



Islamic Republic of Pakistan

**Punjab Inclusive Cities Program (PICP)
Local Government & Community Development
Department, Government of the Punjab**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

September 2025

Punjab Municipal Development Fund Company (PMDFC)

Acronyms

BoR	Board of Revenue
EPPCD	Environmental Protection and Climate Change Department
ESF	Environmental and Social Framework
ESCP	Environment and Social Commitment Plan
ESMP	Environment and Social Management Plan
ESS	Environmental and Social Standard
FGD	Focus Group Discussion
FWMC	Faisalabad Waste Management Company
GCC	Grievance Complaint Cell
GM	Grievance Mechanism
GRM	Grievance Redressal Mechanism
GoPunjab	Government of Punjab
HUD & PHED	Housing, Urban Development and Public Health Engineering Department
IDPs	Internally Displaced Persons
IPF	Investment Project Financing
LG&CDD	Local Government and Community Development Department
NDC	Nationally Determined Contributions
NAP	National Adaptation Plan
OSH	Occupational Safety and Health
PEECA	Punjab Energy Efficiency & Conservation Agency
P for R	Program for Results
PICP	Punjab Inclusive Cities Program
PID	Punjab Industry Department
PCP	Punjab Cities Program
PDMA	Provincial Disaster Management Authority
PMDFC	Punjab Municipal Development Fund Company
POM	Project Operations Manual
RA	Result Area
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SWM	Solid Waste Management
TA	Technical Assistance
ULG	Urban Local Government

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1 Introduction

The proposed Punjab Inclusive Cities Program (PICP) aims to provide inclusive and sustainable WASH services in selected cities. The Program will support participating urban local governments (ULGs) in 16 secondary cities of the Punjab Province to provide water supply, sewerage (including wastewater treatment), and stormwater drainage services. Collectively, these interventions aim to benefit an estimated 4.5 million residents of the 16 secondary cities. In addition, the program will also support the development of a sanitary landfill site and material recovery facility (MRF) as well as the closure of an existing dumpsite in tehsil Jhang.

In addition to physical infrastructure development, the Program will provide institutional support and capacity-building to strengthen the performance of participating ULGs. These efforts are expected to enhance urban resilience to climate change through improved drainage and flood management systems, while also promoting inclusive development through increased revenue mobilization. This includes reforms in tariff structures and improvements in real estate revenues collection.

PICP forms part of a broader World Bank regional initiative that aims to expand access to WASH services for 100 million people across South Asia by 2035. Building on the Government of Punjab's (GoPunjab) previous experience with the Program-for-Results (PforR) instrument, which was successfully implemented under the Punjab Cities Program (PCP). PICP will leverage this mechanism to manage conditional transfers and reinforce institutional capacity and country systems. To further support implementation, the Program will include an Investment Project Financing (IPF) component to deliver targeted technical assistance and capacity development to key implementing agencies.

The Stakeholder Engagement Plan (SEP) is a participatory tool designed to provide guidance on how the various agencies involved in the PICP program would identify, map/categorize, engage, and maintain a responsive and transparent communication line with their stakeholders. The SEP is crucial to the overall program goal because the role of every stakeholder is important to the successful implementation of the program. This SEP provides guidelines for stakeholder engagement during preparation and implementation of the program under the IPF component. It would also guide the disclosure process for the entire PICP.

This SEP is a living document and will be updated throughout the program lifecycle. It will be the strategic tool for all program related engagements and will be:

- Disclosed prior to program commencement;
- Periodically updated and changes validated during program implementation; and
- Monitored and its effectiveness evaluated towards the end of the program.

This SEP has been prepared in compliance with the World Bank's Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure. It outlines the approach to engaging with stakeholders throughout the program lifecycle to ensure their informed participation, manage expectations, and minimize risks related to exclusion and grievances.

1.1 Program Description

The PICP supports the government of Punjab's key priorities, the sustainable improvement of water, sanitation, and drainage outcomes in Punjab. PICP builds on the achievements of the

earlier initiatives,¹ including the ongoing Punjab Cities Program (PCP; US\$200 million) which incentivized improved planning, resource management, transparency, and urban governance. PCP has delivered improved WASH services to 4.75 million citizens, operationalized new municipal e-governance systems, significantly enhanced own-source revenues in 16 ULGs, and commissioned wastewater treatment plants in 11 cities, among other investments. PICP will draw from global experience in strengthening urban governance, financing, institutional and service delivery systems, environment and social management. The PICP will build upon the robust learning agenda proposed in Phase 1 by enabling learning across provinces on water service provider reforms and hygiene behavioral change. The Program will be implemented over a period of five years between 2025 and 2030.

The proposed Program will be financed through hybrid of Program for Results (PforR) and Investment Project Financing (IPF) instruments through a US\$400 million credit from the World Bank. The larger part of the operation will be financed through the PforR instrument. IPF will be used to fund a range of institutional strengthening and capacity development activities.

