



EXPLORING THE POLICY ISSUES IN MALAYSIA MY SECOND HOME PROGRAMME (MM2H): A POLICY ANALYSIS STUDY

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Abstract:

Malaysia My Second Home Programme (MM2H) is not a new policy in the country. This programme has been implemented since 2002 and it is not a stranger to the foreign retirees and investors who chose Malaysia as their second home. Nevertheless, this programme attracted a spark of controversy due to its constant reviews that come with new requirements from time to time. As a result, the changes affected the potential applicants and the existing pass holders which hinder the programme's achievement. With that, this study aims to explore the policy issues in the MM2H programme by coordinating suggestions from academicians and policy actors who are involved in the programme. By using a qualitative approach, three policy issues were found to influence the programme's implementation success. Correspondingly, three recommendations are proposed related to the programme's structure, the programme's parent owner, and the empowerment of the MM2H Centre. Finally, this study offers a new dimension of policy studies by focusing on the progress of the MM2H programme which has not been evaluated since its establishment in 2002. Hence, this analysis is one of the pioneer studies that highlight the implementation of MM2H from the policy perspective.

Keywords:

Policy issues, Malaysia My Second Home Programme, MM2H Programme, Public Policy, Policy Analysis, Policy Transfer

Introduction

The influx of foreigners in Malaysia is among the ongoing challenges to the government. Although being previously acknowledged as a country that efficiently manages foreign workers, Malaysia also has been the focus of international media related to cases of misconduct against foreigners in recent years (Economist, 2020; Anderson, 2020).

In the past two years, Malaysia was accused of being a country that practices discrimination against foreigners based on “inhumane behaviour” during the Movement Control Order (MCO) period (Aling, 2020; Wahab, 2020). Accordingly, the Malaysian government has explained that the foreigners who are allegedly abused were illegal immigrants (PATI) who entered Malaysia without valid documents. Nevertheless, the treatment given is based on stipulated laws as enforced in other countries. In fact, the Malaysian government is deemed considerate by providing protection, mitigating the risk of disease, covering the cost of food and managing the repatriation of illegal immigrants for free (Bernama, 2020).

Before the discussion proceeds, the general public should understand some categories of foreigners in Malaysia. Unfortunately, it is uncommon for past studies to clearly describe the different categories of foreigners. In the simplest form, foreigners can be described as non-citizens who come or enter another country.

In Malaysia, the Malaysian Immigration Department under the Ministry of Home Affairs (MOHA) manages the procedures of entry and exit of citizens and non-citizens into Malaysia (Malaysian Immigration Department, 2021). According to the Malaysian Immigration Department (2021), there are two categories of foreigners in Malaysia, namely (1) foreigners and (2) foreign workers. Foreigners mainly refer to expatriates, foreign students, tourists, and MM2H participants. Meanwhile, foreign workers include labour from certain countries to work in sectors permitted by the Malaysian government (such as the manufacturing, construction, agriculture, plantation and service sectors) including domestic workers (Malaysian Immigration Department, 2021).

Difference Between Documented And Undocumented Foreigners

In some cases, previous studies also use the term foreigner to refer to foreign workers or refugees (Ajis et al., 2018; Rahim et al., 2019; Zulkipli & Ma'alip, 2021). However, to be specific, foreign immigrants are divided into two more sections, namely *Pendatang Asing Tanpa Izin* (PATI) and *Pendatang Asing Dengan Izin* (PADI). Nevertheless, the term PATI is more often used widely in the mass and electronic media compared to the use of term PADI which is commonly used at the ministerial level and in academic studies only (Abdullah, 2020). PATI is the term used to describe undocumented foreigners/foreign workers, whereby PADI reflect the documented ones.

Looking at the current scenario where the general public often labels foreigners as PATI, the Immigration Department community network has provided an infographic on the difference between PATI and PADI on their unofficial social media (Friends of Immigration, 2020). However, until now there is still a lack of public awareness of the difference between PATI and PADI. The contribution and support of these two categories of foreigners to Malaysia's economic development are very significant (Berawi, 2019; Selamat, 2022). However, prejudice and social disparity towards PATI have resulted in the PADI group being exposed to discrimination by the general public in Malaysia against foreigners as a whole.

