

Stakeholder Engagement Plan (SEP)

DEEP: Digital Economy Enhancement Project P173663

May 2023

Acronyms

API	Application Program Interface
BoI	Board of Investment
CERT	Computer Emergency Response Team
E&S	Environmental and Social
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESRS	Environmental and Social Review Summary
FBR	Federal Board of Revenue
FDH	Fiber Distribution Hub
FM	Financial Management
FTTH	Fiber to the Home
FTTP	Fiber to the Premises
FTTX	Fiber to the X
G2B	Government-to-Business
G2P	Government-to-Person
Gbps	Gigabits per second
GDP	Gross Domestic Product
GDPR	General Data Protection Regulation
GoP	Government of Pakistan
GPON	Gigabit Passive Optical Network
GRS	Grievance Redress Service
ICT	Information and Communication Technologies
IDA	International Development Association
IPF	Investment Project Financing
IRR	Internal Rate of Return
ISP	Internet Service Provider
IT	Information Technology
KP	Khyber Pakhtunkhwa
KPITB	Khyber Pakhtunkhwa Information Technology Board
Mbps	Megabits per second
MLETR	Model Law on Electronic Transferable Records
MoITT	Ministry of Information Technology and Telecom
NADRA	National Database and Registration Authority
NCPDP	National Commission for Personal Data Protection
NDIL	National Digital Integration Layer
NITB	National Information Technology Board
NOC	No Objection Certificate
NTC	National Telecommunication Corporation
O&M	Operations and Maintenance
OHS	Occupational Health and Safety
PBC	Performance Based Conditions
PBP	Pakistan Business Portal
PITB	Punjab Information Technology Board
PIU	Project Implementation Unit
PMU	Project Management Unit
POM	Project Operations Manual
PPP	Public–Private Partnership

PPSD	Project Procurement Strategy for Development
PRMI	Pakistan Regulatory Modernization Initiative
PTA	Pakistan Telecommunication Authority
RoF	Registrar of Firms
RoW	Right of Way
SEA	Sexual Exploitation and Abuse
SECP	Securities and Exchange Commission
SH	Sexual Harassment
SMP	Social Management Plan
STEP	Systematic Tracking of Exchanges in Procurement
TIP	Telecommunications Infrastructure Provider
ToR	Terms of Reference
TSC	Technical Steering Committee
USF	Universal Service Fund
VoIP	Voice over Internet Protocol
WB	World Bank
WBG	World Bank Group

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1. Introduction/Project Description

The Digital Economy Enhancement Project will support activities that will increase access to and promote the use of digital services across Pakistan, with a focus on broadband access and reducing the significant digital divide currently existing in many parts of the country. The project will also support cross-cutting improvements in the enabling environment—supporting reforms to expand broadband connectivity and to strengthen the policy and legal framework for the digital economy. DEEP will also enable institutional, policy, and regulatory global best practices through technical assistance to the implementation agencies—including the MoITT, NADRA, Board of Investment (BoI), and other provincial institutions. Under the project, NADRA (National Database & Registration Authority under the Ministry of Interior) will build a data exchange layer for government agencies to exchange information securely, as well as provide citizens with a digital ‘wallet’ to secure credentials. This is potentially transformative for increasing citizens’ access to public and private services (everything from birth certificates to banking).

The project is aligned with the 2018 Digital Pakistan Policy, and in particular objective 10.2, which calls for the establishment of a holistic (government wide) enterprise architecture and the integration of government databases and systems through e-government service portals. It is also aligned with the World Bank Group’s (WBG) Country Partnership Strategy and its objective to catalyze inclusive and sustained growth. It also corresponds with the Systematic Country Diagnostic’s (2020) identified priority of “levelling the playing field” by investing in policies to improve competitiveness and promote equity and inclusion. It will improve the efficiency of digitally enabled public services. These activities are expected to improve access to and quality of basic services, thereby improving social and human development outcomes in Pakistan.

Program Description

The project is comprised of three components:

Component 1: Improving digital economy, governance and service capabilities.

This component will provide technical assistance to the Ministry of Information Technology and Telecommunications (MoITT) for policy and regulatory reforms to address regulatory and market failures in the country’s connectivity infrastructure. It will include:

- i. Right-of-Way (RoW) reforms, development, and adoption of a RoW-single-window, on-boarding and change management of major civic agencies in the RoW-single-window, and development of RoW dispute resolution procedures.
- ii. Broadband demand analysis and stimulation options to improve the affordability of smartphones and update of digital services.
- iii. Broadband infrastructure mapping, assessment of market failures.
- iv. Review and recommendations on the institutional and structural alignment of MoITT to meet emerging challenges and opportunities for digital transformation.
- v. Nationwide stakeholder engagement, training, and workshops

This component is divided into the following sub-components:

