Stakeholder Engagement Plan (SEP)

Pakistan Crisis Resilient Social Protection Program (CRISP)

DRAFT
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Acronyms

ADB	Asian Development Bank
ANC	Ante Natal Care
ASPIRE	Action to Strengthen Performance for Inclusive and Responsive Education
ATM	Automated Teller Machine
BISP	Benazir Income Support Programme
CCT	Conditional Cash Transfer
CPF	Country Partnership Framework
CPS	Country Partnership Strategy
CRISP	Crisis Resilience Social Protection Program
DfID	Department for International Development
DG	Director General
DLI	Disbursement Linked Indicator
DLR	Disbursement Linked Results
DoH	Department of Health
DPC	Development Policy Credit
DRF	Digital Rights Foundation
F&A	Finance & Accounting
FATA	Federally Administered Tribal Areas
FCDO	Foreign Commonwealth & Development Office
FM	Financial Management
FSA	Fiduciary Systems Assessment
GDP	Gross Domestic Product
GoP	Government of Pakistan
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
ICT	Information and Communications Technology
IDS	Innovative Development Strategies
IT	Information Technology
IVA	Independent Verification Agency
IYCF	Infant and Young Child Feeding
LEG	Labor Expert Group
M&E	Monitoring & Evaluation
MDTF	Multi-Donor Trust Fund
MELA	Multi-entry Localized Access
MIS	Management Information System
MoNHSRC	Ministry of National Health Services, Regulation and Coordination
MoU	Memorandum of Understanding
NADRA	National Database and Registration Authority
NISP	National Immunization Support Project
NOWPDP	Network of Organizations Working for People with Disabilities in Pakistan
NSER	National Socio-Economic Registry
NSPP	National Social Protection Program
OPM	Oxford Policy Management
PASS	Poverty Alleviation and Social Safety
PMT	Proxy Means Test
PNC	Post-Natal Care
POS	Point of Sale
PPAF	Pakistan Poverty Alleviation Fund
PREP	Pandemic Response Effectiveness Project
PSP	Payment Service Provider

RA	Results Area
RSPN	Rural Support Programmes Network
SDPI	Sustainable Development Policy Instittute
SHIFT	Securing Human Investments to Foster Transformation
SP	Social Protection
SPRC	Social Protection Resource Center
STEP	Special Talent Exchange Program
TA	Technical Assistance
UCT	Unconditional Cash Transfer
USAID	United States Agency for International Development
WB	World Bank
WeT	Waseela-e-Taleem

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1.   Introduction/Project Description

The **Crisis Resilient Social Protection Program** aims to advance Pakistan's Social Protection (SP) system to make it an adaptive, crisis-resilient system and move towards the next generation of programs beyond social assistance. The proposed project is expected to be in the amount of US$600M equivalent and will span fiscal years 2021-2024 with a nationwide focus.

The program is structured around **three main results areas** (RA) carved out around the current Government efforts in the SP sector: **RA1 Building Crisis-Resilient Delivery Systems; RA2 Developing Innovative Hybrid Social Protection Scheme; and RA3 Protecting Human Capital in the Early and Primary School Years.**

Moving to a more effective and responsive SP system is expected to both promote COVID-19 recovery in the medium- to long-term and enable timely action in the event of future crisis, and to protect and help build resilience among a broader segment of the population that is vulnerable to shocks. The program intends to achieve this by introducing positive disruptions to the existing safety net and delivery systems, introducing new reform directions, and consolidating recent gains. Specifically, it would:

1. Build-in greater innovation and technology within the SP system to strengthen the social registry, optimize the use of big data, and advance the delivery system components including the payment systems, the social registry, and related information systems **(Results Area 1)**
2. Support the next generation of social protection interventions targeting the 'missing middle' (uncovered by existing safety nets or formal social insurance) by developing innovative hybrid social protection mechanisms.   **(Results Area 2)**
3. Promote medium- to long-term mitigation of COVID impacts by prioritizing the human capital accumulation among the youngest. **(Results Area 3)**

Program Development Objective: To support positive disruptions and advances in the social protection system to make it more adaptive and to build crisis-resilience among poor and vulnerable households.

TA Component (US$ 5M)

This program would include an IPF component to provide Technical Assistance for various aspects of the PforR implementation. To inform the overall design of the crisis-resilient SP system, it would support impact and process evaluations of the COVID-19 response implemented by the Government.

1. **For Results Area 1**, it would provide TA to support: (i) design and evaluate the social registry's MELA mechanism; (ii) assess the effectiveness of use of systematic cross-checks, big data and analytics, and related tools to complement the traditional targeting methods and improve targeting performance; (iii) define protocols related to the social registry governance and data exchange mechanisms; and (iv) design and assess mechanisms to further strengthen the beneficiary payment system by exploring technological innovations.

2. **For Results Area 2**, the design of a hybrid scheme that responds to the needs of the 'missing middle' requires attention to design features and continuous evaluation, particularly since the global evidence base for these interventions is still nascent. This component would therefore support TA to help guide the choice of an appropriate model for hybrid social protection scheme scale up in the Pakistan context, namely: (i) design of the hybrid social protection model including monetary and non-monetary (behavioral nudges) design elements; (ii) capacity building for management and implementation of the hybrid social protection system and development of a platform to support monitoring of contributions, management of funds, and individual savings accounts, which is interoperable with the relevant existing SP delivery

systems; (iii) evaluation of different design features and of the impacts of the hybrid scheme on households' ability to manage risks; and (iv) planning for potential scale up of the hybrid SP scheme.