It should be noted that normally, PADIs are documented foreigners with skilled, professional or high-income skills who temporarily reside in Malaysia to drive the global market in the country (Nor et al., 2015; Khan et al., 2019; Ridzuan et al., 2021). Therefore, unfair treatment by Malaysians towards the PADI group will harm the country and hinder the Malaysian government's efforts to liberalize foreign human capital through the sharing of experience

and expertise by PADI. Realizing this fact, this study focuses on PADI to fill the knowledge gap related to PADI affairs in Malaysia, especially among those who participate in the MM2H Programme.

Malaysia My Second Home Programme (MM2H)

Based on the records of the National Archives of Malaysia (ANM), the MM2H Programme was officially launched on 24 June 2002 by Tan Sri Abdul Kadir Sheikh Fadzir (former minister of the Ministry of Tourism and Culture). Based on statistics from field research (refer to Table 1), MM2H participants consist of 131 countries which are topped by Chinese nationals (31.6%), followed by Japanese nationals (11.1%) and Bangladesh nationals (9.5%).

Table 1: Statistics of the MM2H Programme

No	Country	2017	2018	2019	Total	%
1.	Republic of China	2,923	1,495	1,011	13,892	31.6
2.	Japan	352	233	104	4,882	11.1
3.	Republic of Bangladesh	451	191	52	4,187	9.50
4.	United Kingdom	200	105	38	2,729	6.20
5.	Republic of Korea	693	449	190	2,568	5.80
6.	Other countries	1,576	866	277	15,685	35.8
TOTAL		6,195	3,339	1,672	43,943	100

Note: This is the latest published data from the government before COVID-19.

Source: Field Research (2021)

This program was created as one of the Malaysian government's initiatives to attract foreigners who meet certain criteria to live in Malaysia with a Social Visit Pass that can be renewed every 10 years (Wong & Musa, 2020). MM2H participation is open to foreigners from any country that has diplomatic relations with Malaysia regardless of age, gender, religion, or skin colour. The programme successfully places Malaysia as one of the best countries in Asia for the most ideal retirement destination in the world (Parliament - Aziz, 2014; Davison, 2019; Eisenberg, 2021).

Looking at the main objective of the MM2H Programme, the Malaysian government through the Ministry of Tourism, Arts and Culture (MoTAC) targets high-income groups from abroad to boost the tourism industry and real estate development market in Malaysia (Parliament - Aziz, 2014; Rishyakaran, 2021). Initially, this program was known as the Silver Hair Programme (SHP) which was established in 1987 by the Immigration Department to attract retirees from a few selected countries to reside in Malaysia for a certain period (Guan, 2018).

Current Issues Related To The MM2H Programme

Going back to the history of the MM2H programme, it was initially introduced by the Immigration Department as part of a special visa programme. However, after the MoTAC took over, the MM2H Programme was seen as successfully boosting the country's tourism subsectors including the real estate, automobiles, education and medical field (Guan, 2018; Rishyakaran, 2021). In fact, MoTAC has also succeeded in encouraging foreign investment in Malaysia with a total of RM40.6 billion through the purchase of the real estate, funding for education, medical services, and daily expenses in terms of living costs, rental and vehicles purchase, accommodation and miscellaneous expenses (Hasnol, 2021; Rishyakaran, 2021).

Despite this revenue, the success of a policy is not subject to the measurement of economic performance alone.

From an opposite view, the MM2H Programme is believed to be diverted from the original objective of attending to the global ageing population. Not only that but MM2H is also entangled in various political disputes and alleged criminal cases linked to this program (Zin, 2021). With a series of controversies involving the MM2H Programme, the responsible ministries (MoTAC and Ministry of Home Affairs - MOHE through the Immigration Department) had revised and temporarily frozen the programme several times to restructure the MM2H progress (Sanusi, 2021).

