SYSTEM DEVELOPMENT PROJECT (CREDIT NO. 6828-FJ)

**MINISTRY OF ECONOMY
AND
FIJI NATIONAL PROVIDENT FUND**

April 2021 (V.4)

ABBREVIATIONS AND DEFINITIONS

Beneficiary – a member of FNPF who is eligible to receive a Cash Transfer under Part 1 of the Project under the Financing Agreement in accordance with the eligibility criteria, procedures and other requirements described in Section I.B of Schedule 2 of the Financing Agreement, the Cash Transfer Agreement and this Cash Transfer Operations Manual (and “Beneficiaries” means, collectively, all such Beneficiaries).

Cash Transfer – a cash payment made out of the proceeds of the Financing through FNPF to a Beneficiary under Part 1 of the Project, in accordance with the provisions of Section I.B of Schedule 2 of the Financing Agreement, the Cash Transfer Operations Manual and the Cash Transfer Agreement (“Cash Transfers” means, collectively, all such cash payments).

Cash Transfer Agreement (or “Agreement”) – The ‘Cash Transfer Agreement’ between the MOE for and on behalf of the Government and the FNPF which reflect their respective roles and responsibilities in relation to the Cash Transfers under Part 1 of the Financing Agreement.

Cash Transfer Operations Manual (or “Manual”) – this document.

Credit – has the meaning given to that term in the Financing Agreement.

DA – Designated Account in local currency nominated by Government with Home Finance Cooperation (Limited).

Effective Date – date of Financing Agreement effectiveness, 19 February 2021.

ESCP – Environment and Social Commitment Plan for the Project, dated January 11, 2021, as the same may be amended from time to time in accordance with the provisions thereof.

ESS2 – Environment and Social Standards 2.

Financing Agreement – Financing Agreement for the ‘Fiji Social Protection COVID-19 Response and System Development Project’ dated 15 February 2021 between the Republic of Fiji and IDA (Credit Number 6828-FJ), as such financing agreement may be further amended from time to time.

FI – Financial Instruction 2010.

FJD or \$ – Fijian Dollar, the currency of the Republic of Fiji.

FMA – Financial Management Act 2004.

FNPF (or “Fund”) – Fiji National Provident Fund.

GDP – Gross Domestic Product.

Government – Government of the Republic of Fiji.

GRM – Grievances Redress Mechanism.

HFC – Home Finance Cooperation Limited.

IDA (or “Association” or “World Bank”) – International Development Association.

MOE – Ministry of Economy.

OAG – Office of the Auditor General.

Member – a member of FNPF.

Project or project – the Fiji Social Protection COVID-19 Response and System Development Project, as described in Schedule 1 to the Financing Agreement.

ProMIS – Provident Fund Management Information System.

PAD – Project Appraisal Document.

PDO – Project Development Operation.

PMU – Project Management Unit.

Scheme – the Government’s COVID-19 Unemployment Assistance Scheme.

SOP – Standard Operating Procedure.

SEP – Stakeholder Engagement Plan.

TOR – Terms of Reference.

WA – Withdrawal Application.

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I. BACKGROUND

The Fiji Social Protection COVID-19 Response and System Development Project aims to mitigate the impact of the COVID -19 crisis on the income of the unemployed and underemployed, and to increase efficiency and adaptability of the social protection system of Fiji. The Project has two components: **Component 1** will support Cash Transfers in the form of Government payments to the FNPF-member Beneficiaries who have lost their jobs or face reduced hours or reduced wages as a result of the COVID-19 crisis; and **Component 2** will focus on strengthening the Fijian social protection system and the relevant policy setting and also support Project management, monitoring and evaluation. The Project will be financed by an IDA Credit in the amount equivalent to thirty-four million eight hundred thousand Special Drawing Rights (SDR 34,800,000) with the closing date of 31 July 2024.

Under Component 1, the MOE, in collaboration with the FNPF, is responsible for the rollout of the COVID-19 Unemployment Assistance Scheme. The MOE and FNPF have defined their respective roles and responsibilities in three 'COVID-19 Response Assistance Agreements for Government Subsidy' entered into between the two agencies; of these three agreements, future payments to be financed by proceeds of the Credit under Component 1 are contemplated to be made under the Phase 3 agreement only (and no other future payments under the Scheme will be financed by proceeds of the Credit). The FNPF is mainly responsible for the verification of the eligibility through its digital platform and processing of the payment to the Beneficiary's bank or mobile money account. To carry out the activities of Component 1, a Cash Transfer Agreement between MOE and FNPF will be signed and a Cash Transfer Operations Manual developed, both in accordance with the Financing Agreement. The execution of the Agreement by the MOE and FNPF and the adoption of a Manual by the MOE that is acceptable to the Association are the conditions for withdrawal of Credits allocated for Component 1 of the Project, and in any event, these actions are required to be completed by not later than three months after the "Effective Date" of the **Financing Agreement** (that is, 19 February 2021).

II. OBJECTIVE

The objective of this Manual is to provide detailed arrangements and procedures for the implementation of Component 1 of the Project. No provision of this Manual shall be amended or waived (or permitted to be amended or waived) unless the Association otherwise agrees in writing.

III. SCOPE

This Manual defines the guiding principles and specifies the detailed arrangements and procedures with regards to eligibility criteria and procedures for the verification of Beneficiaries and the amounts of Cash Transfers; detailed procedures and arrangements for the payment systems; financial management, accounting and auditing requirements; documentation and information management; grievance redress mechanism; monitoring and evaluation; mechanisms for verification of compliance of Cash Transfers; Personal Data collection and processing; and other administrative, financial, technical, and organisational arrangements and procedures necessary for the implementation of the Cash Transfers.