3. **For Results Area 3**, the TA would focus on support for: (i) design and implementation of the nutrition-focused CCT; (ii) planning for national rollout of WeT; (iii) evaluations of the nutrition-focused CCT and WeT to understand impacts on key outcomes related to human capital; and (iv) linkages of both CCT programs to existing delivery systems.

Result Area 1 has a number of new initiatives which will be introduced and hence the need to ensure that proper capacity exists at Islamabad and the field offices. As mentioned in the institutional arrangement section, BISP has qualified human resources in place but these will need to receive training and augmented by specialized technical expertise for some of the new concepts. Even though BISP has maintained the NSER successfully, the new model for dynamic update would require some capacity enhancement, especially at the local level where MELA would be functional. For this, BISP will have to introduce a well-designed training program. Similarly, for the new beneficiary centric payment system and the financial inclusion aspects of the program, BISP will have to develop training activities for the field staff to understand these concepts and to create awareness among the potential beneficiaries. This support will come through the TA which will be available to BISP.

On Results Area 2, BISP largely has the capacity for the cash delivery elements of the hybrid scheme, but additional capacity and expansion of partnerships will be required for other aspects. The intervention would largely build on and leverage existing infrastructure and the strong linkages that already exist between the social registry, the national ID system and the biometric payment systems. However, some investments may be required in areas specific to management of the hybrid SP scheme. CRISP would therefore provide technical assistance to identify and set up capacity for: (i) treasury, collection, and investment functions; (ii) development of a platform to support monitoring of contributions, management of funds and individual savings accounts (interoperable with the relevant existing SP delivery systems and financial institutions' systems); and (iii) expansion of or new partnerships to develop the savings products (e.g., with commercial banks delivering BISP payments) and to manage contributions under the hybrid scheme.

On Results Area 3, BISP already demonstrated its capacity to manage one CCT program in 50 districts successfully. The augmenting of the compliance monitors at the field level has also been a major step towards effective monitoring of the program. However, the testing out of the health and nutrition CCT is a very daunting task as co-responsibilities under the Nashonuma program are much more complicated than Waseela-e-Taleem. Training and capacity enhancement of the field staff managing the one stop centers at Tehsil level will be crucial for their understanding of new concepts related to the program including compliance with conditionalities. The TA component would be used for building this capacity including developing specific training modules and content for awareness sessions.

The proposed program is aligned with the Bank's support in Pakistan, including the overall response to COVID-19; including the recently approved Development Policy Credit Securing Human Investments to Foster Transformation (SHIFT, P170568), as it supports operationalization of some of the policy actions supported by Pillar C (Improving national safety nets for efficient response to shocks). It follows the emergency support for safety nets under the Pandemic Response Effectiveness Project (PREP, P173796) by moving into the next phase, and is within the overarching post-COVID agenda for Bank support to Pakistan, where SP emerges as one of four key support pillars. The project is also well aligned with other sectoral projects in education and health, and in particular, complements activities in the Emergency Action to Strengthen Performance for Inclusive and Responsive Education (ASPIRE, P173399) project and the National Immunization Support Project (NISP, P132308).

Objectives of SEP

Under World Bank-financed projects, **a Stakeholder Engagement Plan (SEP), and project level Grievance Redress Mechanism (GRM) need to be developed in accordance with ESS10 (Stakeholder Engagement and Information Disclosure) of the World Bank's Environmental and Social Framework (ESF) and any corresponding national legislation.** ESS10 requires that Borrowers engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement have to be proportionate to the nature and scale of the project and its potential risks and impacts.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the IPF TA component. **The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project.** The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

2.   Brief Summary of Previous Stakeholder Engagement Activities

Virtual stakeholder consultations were held on September 14th and November 26th, 2020 and nearly 50 representatives from civil society, academia and partner institutions attended. The focus of the stakeholder consultation was on the broader PforR program and was undertaken as part of the Environmental and Social Systems Assessment (ESSA). Stakeholder consultations were also held in 2017 regarding the National Social Protection Program (NSPP), an ongoing PforR with the same implementing agency and in April 2020 for the Pandemic Response Effectiveness in Pakistan (PREP) project again with BISP.

3.   Stakeholder Identification and Analysis

For meaningful and substantive engagement, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, as well as their priorities and objectives in relation to the Project. This information will then be used to tailor engagement to each type of stakeholder. As part of this process it is particularly important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be modified accordingly.

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Project stakeholders are defined as individuals, groups or other entities who:

i. are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
ii. may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders. Legitimacy of the community representatives can be verified by talking informally to a random sample of community members and heeding their views on who can be representing their interests in the most effective way.

The project intends to utilize various methods of engagement that will be used as part of its continuous interaction with project stakeholders. For the engagement process to be effective and meaningful, a range of various techniques need to be applied that are specifically tailored to the identified stakeholder groups. In accordance with best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communication and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, indigenous people (Kalash living in 3 valleys of Chitral district in Khyber Pakhtunkhwa province), internally displaced persons (IDPs), returnees, drug addicts, persons with disabilities, youth, elderly and the cultural sensitivities of diverse ethnic and religious minority groups and those living in remote or inaccessible areas.