Yet, the reviews conducted are usually ad-hoc and not comprehensive (Guan, 2018). This situation has raised numerous financial complications for the stakeholders especially the certified consulting companies and real estate developers registered with MoTAC have lost their livelihoods (San, 2020; Hasnol, 2021; Rishyakaran, 2021). Worse still, the country's economy is estimated to suffer losses in terms of lack of investment potential when applicants turn to compete with countries such as Thailand and the Philippines (Ng, 2018; Parliment-Wai, 2020).

Problem Statement

Looking at the advantages of the MM2H Programme for Malaysia's economic development, there is an urgent need to carry out a comprehensive policy analysis. In fact, the Malaysian government's support for accommodating foreign senior citizens through the MM2H Programme is fading and the changing political landscape in Malaysia has further clouded the current situation.

This can be seen when the MM2H Programme applicants have to wait for the application results for almost a year (from September 2018 until July 2019), although according to the Standard Operating Procedure (SOP) the waiting time should be for 120 days only (Parliment-Wai, 2020). As a result, more than 90 per cent of applications were rejected without any reason given (Kumar, 2020). The political turmoil since the government transition from Barisan Nasional to Pakatan Harapan has proven to come with some drastic changes that have heightened the public frenzy toward foreigners (Reuters, 2018).

To deal with this problem, policy analysis using the policy transfer approach was chosen to examine the weaknesses of the MM2H Programme that warrant the Malaysian government's attention urgently. By referring to past studies, literature related to the MM2H Programme from a public policy point of view is very limited. On average, previous scholars discuss the factors that influence the motivation of MM2H participants (Guan, 2018; Khan et al., 2019; Mariadas et al., 2020). Meanwhile, the majority of MM2H studies focus on the participants' perspective only (Abdul- Aziz et al., 2014; Jayaraman et al., 2019; Wong & Musa, 2020).

Apart from the loss to the country's investment and economic potential, the MM2H issues also resulted in Malaysians' prejudice and discrimination against foreigners. On the other hand, the confusion regarding the categories of foreigners and participants of the MM2H Programme has also never been studied in depth. With that, this article focuses on practical solutions to resolve problems involving documented foreigners in Malaysia with a policy analysis of the MM2H Programme from its grassroots causes.

Technically, the MM2H Programme has never been comprehensively studied since its establishment in 2002. In fact, the transfer of power of the program owner has caused gaps in information such as documents related to the policy formulation process that are not properly recorded (Guan, 2018). This limited information has made the ministry avoid conducting comprehensive policy analysis. From time to time, this program also faces various other challenges as listed in Table 1.

Table 1: Challenges in the MM2H Programme

Challenges	Description
1. Unclear requirements	Due to the frequent changes in the program structure - In terms of age, finances, bank loan eligibility, <i>etc.</i>
2. Conflicting instructions	Due to the inconsistent top management decision from different ministries.
3. National issues	Including the land ownership issues, the Forest City Scandal, citizenship status (Permanent Resident), and so on.

Source: Field Research (2021)

Justifications To Include Academicians And Policymakers

Worth to note that, this article is an excerpt from the policy paper that was submitted to the selected ministries, information sharing of study findings to improve the MM2H Programme. Based on preliminary observations from the literature, the problems that exist in the MM2H Programme are based on conflicting instructions from top management who have obvious differences in terms of the functions and duties of the ministries involved (Guan, 2018).

Upon realising this fact, the involvement of academics and policymakers is very critical in solving problems related to public policy in Malaysia (Osman et al., 2022). Impartial and neutral, both parties are considered competent parties who can find a rational and practical solution. When compared to the practice of solving public policy problems before, most solutions are decided by the highest levels of government who are not actually directly involved in policy implementation (Satar, 2021).

For that reason, quoting recommendations from Professor Edmund Gomez, the government should involve industry players or policymakers in efforts to improve existing policies to reflect a good governance system with integrity and relevance (as stated in Abdullah, 2019). Looking at the early history of the MM2H Programme, which was rebranded from the previous program, which is SHP, this study decided to adapt the Policy Transfer Theory using the Policy Transfer Framework by Dolowitz and Marsh (2000).