- **Subcomponent 1(a): Development of key enablers for whole-of-government approaches:** review and support the implementation of personal data protection laws and regulations; assess the cybersecurity baseline; support the implementation of the Pakistan Cloud first policy; develop and support the adoption of an Open Data framework; develop Pakistan Digital Government Institutional Framework; develop Pakistan Digital Government Enterprise Architecture; develop Pakistan Digital Government Data Governance and Interoperability Framework; support nationwide consultation, information sessions, training, and workshops for public sector staff, private sector, and civil society.
- **Subcomponent 1(b): Development and Implementation of Interoperability Exchange Layer:** stock taking of existing sources of data in the country; building governance and institutional capacity; producing the detailed technical design and procurement documentation for the national data exchange layer; developing the technological infrastructure for the national data exchange layer; writing relevant documentation; and integrating prioritized databases and services.
- **Subcomponent 1(c): Development of digital authentication, digital vaults, and digital wallets:** define the most appropriate architecture for the digital authentication services; identify key services to be provided by the digital identification and authentication solution; deploy the prioritized services for the use of digital authentication; and creation of personal data vaults including feasibility, design and deployment, and awareness campaigns etc.
- **Subcomponent 1(d): National Digital Portal and Digital Services Collaboration:** conducting an inventory of services; mapping business processes and regulations; providing advice on transitioning systems to cloud infrastructure; producing detailed technical designs and procurement documentation; developing new systems; and supporting knowledge transfer
- **Subcomponent 1(e): Civic Innovation:** Design Testing, Communications and Outreach; Digital Inclusion for Women and Girls; Digital Government Fellowship

Component 2: Pakistan Business Portal. This component will support the Board of Investment (BoI) to modernize regulatory regimes in Pakistan at three levels of government: federal, provincial, and municipal. The first stage entails reviewing, mapping, and developing a catalogue of registrations, certificates, licenses, and others (RLCOs) across the three levels of the government, potentially including up to 800 government agencies relevant to dealing with investing and operating businesses in Pakistan. Activities for establishment of PBP will include stock taking and reform recommendation for simplifying, streamlining, and improving existing regulatory requirements for investing and operating business across Pakistan; digitalization of compliance with regulatory approvals; institutionalizing the reform process as well as the management and upgradation of PBP; and Communicating reforms and transitions to PBP.

Component 3: Project management. This component will cover the establishment of Project Management Units (PMU).

Institutional Arrangements

The project will be implemented by the MoITT, which has the required institutional mandates. The Member for Information Technology “Member, IT” will provide general implementation and coordination oversight. In terms of specific components, Component 1 will be managed and implemented by MoITT. Component 1 (a) and 1 (d) will be led by MoITT with the assistance of provincial IT Boards; 1(b) and 1(c) will be led by NADRA; while Ignite will assist MoITT for the civic innovation subcomponent (1e). Component 2 will be managed by BOI. All the implementation support entities (MOITT, NADRA and BOI) will establish separate PMUs after the project launch.

MoITT will establish a PMU – supported through component 3 – responsible for overall project administration, oversight of procurement, financial management, safeguards, monitoring and evaluation, communications, and periodic reporting. The PMU will be led by a Project Director and its core team will include specialists in Financial Management, Procurement, Social and Environmental Safeguards, Monitoring, Evaluation and Reporting, and Communications/Outreach. A project operations manual (POM) will be prepared within three months of Project Effectiveness, describing in detail the PIU’s organizational structure, duties, and responsibilities of PMU staff, as well as technical, administrative, financial, procurement, safeguards, gender considerations, monitoring and evaluation, and reporting. One E&S Specialist and one Gender Specialist (two positions covering gender, social and environmental related aspects) will be hired by the PMU. Furthermore, an e-waste Specialist will be placed in the PMU. The e-waste specialist maybe someone from the existing staff with additional responsibility of e-waste management, or could be hired specifically for the purpose of e-waste management and coordination. In the latter case, the incumbent staff maybe given the responsibility of e-waste management and coordination across the various initiatives of MoITT, within and outside of DEEP. PMU staff will be hired soon after Project launch. The detailed job description, qualification requirements, and selection procedure for the PMU staff will be approved by the Project Steering Committee.

The Project Director and the PMU staff will report to a Project Steering Committee (PSC) chaired by MoITT and comprising representatives of MoITT, BOI, NADRA and provincial IT boards/departments. The PSC will meet on a quarterly basis to review project management, monitor the achievement of deliverables, review the quality of reports and resolve issues that may arise during implementation.