The Kalash are recognized as Indigenous Peoples (IP) under WB Operational Policy OP 4.10 and Environmental and Social Standard (ESS) 7 under the Environmental and Social Framework (ESF). This policy requires that Bank-financed programs do not cause adverse impacts on/for IP and when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts. Its aim is to promote sustainable development benefits and opportunities for IPs in a manner that is accessible, culturally appropriate and inclusive.

The three categories of stakeholders as per the ESS10 are outlined below:

i. **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;

ii. **Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and

iii. **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status[1], and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

3.1. Affected Parties

ESS10 refers to Identifying individuals, groups, and other parties that may be directly or indirectly affected by the project, positively or negatively. Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. The SEP focuses particularly on those directly affected, positively or adversely by the project activities. At this time, the client and the World Bank's Safeguards team have identified directly affected parties under this category as:

a. BISP
b. MoNHSRC
c. MoFEPT
d. Provincial Health Departments
e. Provincial Education Departments
f. BISP beneficiaries
g. Implementation partners
h. Informal workers being surveyed

3.2. Other Interested Parties

There may be broader stakeholders who may be interested in the project because it indirectly affects their work or has some bearing on it. As elucidated in the ESS10, while these groups may not be directly affected by the project, they may have a role in the project preparation or have a broader concern including for, but not limited to, information dissemination, awareness raising, community mobilization, and feedback. Interested parties under this category may be identified as:

a. Aurat Foundation
b. AKF
c. Digital Rights Foundation
d. Federal EPA
e. German Red Cross
f. IDS
g. ILO
h. Karandaaz Pakistan
i. Ministry of Climate Change
j. Ministry of Information Technology and Telecommunication

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[1]Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

k. Ministry of Overseas Pakistanis and Human Resource Development
l. NADRA
m. OPM
n. Provincial EPAs
o. PPAF
p. Pakistan Bureau of Statistics
q. RSPN
r. SDPI
s. Social Protection And Poverty Alleviation Division
t. SPRC
u. UNICEF
v. Mobile Service Providers
w. Banks in particular Bank Alfalah and Habib Bank who are presently engaged with BISP

The SEP process will include conducting consultations with representatives of each of these groups and defining a strategy for continual engagement with each of them throughout the project life.

3.3. Disadvantaged / Vulnerable Individuals or Groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impact of a project. It would also be critical to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups (on infectious diseases and medical treatments in particular,) be adapted to take into account such groups or individuals particular sensitivities, concerns and cultural sensitivities and to ensure a full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, literacy levels, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. religious and ethnic minorities or fringe groups), dependence on other individuals or natural resources, especially those living in remote, insecure or inaccessible areas, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

In this Project, the vulnerable or disadvantaged groups may include, but are not limited to the following:

a. Differently abled citizens
b. Elderly citizens
c. Female-headed households, especially within IDPs
d. Indigenous People of Kalash(living in 3 valleys of Chitral District in KP province)
e. Internally displaced people and returnees
f. Refugees and migrants
g. Religious and ethnic minorities
h. Transgender people
i. Widows
j. Residents of remote areas

Some of the organizations representing the groups listed above include NOWDP[2], STEP[3], Akhuwat etc.

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[2] Disability inclusion initiative which is focused on inclusion through empowerment
[3] A Cross Disability and Development organization. Conceived by people with disabilities in 1997, The organization envisioned to advocate the society about the rights of persons with disabilities; lobbying with policy

The Kalash people, living in Chitral Valley of KP Province are recognized as Indigenous Peoples under World Bank ESF Environmental and Social Standard 7. The CRISP program will be implemented in all provinces of Pakistan, including the Kalash valleys. Aside from the nationwide CRISP activities no additional specific activities targeting the Kalash will be undertaken. At present BISP and other agencies lack systematic approach to undertake free, prior and informed consultations with the indigenous Kalash people to determine their concerns and engage in the social protection net. Kalash falls in cluster-4 of the new NSER survey. NSER wing could not amend the survey questionnaire specifically for Kalash. There is a risk that the specific communications and outreach needs of the Kalash may be overlooked. Consultation with the Kalash people will be important to give special attention to the rights and interest of the Kalash people. It is required that the Kalash people are given due consideration to cultural appropriateness of, and equitable access to, program benefits. PRU in collaboration with Regional Director KP, M&E and MCO Wing may conduct a sample survey in Kalash.

Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. A description of the methods of engagement that will be undertaken by the project is provided in the following sections.

3.4. Summary of Project Stakeholder Needs

A detailed stakeholder mapping of the three categories of stakeholders- Affected, Interested and Disadvantaged/Vulnerable Groups has been undertaken and guided the initial consultations. However, given the current emergency context, physical distancing requirements are in place. Appropriate adjustments will be made to the mode used for conducting consultations to take into account the country lock down restrictions and the need for social distancing. Virtual consultations will be held using WebEx, telephone calls, SMS and emails.

The first consultation was held via WebEX on November 26, 2020 with BISP, and an array of stakeholders from the public and private sector. As part of the virtual consultation session conducted with BISP, partner institutions, non-governmental institutions, academics and civil society to discuss the findings of ESSA, discussion was also held on stakeholder engagement in relation to the TA component.

