



Punjab Urban Land Systems Enhancement (PULSE) Project

Stakeholder Engagement Plan

November 2021

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Executive Summary

The overall objective of PULSE is to provide beneficiaries in Punjab Province with improved land records and identification of land for development including housing programs. The project has five components including: 1) Digital Land Records and Cadastral Maps for the Land Records Management Information System (LRMIS); 2) Land for Housing; 3) Integrated Land and Geospatial Information Systems and Services; 4) Project Management and Institutional Strengthening; and 5) Contingent Emergency Response Component (CERC). The project is being prepared under the World Bank's Environment and Social Framework (ESF) and is expected to have 'High' social risk while environmental is anticipated to be moderate. The social risk is deemed high as more disputes over land ownership are likely to come to light as cadastral maps are updated and properties registered. The second risk relates to the process of identification of state land and possible mobilization of such lands for development programs. The identification of the land itself may give rise to disputes.

Stakeholders include both those who are clearly and unquestionably affected by the project and those who do not experience direct impacts, but who have an interest in how the project proceeds. The key stakeholders for Punjab PULSE are as follows.

Landowners and Property Owners: Parcel mapping and registration for the entire province (including urban and peri urban areas) is a key activity to be carried out in the project, and this will affect millions of land and property owners.

Housing Societies: The project will also significantly impact the functioning of housing societies and the activities of property developers. With land ownership documentation in place, property development will be a relatively transparent area of economic activity.

Real Estate Renters and Buyers: The creation of a land registry will be invaluable for the smooth functioning of a real estate market, and will promote transparency and accountability in all transactions.

Residents of Katchi Abadis/informal settlers: Residents of non-regularized katchi abadis, or informal settlers on state land will be affected by project processes, in that state land will be clearly identified as such, and will be systematically registered. Their rights of residence will thus either be recognized through the regularization process notified by the GoPb; or the government may decide to use the land for development purposes or another purpose, and they may be asked to vacate the land.

Surveyors Hired and Trained: The project will hire a cadre of village level para-surveyors and train them in land surveying techniques, as well as in identification of parcel boundaries. As such, a small group of educated youth will benefit from skill development in a technical field.

Other interested parties include skilled surveyors and IT professionals, elected representatives, and of course the general public.

Three vulnerable groups have also been identified for this project, and the stakeholder engagement process will be sure to include them in future consultations. These include women who are potentially inheritors of property, residents of katchi abadis and vulnerable groups such as minorities and the landless who may be settled on state land.

The purpose of stakeholder engagement is to ensure that all groups that either have an interest in the project, or stand to be affected, can participate in the project design process to identify flaws and point out possible obstacles; engage in implementation by highlighting what is going well and what isn't; and generally work with project proponents to ensure that the project proceeds such that its benefits are multiplied and possible negative fallouts minimized. In the preparation stage, given time constraints, engagement will be limited to interactions with program affected parties. In the project implementation stage, the emphasis will be on disseminating information on how activities are proceeding, getting feedback on impacts, and consultations on how activities can be carried out such that any negative effects (if any) are mitigated. Engagement after program conclusion will focus on all identified stakeholder groups. At this stage of the process, the emphasis will be on understanding whether the project has achieved its objectives. It is vital that accurate information is disseminated to the relevant stakeholders and the affected parties at the beginning, and updates are provided at regular intervals as the project proceeds. Various modes of communication will be used to disseminate the necessary information, including community meetings, stakeholder workshops, public display of information and messages communicated through social media. Details of strategies for different groups are given in the report. A Social Specialist will be appointed amongst project staff who will formulate a strategy to regularly reach out to vulnerable groups.

A Grievance Redress Committee (GRC) will be constituted at the main project implementation unit, managed by a Grievance Redress Management Specialist (GRMS). The committee will include members from all implementing agencies. An online complaint registration system will be set up for the project, which will also link with the PLRA's existing system. Grievances/complaints will be screened and classified into three categories by order of priority, with those requiring instant action being classified as high priority, and will be investigated and resolved within the timeframe specified, which will not be longer than ten days. If resolution demands longer than this timeframe, the complainant will be informed. Records of all grievances will be maintained in a database, including details of actions taken to resolve the issue, and dates on which resolution was effected. The system will include a system for Appeals. A monitoring unit will also be set up in the PIU. Microsoft Information Management System shall be developed based on formats for review and monitoring that have already been agreed upon and developed. PIUs will hire an experienced agency for development and customization of this system.

This SEP will be periodically revised and updated as necessary in the course of project implementation.

1. Introduction

The Government of Punjab (GoPb) has requested the World Bank to provide assistance to enhance land management systems in Punjab. The GoPb is in the process of designing the Punjab Urban Land Systems Enhancement (PULSE) project for the purpose. The project is being prepared in collaboration with the World Bank, and is being led by the Board of Revenue (BOR). Other key institutions involved are the Punjab Disaster Management Authority (PDMA), the Punjab Land Records Authority (PLRA), and the Directorate Land Records (DLR). Institutions such as Survey of Pakistan (SOP) will provide key support.

1.1. Project Description

The overall objective of PULSE is to provide beneficiaries in Punjab Province with improved land records and identification of land for development including housing programs. The project has five components including: 1) Digital Land Records and Cadastral Maps for the Land Records Management Information System (LRMIS); 2) Land for Housing; 3) Integrated Land and Geospatial Information Systems and Services; 4) Project Management and Institutional Strengthening; and 5) Contingent Emergency Response Component (CERC). The first component will create a spatial framework for the LRMIS, in addition to creating systems to register peri-urban and urban property, and upgrading property tax records accordingly. The second component will develop an inventory of state lands asset and management strategy. The third component will integrate information from a variety of sources with the LRMIS to create an integrated land records portal. The component will also establish the infrastructure for maintenance of records on spatial data in the province. The fourth component will provide policy, legal and regulatory support to the project, carry out monitoring of project activities and disseminate information on the project, among other administrative functions. The CERC component is supposed to finance activities that may arise in an emergency.

Key activities in the four main components are briefly described as follows.

Component 1: Digital Land Records and Cadastral Maps for LRMIS

This component is mainly concerned with developing a seamless cadastral map linked to digital land records in both rural and urban areas for the whole province. This will entail georeferencing revenue maps (*masawi*) to the national coordinate reference system, examining claims, and producing final rural parcel maps. Key activities include preparing the spatial framework for the LRMIS, registration of peri-urban and urban properties, and upgrading tax records to urban land records.

Component 2: Land for Housing

This component will support government agencies to identify and mobilize suitable public lands for development programs. This component will consolidate the state lands identified under Component 1 and the paper records kept by various government authorities. These state lands will be digitalized, georeferenced, and stored in a database in LRMIS to build an inventory of state lands asset. The project will finance the establishment of public lands asset management procedures and good governance with a monitoring system to ensure transparency and accountability.