IV. MAIN CONTENT

As the Project supports the existing Scheme of the Government, the Cash Transfers will largely rely on the existing systems used by the MOE and FNPF. This Manual will build on the guidelines and SOPs developed by FNPF for its implementation of unemployment assistance as announced by Government and approved

by the FNPF Board. This Manual complies with the requirements of the Cash Transfer Agreement between MOE and FNPF and the Association's operations policy and procedures applicable to this Project.

1. OVERVIEW OF FIJI COVID-19 UNEMPLOYMENT ASSISTANCE SCHEME

As part of the COVID-19 Response Budget 2019-2020, the Government announced that financial assistance, in the form of subsidy, will be provided to the Beneficiaries whose employment has been impacted by COVID-19 through FNPF. The Government has allocated \$100.0 million for the "Unemployment Assistance Scheme".

The Scheme was rolled out in three (3) separate phases as follows:

- (a) Phase 1 – commencing from 1 April 2020, a lump sum assistance payment of up to \$1,000 was provided to tourism sector workers and up to \$500 was provided to eligible Members affected by lockdown and/or travel restrictions due to COVID-19. This is only available to Members who were not paid by their employers due to being not able to go to work or not able to work from home.
- (b) Phase 2 – further unemployment assistance commenced from 25 May 2020 and was paid out under three categories. This phase enables all affected Members that had received an assistance payment under Phase 1 of the Scheme to access an additional payment of \$1,100 if they remained unemployed at the relevant time. The Government will provide a top-up for all eligible Members with general account eligibility of less than \$1,100. Assistance will be paid out in 5 instalments of \$220 per fortnight.
- (c) Phase 3 – commencing from 10 August 2020, recurring payments of up to \$176 per fortnight will be provide to eligible Members who have been on reduced hours or reduced wages during the COVID-19 crisis. As part of this phase, eligible Members who are on a reduced wage or salary rate due to the economic impact of COVID-19 will also be provided with a lump sum top-up payment of \$550 or \$1,100 (scaled to the percentage of the wage/salary reduction).

Subsequently, the Government and FNPF entered into 3 separate agreements (**Annex 1**), as follows:

- (a) Phase One COVID-19 Unemployment Assistance, Agreement for Government Subsidy executed between the Ministry of Economy and FNPF, dated 3 April 2020, commenced on 1 April 2020 and has been completed ("**Phase 1 Agreement**");
- (b) Phase Two COVID-19 Unemployment Assistance, Agreement for Government Subsidy executed between the Ministry of Economy and FNPF, dated 20 July 2020, commenced on 25 May 2020 and is in effect ("**Phase 2 Agreement**"); and
- (c) Phase Three COVID-19 Unemployment Assistance, Agreement for Government Subsidy executed between the Ministry of Economy and FNPF, dated 26 November 2020, commenced on 10 August 2020 and is in effect ("**Phase 3 Agreement**"),

(each referred to as the "Agreement for Government Subsidy").

In addition to the obligations set out under Section 3 of the Cash Transfer Agreement, the following are roles and responsibilities of the FNPF and MOE for the purposes of completing the Project.

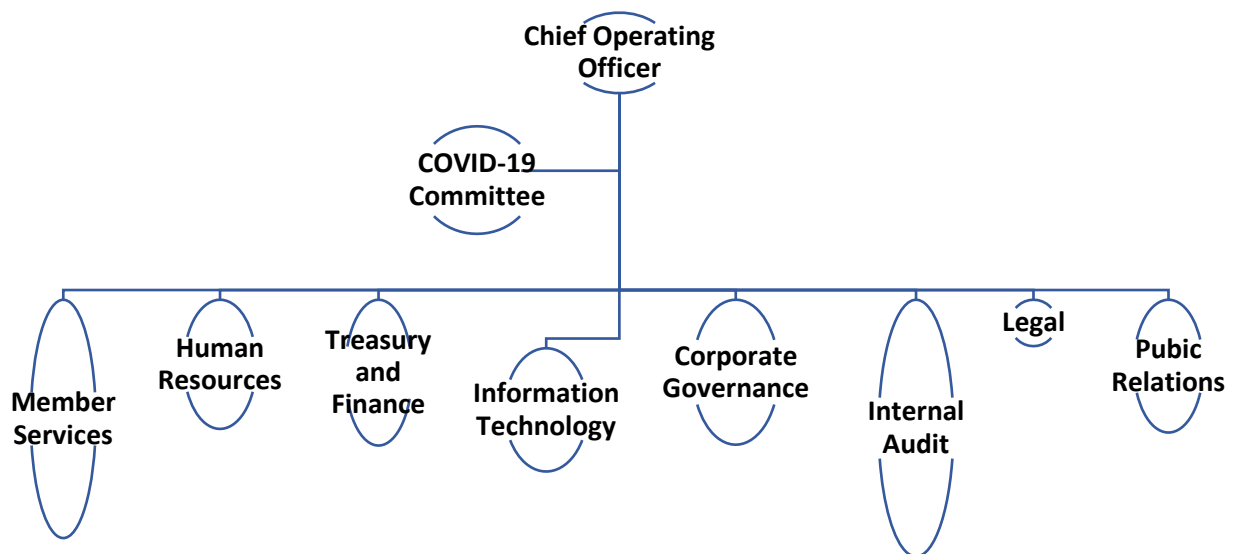
The key roles and responsibilities of FNPF include assessing and verifying the eligibility of a Member under the Scheme, ensuring proper dissemination of information to its Members regarding the Scheme, ensuring regular communications with Government, exercising all reasonable care and skill in the performance of its obligations under this Manual and ensuring compliance with all relevant laws and regulations in the conduct of its business. The FNPF is also responsible for providing accurate and timely reporting of acquittals and other necessary documentation as required by the Agreement for Government Subsidy and the Cash Transfer Agreement to the MOE.