In particular relevant organizations were approached to learn about concerns related to social protection and how the project may consider addressing and mitigating these. Several issues came under discussion, of which the salient points are provided below:

i.   Governance is a big challenge in terms of coordination and alignment between provinces and the federal ministries and agencies.
ii.   There have been significant delays in the updating of the NSER. This poverty registry not very representative of the welfare status of households today. A more dynamic updateda mechanism with a specific time frame is needed to ensure the validity of the data collected
iii.   Social ownership of the program is needed to make it successful. A social mobilization strategy is important for the public to own it and hence contribute to achievement of the result.
iv.   There is an urgent need for a social mobilization strategy to ensure that the right people are being tapped into.
v.   A beneficiary centric payment mechanism needs to be introduced for mobile people who may be registered in one district and have moved to another or are stuck in another area due to the lockdown and can therefore not avail benefits

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makers in public, private and development sector for inclusion of persons with disabilities in overall development process; raising awareness and conducting consultations for empowerment of persons with debilitates; counselling development of accessible environment; and promoting accessible information by creating bridge between persons with debilitates and facilities of health, education and livelihood.

vi. It would also be critical to link the NSER records with Government databases and privates ones such as telecoms and financial institutions.

vii. Data protection is an evolving issue with no clear policy in place as of now.

viii. The definition of vulnerability needs to be examined as the lack of a standard definition increases the complexity of targeting. It is also politically sensitive as to who is included or not in this umbrella catch all term.

ix. In terms of social protection policies, it would be important to examine the provincial policies as these vary and can have practical implications

x. Informal organizations often have last mile issues in enabling end users to avail services. BISP and the WB can help these organizations and CSOs with new technology such as apps for creating a social registry for Gilgit Baltistan or for the Kalash as this is most expensive and technologically difficult

xi. It is critical to have systems and processes with empowered people who can take decisions in real time and affect the outcome of the program. A strong empowerment spirit being deployed for social protection needs an effective and competent agency to handle it

xii. Data sharing and access is more secure if the data logistics are automated.

xiii. A survey on Covid-19 conducted by the Pakistan Bureau of Statistics would be an important resource for examining vulnerability today. It is an important tool for shaping the GoPs crisis resilience strategy.

Further consultations will continue to be held to seek additional input and the SEP will be updated and disclosed accordingly.
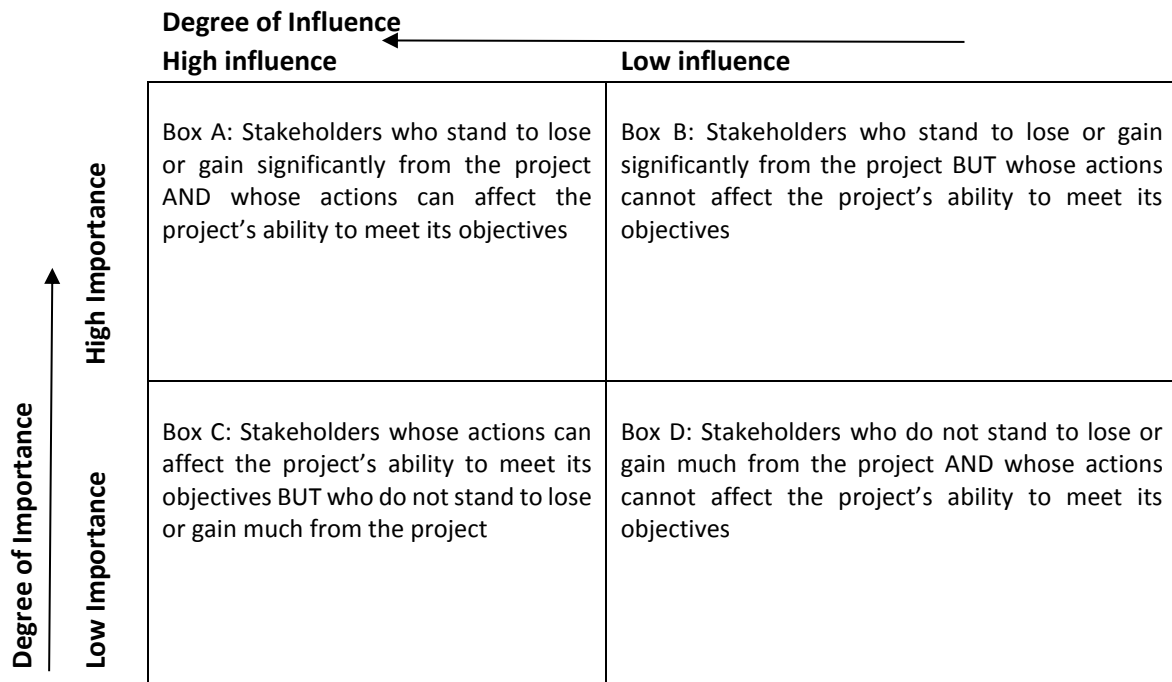
Since this project impacts citizens as a whole, engagement with civil society platforms and citizens representative groups (like labor, women, disabled, and elderly persons) will have to be extensive and meaningful. The SEP will also highlight methods to involve citizens voices and feedback into the TA implementation and will suggest differentiated measures of engagement across Pakistan.

The approach for the stakeholder engagement analysis will be underscored by three elements: (i) belief in the primacy of qualitative data; (ii) commitment to participatory methods; and (iii) flexible responsive methods. An inclusive and participatory approach has been followed taking the main characteristics and interests of the stakeholders into account, as well as the different levels of engagement and consultation that will be appropriate for different stakeholders.

In general, engagement is directly proportional to the impact and influence of a stakeholders. As the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used. The different combinations of influence and importance that a stakeholder may exercise are elucidated in the diagram[4] below.