Component 3: Integrated Land and Geospatial Information Systems and Services

This component will focus on establishing a modern Land Information System, unifying and integrating rural and urban land records. Key activities will include strengthening the new LRMIS with advanced GIS features for managing spatial information; and developing an integrated Land Information Portal, which will be used to provide a number of e-services. One of the key components of the portal will be a digital cadastre map of unified rural and urban land parcels. For the new, integrated system to function effectively, it will be crucial to strengthen existing Data Centers and other backup sites. The component will thus also invest in increasing data storage, power backups and server equipment, together with software licenses, required to run ICT infrastructure. Apart from the main Data Center upgrades, similar mirrored upgrades would be carried out in backup sites.

Component 3 will also support the mapping activity being carried out under Component 1 by working with SOP to establish a common reference system of all mapping products, thus contributing to developing a nationally consistent spatial framework in Pakistan. Lastly, the list of activities for this component also includes upgrading existing Arazi Record Centers and equipping new centers, by procurement and installation of equipment, hardware and software.

Component 4: Project Management and Institutional Strengthening

This Component will support effective project management, fiduciary support (financial management and procurement), monitoring and evaluation of project activities, establishment of a solid M&E framework, and compliance with social and environmental safeguards policies and processes. A grievance redress mechanism (GRM) will also be established for project workers, as well as the general public, who want to bring any project related issue to the notice of the provincial government. The policy, legal and regulatory framework for comprehensive land administration, systematic land registration, and unified land registry management will also be reviewed and further developed under this component, and a public awareness campaign will be launched to educate the public on the reforms.

The project is at **preparation stage as of November 2021.**

1.2. Potential Social and Environmental Risks

The project is being prepared under the World Bank's Environment and Social Framework (ESF) and is expected to have 'High' social risk and "Moderate" environmental risk. There are some potential social issues which may arise as the project proceeds. First, more disputes over land ownership are likely to come to light as cadastral maps are updated and properties registered. In Pakistan, land disputes typically take the form of inheritance related issues amongst multiple heirs; issues related to the widespread practice of not allowing women to claim inheritance; multiple claimants for properties who often rely on falsified documentation etc. There may be an increase in court cases registered with regard to land ownership once the mapping and registration processes are set in motion, and project staff may also face a barrage of complaints.

The second risk relates to the process of identification of state land and possible mobilization of such lands for development programs. The identification of the land itself may give rise to disputes as there is a chance that citizens will have laid claim to long-forgotten tracts of land. There is also the issue of katchi abadis or informal settlements on state land. Although the

government has a notified process for regularization of such settlements, under the broad framework of the Punjab Katchi Abadis Act 1992, there is a possibility that some occupied land may be reclaimed for alternate use. In such cases, both government, and project specific processes require that communities living on the lands be relocated only after due process is carried out. This would include a series of consultations, clear agreement on alternative locations (government may provide this), and amenities to be provided in the new location etc if provided by government.

2. Brief Summary of Previous Stakeholder Engagement Activities

The Provincial Disaster Management Authority (PDMA) organized consultations with intended beneficiaries, potentially affected persons and other key stakeholders while implementing the ADB assisted Project “Flood Emergency Reconstruction and Resilience Project” (FERRP). Under this project, PDMA developed operating procedures and tools to foster better communication and collaboration across government institutions and relevant civil society stakeholders. Consultations were held with key government and civil society stakeholders at different levels through meetings, focus group discussions and key informant interviews with smaller groups of grassroots stakeholders such as potentially affected persons, project beneficiaries and local communities at Mouza, Union Council, Tehsil, District and Province level. Whereas discussions with institutional stakeholders were arranged in consultation workshops. All these efforts at district and community level had been carried out to help inform the population about availability of mechanisms, such as grievance redressal and information disclosure systems. The communications strategy within the project informed the vulnerable communities of such initiatives and also set up communication channels for them. All these efforts were carried out to ensure ownership of community in the development planning procedures and processes.

For the PULSE project, stakeholder consultations have primarily taken the form of intra-government or inter-departmental consultations, with the World Bank playing the role of facilitator to bring different agencies together. For example, the World Bank conducted a virtual preparation mission in December 2020, where discussions revolved around project design, incorporation of adequate safeguards, and how to improve inter-governmental coordination. Another round of similar consultations took place in April-May 2021 where the scope and activities of each component were finalized.

In terms of regional consultations, a south-south knowledge exchange workshop on land registration was held on April 29 2020 to share Indonesia’s experience and lessons from the systematic and complete land registration program being implemented by the Indonesia National Land Agency (ATR/BPN).

The BOR organized a project specific multistakeholder consultation on November 19, 2021, to present a summary of project activities, potential E&S risks and impacts, and seek feedback from a range of stakeholders. The consultation was attended by World Bank staff and consultants, and representatives from the BOR, PDMA, and PLRA, in addition to other government agencies such as the Environment Protection Department, as well as representatives of the Urban Unit, and members of Academia and civil society. A complete list of invitees is attached in Annex I. Participants were presented with a project overview, including details of project components. After this, the envisaged environmental and social risks were dilated upon including construction related environmental risks, generation of e-waste, health and safety risks to project personnel, and, in terms of social risks, the possibility of conflicts arising from the emergence of multiple claimants to land, and the possibility of displacement of people living in informal settlements, among others. It was emphasized that the project intends to be particularly mindful of the impacts on marginalized groups, including women and the poor, and will take measures to mitigate negative fallout to the maximum extent. In a second presentation, the key questions that could be raised in citizen consultations,

whether with project affected parties or others, were listed for the stakeholders to comment on and take into account for future consultations.

The meeting went on to generate a rich debate. A participant was of the opinion that placing the project in a “high social risk” category was not justified, as past experience with digitization of rural land records did not indicate increased risk of disputes. It was pointed out, in response, that the situation may be different in urban areas with higher value land parcels, and communities who are more aware of financial and legal implications of cadastral mapping. Another participant pointed out that the possibility of new ARC construction causing environmental damage should not be under-estimated. In response, a BOR representative said that there was no provision so far for construction of new ARCs, and the project PC-1 does not budget for the same. Participants were appreciative of the steps already included in the Project related to communication with vulnerable groups and dispute resolution, and facilitating participation of especially women in land registration.

Other participants were concerned about possible pollution impacts, and also wanted to know if additional housing development would be supported in highly polluted areas. It was pointed out that PULSE would not be supporting housing projects, but was simply concentrating on registration and updating of cadastral maps. Concerns were also raised about the safety and security of field surveyors, and it was pointed out that all project field operations should be preceded by the implementation of a comprehensive communication plan that informs communities of the nature of the activities and why these are being undertaken. In general, participants agreed that it would be crucial for the project to finalize a stakeholder engagement plan in the inception phase, and ensure its effective implementation. They were of the view that reaching vulnerable groups by taking project activities to their neighborhoods, and implementing a communications strategy, would play a critical role in enhancing inclusion and minimizing social conflict.