Policy Transfer Framework

Based on the problems explained above, this study opts to adopt the policy transfer approach as a guideline to study the MM2H Programme. This approach refers to the process where knowledge about a policy, administrative affairs, institutions, and ideas in a country (in the present or the past), is 'borrowed' or used in formulating a policy in another time or place (Common & Gheorghe, 2017; Dolowitz et al., 2019).

As stated by previous researchers, the role of policymakers from the beginning of the policy transfer process is important because they influence the direction of a policy (Dolowitz & Marsh, 2000; Common & Gheorghe, 2017; Stone et al., 2020). Therefore, the policy transfer approach was chosen as a solution to the problems that exist in the MM2H Programme because this approach gives the researcher space to study (1) the original purpose of this program and identify (2) where this program was 'borrowed' from.

According to Dolowitz and Marsh (2000), the policy transfer framework they highlighted is a comprehensive framework by combining the synergy of ideas from previous scholars. Containing eight main questions, this framework has been revised several times with improvements in the quality of policy transfer measurements.

In conclusion, this framework has been used as a reference by many countries for various fields such as public administration in China (Zhang & Yu, 2019), crime policy in Scotland (Graham & Robertson, 2021), elderly policy in South Korea (Woo & Choi, 2020) and immigration policy in Canada (Bertram et al., 2019).

Research Methodology

This qualitative study was conducted by a research team from the Political Science Division, School of Distance Education, Universiti Sains Malaysia. The duration of this study is one year, starting from March 2020 until March 2021.

By using elite interview techniques and document analysis, data for this study was also collected through a review of policy documents, archival records, and personal note-taking. However, the identity of the informant needs to be kept confidential because the data obtained belongs to the ministry. This study also wants to point out that the information collected is regarded as the informants' perspectives based on their personal and professional experiences as public servants in Malaysia.

Accordingly, the elite group selected in this study consist of a group of professionals in their respective fields who can contribute to the in-depth knowledge about the MM2H Programme, namely; (1) policymakers involved in the program implementation and (2) academicians with research backgrounds related to Malaysian public policy. In terms of policy documents and archival records, the Malaysian Parliament and the National Archives of Malaysia were also selected as informants. Secondary data is also collected online such as journal articles, theses, and newspapers for comparison and data triangulation process.

The criteria for selecting informants for this study are civil servants with Grade 41 and above who are involved in the implementation of the MM2H Programme (policymakers) and academicians with experience in policy research at least in the last two years. The interview session was recorded after obtaining the informants' consent and they were reminded that they were allowed to withdraw at any time as they wish. With that, the informant's involvement in this study is voluntary and the interview session is conducted according to the informant's convenience based on a time and location that suits their work schedule.

Data Analysis

In this study, data analysis using case studies was used based on the recommendations of Creswell and Poht (2018) and Yin (2018). Although not using qualitative data software such

as Nvivo or Atlas.ti, manual data analysis is seen to be able to help researchers understand the study subject more deeply.

Although various user-friendly features and intuitive elements are included in qualitative data analysis software, the human brain's ability to classify codes and themes can reflect more valuable information, meaning and interpretation of the data collected (Jasmi, 2012). In addition, data interpretation can also be analysed more accurately using elements of intuition, emotion and researcher experience compared to analysis algorithms using rigid and limited computer software.

After the audio recordings of the interviews were translated into written form (transcribed), data patterns were identified and recurring patterns were labelled as codes. Code lists were compiled to form themes and data relationships (Yin, 2018; Ahmad et al., 2021). According to Creswell and Poth (2018), after no new information is obtained, the data collection process is stopped which indicates that the study data has reached saturation point.