The MOE shall ensure the timely transfer of the relevant portion of the proceeds for financing of the Project to FNPF to assist affected Beneficiaries as based on FNPF internal assessment of eligible criteria. MOE is responsible for reviewing acquittal report submitted by FNPF prior to release of funds for the next phase. It also ensure that all reporting requirements for the Project are met in accordance with the Financing Agreement and the Cash Transfer Agreement.

The MOE is also responsible for creating a Designated Account in a local currency with the nominated Bank, Home Finance Corporation Limited in Suva. The DA ceiling will be set at \$200,000 to finance eligible project expenditures expected to be financed out of the funds in the DA and to accommodate Project requirements. The DA will be operated on an advance basis and will be funded from proceeds of the IDA Financing.

2. ORGANISATIONAL STRUCTURE FOR IMPLEMENTATION

The following section outlines the organisation structure of FNPF for the implementation of the Project. It defines the level of roles and responsibility and delivery of service for the Project.



Business Unit/Division	Role & Responsibility
Chief Operating Officer	Project Manager.
COVID-19 Committee	Deliberate and makes decisions in consultation with Ministry of Economy, Legal and Corporate Governance on FPNF member appeals and clarity on withdrawal guidelines and policy.
GRM Committee	Ensure that Member's concerns are dealt with fairly and independently; operate in line with the Review of Decision Policy; review the submission and make recommendation for the Funds Chief Executive Officer's consideration.
Member Services Department	Process and approve FPNF member applications.
Human Resources Department	Assist COVID – 19 Committee in resource allocation.
Public Relations Department	Member awareness through social media, TV, Radio and newspapers.
Corporate Governance	Provide policy guidance and risk assessment of the COVID-19 payment assistance.
Information Technology	Provides all IT Infrastructure and support.
Finance Department	Maintains a financial management system and prepare financial statements; process COVID-19 payment, reconcile actual and advances; prepare acquittal reports, and responsible for document and record-keeping.
Legal Department	Provides legal advice.
Treasury Department	Monitors cash flow position.
Internal Audit Department	Real time and audit assurance of COVID-19 assistance.

3. IMPLEMENTATION PROCESS AND PROCEDURES

There are three (3) phases of payments under the FPNF COVID-19 Withdrawal scheme for Members guided by three (3) separate standard operating procedures (“SOP”) as attached in Annex 2 and briefly summarised below:

- a) FPNF Phase One SOP – defines the registering and processing of applications for COVID-19 assistance Phase 1 and specifies the associated roles and responsibility for the process. It applies to any staff authorised to register and process a partial withdrawal application, verify, check and sign off documents. In phase 1, employers are to complete application form with the affected member and upload to the FPNF portal. The Inspection team, IT, Member services and Finance team of FPNF will review and perform necessary internal checking to the end process. Thorough verifications are done to ensure completed withdrawal application and supporting documents meet the withdrawal criteria as outlined in section 6.1 c of the SOP before the final payment process;
- b) FPNF Phase Two SOP – targets affected Members that applied in phase 1 and are still or have recently become unemployed and details the 3 categories of affected Members who qualified under phase 2. Submissions are done in 2 methods via myFPNF app and Employer Portal and only exceptional reasons will be considered for manual submissions. Thorough verifications are done by the FPNF team to ensure completed withdrawal application and supporting documents meet the withdrawal criteria as outlined in the SOP before the final payment process; and

- c) FNPF Phase Three SOP – targets Members that are still unemployed, on reduced pay or reduced hours of work. Submissions accepted on 2 modes, i) myFNPF App for unemployment assistance and ii) Employer portal for reduced pay assistance. Refer to section 8 of the SOP for the detailed verifications of applications for the 2 modes to ensure completed withdrawal application and documents meet the withdrawal criteria as outlined in the SOP before the final payments are processed.

The detailed steps and procedures taken by the FNPF in registering and processing of applications, eligibility criteria, verification of beneficiaries, and determination of the amounts of the Cash Transfers with Government top-up, frequency and mode of payment to Beneficiaries, procedures and arrangements of payment can be viewed in the attached SOP.

4. FINANCIAL MANAGEMENT AND PAYMENT SYSTEM

The objective of the payment system for FNPF is to provide timely and accurate cash payments to the Beneficiaries.

This section will describe the guidelines and processes for the institutional arrangements between the FNPF and MOE.

- A. Institutional Arrangements – is an arrangement agreed between the FNPF and MOE and is outlined below:
 1. The FNPF request for advance from MOE;
 2. The MOE authorises disbursement of advance to the FNPF;
 3. The FNPF submits acquittal reports to the MOE before the next disbursement tranches are released; and
 4. The FNPF facilitates payments to eligible affected members either through direct transfer to member’s bank accounts and telegraphic money orders.