3. Stakeholder Identification and Analysis

Stakeholders include both those who are clearly and unquestionably affected by the project and those who do not experience direct impacts, but who have an interest in how the project proceeds. The key stakeholders for Punjab PULSE are listed as follows.

3.1. Project Affected Parties

Possible Sensitive Issues Requiring Consultation with Other Government Agencies

The PULSE project is a major reform initiative, and along with affected parties amongst the citizens of the province, it is also likely to require detailed consultations and consensus building with other government agencies and legal institutions. Some of the issues which may arise are being listed here.

Component 2 of the project relates to possible transactions on state land – if not sale to private parties, then transfer between different government entities in exchange for consideration of a nominal fee. In practice, such transactions are often brought into question and referred to courts or other legal forums. Of late, the judiciary has not been supportive of such practices. For this project, the concerned implementing agencies will take legal advice to ensure that any transfers of state land take place under approved and legally watertight processes.

The project includes extensive use of aerial photography and satellite and drone imagery, as well as GIS mapping which requires the collection of coordinates. All these actions will be discussed in advance with government security agencies, to ensure that they take place within the ambit of the law and in consideration of the prevailing security environment.

Parties affected by this project have been identified as follows.

Landowners and Property Owners: The province of Punjab is estimated to have, in total, about 70 million parcels of land, about 60 percent of which is cultivated area, while a further 6 percent or so is built up area. The existing LRMIS documents land ownership for about 44 million largely rural landholdings. Parcel mapping and registration for the entire province (including urban and peri urban areas) is a key activity to be carried out in the project, and this will affect millions of land and property owners, in urban as well as rural areas, throughout the province.

Housing Societies: In addition to individual landowners, the project will also significantly impact the functioning of housing societies and the activities of property developers. With land ownership documentation in place, property development will be a relatively transparent area of economic activity.

Real Estate Renters and Buyers: While landlords and property owners are most closely affected by project activities, other stakeholders in the real estate market, particularly in urban areas, also stand to gain from the creation of a comprehensive record of land ownership. Buyers will be able to confirm ownership quickly and conveniently, and will not be worried about facing potential claimants. Renters will similarly be able to check all possible owners of a property and will find it easier to negotiate, without a fear of alternate demands arising from different owners. In short, the creation of a land registry will be invaluable for the smooth functioning of a real estate market, and will promote transparency and accountability in all transactions.

Residents of Katchi Abadis/informal settlers: Residents of non-regularized katchi abadis, or informal settlers on state land will be affected by project processes, in that state land will be clearly identified as such, and will be systematically registered. Their rights of residence will thus either be recognized through the regularization process notified by the GoPb; or the government may decide to use the land for development purposes or another purpose, and they may be asked to vacate the land. In the latter case, the project’s resettlement policy will inform the GoPb’s actions, and consultations with the affected communities will take place to decide on a resettlement process, including compensation packages. Forcible evictions will not be allowed under the Project.

Surveyors Hired and Trained: The project will hire a cadre of village level para-surveyors and train them in land surveying techniques, as well as in identification of parcel boundaries. As such, a small group of educated youth will benefit from skill development in a technical field, which can potentially open up work opportunities for them not only in the province, but in Pakistan or even abroad.

A summary of the interests of project affected parties is given in Table 3.1.

Table 3.1: Project Affected Parties

<i>Component</i>	<i>Sub-component</i>	<i>Impact by Stakeholder Group</i>
Component 1: Digital Land Records and Cadastral Maps for LRMIS	Sub-component 1.1: Spatial framework for LRMIS	Landowners and Property Owners: Generally positive Renters and Buyers: Positive Residents of Katchi Abadis: Neutral to negative (if it results in relocation) Surveyors Trained: Positive
	Sub-component 1.2: Systematic registration of peri-urban properties	Property Owners: Positive in that ownership will be established and cannot be easily challenged Neutral for others
	Sub-component 1.3: Upgrading tax records to urban land records	Property Owners: Positive in that tax payments will be predictable and clear Neutral for others
	Sub-component 1.4: Incorporation of existing urban records	Land and Property Owners/Renters and Buyers: Positive as records will be easily accessible
	Sub-component 1.5: Systematic registration of urban property	Property Owners: Positive in that ownership will be established and cannot be easily challenged Neutral for others
Component 2: Land for Housing	Sub-component 2.1: Inventory of state lands and asset	Informal Settlers: Mixed in that they could get ownership rights, or they may be resettled
	Sub-component 2.2: State lands asset strategy	Development Authorities: Positive in that the legal status of land will be clear
Component 3: Integrated Land and Geospatial Information Systems and Services	Sub-component 3.1: ICT Infrastructure Upgrade	Property Owners: Positive in that ownership will be established and cannot be easily challenged Neutral for others

<i>Component</i>	<i>Sub-component</i>	<i>Impact by Stakeholder Group</i>
	Sub-component 3.2: LRMIS Improvement	
	Sub-component 3.3: Integrated Land Portal	
	Sub-component 3.4: Establishment of Provincial Spatial Data Infrastructure	
Component 4: Project Management and Institutional Strengthening	Sub-component 4.1: Project Management, Monitoring and Evaluation	Generally positive for all project affected parties as efficient management of the project will work in favor of all stakeholders
	Sub-component 4.2: Legal and Regulatory Support	
	Sub-component 4.3: Institutional Strengthening and Public Awareness	

3.2. Other Interested Parties

Skilled Surveyors and IT Professionals: While project pilots will be run primarily by government institutions, project scale ups will require the participation of the private sector. The project is likely to hire firms to prepare index parcel maps; complete tax maps and use tax information to create urban property maps, and even complete the systematic registration process in urban areas. All these activities require skilled workers and some of them will require the deployment of sophisticated equipment. Outsourcing the scale up to private companies will build demand for these specialized skills in the market and create job opportunities in general. If the work in Punjab is carried out successfully, the resulting skilled labor pool can avail of opportunities in other parts of the country or overseas.

Elected Representatives: In an environment where promoting transparency and accountability in all works of life is a prime objective of political leadership, the project provides an opportunity for elected representatives to institute incorruptible governance systems. Regardless of political affiliation, these are goals that all people's representatives should endorse and encourage. The new systems will discourage the arbitrary allocation of state land, which is a positive development for those elected representatives who do not seek to curry favor through non-transparent means.

Lawyer community: In current scenario, major of chunk of transfers of land in urban areas are being done through the deed registration. In Punjab's most of the urbanized cities, more than 95% transfers are being carried out through the lawyer. This project will fade out their role in the land transfer of urban properties. The project needs to address the handling and incorporation of this important segment of society.