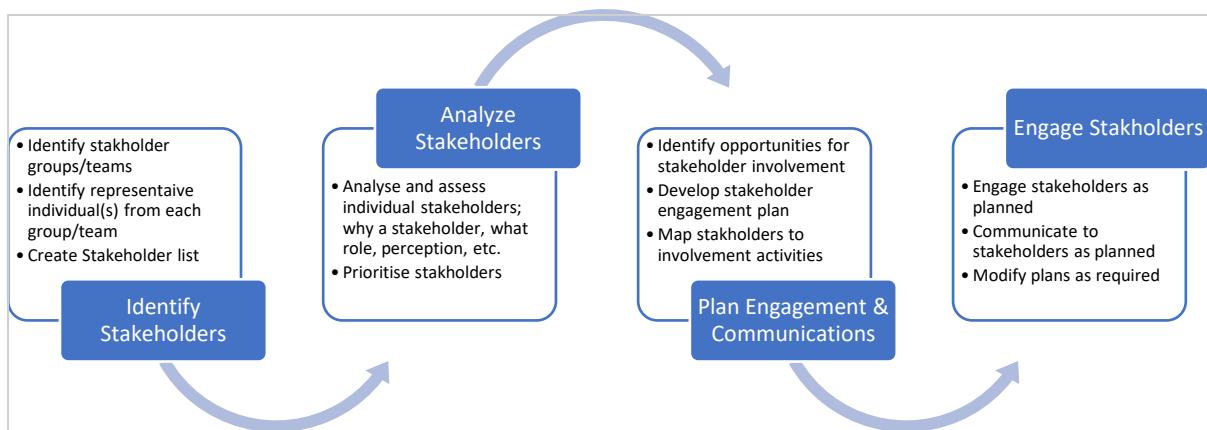
Objectives of SEP

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 the MoITT to 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 project lifecycle. **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.** It does this by:

- Establishing a systematic approach to stakeholder engagement that will help MoITT identify stakeholders and build a constructive relationship with them
- Assessing the level of stakeholder interest and support for the project, and to enable stakeholder views to be taken into account in project design and environment and social performance
- Promoting and providing means for effective, inclusive engagement with project stakeholders throughout the project lifecycle
- Ensuring that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner

Figure 1: Process of Stakeholder Engagement



2. 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.

Stakeholder analysis identifies relationships between the project and potential stakeholders. Stakeholders are defined as individuals, communities, and organizations/institutions that Project stakeholders are defined as individuals, groups, or other entities who:

- are impacted or likely to be impacted directly or indirectly, positively, or adversely, by the Project (also known as ‘affected parties’); and
- 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.
- are highly vulnerable to potential project impacts and do not have a voice to express concerns or understand the project’s risks and impacts. Aspects of vulnerability may include: gender, ethnicity, religious identity, health conditions, disabilities, economic marginalization, financial

and food insecurity, and disadvantaged status. Stakeholders in this category are referred to as “disadvantaged/vulnerable individuals and groups”

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.

Methodology

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

2.1. Affected Parties

ESS10 refers to Identifying individuals, groups, and other parties that may be directly or indirectly affected by the project, positively or negatively. The SEP focuses particularly on those directly affected, positively or adversely by the project activities. Under the proposed scope of project, local communities are not affected parties as they are not subject to direct impacts from the Project. At this time, the following have been identified as directly affected parties under this category, and these will be further confirmed during program implementation:

- Board of Investment
- Ministry of Information Technology and Telecom
- National Information Technology Board
- Provincial Information Technology Boards (KP and Punjab)
- Sindh and Baluchistan IT Departments

- National Database and Registration Authority (NADRA)
- Universal Service Fund (USF)
- Provincial line departments
- *E-Khidmat* Centres Punjab
- KP Citizen Facilitation Centres

2.2. 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:

- Council of Common Interests
- Pakistan Telecommunication Authority
- Punjab Safe Cities Authority
- National Commission for Personal Data Protection
- NGOs (Bolo Bhi, Beti, Aurat Foundation, AGAHI, Digital Rights Foundation, Rozan, Media Matters for Democracy, NRSP, others)
- Academia (particularly computer science / engineering departments in the public sector and private universities)
- Chambers of Commerce
- Ministry of Commerce
- Federal Investigation Agency
- Private sector organizations
- Pakistan Software Association
- International Telecommunication Union
- PM Task Force on IT and Telecom
- Provincial NGOs with community outreach such as SRSP, PRSP etc.
- Press and Media

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.

2.3. 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. 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, 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.

For this project, the vulnerable or disadvantaged groups (based on access and voice perspective) may include, but are not limited to the following:

- a. People with low e-literacy levels
- b. Differently abled citizens
- c. Women especially with low or no literacy, residing in remote or rural areas, older age groups, young women and girls,
- d. Religious and ethnic minorities
- e. Transgender people
- f. Low income or remotely situated communities,
- g. Migrants
- h. Refugees

Some of the organizations representing the groups listed above include NOWDP¹, STEP², Akhuwat etc.

3. Brief Summary of Previous Stakeholder Engagement Activities

Program preparation included a detailed mapping of the stakeholders. Individuals and groups likely to be affected (direct beneficiaries) were identified. Initial mapping of other interested parties such as other relevant Government agencies, national organizations and private sector organizations has also been completed. Following initial disclosure and with the commencement of implementation of the program, the SEP will be updated based upon subsequent consultations with various stakeholder groups. These will include key informant interviews and in-depth discussions to learn about their expectations and concerns.