- B. Payment Process for FNPF

A separate SOP is maintained to guide the Finance team in processing the COVID-19 assistance payments to eligible Members. The process from receipt of FNPF Member’s COVID-19 assistance application to its approval is undertaken through the Member system, ProMIS. The Finance team will use the SOP for guidance where an eligible Member requests for a Government top-up payment and where the eligible Member is required to choose either of Billpay or MPAISA mode of payments to receive their payment.

A more detailed description of the FNPF payment process to its Members under phase 1 can be viewed under the SOP for Payment Process as attached in **Annex 3**.

- C. Accounting – The MOE is responsible to carry out the accounting function for the Project. The Government approved Financial Management Information System (**FMIS**) will maintain the accounting records of the project. A general ledger Liability account under Standard Liability Group (SLG) 81 will be created for the IDA credit with every drawdown of funds from IDA to increase the liability account. The corresponding debit entry will be either Cash (Standard Asset Group (SAG) 52) or Expenditure depending on the disbursement methods from IDA.

In terms of accounting of Advance payment to the FNPF COVID-19 Assistance, the Budget division will assess requisition and upon approval, submit to the Treasury division (FMIS team and Financial Operations) for release of funds in the system and release of payments. This is recorded under Head 50, Standard Expenditure Group (SEG) 10 allocation.

On the Reconciliations of Actuals and Advances: FNPF prepares a forecast schedule which determines the timelines for the payouts. Based on the forecast, a lump sum is requested by FNPF to MOE for which necessary payments are facilitated to FNPF. Once claims are verified and assessed, FNPF will do the necessary payouts to the eligible Members after which acquittals are submitted to MOE, through a member listing.

The current format of the acquittal report includes: breakdown of Government disbursement to FNPF by date, breakdown of Government subsidy by phase, details of total funds disbursed versus total Government subsidy paid to date including any fees charged by FNPF which provides the total current balance available with FNPF.

However, FNPF will align its reporting based on the requirement by the World Bank which includes: Summary Report of each Phase and Round and detailed payout listing under each Phase and Round whereby the listing should match with the summary report. The responsible officer at the FNPF for this reporting is the Chief Operating Officer.

FNPF is required to immediately refund to Government all or any part of the amount of the Cash Transfers then withdrawn in any of the circumstances set out in Section 3.3 of the Cash Transfer Agreement.

The FNPF accounting and records keeping as follows:

- three (3) separate general ledgers accounts setup,
 - (i) COVID-19 Bank Account GL (in where Government top-up and Member GA entitlement received and payment to members are recorded – ANZ Account # 13397717;
 - (ii) Government Top-Up Liability GL (TRUST ACCOUNT - Where Government top up received and utilization is recorded) – a GL account is created for each phases. GL Account for Phase 1 is 20014-SAL-000-000, Phase 2 is 20019-SAL-000-000 and GL Account for Phase 3 is 20021 –SAL-000-000;
 - (iii) Member GA liability GL (a TRUST ACCOUNT - Where member GA is received from FNPF and payout to member is recorded);
- a Trust bank account created solely for receiving Government top up and Member general account balance;
- Separate Trust General Ledger accounts created as contra for cash received from Government and FNPF Members;
- FNPF uses its Epicor FMIS to process COVID payments to members (EFT mode), Vodafone (MPAISA mode), Post Fiji Limited (Billpay mode);
- Payment details are populated from ProMIS approved application, checked for accuracy (amount split and GL account) before payment is processed through Transactive;
- Bank reconciliation of the COVID Trust bank account is maintained;
- General ledger reconciliation is maintained for all Trust monies received from Government and members; Monthly reconciliations are performed by Accountants and reviewed by Principal Accountant/Manager Finance.

- D. Internal Controls – Government financial management is governed by the Financial Management Act 2004 and the authorisation of payments is made through MOE in compliance with the Finance Instruction 2010. This provides a basis for internal controls and payments of accounts by Government. The FNPF will be guided by its internal policy for COVID-19 payments and financial manual for good internal control.
- E. Acquittal report and record keeping - It is the responsibility of the Finance team in FNPF and PMU in MOE to ensure all records (hard copy and soft copy) are properly maintained. Acquittals of Government top up utilisation must be in accordance with this Cash Transfer Operations Manual. In the absence of explicit timelines, the Fund must have in place a process to ensure proper reporting of Government top up utilisation and subsequent request.

5. GRIEVANCE REDRESS MECHANISM

The objective is to assist and resolve complaints and grievances in a timely, effective and efficient manner that satisfied both parties. The FNPF has implemented a COVID-19 Complains and Appeals Committee (TOR dated September 2020) for the purpose of ensuring that the complaints registered from the Scheme are fairly and transparently handled. The mandate of the COVID-19 Complains and Appeals Committee is derived from the FNPF's Complaints Management SOP and in accordance with the Fund's Complaints Management Policy approved by the FNPF Board.

For the benefits of FNPF Members, the Fund has implemented procedure on handling complaints during the course of COVID-19 assistance payments and resolutions to the complaints. These are detailed in the FNPF complaints resolution SOP as attached in **Annex 4**.

The purpose of the SOP is to define process for addressing payment issues and specifies the associated roles, accountability and timelines to implement. The type of complaints received includes inactive bank account, closed and wrong bank account, unregistered mobile number and third party mobile contact.

- What can be considered through the Appeals Process
FNPF Appeals Committee look into concerns or complaints whereby the Member provides relevant information which may challenge the decision of FNPF or raises valid points which is new to the Fund. Members may question the integrity of FNPF's decision making in the areas of:
 - i) Misguided by the information disseminated by the FNPF;
 - ii) Unfair processing practices;
 - iii) Incorrect applications of FNPF's policies and procedures;
 - iv) Incorrect actions by the Employer where Employer has made a proven attempt to correct the action;
 - v) Audit reports establishing anomalies and inconsistencies; and
 - vi) Entitlement and determination errors by the FNPF.