Sub-Registrar Offices & their staff: Currently, Sub-Registrar office is responsible for registration of transaction being undertaken in the urban areas of Punjab. This project needs to clearly define the role of Sub-Registrars and his office along with his staff.

General Public in Punjab: The general public in Punjab should benefit from improved governance systems in general, and also from development programs that result from the more effective use of state land.

Table 3.2 summarizes the discussion.

Table 3.2: Other Interested Parties

<i>Other Interested Parties</i>	<i>Interest in the Project</i>
Skilled surveying professionals	A province wide exercise of this nature provides excellent opportunities for skill development
Elected Representatives	The project promotes systems of good governance which elected representatives will be interested in supporting
General Public	Land disputes are the most frequently occurring disputes in Pakistan – as reflected in court records. Systems that seek to make land transfer systems transparent will benefit citizens in general.
Lawyers	The lawyer community would support the preparation of the deed for transfers and first registration in urban areas.
Judiciary	Accurate land records would significantly reduce land related litigation in court, and the presence of accurate records would also make it easier for courts to dispose of new and existing land disputes.
Sub-Registrar Offices	The project will work with Sub-Registrar Offices for registering the transactions in urban areas.
NGOs, CSOs	Single updated database would go a long way in safeguarding rights of vulnerable groups such as women and children – issues which NGOs typically deal with.
Private Sector/ Developers/Purchasers	Access to accurate land records would significantly ease the process of land acquisition and disposal.

3.3. Disadvantaged / Vulnerable Groups

Three vulnerable groups have been identified for this project, and the stakeholder engagement exercise will be designed to ensure that they are consulted with on a regular basis, and included in key decision making processes. For all vulnerable groups, stakeholder engagement will be designed such that discussions take place within their residential neighborhoods or at their places of work, so that their access to the venue is assured. An effort will be made to either arrange discussions through NGOs or community based organizations who closely work with them, understand their issues, and also employ staff who speak the language most often used in the community, and can advise on the most suitable times of the day for consultations. Provisions for hiring community workers have already been made in the World Bank’s project documents. The vulnerable groups identified include the following.

Women Inheriting Property: The GoPb has instituted some measures to ensure that women’s right to inheritance and property is not circumvented by male relatives. For example, Section 135A of the Punjab Land Revenue Act 1967 requires Revenue Officers to serve notice on all owners of joint property to submit a scheme of private partition after mutation of inheritance takes place. Revenue officers are now bound to ask for details (CNICs and/or Form B) for all

legal heirs, including females. In spite of such measures, there is still a likelihood that families may find ways to circumvent the law and disinherit females. This project will help to create systems that make such actions difficult, if not impossible.

Residents of Katchi Abadis: As mentioned before, residents of katchi abadis are amongst the project affected parties for PULSE. Given that katchi abadis dwellers are more often than not poor, often disenfranchised (in that they may not have requisite citizenship papers or any documentation on payments for land or utilities) and rarely approached by officials, their voices are in danger of being ignored or drowned out. However, Punjab PULSE recognizes the dangers of marginalizing such groups, and will make an explicit effort to include them in stakeholder consultations, through the GoPb Directorate of Katchi Abadis and community organizations working with KA residents. Residents of katchi abadis will also have opportunities to apply for positions as para surveyors, if they meet the qualification requirements.

Minorities: Non-Muslims in Pakistan, particularly those who belong to lower socio-economic strata typically suffer multiple forms of discrimination on account of their poor socioeconomic status, and as a religious minority.

Landless

People without any landholdings, but who are living on land without title, can be negatively affected when the state moves to regularize the land systems, as they could potentially be displaced. This is dealt with in more detail in the Resettlement plan

Groups Below Poverty Line

Regularization of land can also negatively affect the rights of those who fall in the lower income brackets as state land once clearly marked would need to be vacated which could cause displacement of these families. Once again, PULSE is keenly aware of the need to preserve the rights of such vulnerable groups, and the SEP, as well as the resettlement policy framework, takes them into account.

Table 3.3 summarizes the interests of vulnerable groups.

Table 3.3: Interests of Vulnerable Groups

<i>Activities</i>	<i>Vulnerable Groups and Individuals</i>	<i>Characteristics/ Needs</i>	<i>Preferred means of notification/consultation</i>	<i>Additional Resources Required</i>
Preparing the spatial framework for LRMS	Residents of katchi abadis	Need to be consulted and informed in advance of survey activities	In person	Social organizers and links with NGOs
Preparing the spatial framework for LRMS	Landless	Need to be consulted and informed in advance of survey activities	In person	Social organizers and links with NGOs
Development of the next generation Land Records Management Information	Women who stand to inherit property	Often not aware of their ownership or of characteristics of	Social media/electronic media/Awareness campaigns through	Communications and awareness raising

<i>Activities</i>	<i>Vulnerable Groups and Individuals</i>	<i>Characteristics/ Needs</i>	<i>Preferred means of notification/consultation</i>	<i>Additional Resources Required</i>
System (LRMIS) and Land Information Portal		land and property owned	women's groups and NGOs	campaign to be developed
Development of policies, laws, regulations, and strategies as well as technical studies and experiments associated with the operationalization of a unified land records and cadastral mapping system in Punjab	All vulnerable groups	Currently awareness of rights and obligations with regard to landholdings or status as residents is low	Social and electronic media/in person consultations in key areas such as large katchi abadis	Communications and awareness raising campaign to be developed

3.4. Summary of Project Stakeholder Needs

The following table summarizes project stakeholder needs.

Table 3.4: Project Stakeholder Needs

<i>Stakeholder group</i>	<i>Key characteristics</i>	<i>Language needs</i>	<i>Preferred notification means (e-mail, phone, radio, letter)</i>	<i>Specific needs (accessibility, large print, child care, daytime meetings)</i>
Low income Communities	Low income, below or close to poverty line.	Punjabi, Seraiki	In person meetings and mosque announcements	Available at specific times of day, probably in evening.
Middle income communities	Range of livelihoods	As above, but probably comfortable with Urdu also	Phone, TV, social media, community leaders may be available on email or by telephone	Available at specific times of day, probably in evening
Expert groups	Often employed in the formal sector	English or Urdu	Email and phone	Meetings during working hours preferably
Women	May not have much freedom of association or movement	Punjabi, Seraiki and Urdu.	TV, Phone, social media, radio or NGOs	Accessible mainly to other women. Times of availability will vary for different groups
Residents of katchi abadis	May not be aware of their legal status or may be wary of state action in their abadis	Punjabi, Seraiki, some Urdu	In person through social organizers or NGOs. Social media	May only be willing to talk to NGO workers and community organizers who have been in contact with
Landless	Low incomes and problems in mobility	Punjabi, Seraiki, some Urdu	In person meetings and mosque announcements	Available at specific times of day, probably in evening.