At the same time, policy document analysis is conducted simultaneously for triangulation or data verification. At this stage, the results of the analysis of interviews and policy documents are organized and combined according to the code set to become the theme of the study (Creswell & Poth, 2018; Yin, 2018). With that, the data analysis step has ended and the research findings are compiled according to the needs of the ministries involved, which are MOHE and MoTAC.

Study Findings and Discussion

The findings of this study summarize the analysis of the MM2H Programme implementation since 2002 (see Table 2). The main policy issues discovered were found to be affecting the reputation of the MM2H Programme and suggestions were collected for policy improvements from the point of view of academics and policymakers. Meanwhile, the use of policy transfer theory has unravelled underlying problems in the MM2H Programme for a long time.

Table 2: Summary of findings

Programme Restructure	Determine the Parent Owner	MM2H Centre Empowerment
a. Tightening enforcement	a. Reassign the responsible ministries	a. Set up a centralised database
b. Intensify monitoring operations	b. Switch the parent owner	b. Develop a mobile application
c. Border control monitoring		c. Create social media accounts
d. Revision of application requirements		

Source: Field Research (2021)

As admitted by the majority of the informants of this study, the MM2H Programme does not have an official policy document or record because this program is an extension of the previous programme from the past and different ministries. Therefore, it is not an

overstatement if it is said that no party has access to the policy document or the actual action plan since the establishment of the MM2H Programme.

The implementation of this program continues from year to year according to the Standard Operating Procedures (SOP) according to the own interpretation of the Division or Unit of the respective ministries. The inconsistency of instructions from different ministries has become a silent cancerous tear that disrupts the implementation of the program and has negative impacts on the reputation of the MM2H Programme.

Overall, this study revealed three main factors that need to be improved for the improvement of the MM2H Programme based on an analysis of the perspectives of academicians and policymakers involved in the programme. As a result of the data analysis process, eight recurring codes were identified: including issues related to (1) enforcement, (2) monitoring, (3) border control, (4) revision of application's requirement, (5) re-assign parent owner, (6) providing a centralised database, (7) mobile applications, and (8) creating social media accounts for the MM2H Programme.

Programme Restructure

Looking at the weaknesses in the MM2H Program, the majority of informants in this study believed that the overall structure of the program needs to be revised. In particular, authorities responsible for law enforcement such as the Malaysian Immigration Department or the Royal Malaysian Police (PDRM) need to be trusted to be involved in the enforcement and monitoring aspects of the program. With the powers that the Immigration Department and PDRM have, MM2H participants, can be controlled more systematically, especially in cases of not complying with the period set to be in Malaysia (overstay) and carrying dependents that exceed the set quota. In general, the MM2H participants are allowed to bring their family members that must be registered as their dependents. However, in some cases, they do not declare or register their family members which indirectly means they brought 'undocumented' people into Malaysia.

Tightening Enforcement

Although the implementation of strict enforcement such as patrols and surprise raids has proven to be successful in reducing the crime rate among foreigners, this study also takes into account the authority constraints, workload and cost for each enforcement operation involving Immigration Department and PDRM members. Realising this fact, the Malaysian government is advised to encourage the new MM2H Programme participants to comply with the conditions of the Alert/Notification of Presence.

This notification is proposed based on reference to the method employed by the Thai government in monitoring foreigners in the country (Bruton, 2019). Only by filling in a specific form (recommended one page only - Example: Form A1), MM2H participants need to inform their last address.

However, it should be noted that these conditions are not meant to limit or restrict the participant's movement. In fact, in accordance with the latest scenario of the COVID-19 pandemic, the Malaysian government is urged to take precautionary measures to ensure the safety of all parties including the MM2H participants themselves. Therefore, the existence of

MM2H participants in the community does not upset fellow Malaysians because the authorities have been informed. Therefore, the citizens have nothing to worry about.

Intensify Monitoring Operations

This study also recorded some complaints from study respondents who were disappointed with the monitoring problems in the MM2H Programme. Without monitoring from the authorities, it is feared that MM2H participants feel ‘untouchable’ and ‘immune’ to the laws of this country because they have been in Malaysia for a long time. In terms of law, this situation is referred to as a Crime of Opportunity.