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[4] Adapted from the World Bank Stakeholder Analysis Guidance Note

Figure 1: Stakeholder Influence and Importance

Degree of Influence

	High influence	Low influence
High Importance	Box A: Stakeholders who stand to lose or gain significantly from the project AND whose actions can affect the project's ability to meet its objectives	Box B: Stakeholders who stand to lose or gain significantly from the project BUT whose actions cannot affect the project's ability to meet its objectives
Low Importance	Box C: Stakeholders whose actions can affect the project's ability to meet its objectives BUT who do not stand to lose or gain much from the project	Box D: Stakeholders who do not stand to lose or gain much from the project AND whose actions cannot affect the project's ability to meet its objectives

Degree of Importance

This matrix provide the framework for stakeholder analysis which will be conducted within 45 days of project effectiveness.

4.   Stakeholder Engagement Program

4.1.   Purpose and timing of stakeholder engagement program

The stakeholder engagement program for the TA aims to: establish a systematic and inclusive approach to stakeholder engagement; build and maintain a constructive relationship with stakeholders; incorporate stakeholders' views and concerns into project design/implementation; mitigate negative social and environmental impacts of the project; and, enhance project acceptance and socio-environmental sustainability. Stakeholder engagement for the IPF component has been divided into two phases:

- Phase I (Project Preparation) : Since the TA component primarily focuses on capacity development of BISP, stakeholder engagement during this phase focused on representatives of BISP and other social protection organizations. The purpose of stakeholder engagement during this phase was to: ascertain institutional needs; apprise GoP institutions about planned activities/reforms; improve project design; create synergies; and, enhance the socio-environmental sustainability of the TA component of the project. **Detailed consultations could not be held due to social distancing protocols and Covid restrictions in place across the country.**

- Phase II (Project Implementation): Extensive stakeholder engagement will be carried out during this phase with PAPs, Disadvantaged/vulnerable groups and other interested parties. Section Error! Reference source not found.**.** provides an exhaustive list of topics for stakeholder engagement during this phase along with the corresponding tools and techniques for conducting them. These will be further refined during project implementation and the finalised engagement topics, methods and frequencies will be presented in the revised SEP within 90 days of project effectiveness.

4.2.   Proposed Strategy for Information Disclosure[5]

Based on consultations with the implementing agency and following World Bank disclosure protocol, the following table provides an initial outline of the information to be disclosed at the preparation stage.

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Preparation	BISP, affected parties, interested groups, public at large, vulnerable groups, Government entities	Project documents, SEP, Appraisal stage ESCP.	• Websites of BISP, before project effectiveness • Print and electronic media • One-on-one meetings, Consultation meetings
Implementation	BISP, and other relevant Government ministries	PAD, E&S principles and obligations, Consultation process/SEP, ESMP, ESCP, GRM procedures, project information	• Websites BISP • One-on-one meetings • Consultation meetings
	Local communities and Vulnerable groups (including refugees, migrants, minorities, women), Indigenous peoples (Kalash)	Regular updates on project activities and specific interventions for vulnerable groups (through BISP), ESMP, SEP and GRM procedures.	• Outreach through local community organizations • Community sensitization sessions • Public notices • Press releases in the local media and on the project website • Mobile loudspeakers, announcements in local mosques and communities in local languages • Airing of key messages through h social protection programs on local FM radio, Television and text messages • Dissemination of information through social media
	Other ministries (IT, Climate Change MoNHSR&C)and relevant public agencies (Federal and Provincial EPAs,)	Project overview, Progress reports, ESMP, SEP and GRM procedures.	• Consultation meetings • Electronic publications Information leaflets and brochures
	International donor agencies	Scope of Project, social protection interventions, opportunities for collaboration, regular	• Bi Annual Consultative sessions with agencies to create synergies in the

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[5] The proposed meetings will be held once social distancing measures are eased or SOPs are available.

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
		updates on project progress, ESMP, updated SEP and its implementation	work undertaken and avoid duplication of efforts • Monthly updates through emails • Interagency forums and virtual meetings.
	NGOs, Media representatives Health agencies, Academics, Organizations /philanthropies working on social protection	Scope of Project, social protection interventions, opportunities for collaboration, ESMP, updated SEP and GRM procedures.	• Information Resource portal on project website • Bi-Annual Project Dissemination Workshops
	BISP beneficiaries	Relevant project information related to cash disbursement timings, venues and protocols; updated SEP and GRM procedures.	• SMS • BISP beneficiary committees and their local field offices • Mosque announcements Local influentials (councilors, community workers etc.)
	General public interested in education and nutrition, school children and their parents,	Information on the Ehsas Nashonuma Programme providing food underprivileged children and prevent their malnourishment and stunting of growth and the Waseela-e-Taleem Programme, FAQs, updated SEP and GRM procedures	• Provincial Education Department websites • Provincial Health Department website

For the implementation stage, detailed consultations will suggest the modes of communication and frequency of future engagements, suitable for each type of stakeholder. The information per target stakeholder will be provided during the update of this SEP to be carried out within 45 days of the project effectiveness date.