<i>Stakeholder group</i>	<i>Key characteristics</i>	<i>Language needs</i>	<i>Preferred notification means (e-mail, phone, radio, letter)</i>	<i>Specific needs (accessibility, large print, child care, daytime meetings)</i>
Land developers and housing societies	To be contacted through associations	-	Phone and email	Timings to be agreed with them – may only be available for limited sessions

4. Stakeholder Engagement Program

This project is being prepared under the World Bank's Environment and Social Framework (ESF) and as per the Environmental and Social Standard ESS 10 on "Stakeholder Engagement and Information Disclosure," the implementing agencies are required to provide stakeholders with timely, relevant, understandable and accessible information and consult with them in an appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

This stakeholder engagement program will begin at a time when a global pandemic has wreaked havoc across the world, including Pakistan. While nobody can accurately predict the course of the pandemic, it is safe to assume, given Pakistan's recent rates of disease transmission, that standard operating procedures (SOPs) for social distancing and infection containment may be in place as consultations begin in early 2022. The plan has been prepared keeping this eventuality in mind, and allows for SOP compliant consultations at least in the initial phase of the project

4.1. Purpose and Timing

Purpose

The purpose of stakeholder engagement is to ensure that all groups that either have an interest in the project, or stand to be affected, either positively or negatively, can participate in the project design process to identify flaws and point out possible obstacles; engage in implementation by highlighting what is going well and what isn't; and generally work with project proponents to ensure that the project proceeds such that its benefits are multiplied and possible negative fallouts minimized. In general, engagement will be directly proportionate to impact and influence of a stakeholder. As the extent of impact of the project on a stakeholder group increases, engagement with that particular stakeholder group will intensify and deepen.

Timing

Stakeholder engagement will take place in three phases – in the project preparation phase (ongoing), while the project is being implemented, and lastly in the first few months after project activities have been wrapped up.

In the preparation stage, given time constraints, engagement will be limited to interactions with program affected parties. The purpose of engagement at this stage is to apprise the stakeholder groups of planned activities, and to ensure that valid concerns of stakeholders and useful suggestions are taken on board and addressed before program activities are finalized.

In the project implementation stage, consultations will be carried out with affected parties, and other interested parties. Vulnerable groups likely to be affected by project work will be consulted, both in separate groups, and by making sure that their representatives are included in the consultations with affected parties and others. In this phase, the emphasis will be on disseminating information on how activities are proceeding, getting feedback on impacts, and consultations on how activities can be carried out such that any negative effects (if any) are mitigated.

Engagement after program conclusion will focus on all identified stakeholder groups. At this stage of the process, the emphasis will be on understanding whether the project has achieved its objectives.

The periodicity of consultations will vary through the project cycle. In the preparation stage, community level consultations, as well as discussions with experts will take place from October to December 2021, focusing mainly on project affected parties. In the program implementation stage, consultations will be planned monthly or quarterly, depending on the stakeholder group, and the activities to be discussed. In the post program implementation phase, a fixed number of consultations will be carried out. Details are given in the following sections.

4.2. Proposed Strategy for Information Disclosure

The project will be hiring a firm to handle communications, and key responsibilities for project advocacy and relaying information on project activities will thus be outsourced to the firm.

An uninterrupted two-way flow of information is crucial to the success of any stakeholder engagement program. This is particularly true for projects which are likely to have widespread impacts across a range of stakeholders covering almost all income groups. Since PULSE is such a project, it is vital that accurate information is disseminated to the relevant stakeholders and the affected parties at the beginning, and updates are provided at regular intervals as the project proceeds. It is also necessary to give stakeholders ample time to formulate their response and provide feedback during the engagement process. Various modes of communication would be used to disseminate the necessary information to the relevant stakeholders as given in the table below. Key messages will be conveyed in the national as well as relevant regional languages to facilitate a broader audience. This is summarized in the table below.

Table 4.1: Information Disclosure

<i>Project Activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/Dates</i>	<i>Target Stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
Sub-component 1.1: Spatial framework for LRMIS	Process of creation of maps	Stakeholders' workshops and inter-departmental meetings	Program planning and pilot phase of the project	Project Affected Parties	N/A	BOR/DLR, PLRA
	System of field verification			Vulnerable Groups		In this process District and Tehsil offices would also have a significant role
	Process of hiring village members as para-surveyors	Field Community interactions	Project implementation phase	Local Communities		
	Display of digital cadastral maps	Public Display of information at relevant Tehsil or UC office.				
	Dispute Resolution Mechanism					
Sub-component 1.2: Systematic registration of	Process of registration of peri-urban properties	Stakeholders' workshops and inter-	Program planning and pilot phase of the project	Project Affected Parties	N/A	BOR/DLR
						In this process District and

<i>Project Activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/Dates</i>	<i>Target Stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
peri-urban properties	List of areas to be surveyed Registration/or results of the exercise	departmental meetings Public display of information at relevant Tehsil or UC office	Project implementation phase	Vulnerable Groups		Tehsil offices would also have a significant role
Sub-component 1.3: Upgrading tax records to urban land records	Process of geo-referencing tax maps and also creating new maps for tax records. The urban land records which are created would need to be shared with public	Stakeholders' workshops and inter-departmental meetings which would also include members of Excise and Taxation and Urban Unit. Public display of information at relevant Tehsil or UC office.	Program planning and pilot phase of the project. Project implementation phase	Project Affected Parties		BOR/DLR District and Tehsil offices would also have a significant role. Excise and Taxation and Urban Unit
Sub-component 1.4: Incorporation of existing urban records	Data requirement for creation of single LRMIS. Modalities/MOUs under which the data would be shared. Process for validation of record provided by other organizations Land record information	Stakeholders' workshops and inter-departmental meetings. Public display of information at relevant Tehsil or UC office.	Program planning and pilot phase of the project. Project implementation phase	Project Affected Parties Other government and private organizations who will be part of this exercise		BOR/DLR Other relevant government organizations Private sector firms which would provide technical inputs In this process District and Tehsil offices would also have a significant role.