The SEP draft will be disclosed publicly (websites of the 3 implementing agencies) and will be updated as further stakeholder engagement takes place during the early implementation phase. MoITT will also strengthen its existing GRM to enable stakeholders to air their concerns/ provide feedback/ suggestions. Details on the GRM process are provided in section 6.

3.1. Summary of Stakeholder Engagement on Data Protection Bill

Since 2018 the MoITT has been engaging with key stakeholders on thematic areas around the project focus. It sought feedback from stakeholders – specially those working on the digital rights and privacy – on the four drafts of the Personal Data Protection Bill, the most recent in August 2021. The proposed legislation will govern the collection, processing, use, and disclosure of personal data and to establish and making provisions about offences relating to violation of the right to data privacy of individuals by collecting, obtaining, or processing of personal data by any means. The Digital Rights Foundation in particular, provided comprehensive feedback on this latest draft and emphasized the importance of an open, inclusive and transparent consultation process. Stakeholders should include civil society, industry representatives, the legal fraternity, academics, and individuals across the political spectrum. Including a wide cross-section of stakeholders will ensure that all aspects of data protection are captured in the Bill and result in ownership over it when it is implemented. While the process itself is important and crucial, the substance of the Bill must adhere to human rights standards to ensure that Bill not only complies with international norms but also Article 14 of the Constitution of Pakistan, 1973 which guarantees the right to privacy of all persons.

¹ Disability inclusion initiative which is focused on inclusion through empowerment

² A Cross Disability and Development organization. Conceived by people with disabilities in 1997.

3.2. Summary of Stakeholder Engagement done during Project Preparation

Multiple stakeholder meetings and engagement events have taken place over the course of project design:

- A meeting was held at the NTC Headquarters, Islamabad on the 28 January, 2022 which was attended by representatives of the Telecom operators, Ministry of Planning, Development and Special Initiatives, Ministry of IT & Telecom, and the World Bank.
- Prior to the joint consultation meeting at the NTC, individual consultation meetings were also held with the telecom operators.
- A virtual stakeholder consultation was also organized on 27 April, 2022 with civil society and private sector organizations working on digital transformation.

The project design has undergone vital and significant changes since its conception. The changes have rendered some of the discussions during previous stakeholder meetings not relevant for the current stage of the project. Therefore, the entire discussion is not being reported here. However, the pertinent points raised by the stakeholders during the virtual consultation session on 27th April, 2022, are summarized in the table below, as they remain largely relevant even for the revised project design:

Stakeholder	Question/Discussion Point	Project Response
Ernst and Young	Where is the project in terms of contracting? In terms of stakeholders, we see that there are lots of implementation stakeholders, so what about organizations like state banks and provincial governments where service delivery will happen?	MoITT will form a steering committee and that will coordinate with the provinces.
Ernst and Young	The policy and institutional reform was quite significant in the concept note, just want to know if it's still there and what shape and form it is in the project currently.	Yes, there is separate component, which will support policy and regulatory reforms.
Digital Rights Foundation	Is it a multi-stakeholder approach or just government agencies? Also want to bring up issues around GBV and digital rights	We are happy to engage more and MOITT will involve anyone with potential roles in stakeholder consultations. Dialogue with stakeholders will continue. Stakeholder engagement envisioned throughout life of project. Presentation also included the point of cyber bullying and GBV. So definitely we are interested in organizations that work on digital/online cyber gender based violence issues. Other types of engagement also such as designing training for govt authorities engaging with the project.

Stakeholder	Question/Discussion Point	Project Response
Pakistan Telecom Authority	I want to highlight that PTA which is regulator is the major stakeholders in expansion of broadband services. In this project there is no role of telecom regulator?	The project does not directly entail expanding broadband services. PTA remains an important stakeholder. MoITT will regularly engage with PTA to discuss next steps.
Code for Pakistan	Institutional strengthening through policy. Let's say we are working towards policy making. How do you intend to do that? Go through MOITT and TORs will be published and people will be asked to participate. Will there be a committee or a task force since it is a dialogue activity.	This a very valid observation and regular stakeholder engagement activities will take this into account.
Tabadlab	Is this just a architecture development or are we specifically developing discrete pieces for instance the ID wallet piece?	Working initially on frameworks and government enterprise architecture.
Code for Pakistan	Documentation we do well, but when it comes to execution, deeper impact is neither executed appropriately, nor is the impact analyzed later on. The risk is not creating the impact correctly at the level you are trying to create it.	Your point is noted. There are layers of due diligence so we will try to ensure this is considered.
NEC Consultants Pvt. Ltd.	Data privacy issues. How would coordination take place between departments?	Many activities under the project revolve around creating a data secure environment – so we are well cognizant of data privacy issues.
Ernst and Young	Key risk should be the digital divide along income, gender, provincial, city tiers. This project could further the digital divide. The framework for the project should be participative and reach out to those people who are digitally excluded at this time.	Point well taken. Project is already targeting 10,000 women trainees to work as agents of change.
Optera Digital	WB is one of the biggest investors in energy transition. Are we exploring merging blockchain tech with energy transformation systems?	This is not in the mandate of this project.
Digital Rights Foundation	Regarding online GBV, the concern is that this has been under discussion for many years. Has there been deeper discussion of how this component is being addressed? It is an intersectional issue and there are multiple layers of vulnerability. How do we look into this issue, not just in terms of regulatory and law enforcement, but also looking into tech companies and how they respond to issues like this in Pakistan.	Challenges will be addressed through stakeholder engagement. MoITT will be reaching out to a wider audience and World Bank can facilitate such a meeting and highlight these issues in the project road map.
Code for Pakistan	My experience from digital "super app" also known as citizens wallet. Smart Dubai with their UAE pass project has been v successful in digging into social impact aspect. UAE has a minister for happiness. From the aspect of digital intervention, that is a good	Thank you for these excellent examples. It would be great to connect the implementing agencies to these programs.