Meeting of the Appeals Committee is held as and when needed. The decision of the Committee shall be consensual and based on majority votes. The Committee's decision on the case is final. An information paper update is provided to the Fund Chief Executive Officer and Chief Operating Officer and when required by the Executives to ensure proper provisions on the complaints and appeals committee functions.

Section 18 of the FNPF Act allows members to complete a Review of Decision Form if they are unsatisfied with the outcome by the Committee. A review of Decision Scheme is publicly available to the members.

Furthermore, affected members and beneficiaries can file grievances relating to the Project activities via the following mediums:

- Letters or through emails;
- In person (at the FNPF service counters);
- Through the Funds toll free complaints line 11 22 77;
- Through the contact form available on the Fund’s website;
- Through the Fund’s Application (Complains Management System) which manage the complaints from members; and
- Through any of the Fund’s social media platform.

The process of grievance resolution is not expected to take longer than 5 working days for normal complaints. Complaints that require changes to the system or further investigation may take longer.

The PMU in the Ministry of Economy will review, document, and monitor the grievance redress mechanism and records throughout the project implementation period as per the requirement set out within the Project’s Environmental and Social Commitment Plan, see section 10A below.

6. DISBURSEMENTS FROM THE WORLD BANK

Under Component 1 of the Project, the amount of SDR 31.3 million is available for disbursements to Government. Due to the emergency nature of the Project, retroactive financing of up to 67 percent of total IDA financing for the Project (that is, SDR 23.3 million) will be available for payments to the Government against eligible expenditures under Category (1) made prior to the signing but on or after 26 March 2020.

Table 1: Component 1 of the Project

Category	Amount of the Credit Allocated (expressed in SDR)	Percentage of Expenditures to be Financed (inclusive of Taxes)
(1) Cash Transfers under Part 1 of the Project	31,300,000	100%

Prior to the submission of the first withdrawal application under Component 1 to the World Bank, MOE will provide to the Word Bank copies of:

- (i) FNPF internal performance audits of COVID-19 cash transfer payments;
- (ii) FNPF’s audited annual accounts associated with the cash transfer include the use of the retroactive financing;
- (iii) FNPF acquittal reports documenting the advances and the actual transfers made to the Beneficiaries;
- (iv) performance audits conducted by the OAG of Fiji (available in March 2021).

The above requirement covers all COVID-19 withdrawal application phases and is not restricted to the first WA.

The Financial Management Section of the World Bank will review all documents mentioned above. In case issues are identified, the World Bank may request additional information and recommend appropriate actions to be taken.

7. AUDITS

An annual audit of the project's financial statements will be required by the World Bank. The OAG of Fiji is mandated to audit all government funds. The audited financial statements, audit reports, and Management Letter must be received by the World Bank within nine (9) months of the end of the fiscal year and shall be made publicly available by the Recipient in a manner acceptable to the World Bank according to the International Development Association General Conditions for IDA Financing, Investment Project Financing (dated December 14, 2018 revised August 1, 2020). In addition, a separate audit opinion on the category for 'cash transfer including retroactive financing' in compliance with the Financing Agreement will be required as part of the audit assurance. A World Bank TOR for the audit will be provided to MOE as part of the audit arrangement.

Audit arrangement for the FNPF:

- FNPF Internal Audit team performs real time audit of each COVID-19 phase payments;
- PricewaterhouseCoopers audits all withdrawals of Members general account balances;
- Office of the Auditor General currently auditing the controls, accuracy and overall management of the Government top up amounts paid to FNPF Members.

8. INFORMATION SYSTEM AND INFORMATION MANAGEMENT

The FNPF information system provides a digital platform to capture the process, generate data and facilitate the required process and procedures for the implementation of the Cash Transfers. The FNPF COVID-19 Assistance Specification document details the required enhancements to ProMIS to enable an efficient processing of funds to Members in need:

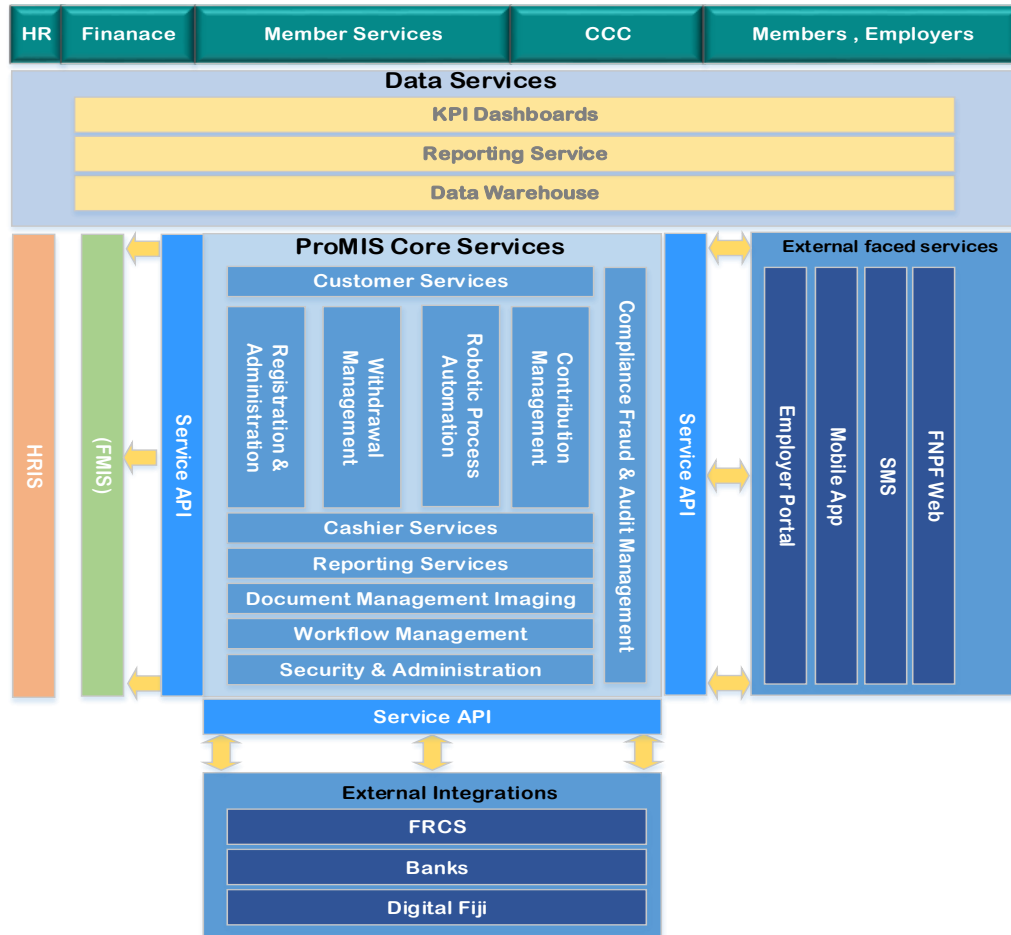
- that have reduced working hours, reduced wage rate, leave without pay and terminated or permanently laid off as part of the phase 2 rollout;
- whom continue to be unemployed that is part of the phase 2 continuation rollout;
- whom continue to be unemployed that is part of the phase Unemployment and Reduced hours continuation rollout; and
- that have reduced working hours, reduced wage rate, leave without pay and terminated or permanently laid off.

The detailed specification and features of the FNPF information system and information management can be viewed in Annex **5 (a to d)**. These software requirement specification document details of the required enhancements to ProMIS to enable an efficient processing of funds to Members in need that continued to be affected by the pandemic. The documents detailed the scope requirements, solution design overview, enhancement overview and authorize development of the enhancement on ProMIS.

- Version 1.0 – a solution design overview and covers phase Unemployment and on reduced hours.
- Version 2.0 – a solution design overview and covers affected Members that have reduced working hours, reduced wage rate, leave without pay and terminated or permanently laid off that is part of the phase 2 rollout.

- Version 3.0 – a solution design overview and applies to affected Members that continue to be unemployed as part of phase 2 continuation rollout.
- Version 9.0 – an enhancement overview and applies to affected Members that have reduced working hours, reduced wage rate, leave without pay and terminated or permanently laid off.

Below is FNPF’s COVID-19 assistance information system architecture diagram



9. PERSONAL DATA PROTECTION

The Fund has an IT Policy on confidentiality of Member’s information and is align to the Fiji laws.

Some of the required personal data information is detailed in the **Business Rule description of the IT specification documents, section 4.8, as attached in Annex 5.**

However, the templates required for collection of Personal Data is outlined below:

Personal Data collected under the Project will be processed only for purposes defined in the Project. To meet these requirements, the Recipient represents and warrants that it will, or will cause its agents or contractors acting on its behalf (including FNPF) to (and FNPF acknowledges that it shall):

- a) Process Personal Data only for purposes defined in and only for performing and achieving the objectives under the Project (“**Legitimate Purpose**”).
- b) To the extent practical in the circumstances, inform Data Subjects about the Personal Data being processed using the following form of notice, and keep a log of all Data Subjects who are so informed and where it keeps its register of other data collected in connection with this Project.

Form of notice:

“You are hereby informed that data about you is being collected for reasons. We may share or otherwise automatically process this data for that purpose only. You have the right to inspect this data and correct any errors by contacting us at [].”

- c) Process only the amount and type of Personal Data necessary for the Legitimate Purpose.
- d) Take due care to ensure that Personal Data collected is accurate, complete, and up-to-date.
- e) Take due care to secure collected Personal Data.
- f) Retain collected Personal Data only for so long as is necessary to fulfill the Legitimate Purpose.
- g) Afford Data Subjects with the ability to inspect Personal Data collected about them and correct any errors in such data.
- h) Establish a procedure for Data Subjects to seek redress for abuse of these provisions.

Related definitions used under this Section:

“**Data Subject**” means an identified or identifiable natural person.

“**Personal Data**” means any information relating to a Data Subject.

“**Processing**” means collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing, sharing or otherwise making available to third parties, erasing or destroying Personal Data collected under the Project.

Guidance & Examples (for illustrative purposes only):

1. Examples of good practices for collection and processing of Personal Data

- a) Provide access to Personal Data to third parties only where strictly necessary to achieve Project objectives.
- b) Share anonymized or aggregated data, rather than Personal Data, wherever possible.
- c) Don’t combine Personal Data from the Project with other government databases for other objectives that are not related to the objectives of the Project, such as to enforce unrelated social security contributions and tax obligations.
- d) Don’t share Personal Data from the Project for advertising purposes.
- e) Securely destroy or delete Personal Data when no longer needed.
- f) Store physical records securely, e.g., in locked cabinets or rooms.