4.3. Proposed strategy for consultations

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Preparation	• Need of the project • Planned activities • E&S principles, risk and impact, management/ ESMF • Grievance Redress mechanisms (GRM)	• Virtual meetings providing background information • Phone • Emails • Appropriate adjustments were made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, SMS, emails, etc.)	Officials from BISP, Provincial Health and Education Ministries	BISP with input from other implementing ministries and organizations
Implementation	• Project progress on ongoing activities/targets and outputs • Coordination among various agencies • ESMP • Updated SEP &its implementation • GRM Processes • Health and safety concerns • Environmental concerns Monitoring and Evaluation Plan	• Project progress Reports • Emails • Meetings • Electronic publications as well as dissemination of hard copies • ESMP monitoring reports and reviews • Gender Assessment • Reports on the GRM • information dissemination channels	• BISP	BISP is responsible for the implementation of the ESMP and the SEP

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
	• Project ongoing and planned activities pertaining to health, emergency relief and social protection support • ESMP • Updated SEP & its implementation • GRM mechanism for public • Environmental concerns	• Information resource portal on the BISP website with provincial and district data pertaining to project activities • BISP websites for GRM information • Social media channels (e.g. Facebook and twitter) of the implementing agencies • Outreach programs on radio and state-run television where the public can call-in	• General public, • Parents of children in the Ehsas Nashonuma and the Waseela-e-Taleem Programmes • BISP Beneficiaries	BISP,MoNHSRC, MoFEPT, Provincial Departments of Health and Education
	• Project progress on activities. • Opportunities for collaboration • ESMP and other instruments • Updated SEP & its implementation • GRM Procedures • Health and safety concerns Environmental concerns	• Bi Annual Provincial consultative meetings • Project progress Reports • Information resource portal • Print, electronic and social media	• Other ministries and public bodies, • Universities and research organizations • Media, • NGOs and social protection organizations in each province/area • International Organizations such as UNICEF, ILO, ADB etc.	BISP,MoNHSRC, MoFEPT, Provincial Departments of Health and Education
	• Information on support interventions • Information on protection and prevention measures • ESMP • Updated SEP and its implementation • GRM Procedures • Environmental concerns	• Mapping of CSOs to identify outreach in provinces and districts • Vulnerability outreach assessments to identify beneficiaries especially when it is a question of communal assets. • Community meetings in disadvantaged/ vulnerable areas • Project Brochures, posters	• Affected individuals and their families • Local communities • Vulnerable groups • Indigenous people (the Kalash)	BISP,MoNHSRC, MoFEPT, Provincial Departments of Health and Education

4.4. Proposed Strategy to incorporate the view of vulnerable groups

Consultations using FGD as a tool, will be carried out with representatives of disabled citizens, women, minorities and Kalasha will be carried out, and accordingly engagement mechanisms and frequencies, will be designed and customised for vulnerable people. This will continue throughout the Project life. A few such representative bodies have been identified in the design phase, which will be further verified and validated in the inception (first six months) phase of the project. These have been mentioned in section 3.3

4.5. Timelines

The frequency of stakeholder engagement will vary across the TA activities (quarterly, bi-annual or annual), depending on the nature/pace of TA activity design/implementation, its social and environmental risk and impact and its relevance to the stakeholders. As consultations are held with stakeholders these timelines will be ascertained accordingly when the SEP is updated following project effectiveness.

The project will review its stakeholder engagement against the SEP bi-annually, and this review will be a part of the progress report that will be shared with the client management and the World Bank.

4.6. Review of Comments

All stakeholder engagement activities (FGDs, KIIs and consultations) will be recorded and transcribed. Comments provided by stakeholders will be collated and reviewed following each engagement activity. These comments will be analyzed and formulated into a report which will be shared with BISP and the relevant Government Departments (Provincial Health Departments, Provincial EPAs etc.) for further action.

4.7. Future Phases of the Project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. The modes and frequency of reporting to stakeholders will be determined by the Team during the first quarter of project implementation after conducting initial workshops/FGDs and KIIs with the stakeholders.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources (estimated cost: USD$20,000)

Implementation of all ESF instruments including the SEP will be financed from the program budget. An estimated budget will be provided in an updated SEP at the start of program implementation. Based on prior experience in similar engagement and awareness campaigns undertaken by the GoP, the budget for the SEP is proposed to be approximately USD$20,000. The detailed costs will be calculated once the activity plans for the project components are developed.

5.2. Management Functions and Responsibilities

BISP, an autonomous authority working under the newly created Poverty Alleviation & Social Safety (PASS) Division, is the main implementation agency for the Program. BISP is headed by a Chairperson supported by a Management Board, which includes governmental and non-governmental members. The Chairperson provides strategic guidance and ensures implementation of the program in accordance with Board decisions. The key functions of the Board include approving the eligibility criteria for financial assistance, approving BISP policies, regulations, and budget and ensure transparency through monitoring of the organization. The Secretary of BISP, appointed by the Federal

Government, officiates as the Principal Accounting Officer of the organization as well as the ex-officio Member/Secretary of the Board.

The Secretary BISP heads the Management, which includes several Director Generals (DGs) at headquarters as well as four provincial and two regional levels. The provincial/regional offices are the main coordinating entity for their respective geographic areas and are responsible for implementing policies and plans in accordance with procedures defined by the program's operational manuals and guidelines. They supervise and 418 functional divisional and tehsil offices nationwide.

There are five operational wings that are absolutely essential for on ground implementation of the CRISP Program. These include NSER, Cash Transfer, Conditional Cash Transfer, Complementary Initiatives and Technology Wings. NSER will be instrumental in the implementation of RA 1, CI Wing in RA 2 and CCT Wing in RA 3. CT Wing will be cross supporting RA 1 in further enhancement of the payment system and RA 2 through establishing the delivery mechanism for hybrid social protection scheme. Technology Wing as in the past will be supporting across all RA by developing and managing the IT based registries and delivery systems.