Stakeholder	Question/Discussion Point	Project Response
	model to look at. Dr. Sohail Munir would be very helpful. Singpass in Singapore, the gender based and marginalized community based aspects have been really well understood.	
NEC Consultants Pvt. Ltd.	Regarding E&S documents, will there be a gender action plan?	We should give preference to girls and women for trainings under the project. There will be a gender action plan for this project.
Digital Rights Foundation	Our work is digital rights so important to talk about civil liberties in online space. Any project design of this sort always looks into UN guiding principles on Business and human rights etc. Pakistan Government has signed and ratified the ICCPR. These projects should be centered on international human rights frameworks and if that is not possible it should be reflected somewhere. It would be great to have a look at international best practices especially UN. Regarding data protection and online harm rules, how will those regulations be used and the question of rights presented to the public	The Personal data protection bill has been approved by the Cabinet and is with the Parliamentary Committee. It is important and we need to make a road map for such conversations
National Incubation Center / LMKT	There is a risk of redundant infrastructure in data centers and the social and environmental impacts of that.	Initially data centers were proposed but now there will be a cloud model and the providers will be the private sector.
KP IT Board	Are you considering Starlink while going for FTTH/FTTX	It is not relevant for this project
Pakistan Telecom Authority	There is no mention of Digital Gender Inclusion initiatives in terms of infrastructure development. It is one of the most pressing issue at the moment for digital deepening of the economy.	Your point is noted
Digital Rights Foundation	We can't address digital divide without addressing digital gender divide across Pakistan	That is correct and that is why stakeholder engagement is so important
Code for Pakistan	The key term is "Framework". I think in terms of risks, in whatever aspect of the project, if a Framework "stage" is included in the process it will considerably mitigate risk. Bank's proactive, consistent oversight throughout project all the way to retrospective should be an integral part of the process. In terms of trainings, we can only offer CivicTech, GovTech and Project related learnings. E.g.: Monitoring and Evaluation Methodology, Agile Methodology, Human Centered Design, Project Management	MoITT to setup a meeting where a future roadmap or a working group can be decided for providing input.

Stakeholder	Question/Discussion Point	Project Response
Ernst and Young	We specialize in policy and institutional reform and we are working in this realm particularly in the digitization of Government institutions at the federal and provincial level. So we can come in. Also worked on bottlenecks in the digital ecosystem in Pakistan and can be useful in this regard	This is well noted.
Telecom Consultant	Working on this project and with my experience with USF, can contribute to the implementation and how things are modelled. Regarding engagement there should be working groups and the mode should be a hybrid of in person and virtual.	Thank you
Pakistan Telecom Authority	Would like to be engaged with the team and extend our assistance and would like to be a participant in the sub groups if they are assigned under different tasks. Specifically the Economic Affairs Department within the PTA	Thank you

With the revised project design, couple of meetings were held at the MoITT, Islamabad on 30th June 2022, and 19th July, 2022 to discuss the implementation modalities of the Project. These meetings were attended by the representatives of MoITT, NITB, NADRA, PITB, SBP, PTA, SECP, KP IT Department, AJK IT Board, Secretary (Information) KP, and IT Department Sindh. A total of 19 officials attended the first meeting while 17 attended the subsequent one.

Following decisions were made during these meetings:

- Participants of the meeting endorsed the concept of the project and agreed that each component of the project is need of the time, which may be executed collaboratively for necessary integration and synergy between Federal and Provincial Institutions.
- All the Federal and Provincial stakeholders would furnish their feedback within five (05) days in terms of component wise interest in execution and implementation with justification and mandate.
- Based upon feedback of stakeholders, Private sector will be engaged to create cross sectoral synergy (MoITT).
- Based upon consultations and feedback, execution body of each component will be decided.
- As there are multiple stakeholders interested in development of the project, therefore, a meeting will be convened only among stakeholders who showed interest to become development partner. So that one lead development / implementation partner may be identified for each component.
- The final list of Executing Partners(s) will be shared with all the stakeholders.