As mentioned in the previous discussion, two main issues that require the attention of the Malaysian government include: (i) the issue of overstaying and (ii) the number of unregistered dependents. Both of these issues need to be dealt with in firm action to avoid the malpractice or misuse of visas and passports in Malaysia. Therefore, the findings of the study suggest that the MM2H Centre establish a Monitoring Unit (at least two employees) to monitor the MM2H participants over the phone.

This condition should be clearly stated that the Malaysian government through the MM2H Centre will contact MM2H participants at least once a year to review the amount of liability for each principal. As additional information, the principal is the head of the family or the main applicant referred to as the principal. Meanwhile, family members who are brought together are referred to as dependents.

Further, a visit to the participant’s home should be done (if necessary) for review or security purposes. This suggestion is proposed by referring to the Thai and the Philippines governments that successfully manage foreigners who participate in similar second home programmes. The government’s efforts to take the initiative to involve the local community through cooperation with the public to channel information directly to the authorities have reduced the crime rate involving foreigners (Tantravanich, 2018; Bruton, 2019).

Border Control Monitoring

As an additional step, specifically referring to the border control method practised by the Australian government, monitoring the movement of participants can also be done through airline support (Coyne, 2019). In collaboration with airlines, the MM2H Centre through the Monitoring Unit is advised to obtain data or flight logs involving MM2H participants every six (6) months or once a year.

Using the latest and increasingly sophisticated technology, airlines only need to send flight records involving MM2H participants in terms of the flight date, departure location and flight destination. In fact, looking at the existing program conditions, MM2H participants have been informed that their private data will be extracted in any case for security and monitoring purposes. So, there is no data privacy issue in this case.

Revision Of Application Requirements

Although enforcement and monitoring strategies are proposed to regulate MM2H participants, the review of application conditions is more geared towards administrative affairs and public sector efficiency. In this regard, policymakers should provide

comprehensive guidelines and consider input from various stakeholders and industry players such as academics, non-governmental organizations, and residents' associations.

For example, for any government activity related to land issues, the government should refer to (i) the state government, (ii) real estate developers, (iii) local leaders, and (iv) non-governmental organizations such as *Sahabat Alam Malaysia*. Without the collaborative efforts of the relevant parties, this program will reach a dead end.

In addition, a more effective improvement for the MM2H Programme is to limit the quota of MM2H participants as regulations are being used by the Thai government. In fact, Thailand is also seen as one of the most consistent countries in attracting foreign investors through the Thailand Elite Visa and Retirement Program. Among the keys to the success of their programs are the Thai government's decision to limit long-term visa applications to (i) specified countries and (ii) the number of participants will be limited according to nationality (Limcaco, 2019).

In line with the method aforementioned, this study suggests the Malaysian government to limit the quota of participants to only 30 - 40 per cent for each country (for the demographic balance aspect) and limit the national quota for certain countries only whether they consist of developed or developing countries only at discretion (for national security aspects).

Determine the Programme's Parent Owner

After the structure of the MM2H Program is updated, the next demanding attention is the determination of the parent owner of the program. In short, MoTAC sees MM2H as an aspect of national investment to stimulate the Malaysian economy. Meanwhile, the Ministry of Home Affairs through the Immigration Department focus more on security measures because it accentuates the national security aspect. This conflict of instructions and working methods makes it difficult to implement the MM2H Programme because both parties stick firmly to the specialised functions of their respective ministries. Therefore, the decision to determine the responsible ministry (to one ministry only) and the transfer of power are seen as corrective measures to steer the policy direction.

Reassign The Responsible Ministries

Once the structure of the MM2H Program is refined, the reassignment of the responsible ministry requires serious attention. As a brief overview, the MM2H Programme is an extension of the SHP Program managed by MOHE (1987 - 2004) but after 2005 (2005-2021), the MM2H Programme is managed by MoTAC.