6.   Grievance Mechanism

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects.

- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and

6.1.   Description of GRM

BISP has a comprehensive Case Management System (CMS)/Grievance Redress Mechanism (GRM) in place since 2012 that is available to both existing beneficiaries and community members. The system comprises of a web-based application that provides access to BISP staff right up to the Tehsil (sub-district) level. It assists the BISP operational teams to receive and address beneficiaries' complaints in relation to quality of services and requests for update of information of households and families participating in the Program. It also enables existing and potential beneficiaries to understand the procedures to lodge appeals and complaints - particularly appeals by households who have either not been surveyed or their poverty score is above the eligibility cut off score but they consider themselves to be poor and eligible for BISP benefits.

The grievance/complaint resolution authority has been devolved from the Head Office to the Tehsil level interface, ensuring that resolution time is quickened and beneficiaries are provided with a more personalized environment while tracking. The system is online and all offices are linked on a real time basis to process these requests. Both internal and external action committees have been set up to address attempted corruption or malpractice complaints received against BISP staff or contracted vendors.

The new banking[6] contracts have resulted in building of a robust and transparent system for payments to the affectees throughout the country. With the integration of the payment complaint management system (PCMS) with the Banks complaints registration mechanisms (CRMs), the GRM mechanism will be further strengthened. With the implementation of exceptions[7] policy, the beneficiaries who are not able to get payments biometrically will now be able to withdraw their payments in a transparent manner.

During the preparation of the National Social Protection Program, an Environment and Social System Assessment (ESSA) was undertaken to strengthen BISP's capacity, among others, for complaint handling and tracking facility. This provides an avenue for utilizing the services of the existing GRM within BISP. The existing GRM system of BISP may be provided additional resources to manage additional caseload due to the CRISP project. BISP has a comprehensive complaint management mechanism in place through which anybody can request for inclusion, check eligibility, status, report for exclusion, lodge a complaint/appeal and seek other information by visiting BISP field/Tehsil offices, by writing a letter to BISP, by lodging a complaint online on the BISP website or by calling on the BISP toll free number. For this purpose, BISP has set up a centralized call center that is available for the service of the callers from across Pakistan from 8.00 am to 5.00 pm. The staff provides information about new initiatives, register complaints and resolve complaints on spot regarding CNIC updates and appeals for eligibility cases. The status of all pending complaints is available on BISP's website with IDs for tracking. The active complaints remain on this link till they are resolved and are available to public for reasons of transparency. The program beneficiaries' CMS became fully functional in mid-April 2012. As of October 31, 2020, BISP has received almost 3 million cases out of which 98% have been processed within 72 hours of receipt.

Further, although BISP has a Grievance Redress Committee (GRC) in place, the complaint interface for procurement on BISP's website needs to be made more user friendly to facilitate bidders to lodge complaints. Records are available, but scattered within BISP and their retrieval takes time. Though the responsibilities of different wings are clearly delineated, delays occur in payment to bidders for a lack of common understanding of procurement and contract management responsibilities within the users' wing. Inadequate delegation of financial powers also contributes to such delays. The perception that payments to bidders are not released promptly could have led to limited participation of bidders in procurement opportunities.

Measures to mitigate gender-based violence (GBV) will also be taken into account, both as part of the overall project and, more specifically, in the GRM. To promote ownership, the project will put in place strong communication and citizen engagement to provide information as well as receive feedback from beneficiaries, especially women and other vulnerable groups. A Gender and Social Assessment undertaken under CRISP will inform the mitigation measures and actions in the ESMP that may be required to address existing and potential gender vulnerabilities and challenges.

CRISP is proposing that a robust GRM be in place to ensure that stakeholders across the board are able to avail to a simple, accessible and effective platform for having their complaints addressed and resolved. The GRM will be a part of the BISP website and will be highly visible. The process is illustrated below.

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[6]Recently BISP has signed new contracts with Bank Alfalah and Habib Bank hired through a competitive bidding process based on an improved payment system. There is a geographical distribution of districts for beneficiary payments between the two.

[7] Older women (they lose lines on thumbs) or amputees (with both thumbs gone) will now be able to receive cash. Such beneficiaries will be provided debit cards with their name, CNIC number and photograph on the card. Otherwise BISP has discontinued using debit cards and replaced it with a biometric verification system.

Figure 2 : Steps for the GRM Process

The GRM process will commence with public communication i.e. when citizens will be informed about existing mechanisms where they can register their grievances. Methods of how to register grievances and expectations from the process will also be communicated. Information dissemination about the GRM process will be undertaken through various means. These means include but are not restricted to:

- Leaflets, brochures posters and printed material available at BISP (Headquarters,6 regional offices (located in the provincial/ regional capitals) or more than 400 Tehsil (sub-district) offices all across the country) be distributed during consultation sessions, as well as through face to face communication in the early implementation phase
- Social media such as Facebook;
- Website of BISP

Complaint Uptake Channels

Uptake will take place at multiple levels through a broad range of channels:

- **By post** at Benazir Income Support Programme Headquarters in F-Block, Pak Secretariat, Islamabad
- **Hotline/Call Center**: Toll free number at the provincial level 0800-26477
- **Online Complaint** on the BISP website
- **Walk in/complaint form** to be lodged at BISP Headquarters, 6 regional offices (located in the provincial/ regional capitals) or more than 400 Tehsil offices of BISP all across the country.