<i>Project Activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/Dates</i>	<i>Target Stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
Sub-component 1.5: Systematic registration of urban property	Plan on how to use the existing excise and taxation records to create urban land records	Stakeholders' workshops and inter-departmental meetings.	Program planning and pilot phase of the project.	Project Affected Parties		BOR/DLR
	New processes in the field to validate the maps			Excise and Taxation Department		Other relevant government organizations including excise and taxation department
	Process of systematic registration of urban lands		Project implementation phase			District and Tehsil offices would also have a significant role.
	Land record information	Public display of information at relevant Tehsil or UC office.				
Sub-component 2.1: Inventory of state lands asset	Collection of existing public land records		Project Design Phase	Project Affected Parties		BOR/DLR
	Process for identification of public lands		Project implementation phase			
	Process for digitalization of public lands					
	Proposed training of staff					

<i>Project Activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/Dates</i>	<i>Target Stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
Sub-component 2.2: State Lands Asset Management Strategy	<p>Process for valuation of these lands</p> <p>Procedure to dispose of surplus land</p> <p>Proposed information system to monitor the portfolio of state lands.</p> <p>Proposed training of staff.</p>	and inter-departmental meetings.	Project Design Phase	<p>Project Affected Parties</p> <p>There needs to be broad based consultations at this stage with not only the provincial government organizations but also but also federal government setups.</p> <p>*This would also have legal impact as normally the superior courts have never shown an inclination towards supporting the sale of government lands and such transactions are routinely struck down</p>		BOR/DLR
Sub-component 3.1: ICT Infrastructure Upgrade	<p>Plan for upgradation of current ICT infrastructure</p> <p>Technical specification for ICT equipment</p>	Stakeholders' workshops and inter-departmental meetings.	Project implementation phase	<p>Project Affected Parties</p> <p>Other departments such as LDA, LG&CD, PITB and other relevant government agencies</p>		BOR/DLR and PLRA
Sub-component 3.2: LRMIS Improvement	<p>Review of existing business process relevant to land records management</p> <p>Land records</p>		Project implementation phase	<p>Project Affected Parties</p> <p>Other departments such as LDA, LG&CD, PITB and</p>		BOR/DLR and PLRA

<i>Project Activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/Dates</i>	<i>Target Stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
	Technical specification for improved LRMIS			other relevant government agencies		
	Process of designing and development of new LRMIS					
	Plan for data migration					
	Schedule and process of training of relevant staff on the new system					
Sub-component 3.3: Integrated Land Portal	Business Analysis Technical Specifications to be decided Development of data sharing protocols	Stakeholders' workshops and inter-departmental meetings	Project implementation phase	Project Affected Parties Other relevant departments		BOR/DLR and PLRA
Sub-component 3.4: Establishment of Provincial Spatial Data Infrastructure	Process of installing geodetic control points and its SOPs Process and usage of high-resolution satellite imagery and process of its integration SOPs and other modalities linked to aerial drone imagery Contribute/Addition to National Spatial Data Infrastructure	Stakeholders' workshops and inter-departmental meetings.	Project implementation phase	Project Affected Parties Other relevant departments such as SUPARCO, Interior Ministry, Home Departments, Ministry of Defense		BOR/DLR and PDMA
Sub-component 4.1: Project Management, Monitoring and Evaluation	Project Implementation setups such as PIUs.	Stakeholders' workshops and inter-departmental meetings.	Project Design Phase	Project Affected Parties		PIUs

<i>Project Activities</i>	<i>List of Information to be disclosed</i>	<i>Methods proposed</i>	<i>Timetable: Locations/Dates</i>	<i>Target Stakeholders</i>	<i>Percentage reached</i>	<i>Responsibilities</i>
	Framework for technical and fiduciary support. Draft M&E Framework Draft of other necessary documents such as social and environmental safeguard policies and processes			There needs to be broad based consultations at this stage with not only the provincial government organizations but also but also federal government setups.		
Sub-component 4.2: Legal and Regulatory Support	Draft policy, legal and regulatory framework for land administration, land registration and unified land registry management.	Stakeholders' workshops and inter-departmental meetings. Ministry of Law and Justice Department of Law Punjab.	Project Design Phase	Project Affected Parties There needs to be broad based consultations at this stage with not only the provincial government organizations but also but also federal government setups.		BOR/DLR
Sub-component 4.3: Institutional Strengthening and Public Awareness	Draft proposal to improve working and physical infrastructure of Arazi Record Centers Draft training plans and manuals for staff training Draft communication strategy	Stakeholders' workshops and inter-departmental meetings.	Project Design Phase Year 1 of the project implementation.			PIUs

4.3. Proposed Strategy for Consultation

As given in the table above, there is a variety of information that is to be disclosed to stakeholders over the course of project preparation and implementation. The information will be disseminated using relevant strategies depending on the stakeholder group and the program stage. Stakeholders will be provided draft documents in advance of consultations. This is summarized in the table below.

Table 4.2: Strategy for Stakeholder Consultation

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/Frequency</i>	<i>Responsibilities</i>
Sub-component 1.1: Spatial framework for LRMIS	Local communities Residents of katchi abadis	System of field verification	Field Community interactions Public Display of information at relevant places and informing the public through newspapers and other media sources.	Sample of communities for in person interaction Key persons from individual union councils for community interaction. Branding will be carried out through mosques announcements, local, national newspapers, community notables, signboards at the tehsil, district level roads entrances, fruit & vegetables markets and main bazars. Focus Group Discussions at two different levels i.e. first with the Government and stakeholders departments and the second with the community preferably at Union Council level. Information dissemination through following means. 1- Dedicated Project information dissemination Website 2- Through GSM services 3- Sensitization through district	All PIUs

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/Frequency</i>	<i>Responsibilities</i>
				level facilitation centers	
	District revenue officials and local administration	Process of creation of maps	Stakeholders' workshops	Workshops at district level Weekly meetings	Main PIU
	General public	Process of hiring village members as para-surveyors	Advertisements and announcements through mosques	Media outlets Frequency as required	Main PIU
	General public	Dispute resolution mechanisms	Advertisements and infomercials Circulation of info-sheets and one pagers	Social media as well as print and electronic media Frequency as required	Main PIU
Sub-component 1.2: Systematic registration of peri-urban properties	District revenue officials General public	Process of registration of peri-urban properties	Stakeholders' workshops and inter-departmental meetings Advertisements and infomercials	Workshops at district level Quarterly workshops to keep relevant officials updated Media outlets including social media	Main PIU
	District revenue and general administration	Identification of areas to be surveyed	Consultations and meetings	Government offices Frequency as required	All PIUs
Sub-component 1.3: Upgrading tax records to urban land records	District revenue officials, other relevant departments (Urban Unit, Excise and Taxation)	Process of geo-referencing tax maps and also creating new maps for tax records.	Stakeholders' workshops and inter-departmental meetings	Government offices Initial meetings to be held as frequently as possible to bring stakeholders on board Subsequently, at least monthly meetings to keep stakeholders updated	Main PIU
	Urban Unit, Excise and	The nature and kinds of record	Inter-departmental meetings	Government offices	Main PIU