As mentioned before, these two ministries have different work ethics and the main focus (core business) is the opposite of each other. MoTAC focuses on profit derived from the tourism sector, while MOHE focuses on national security factors. In any government activity plan that involves national interests, policy issues that require coordination from various public sector organizations are more likely to be complicated and complex at the implementation level. Even worse, the absence of guidelines in implementing the MM2H Programme has complicated teamwork within the MM2H Centre.

After considering inputs from various parties, this study suggests that the MM2H Programme should be returned to MOHE. Specifically, MM2H should be under the Malaysian

Immigration Department because MM2H participants are not just tourists. Indeed, the movement of foreigners to enter and exit Malaysia involves aspects of national security. Again, with the current situation of COVID-19, the control of the foreigner's movement is very crucial. In fact, the management of the MM2H Programme coincides with the scope of work under the Immigration Department where the issue of visas and passports is more systematic and can be accelerated if the MM2H Programme is placed under the jurisdiction of the Immigration Department.

Switch the Parent Owner

Technically, MOHE is the legitimate owner of the SHP Programme and MoTAC is the owner of the MM2H Programme. However, the final authority in approving the MM2H Programme is in the hands of MOHE, not MoTAC. It is clearly seen that the overlap of powers between the two ministries has resulted in the uncertainty of the direction of the MM2H Programme.

Aware of this conflict, the Malaysian government is proposing to give absolute authority to the MM2H Centre as an independent agency without interfering with the structure of the two ministries. From a practical point of view, this study recommends placing the MM2H Centre under the Immigration Department (MOHE) as the sole owner of the MM2H Programme. For the position of MM2H Programme Director, the findings revealed that the Program Director should be appointed from among Immigration Department officers who have experience managing foreign affairs.

In terms of the placement of staff and officers at the MM2H Centre there is no need to re-organize or re-shuffle because even though the program owner has changed the ministries, the responsibilities of the MM2H Centre staff are still the same. Thus, the Malaysian government can save costs from the relocation of staff involved or the need to recruit new candidates to run the MM2H Centre.

MM2H Centre Empowerment

Efforts to empower the MM2H Centre are significant because the transfer of power from MoTAC to MOHE gives appropriate authority to the implementation of the MM2H Programme. At a glance at the position of the MM2H Centre, this study suggests that the MM2H Centre be transferred from MoTAC supervision to MOHE and given certain powers as an independent agency. This time, the MM2H Centre needs to improve the existing governance situation by providing a centralised database, designing mobile applications and creating social media accounts.

Set Up A Centralised Database

Due to the lack of coordination and synergy between MoTAC and MOHE, the Malaysian government is advised to maintain the MM2H Centre as a One-Stop-Centre. Additionally, in empowering the MM2H Centre, this study combines ideas and views from academicians and policymakers so that the Malaysian government through the Malaysian Parliament appoints the MM2H Centre as an independent government agency (with legislative powers) to make specific regulations in the implementation of the MM2H Programme.

Based on the data obtained from this study, it is fair to say that MoTAC and MOHE do not participate in government open data and it is found that they do not have a database specific to the MM2H Programme. Acting on the situation, this study suggests to the Malaysian

government create a centralised database to increase government transparency and also help the ministry make accurate decisions based on accumulated data. In fact, systematic data collection (through a database) allows applicant and participant data to be stored systematically and centrally.

Thus, these data can be made available at any time by interested parties, especially in making policy decisions (such as the current situation that requires immediate analysis related to foreigners and MM2H participants). To make this database a success, this study suggests that various incentives be channelled to data clerks (Recommendation: 3-5 admin or Daily Part-time Workers - PSH). This incentive can be given in terms of annual KPI scores, certificates, or additional allowances according to the data targets entered. Therefore, the staff of the MM2H Centre involved do not feel burdened with the tasks given.

Develop A Mobile Application

Next, the proposal to design a mobile application aims to facilitate and match the needs of MM2H participants with the services provided by the Malaysian government. The objective of mobile application development is two-fold, namely (1) to monitor movement and (2) to assess the well-being of participants. Until now, the MM2H Programme does not have a special monitoring method to track the whereabouts of participants to assess the program's risk management.