The accessibility of the GRM to lesser-educated and disabled citizens needs to be ensured. It needs to be widely circulated via dedicated media campaigns using print, electronic, and social media, so that citizens and organizations in the project area are aware of this facility and can avail it for addressing their issues and complaints. Details on response and frequency of communication with the complainant, complaint handling time and resolution process will be provided in the updated SEP to be prepared 30 days from the effectiveness date.

Grievance Records and Documentation

BISP will nominate a GRM Focal Point to manage a grievance database to keep a record of all grievances received. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by BISP or other relevant party; the final result; and how and when this decision was communicated to the complainant.

Monitoring and Review

It is critical to monitor the effectiveness of the comment response and, grievance mechanism. Appropriate measures/KPIs for this include monthly reporting on the number of grievances received, resolved and outstanding. This will be undertaken by the GRM focal point. As part of the annual review/report, analyzing the trends and time taken for grievance resolution will help to evaluate the efficacy of the comment response and, grievance mechanism. As part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the Comment Response and, Grievance Mechanism is designed in this monitoring and review will help to improve effectiveness and stakeholder buy-in.

6.2. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank's GRS8. The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

7. Monitoring and Reporting

7.1. Involvement of stakeholders in monitoring activities

A monitoring and evaluation plan to ensure transparency and accountability will be concomitantly strengthened and updated on an ongoing basis, with national and provincial partners to monitor the implementation process based on the performance indicators for the project.

7.2. Reporting back to stakeholder groups

It is critical to follow-up with stakeholders at different stages of the project cycle. Once consultations have taken place, stakeholders will want to know which of their suggestions will be used, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored.

Often the same methods used in information disclosure are applied to reporting back to stakeholders. This follow up can include large-scale forums, brochures, targeted meetings, and consultative committees. Given the current context and the need for social distancing, alternate means such as short message service (SMS), radio, television, social media handles, website of BISP may also be employed to share updated information with stakeholders.

The 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. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis. Based on the data collected regularly, these indicators are:

    o Number of consultation meetings (virtual) and other public discussions/forums conducted monthly, quarterly, and annually;

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[8]For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit *http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service*. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

- o Frequency of public engagement activities;
- o Number of public grievances received (monthly, quarterly, and annually) and number of those resolved within the prescribed timeline.

Annex 1 Organogram for BISP

BISP Wing level Organogram
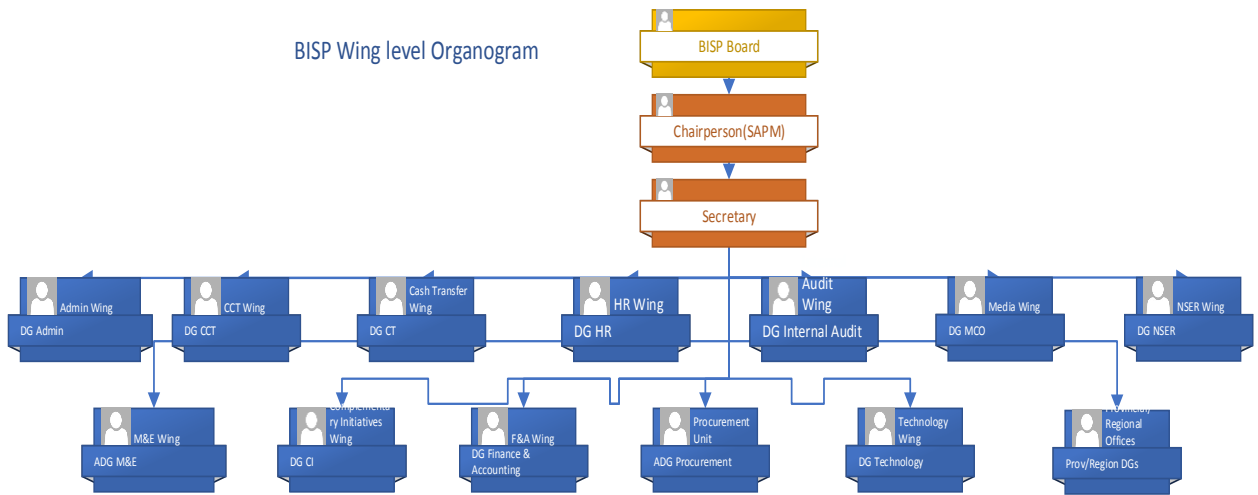
Annex 2 List of Documents Consulted

1.   Concept Environmental and Social Review Summary(ESRS Concept Stage) Date Prepared/Updated: 07/21/2020 | Report No: ESRSC01490
2.   PAD for Pakistan Crisis-Resilient Social Protection (CRISP)- P174484
3.   ESSA for Pakistan National Social Protection Program, January 26, 2017
4.   SEP for Pandemic Response Effectiveness in Pakistan (PREP) Project, May 13, 2020
5.   Template for ESS10: Stakeholder Engagement Plan for Projects in Response to COVID-19
6.   Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings
7.   The GRM Template available at
http://pubdocs.worldbank.org/en/909361530209278896/ESF-Template-ESS10-SEP-June-2018.pdf
8.   The GRM Checklist available at
(http://pubdocs.worldbank.org/en/354161530209334228/ESF-Checklist-ESS10-GRM-June-2018.pdf)
9.   Guidance Note on ESS10 for Borrowers available at:
http://pubdocs.worldbank.org/en/476161530217390609/ESF-GN10-June-2018.pdf