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/Frequency</i>	<i>Responsibilities</i>
	Taxation Department	that need to be shared with public		Two or three meetings within one month	
Sub-component 1.4: Incorporation of existing urban records	All relevant departments and private entities who maintain land records	Data requirement for creation of single LRMIS.	Stakeholders' workshop Meetings and consultations	At the beginning of the activity As needed while data is being collected	Main PIU
		Modalities/MOUs under which the data would be shared.		At the beginning of the activity	Main PIU
		Process for validation of record provided by other organizations.	Meetings	Bi weekly meetings will validation is complete	All PIUs
Sub-component 1.5: Systematic registration of urban property	All relevant departments and private entities who maintain land records	Plan on how to use the existing excise and taxation records to create urban land records	Stakeholders' workshop	At the beginning of activity	Main PIU
		New processes in the field to validate the maps	Stakeholders workshop	Two validation workshops at divisional level	All PIUs
	District revenue officials and general administration	Process of systematic registration of urban lands	Stakeholders' workshop	At the beginning of activity	Main PIU
Sub-component 2.1: Inventory of State Lands Asset	All relevant departments and private entities who maintain land records	Collection of existing public land records, identification and digitization of public lands	Stakeholders' workshops and inter-departmental meetings.	Government offices Stakeholders workshop at the beginning of process and departmental meetings as required	All PIUs
Sub-component 2.2: State Lands Asset Management Strategy	All relevant departments and private entities who maintain land records	Process for identification of public lands and broad contours of proposed strategy	Stakeholders meetings and workshops	Workshops to be held intermittently to share plans and get feedback	All PIUs

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/Frequency</i>	<i>Responsibilities</i>
	District revenue officials and general administration	Process for valuation of these lands and procedure to dispose of surplus land	Inter departmental meetings at district level Final workshop to present valuation procedures for the province	As required	Main PIU
	District revenue officials and general administration	Draft policy on classification of state land into core assets or surplus	Circulation of draft policy to district administrations	Upon completion of draft policy	Main PIU
Sub-component 3.1: ICT Infrastructure Upgrade	Project internal consultations				
Sub-component 3.2: LRMIS Improvement	Project internal consultations				
Sub-component 3.3: Integrated Land Portal	All relevant departments and private entities who maintain land records	Business Analysis of current system	Stakeholders workshops	At the beginning of the activity, and second workshop to present results	All PIUs
		Technical Specifications to be decided	As above	As above	All PIUs
		Development of data sharing protocols	With focal points in relevant organizations/departments	Monthly	All PIUs
Sub-component 3.4: Establishment of Provincial Spatial Data Infrastructure	Project internal consultations				
Sub-component 4.1: Project Management, Monitoring and Evaluation	General public	Social and environmental safeguard policies	To be placed on project website and websites of implementing departments	N/A	Main PIU
Sub-component 4.2: Legal and Regulatory Support	Department of Law Punjab.	Draft policy, legal and regulatory framework for land	Inter-departmental meetings.	Government offices Frequency as required	Main PIU

<i>Activities</i>	<i>Target stakeholders</i>	<i>Topic of engagement</i>	<i>Method used</i>	<i>Location/Frequency</i>	<i>Responsibilities</i>
		administration, land registration and unified land registry management			
Sub-component 4.3: Institutional Strengthening and Public Awareness	General public	Project progress and key outputs	Communications campaign on media	Throughout project implementation	Main PIU

4.4. Proposed Strategy to Incorporate the View of Vulnerable Groups

Vulnerable stakeholders are not a homogenous group. Some may be receptive to immediate and direct contact with a government agency, and may be vocal about their concerns. At the other extreme, there may be some groups who are reluctant to be contacted at all, perhaps because of their legal status or any other reason. Varying strategies will thus have to be adopted.

The project proponents will appoint a Social Sector Specialist (SSS) in the main PIU, and focal points in the Assistant PIUs who will work on the consultations with vulnerable groups. The Specialist will formulate a strategy for engagement at project commencement in consultation with the focal points, but will broadly follow the steps below.

Identification of Potential Partners: As a first step, the SSS will identify NGOs and community based organizations working with vulnerable groups, including women’s groups and legal aid groups concerned with women’s inheritance; community development specialists working in katchi abadis and groups concerned with property rights of the disadvantaged in general. This identification exercise will classify these partners by a) area/location of operations; b) nature of intervention or type of activity; and c) sector(s) of interest. A total of five or six organizations will be shortlisted for further engagement, and to develop potential partnerships through the life of the project. The selection will be made in consultation with social development specialists from the World Bank.

Consultation with Partners: At the next stage, meetings will be organized with representatives of the chosen partners, at first individually, and then in a group, to apprise them of the objectives of the stakeholder engagement program. The requirements of the stakeholder engagement program, with regard to consultations with different groups, and vulnerable groups in particular, will be shared with them, and their inputs sought on how best to establish contact and create an atmosphere of mutual trust. The shortlisted partners will then be asked to enter into formal partnership agreements with the main PIU for the duration of the project.

While the more detailed strategy for interaction with vulnerable groups will be chalked out once partners are on board, the SSS will not only guide the partners, but will also chalk out a program of regular contacts with stakeholder groups which he or she will lead in person. The Specialist will also prepare a workplan and strategy, giving the timelines for outreach with

different groups, linked to different phases of project implementation. At each stage of project implementation, and for each type of outreach activity, the Specialist will define how consultations will take place (in person, through community based organizations in the field), how records of consultation will be maintained, and how concerns raised etc. will be responded to.

5. Resources and Responsibilities for Implementing Stakeholder Engagement Activities

5.1. Resources

It is estimated that the SEP will require technical assistance of approximately \$2.5 million which amounts to \$0.5 million per year for five years. This will include the cost of deploying social outreach specialists, the cost of hiring venues and arranging facilities such as meals etc. for participants of consultations, research studies and surveys and other miscellaneous costs.

The stakeholder engagement effort will be led by the Social Sector Specialist at the main PIU. S/he will have the means to commission data gathering efforts and analytical work if needed, and get any field support as required.

This information about resources will be updated once further details of the design are finalized and the updated SEP will be redisclosed.

5.2. Roles and Responsibilities

The table below delineates the roles and responsibilities of different agencies for different phases of the project. The same entities will be relied upon to respond to stakeholders during relevant phases of the project.

Table 5.1: Roles and Responsibilities

<i>Activities</i>	<i>Responsibilities</i>
Sub-component 1.1: Spatial framework for LRMIS	BOR/DLR, PLRA
Sub-component 1.2: Systematic registration of peri-urban properties	BOR/DLR
Sub-component 1.3: Upgrading tax records to urban land records	BOR/DLR, Excise and Taxation Department and Urban Unit
Sub-component 1.4: Incorporation of existing urban records	BOR/DLR, Development Authorities
Sub-component 1.5: Systematic registration of urban property	BOR/DLR
Sub-component 2.1: Inventory of state lands asset	BOR
Sub-component 2.2: State lands asset management strategy	BOR
Sub-component 3.1: ICT Infrastructure Upgrade	BOR/DLR, PLRA
Sub-component 3.2: LRMIS Improvement	BOR/DLR, PLRA

<i>Activities</i>	<i>Responsibilities</i>
Sub-component 3.3: Integrated Land Portal	BOR/DLR, PLRA
Sub-component 3.4: Establishment of Provincial Spatial Data Infrastructure	BOR/DLR, PDMA
Sub-component 4.1: Project Management, Monitoring and Evaluation	All PIUs
Sub-component 4.2: Legal and Regulatory Support	All PIUs
Sub-component 4.3: Institutional Strengthening and Public Awareness	All PIUs

6. Grievance Mechanism

This section lays out the existing grievance redress mechanisms (GRM) in place in the key institutions responsible for project implementation, in addition to delineating proposed GRM procedures for the project itself. As per World Bank requirements, GRM systems are an integral component of the project administration. Paragraph 26 of ESS 10 says that, “the Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.”