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, transgender, and elderly persons) will be extensive and meaningful.

3.3. Summary of Project Stakeholder Needs, Methods, Tools and Techniques for Stakeholder Engagement

A detailed stakeholder mapping of the three categories of stakeholders- Affected, Interested and Disadvantaged/Vulnerable Groups has been undertaken and will be used to guide the initial consultations during program implementation. However, given the COVID-19 pandemic context, physical distancing requirements will be in place and appropriate adjustments will be made to the mode used for conducting consultations in accordance with COVID-19 SOPs. Virtual consultations will be held using WebEx, telephone calls, SMS and emails.

The following table lists the key stakeholder categories and identifies their specific needs for engagement.

Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone,	Specific needs (accessibility, large print, child care, daytime meetings)
Government/institutional Other Interested parties	Stakeholders not directly involved in or affected by project activities but may be consulted for technical support or collaboration during the design and implementation of the project.	<ul style="list-style-type: none"> •Urdu in the case of national/provincial level institutions/groups •Local languages in the case of district level institutions, 	<ul style="list-style-type: none"> •Email and phone •In-person individual/ small group meetings 	<ul style="list-style-type: none"> •Meetings during working hours preferably
Academics	Often employed in research organizations and Universities	English or Urdu	Email and phone	<ul style="list-style-type: none"> •Meetings during working hours preferably
NGOs and CSOs working on digital transformation	Often exercise influence in local communities and can be. Important in social mobilization and awareness raising	<ul style="list-style-type: none"> •English and Urdu with larger NGOs at the provincial level •Local languages and Urdu at district level when engaging with CSOs 	<ul style="list-style-type: none"> •Email and phone •In person meetings 	<ul style="list-style-type: none"> •Meetings during working hours preferably •Working Group to meet on a quarterly basis

Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone,	Specific needs (accessibility, large print, child care, daytime meetings
Women	May not have much freedom of association or movement	<ul style="list-style-type: none"> •Punjabi, Seraiki in the case of Punjab province •Sindhi in the case of Sindh province •Pushto in the case of KPK province •Balochi in the case of Balochistan province. •Urdu in urban areas 	<ul style="list-style-type: none"> •Phone, social media or radio •Community meetings organized by local CSOs working in rural areas 	<ul style="list-style-type: none"> •Accessible mainly to other women. •Times of availability will vary for different groups •Younger married women may need child-care

The SEP also highlights methods to involve citizens voices and feedback and suggests different measures of engagement across Pakistan.

4. Stakeholder Engagement Program

4.1. Purpose and timing of stakeholder engagement program

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 stakeholder engagement program for the project 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 design/implementation; mitigate possible negative social and environmental downstream impacts; and enhance project acceptance and socio-environmental sustainability. Stakeholder engagement may be divided into two phases:

- Phase I (Project Preparation): Stakeholder engagement during this phase focused on representatives from think-tanks, development practitioners, digitization experts and digital rights organizations representing disadvantaged citizens and other relevant provincial organizations. The purpose of stakeholder engagement during this phase will be to: ascertain institutional needs; apprise all stakeholders about planned activities/reforms; improve project design; create

synergies; and include the perspective of vulnerable groups

- **Phase II (Project Implementation):** Extensive stakeholder engagement will continue to be carried out during this phase with institutional stakeholders, 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 Disclosure³

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	MoITT, BoI, PITB, affected parties, interested groups, public at large, vulnerable groups, Government entities	Appraisal stage SEP, Appraisal stage ESCP.	<ul style="list-style-type: none"> • Websites of MoITT, BoI, PITB, before project effectiveness • One-on-one meetings, • Consultation meetings
Implementation	MoITT, BoI, PITB, and other relevant Government ministries and entities	PAD, E&S principles and obligations, Consultation process/SEP, ESCP, project information	<ul style="list-style-type: none"> • Websites of MoITT, BoI, PITB • One-on-one meetings • Consultation meetings
	Local communities and Vulnerable groups (including minorities, women, people with disabilities, transgender)	Regular updates on project activities and specific interventions for vulnerable groups (through DEEP), SEP and GRM procedures.	<ul style="list-style-type: none"> • Outreach through local community organizations • Public notices • Press releases in the local media and on the project website • Airing of key messages through programs on local FM radio, television and text messages • Dissemination of information through social media
	Other ministries and relevant public agencies	Project overview, Progress reports, SEP and GRM procedures.	<ul style="list-style-type: none"> • Consultation meetings • Electronic publications Information leaflets and brochures

³ 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
	NGOs, Academics, Organizations working on Technology and Digitization	Scope of Project, social protection interventions, opportunities for collaboration, updated SEP and GRM procedures.	<ul style="list-style-type: none"> Information Resource portal on project website Bi-Annual Project Dissemination Workshops
	First time technology users	Relevant project information related to the digitization program, venues, and protocols; updated SEP and GRM procedures.	<ul style="list-style-type: none"> Websites of MoITT, Bol, PITB Print, electronic, broadcast, and social media SMS
	General public	<ul style="list-style-type: none"> FAQs, Updated SEP and GRM procedures 	<ul style="list-style-type: none"> Websites of MoITT, Bol, PITB Print, electronic, broadcast, and social media SMS

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 a month of the project effectiveness date.