It should be noted once again that the MM2H Programme does not restrict the movement of participants but notification of the presence and movement of participants must be recorded for policy assessment matters with urgent needs such as the risk of contagion of COVID-19.

This study suggests that MM2H participants download the MM2H 2.0 Programme application as soon as their application is received by the MM2H Centre. Basically, this application is designed for the purpose of documentation by the Immigration Department through real-time communication using geolocation (GPS) and *selfies*. Specifically, this application is expected to access the location, health status, and validity period of passports and visas of MM2H participants.

Create Social Media Accounts

It should be noted that the proposal to create a database is very important in helping policymakers make rational and accurate decisions. Meanwhile, the use of mobile applications can reduce the bureaucratic burden faced by MM2H participants when dealing with government services. These two technology proposals are considered 'internal' solutions to improve the efficiency of the public sector, especially in the smooth implementation of the MM2H Programme.

On the other hand, to foster participation from potential foreign applicants and the general public in Malaysia, the Malaysian government is proposing to create a social media platform to publicise the MM2H Program. In fact, the use of social media for the MM2H Programme is expected to be an effective government communication tool in an effort to disseminate accurate and authentic information related to the MM2H Programme. This statement can be further strengthened by a study by Akinola et al. (2021) which was conducted in Nigeria. The study's findings show that using social media platforms (government and people) can increase people's trust and support for the government.

In addition, announcements and sharing of activities from the MM2H Centre such as listing activities involving MM2H participants (For example: Hi-tea ceremony, national language program, charity work, *etc.*) are seen to be able to attract tourists or foreign investors to participate in MM2H. To realise this effort, the Social Media Unit needs to be introduced by the MM2H Centre where the staff on duty must have extensive skills and knowledge in managing social media platforms professionally. In this situation, government operating costs can be saved because the MM2H Centre only needs support group staff at the administrative level to manage the Social Media Unit.

Further, the recruitment or reassignment of Daily Part-Time Workers (PSH) at the MM2H Centre is beneficial as this scheme is exempt from overtime pay, insurance, and bonus. In addition, payment of salary or wages is only based on working days, excluding weekends, public holidays, or non-duty days.

It should be emphasised here that this service scheme is not intended to exploit the working force but it is part of the Malaysian government's initiative to reduce public service operating expenses and increase the employability rate of college and university graduates. In fact, the short-term unemployment rate (generally three to nine months) can be reduced through this PSH scheme (Public Service Department, 2011).

Conclusion

In conclusion, this study makes a significant contribution to the development of knowledge related to the policy formulation process and the actual implementation method of a policy in Malaysia. This study reveals the importance of policy evaluation over time because changes in time and current conditions have been found to have changed the direction of the original MM2H Programme policy. In fact, this finding is deemed among the first analysis to unearth the internal issues of the MM2H Programme in depth.

In detail, the findings of this study also found that the MM2H Programme needs to be improved in terms of (1) structuring the program, (2) re-assigning the program owner, and (3) efforts to empower the MM2H Centre. In fact, acting on the interests and factors of national security, the MM2H Programme needs to be placed under the jurisdiction of MOHE through the Immigration Department to curb possible commercial and organised crimes such as the increase in cybercrime cases especially involving foreigners.

If the MM2H Programme continues under the supervision of MoTAC, MoTAC does not have the capacity to control and punish foreigners due to the limitations of existing legal powers in Malaysia. But MOHE practically has a certain strength and power to fight transnational crime. Therefore, arising issues involving MM2H participants are easier to handle by MOHE.

Thus, the findings of this study are expected to be used as a foundation for further studies in the field of public policy, especially those related to the policy transfer approach. In conclusion, special attention should be given to the involvement of academicians and policy actors to evaluate the implementation process and the achievement of a policy from time to time. Not only that, but this study also posed suggestions for future studies to consider the MM2H participant's perspectives to be matched with the findings of this study involving the policy perspectives for a more comprehensive policy improvement.

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