2. Examples of data that might be considered Personal Data:

General client data of a Data Subject including, but not limited to, name, contact information, gender, age, bank account information and account balance.

10. ENVIRONMENT AND SOCIAL MANAGEMENT

The Project is expected to have immediate and long-term positive impacts to the working population and their dependents in Fiji. Information about the unemployment benefits scheme has been widely distributed across the country and is accessible to the targeted Beneficiaries including formal workers made unemployed or underemployed by COVID-19. Membership to the unemployment scheme is mandatory for all formal workers in Fiji, hence vulnerable and marginalized workers are included by law.

All activities contained within this Cash Transfer Operations Manual will be undertaken in accordance with the World Bank Environmental and Social Framework (ESF) and Environment, Health and Safety Guidelines (EHSGs) and other relevant Fijian legislation and good international industry practice (GIIP). The Project Management Unit and FNPF will ensure compliance with the Project's Environmental and Social Commitment Plan (ESCP), which is made available on MOE's website.

A. Regular Reporting:

The PMU will ensure regular reporting to the Association in coordination between the FNPF and MOE and to prepare and submit to the Association regular monitoring reports on the environmental (if any), social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities and grievances log. Details of the reporting requirement under the ESCP is made available on the MOE's website.

B. Labor Management:

The Labor Management for the Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association and in compliance with the ESCP.

FNPF will adhere to the Project's Labor Management Procedures (LMP) which has been developed and identifies the main labor requirements and risk associated with the Project and determines resources necessary to address Project labor issues. This includes the provision for ensuring that a Workers Grievance Redress is in place. Refer to **Annex 6** for a copy.

C. Stakeholder Engagement Plan:

A preliminary Stakeholder Engagement Plan (SEP) has been made available on the MOE's website to be finalised and shall be adopted by the PMU. The objective of the SEP is to define a program for stakeholder engagement around the project, including public information disclosures and consultations throughout the entire project cycle. SEP outlines the process in which the PMU will communicate with stakeholders and include mechanism by which people can raise concerns, provide feedback or make complains about the Project and its related activities. The involvement of the local population is essential to the success of the Project in order to ensure smooth collaboration between the PMU and local communities and to minimize and mitigate environmental (if any) and social risks related to the activities on the Project.

Stakeholders will be kept informed as the Project develops including reporting on Project environment and social performance and implementation of the SEP and grievance mechanism.

11. ANTI-CORRUPTION

FNPF will follow its 'Code of Fair Practice' that sets standards that will govern fair dealings between the Fund and its Members under this Project. The objectives are to promote good, fair and trustworthy practices by the FNPF in dealing with its Members and increase transparency.

The Project team in MOE and FNPF will ensure compliance with the national law and regulations and the World Bank's Anti-Corruption Guidelines.

12. MONITORING AND EVALUATION

The Project's monitoring and evaluation activities will be the responsibility of the MOE and monitoring and reporting will rest with the PMU, in coordination with the relevant FNPF departments. The progress and achievement of the PDO will be monitored and evaluated through the following activities (a) assessment of the PDO indicators and intermediate results indicators in the Results Framework, (b) Project progress reports, (c) mid-term review, and (d) Implementation Completion and Results Report at the time of the Project closing.

Table 2 provides PDO indicators and intermediate indicator for Component 1 to be monitored. Additional information is provided in Annex 7 which includes the Results Framework from the PAD, which provide periodicity of data collection, definition of the indicator and other related information. The progress and achievement of the PDO will be monitored and assessed through routine monitoring at the end of the Project implementation and to be included in the Implementation Completion report. Refer to **Annex 7 (a – b)** for the detailed result framework.

PDO Indicators	Periodicity
To mitigate the impact of the COVID-19 crisis on the income of the unemployed and underemployed	
Number of unemployed and underemployed who received Cash Transfers with the Government top-ups from FNPF (Number)	Bi-annual
Number of female unemployed and underemployed who received Cash Transfers from FNPF (Number)	Bi-annual
Percentage of Beneficiaries in the area affected by TC Harold (Number)	Bi-annual
Gap in General Account balances between female and male Beneficiaries (Text)	Bi-annual
Intermediate Indicators	
Share of unemployed and underemployed whose application were processed and approved in five business days (Percentage)	Bi-annual

Source: PAD, World Bank

13. This Manual may be modified from time to time with prior approval in writing of the Association.

Annex 1 – COVID – 19 Response Assistance Agreement for Government Subsidy between the Ministry of Economy and the FNPF

Annex 1 (a) – Phase 1 Agreement

**COVID-19 RESPONSE ASSISTANCE
AGREEMENT FOR GOVERNMENT SUBSIDY
BETWEEN
THE MINISTRY OF ECONOMY
AND
FIJI NATIONAL PROVIDENT FUND**

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**PHASE 2:
COVID-19 UNEMPLOYMENT ASSISTANCE
AGREEMENT FOR GOVERNMENT SUBSIDY**

BETWEEN

THE MINISTRY OF ECONOMY

AND

FIJI NATIONAL PROVIDENT FUND

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**PHASE 3:
COVID-19 UNEMPLOYMENT ASSISTANCE
AGREEMENT FOR GOVERNMENT SUBSIDY**

BETWEEN

THE MINISTRY OF ECONOMY

AND

FIJI NATIONAL PROVIDENT FUND

Annex 2 (a) – FNPf Phase 1 SOP

Phase 1 is in two categories with process and procedures outlined in the FNPf SOP:



SOP COVID-19
Phase 1.pdf

Annex 2 (b) – FNPf Phase 2 SOP

Three categories of Members under phase 2 with details in the FNPf SOP:



SOP COVID-19
Phase 2.pdf

Annex 2 (C) – FNPf Phase 3 SOP

Phase 3 is the final round of payments to FNPf Member with details outlined in the SOP:



SOP Phase 3.pdf

Annex 3 – SOP for FNPf Payment Process



2 FNPf - COVID 19
FINANCE Payment Pr

Annex 4 – FNPf Complaints Resolution SOP



FNPf COMPLAINTS
RESOLUTION SOP.pd

Annex 5 (a – d) FNPf Software Requirement Specifications

Outline the detailed specification and features of FNPf information system and information management are outlined in the four documents attached as Annex 5 (a to d):



COVID 19



COVID 19



COVID 19



COVID 19

Assistance_SpecificaAssistance_SpecificaAssistance_SpecificaAssistance_Specifica

Annex 6 – Labor Management Procedure

LABOR MANAGEMENT PROCEDURES: Fiji Social Protection COVID-19 Response and System Development Project (P175206)

Fiji Social Protection COVID-19 Response and System Development Project (P175206)

LABOR MANAGEMENT PROCEDURES

Annex 7 (A) – Result Framework

Project Development Objectives(s)

To mitigate the impact of the COVID-19 crisis on the income of the unemployed and underemployed, and to increase efficiency and adaptability of the social protection system.

Project Development Objective Indicators

Indicator Name	PBC	Baseline	End Target
To mitigate the impact of the COVID-19 crisis on the income of the unemployed and underemployed			
Number of unemployed and underemployed who received cash transfers with the government top-ups from FNPF (Number)		0.00	60,000.00
Number of female unemployed and underemployed who received cash transfers from FNPF (Number)		0.00	24,000.00
Percentage of beneficiaries in the area affected by TC Harold (Number)		0.00	90.00
Gap in General Account balances between female and male beneficiaries (Text)		(FJD 32)	FJD 0
Share of unemployed and underemployed whose application were processed and approved in five business days (Percentage)		0.00	90.00

Source: PAD

Annex 7 (b) - Monitoring & Evaluation Plan: PDO Indicators

Indicator Name	Definition/Description	Frequency	Datasource	Methodology for Data Collection	Responsibility for Data Collection
<p>Number of unemployed and underemployed who received cash transfers with the government top-ups from FNPF</p>	<p>This indicator measures the number of eligible FNPF members who are unemployed and underemployed as affected by COVID-19 that received cash transfer with government top-ups from FNPF. This indicator is cumulative. The indicator is disaggregated by gender (female) and by residents living in disaster-prone region. This indicator also measures that the women have received higher top-ups than the average top-up amount disbursed from FNPF</p>	<p>Bi-annual</p>	<p>FNPF Information System and administrative Data</p>	<p>FNPF MIS system reporting</p>	<p>MOE in coordination with FNPF</p>
<p>Number of female unemployed and underemployed who received cash transfers from FNPF</p>	<p>disaggregated number of beneficiaries by gender (female)</p>	<p>Bi-Annual</p>	<p>FNPF Information System and administrative Data</p>	<p>FNPF MIS system data and reports</p>	<p>MOE in coordination with FNPF</p>
<p>Percentage of beneficiaries in the area affected by TC Harold</p>	<p>disaggregated number of beneficiaries living in the area affected by TC Harold</p>	<p>Bi-Annual</p>	<p>FNPF Information System and</p>	<p>FNPF MIS system data and reporting</p>	<p>MOE in coordination with FNPF</p>

			administrative Data		
Gap in General Account balances between female and male beneficiaries	This sub-indicator measures the difference of mean account balances between female and male beneficiaries eligible for government top-ups at the time of benefit withdrawal.	Bi-Annual	FNPF Information System and administrative Data	FNPF MIS system data and reporting	MOE in coordination with FNPF
Share of unemployed and underemployed whose application were processed and approved in five business days	This indicator measures the performance of business service standard of FNPF for unemployment assistance scheme as defined in the SOP developed and maintained by FNPF.	Bi-annual	FNPF Information System and administrative Data	FNPF Information System reporting	MOE in coordination with FNPF
Source: PAD, World Bank					

Annex 8 – Website links to related documents

1. Stakeholder Engagement Plan

<file:///C:/Sisilia%20D/World%20Bank%20Docs/2020%20Fiji%20Social%20Protection%20Project/MANUALS/Stakeholder-Engagement-Plan-SEP-Fiji-Social-Protection-COVID-19-Response-and-System-Development-Project-P175206.pdf>

2. Environment and Social Commitment Plan (ESCP)

<file:///C:/Sisilia%20D/World%20Bank%20Docs/2020%20Fiji%20Social%20Protection%20Project/MANUALS/Environmental-and-Social-Commitment-Plan-ESCP-Fiji-Social-Protection-COVID-19-Response-and-System-Development-Project-P175206.pdf>

3. Code of Fair Practice – for the Fiji National Provident Fund

https://www.myfnpf.com.fj/images/About_Us/Code_of_Fair_Practice.pdf

4. Government of Fiji - Financial Management Act 2004

<https://www.laws.gov.fj/Acts/DisplayAct/962#>

5. Government of Fiji – Finance Instruction 2010

https://www.fpo.gov.fj/attachments/article/58/finance_instructions_2010.pdf