6.1. Existing Mechanisms

PLRA: The PLRA has a fairly well developed complaint registration system wherein a third party manages a complaint logging system for the Authority. The general public can either reach the PLRA through a UAN number, or through the website.¹ The website asks the user to specify nature of complaint and gives three options – 1) delay; 2) corruption and 3) general. Complainants are required to provide details of identification (name, CNIC number, phone number, email); and specify nature of complaint. Adding documents or an explanatory message is optional. PLRA is represented on social media, with a Facebook page, and a YouTube channel (featuring two videos which were uploaded some years ago). There is a Twitter account associated with the Authority, but it is not operational at the moment.

PDMA: The Punjab Information Technology Board (PITB) hosts a Disaster Helpline for the PDMA, which can be used by citizens to file complaints.² As with all PITB helpline systems, the complaints are registered, and a ticket number issued against each complaint. Complaints are assigned to relevant officers to deal with, and progress on resolution can be tracked online. When the complaint is redressed, or if the officer needs to gather more information, he or she contacts the complainant. Moreover, various social media platforms (Facebook, YouTube, Instagram, LinkedIn and Twitter) are being engaged for different awareness campaigns/public information dissemination and community support programs.

Furthermore, the existing approach also helps the department in developing mechanisms, such as grievance redressal and information disclosure systems. The communication strategy also aims to inform the citizens of such initiatives and also aims to set up communication channels with stakeholders to engage and receive feedback on impacts and concerns from the beneficiary population. A Grievance Redressal Committee will also be formed at the project level to handle complaints in an efficient manner.

6.2. GRM Systems for the Project

A Grievance Redress Committee (GRC) will be constituted at the main PIU, managed by a Grievance Redress Management Specialist (GRMS). Other than the GRMS, the Committee will draw on existing resources at the BOR and will comprise of five additional members as follows.

¹ <http://rodportal.punjab-zameen.gov.pk/complaint-page>

² <http://pdma.gop.pk/helpline>

Table 6.1: Constitution of the Grievance Redress Committee

<i>Designation</i>	<i>Parent Department</i>
Head of the GRC	BOR
Director GRC	Main PIU
GRM Specialist /Secretary to GRC	Main PIU
Social Development Specialist (Member)	Main PIU
Environment Specialist (Member)	Main PIU
Gender Specialist (Member)	Main PIU
Members from DLR, PLRA and PDMA	3 members

Thus, a designated officer from the BOR will serve as Head of the GRC. An officer with experience of working on the LRMIS from DLR will serve as Director GRC. Both these officers will work at their parent departments, but will be available to the GRC to decide on complaints that need responses from senior officials or inter-departmental cooperation, or which are otherwise complex in some way. Day to day issues will be handled by the SDS, with assistance from the main PIU and Assistant PIU staff.

GRM System

As a first step, an online complaint registration system will be set up for the project, which will also link with the PLRA's existing system. Thus, it will pick up relevant complaints from the website and social media, as well as complaints registered on it directly. Complaint registration will be structured such that complaints can be entered directly on the project website (in English or Urdu); can be posted to a designated address as letters or written messages; or can be narrated to operators on a helpline. All complaints, however made, will be consolidated into a database on a daily basis, and separated by location as well as nature of grievance.

As a second step, grievances/complaints will be screened and classified into three categories by order of priority, with those requiring instant action being classified as high priority. A set of criteria will be made to determine what sort of grievances/complaints fall into which category. All registered grievances/complaints will be acknowledged through a text message or phone call. If no telephone number is supplied by the complainant, he or she will be asked through a letter to check back with the main PIU. This acknowledgement will be issued within one day of receipt of the grievance/complaint. Each complainant will be given an estimated timeframe for resolution of the grievance/complaint.

Grievances will be investigated and resolved within the timeframe specified, which will not be longer than ten days. If resolution demands longer than this timeframe, the complainant will be informed, and will be contacted by staff from the main PIU or Assistant PIUs to explain details of the issue. Grievances which require cooperation of a number of departments, or which are otherwise complicated, will be referred to the GRC who will specify how resolution is to take place.

Records of all grievances/complaints will be maintained in a database, including details of actions taken to resolve the issue, and dates on which resolution was effected. At the conclusion of action to solve grievances, the complainants will be informed of the outcome. Two days after action is closed and complainants informed, they will be contacted again to ensure that they are satisfied with the work done. The system will include a system for Appeals. If a complainant remains unsatisfied, he/she will be able to lodge an appeal, which will be escalated to the Head of the GRC or the Director.

7. Monitoring and Reporting

The main PIU will include a Monitoring Unit which will devise a complete project monitoring plan and schedule in accordance with project implementation activities.

This SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. Any revised SEP will be reviewed and cleared by the Bank and redisclosed.

The World Bank will participate in joint review missions with the implementing agencies in order to formally review project implementation semi-annually. The missions will conduct a comprehensive review of project performance against the Results Framework and agree on planned actions (including financing plan). The findings of the review will be discussed in detail with the implementing departments and follow-up actions will be agreed upon. One month prior to the joint review missions, the internal auditors & monitoring and evaluation specialist will provide the Bank with a comprehensive progress report on project activities.

The PIUs will also monitor and report the implementation of project activities through a system of reporting that will include the submission of quarterly and annual progress reports. A uniform simple progress-reporting format focusing on physical and financial progress and outcomes achieved will be adopted in this regard. Progress reports will be shared with the Bank prior to the end of the reporting period.

A Microsoft Information Management System (MIS) shall be developed based on formats for review and monitoring that have already been agreed upon and developed. The PIUs will hire an experienced agency for development and customization of this system. PIUs will be responsible for the management and periodic updates of the system. The Project will also set up a base line for monitoring, evaluation and reporting of results.

8. Annex 1

List of non-governmental organizations invited for PULSE ESMF & SEP Consultation, November 19, 2021

Urban Unit

.....
Punjab Katchi Abadis Directorate

.....
Lahore University of Management Sciences

.....
Shirkatgah

.....
Kashf Foundation

.....
Aurat Foundation

.....
Punjab Commission on Status of Women

.....
NESPAK

.....
The Urban Unit

.....
Human Rights Commission of Pakistan

.....
Institute for Art and Culture, Lahore

.....
Lahore University of Management Sciences