4.3. Proposed strategy for consultations

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
Preparation	<ul style="list-style-type: none"> Need of the project Planned activities E&S principles, risk and impact, management/ SMP Grievance Redress mechanisms (GRM) (including SEA/SH/ Cyber Harassment and GBV) 	<ul style="list-style-type: none"> 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, WebEx, Microsoft Meetings, SMS, emails, etc.) 	Officials from MoITT, Bol, and PITB	PMU E&S Specialist, Gender Specialist, and GRM focal points at MoITT, Bol, and PITB

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> Proposed project components Environmental, Social and Gender related Risks and any other concerns stakeholders may have 	<ul style="list-style-type: none"> Phone Emails Individual meetings in person and virtually Virtual Consultative workshops providing background information and discussing environmental and social risks Appropriate adjustments were made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, WebEx, Microsoft Meetings, SMS, emails, etc.) 	<ul style="list-style-type: none"> Relevant Government departments and organizations Academia NGOs' working in communities 	PMU E&S Specialist and Gender Specialist at MoITT
Implementation	<ul style="list-style-type: none"> Project progress on ongoing activities/targets and outputs Updated SEP & its implementation GRM Processes Environmental and social concerns Monitoring and Evaluation Plan 	<ul style="list-style-type: none"> Review of Project progress Reports Emails Meetings Electronic publications as well as dissemination of hard copies of E&S documents SMP monitoring reports and reviews Gender Assessment GRM Reports Updated SEP 	Officials from MoITT, Bol, and PITB	GRM Focal Points on GRM issues E&S Specialist and Gender Specialist at PMU on Project progress, implementation of the SMP and the SEP, and E&S concerns

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> • Project progress on activities. • Opportunities for collaboration • E&S Instruments such as the SMP / GAP • Updated SEP & its implementation • GRM Procedures • Environmental and social concerns • SEA/SH and Cyber Harassment (including GBV) 	<ul style="list-style-type: none"> • Biannual Provincial consultative meetings • Review of Project progress Reports • Information resource portal on the MoITT website with data pertaining to project activities and GRM information Print, electronic and social media	<ul style="list-style-type: none"> • Other ministries and public bodies, • Universities and research organizations • Print and Electronic Media, • NGOs and CSOs in each province/area • International Organizations such as, ADB etc. 	GRM Focal Points at MoITT, Bol, and PITB - GRM Procedures E&S Specialist and Gender Specialist at MoITT for Project progress, implementation of the SMP and the SEP, and E&S concerns

The frequency for consultations and reporting during the implementation stage will be determined within a month of the project effectiveness date.

4.4. Timelines

The frequency of stakeholder engagement will vary across the project activities (quarterly, bi-annual or annual), depending on the nature/pace of the 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 reviewed and 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.

4.5. 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 MoITT, Bol, and PITB for further action.

4.6. 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 which will be conducted biannually.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources (estimated cost: USD\$50,000)

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 undertaken by Government agencies, the budget for the SEP is proposed to be approximately USD\$50,000. The detailed costs will be calculated once the activity plans are developed.

5.2. Management Functions and Responsibilities

The MoITT will establish an overall project management unit (PMU), as described in previous sections. The E&S expert at the PMU will be responsible to implement the SEP and coordinate the stakeholder engagement activities.

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

Pakistan Citizen's Portal (PCP) — National level

Headed by the Prime Minister's Performance Delivery Unit (PMDU), Pakistan Citizen's Portal is an online integrated GRM which connects all government organizations at the federal and provincial level through a mobile application. Available on both Android and iOS, PCP is used for lodging complaints against any government department or functionary, seeking guidance/information regarding government procedures and to provide suggestions to the government for the resolution of any issue pertaining to the interest of the general public. User Guidelines Manual for PCP is available in both Urdu and English. The overall public satisfaction rate with the PCP is low (39%) and only 6.8% of registered PCP members are women. Despite being a robust GRM, PCP's utility to the project's disadvantaged and vulnerable stakeholders is limited due to low female coverage and because of it being a mobile app-based platform which cannot be accessed by persons with no access to mobile phones, with low ICT literacy, or those living in areas with no network connectivity.