Overall, the proposed Program activities for the hybrid of PforR and IPF instruments will be delivered under two results areas (RAs):

RA1: Safely managed water, sanitation, drainage and basic hygiene service: Access to safely managed WSS has considerable public health and environmental benefits by decreasing the incidence of water-related diseases - thereby contributing to reduced stunting incidence in selected areas. Interventions under this RA will encourage participating cities to prepare and provide safely managed WSS, drainage and solid waste, by supporting:

- i. Provision of new or rehabilitated water supply schemes, sewerage lines and connection points, drainage and wastewater treatment plants that meet quality standards in 16 participating ULGs
- ii. Increased sustainability of solid waste management systems by incentivizing cost recovery monitoring and waste minimization and recovery, as well as developing modern disposal capacity in Jhang. While there are E&S risks associated with the demonstration landfill site, criteria will be applied to ensure the exclusion of high-risk E&S activities.

The investments to be supported under the Program will be detailed in the POM, and can include new or rehabilitated water supply schemes, sewerage lines and connection points, and wastewater treatment plants that meet quality standards. Investments will also finance the greenfield development of a modern disposal site, plus two years of operation post commissioning to ensure proper asset management, the reclamation and closure of an existing dumpsite. The Program includes solarization to cut emissions and support Pakistan's NDC and NAP goals. It also features climate-resilient infrastructure—designed to mitigate the impact of floods, with stormwater and potential wastewater reuse—to adapt to shifting water availability and reduce groundwater reliance. The planned investments are climate-resilient (e.g., designed to withstand urban floods). The experience gained, and lessons learnt from RA1 will assist GoPunjab replicate similar sites across the province.

¹ The Punjab Municipal Services Improvement Project (US\$ 50m IPF; 2006-2013), the Punjab Cities Governance Improvement Project (US\$ 200m IPF with DLIs; 2012-2017); and the ongoing Punjab Cities Program (PCP).

RA2: Institutional Strengthening and Financial Sustainability: Ensuring efficient and sustainable service delivery will require ULGs to ensure financing for future operation and maintenance of the infrastructure investments supported by the PforR.

Activities under this component will include program management, the hiring of an independent verification agency by LG&CDD, design and supervision consultants, development of communication and awareness campaigns, a provincial MIS system, results monitoring and impact evaluation, and additional studies on cost recovery and tariffs, etc. as required. A package of capacity building and technical assistance interventions will also be provided to participate in ULGs to ensure they have the requisite capacities and systems to deliver their mandates and meet the DLIs.

This SEP covers activities financed through the IPF Window for RA2 as per the World Bank Environmental and Social Framework (ESF).

2 Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire program cycle. The SEP outlines the ways in which the local government will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the program and any activities related to the program. The SEP emphasizes methods to engage groups considered most vulnerable and that are at risk of being excluded from program benefits. The SEP seeks to:

- Identify all stakeholders affected by or interested in the program.
- Outline a strategy for continuous and inclusive engagement throughout the program lifecycle.
- Provide stakeholders with timely, relevant, and accessible information.
- Establish a structured approach to handle concerns and grievances.
- Build trust and support for program interventions, particularly among vulnerable and marginalized groups.

SEP provides an opportunity for an all-inclusive approach in program preparation, planning, implementation, and monitoring processes. It is geared toward ensuring meaningful and a wide consultative process guided by World Bank's Environmental and Social Framework (ESF), particularly ESS-10.

3 Stakeholder Engagement within the context of PICP

The program's stakeholder's engagement aims at creating a "social licence" and will depend on mutual trust, respect, and transparent communication between PICP and its stakeholders. It will thereby improve decision-making and environment and social performance. This could lead to managing costs and risks, enhancing reputation, avoiding conflict, improving corporate policy, identifying, monitoring and reporting on impacts, and managing stakeholder expectations.

3.1 Principles for Effective Stakeholder's Consultation

The underlying principle of stakeholder engagement for the program will be that engagement shall be a) free of manipulation, b) free of interference, coercion, and intimidation, and conducted based on timely, relevant, understandable, and accessible information, in a culturally appropriate format. It will entail interactions between program's stakeholders and provide them with an opportunity to raise their concerns and opinions and shall ensure that

this information is taken into consideration when designing the program and making decisions.

Openness and life-cycle approach: public consultations for the Program 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 program is inclusive. All stakeholders at all times are 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, internally displaced persons (IDPs), persons with disabilities, youth, elderly and the cultural sensitivities of diverse ethnic and religious minority groups, and those living in remote or inaccessible areas.

4 Stakeholder Identification, Mapping and Analysis

To achieve a 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 Program. 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.

4.1 Methodology

The Program intends to utilize various methods of engagement that will be used as part of its continuous interaction with Program 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 the best practice approaches, the Program will apply the following principles for stakeholder engagement:

These categories of stakeholders as per the ESS 10 are outlined below.