GRM for DEEP

It is not known whether the implementing departments have dedicated staff to respond to complaints. Therefore, a comprehensive diagnostic of these systems will be undertaken during project preparation, following which strengthening and enhancement of existing mechanisms will be proposed under the Project as elaborated below.

DEEP is proposing that a robust GRM be established 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 MoITT website and will be highly visible. The process is illustrated below in Figure 3.

Figure 3: Steps for the GRM



The GRM framework for DEEP will provide mechanisms for project beneficiaries, citizens, and project staff (including contractor staff) to lodge their concerns and complaints.

Use of audio-visuals including photos, video materials with captions and edutainment materials will be encouraged for outreach and dissemination of information on the project and the GRM, and the step-by-step GRM submissions for the illiterate or undereducated people or people with disabilities. Toll-free call centers and automated voice systems will be provided as uptake channels for digitally illiterate people and people who do not own or have access to internet or smart phones.

GBV Responsiveness

The GRM will be responsive to the risk of GBV/SEA/SH and cyber-harassment. GBV / SEA / SH assessment will be conducted and relevant mitigation measures will be included in the Gender Action Plan. The assessment and action plan will include a mapping of relevant GBV service providers and drafting of guidelines on training and capacity building of project staff and other key stakeholders regarding responses to GBV, especially referral and case management. The project staff will also be trained and sensitized on GBV/SEA/SH and cyber-bullying and harassment issues and on how to sensitivity and confidentially address complaints.

GRM Structure

A formal Grievance Redress Committees (GRC) with members nominated by the Project Director will be established. An electronic database of grievances will be maintained at the PMU. The GRC will be responsible for tracking and recording the status of all grievances received.

Complaint Process

Step 1: Receive the Complaint/Grievance

Stakeholders will be able to raise their grievances verbally (in person, or through a dedicated phone number), or in written form. All grievances will have unique identifiers (UIDs) to allow for easy tracking. Once a grievance is recorded, the UID will be shared with the complainant, as well as a tentative timeline for its resolution. This should take place on the same day the grievance is received.

Step 2: Initial Review of Grievance

The Grievance Officer (who will be a member of the GRC) will identify the party responsible for resolving the grievance. The responsible party and the Grievance Officer will then conduct an inquiry into the grievance to identify its root cause, and subsequent resolution measures.

Step 3: Resolution or Escalation of Grievances

At this stage the GRC, in consultation with the responsible party, will identify a suitable resolution to the issue. In case the issue is unresolvable at the level it is received, the GRC shall elevate it to the Project Steering Committee, the complainant shall be notified of its elevation, and an updated resolution timeline shall be communicated.

For grievances that are resolved, the details of the resolution will be entered into the register/database, and the decision will be communicated to the complainant within 3 days. The resolved grievance shall also be flagged for follow-up, and the relevant GRC will check in on the complainant's level of satisfaction with the resolution within 14 days. This feedback from the complainant shall also be added to the register/database.

Step 4: 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.

An annual sex-disaggregated qualitative review of a sample of complaints processed (ensuring variation such as along type of complaint, resolution status etc.) will also be undertaken to analyze the efficacy of the system. Regular monitoring of the grievance mechanism and its outcomes, particularly of trends and patterns, will be critical to ensuring to identify systemic problems and adapt practices accordingly.

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.

Grievance Records and Documentation

The MoITT will nominate a GRM Focal Point to manage the grievance database and 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 MoITT, BoI, PITB and any other relevant party; the final result; and how and when this decision was communicated to the complainant.

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 of the SEP 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 COVID-19 SOP compliant meetings/forums, brochures, 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, websites of MoITT, PITB and BoI 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 activities and to its schedule will be duly reflected in the SEP. Monthly or quarterly summaries and internal reports on public grievances, online harassment, enquiries and related incidents, together with the status of implementation of associated 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:
 - Number of consultation meetings (virtual) and other public discussions/forums conducted monthly, quarterly, and annually;
 - Frequency of public engagement activities;
 - Number of public grievances received (monthly, quarterly, and annually) and number of those resolved within the prescribed timeline

Annex 1: List of Documents Consulted

1. Template for ESS10: Stakeholder Engagement Plan for Projects in Response to COVID-19
2. Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings
3. The GRM Template available at <http://pubdocs.worldbank.org/en/909361530209278896/ESF-Template-ESS10-SEP-June-2018.pdf>
4. The GRM Checklist available at (<http://pubdocs.worldbank.org/en/354161530209334228/ESF-Checklist-ESS10-GRM-June-2018.pdf>)
5. Guidance Note on ESS10 for Borrowers available at: <http://pubdocs.worldbank.org/en/476161530217390609/ESF-GN10-June-2018.pdf>
6. Project Appraisal Document for the Digital Economy Enhancement Project (PI74402)
7. Concept Environmental and Social Review Summary (ESRS) for the Digital Economy Enhancement Project (PI74402)