- a. Affected Parties** – persons, groups and other entities within the Program Area of Influence (PAI) that are directly influenced (actually or potentially) by the Program and/or have been identified as most susceptible to change associated with the Program, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;
- b. Other Interested Parties** – individuals/groups/entities that may not experience direct impacts from the Program but who consider or perceive their interests as being affected by the Program and/or who could affect the Program and the process of its implementation in some way; and
- c. Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the Program as compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the Program.

4.2 Stakeholders Identification

In the context of the PICP, effective stakeholder engagement is critical to the successful implementation of the program's initiatives. Given the diverse roles, interests, and potential influence of various stakeholders, a structured approach to their involvement is necessary to promote collaboration, enhance transparency, and reduce the risk of conflict. For the IPF component, key stakeholders have been identified and categorized as affected parties (outlined in **Section 4.2.1**), other interested parties (outlined in **Section 4.2.2**), and disadvantaged or vulnerable individuals and groups (outlined in **Section 4.2.3**).

The stakeholders within these three categories will be refined and targeted lists will emerge when the TORs for the TA outputs are developed.

4.2.1 Affected Parties

ESS 10 refers to Identifying individuals, groups, and other parties that may be directly or indirectly affected by the Program, positively or negatively. Affected Parties include local communities and organizations, community members and other parties that may be subject to direct impacts from the Program. The SEP focuses particularly on those directly affected, positively or adversely by the Program activities. The following have been identified as directly affected parties under this category. The list is indicative and will be expanded as further stakeholders are identified during the initiation and implementation of IPF activities.

- a. Urban residents in the Program targeted cities
- b. Informal settlers and low-income households
- c. Vendors and businesses in program areas
- d. Persons with disabilities, elderly, and women
- e. Communities in the vicinity of the Program's planned activities and neighboring local governments
- f. Community-based groups/Organizations

4.2.2 Other Interested Parties

These groups may not be directly affected by the Program, they may have a role in the Program 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. Targeted Urban Local Governments institutions (ULGs)
- b. Punjab Local Government & Community Development Department (LG&CDD)
- c. Faisalabad Waste Management Company (FWMC)
- d. District/Tehsil administration departments
- e. Provincial Environment Protection Department and District Offices
- f. Planning and Development Board, Punjab
- g. Punjab Finance Department
- h. Board of Revenue (BoR)
- i. Women Development Department, Punjab
- j. Social Welfare & Bait-ul-Mall Department
- k. Labor and Human Resource Department

- l. Water and Sanitation Agencies
- m. Civil society groups and NGOs on the regional, national and local levels that pursue environmental and socio-economic interests and may become partners of the program. Organizations within this group are likely to be located outside the program's Direct Area of Influence will be identified during implementation.
- n. Housing, Urban Development and Public Health Engineering Department (HUD & PHED)
- o. Irrigation Department
- p. The Provincial Disaster Management Authority (PDMA)
- q. Punjab Energy Efficiency & Conservation Agency (PEECA)
- r. Public Health and Engineering Department (PH&ED)
- s. Rescue 1122
- t. Agricultural Department
- u. Punjab Industry Department (PID)
- v. Forest, Wildlife and Fisheries Department
- w. Health and Education Department
- x. Business community
- y. Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations.
- z. Academic institutions and think tanks

The list of interested parties will be further refined, and a more targeted list will emerge once the implementation begins. 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 program life.

4.2.3 Disadvantaged / Vulnerable Individuals or Groups

It is particularly important to understand whether Program 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 Program. In the case of the TA outputs, it would be critical to ensure that awareness raising, and stakeholder engagement takes place with relevant disadvantaged or vulnerable individuals or groups to take into account their views on proposed schemes under PICP. The vulnerability may stem from a 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 Program - related decision making so that their awareness of and input into the overall process are commensurate to those of the other stakeholders.

For the program, the vulnerable or disadvantaged groups may include, but are not limited to the following:

- a. Differently abled citizens
- b. Elderly-headed households

- c. Female-headed households or single mothers with underage children
- d. Low-income families dependent on Benazir Income Support Program (BISP)
- e. Religious and ethnic minorities
- f. Transgender people
- g. Residents of informal settlements

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

4.3 Stakeholder Power and Interest Analysis

This matrix categorizes stakeholders of the PICP based on their level of power (ability to influence the project) and their level of interest (degree of concern or involvement in the project). This helps prioritize stakeholders for communication and engagement as provided in **Table 1**.

Table 1: Power and Interest Analysis Matrix

Stakeholder Group	Power	Interest	Position in Matrix	Engagement Strategy
Urban residents in program cities	Medium	High	High Interest/ Medium Power	Keep informed and involved in decision-making
Informal settlers and low-income households	Low	High	High Interest/ Low Power	Empower through outreach and participation
Vendors and businesses in program areas	Medium	High	High Interest/ Medium Power	Consult regularly and consider feedback
Persons with disabilities, elderly, and women	Low	High	High Interest/ Low Power	Engage with tailored strategies
Communities near project areas and ULGs	Medium	High	High Interest/ Medium Power	Community meetings and feedback channels
Community-based organizations	Medium	High	High Interest/ Medium Power	Involve in participatory planning
Local government institutions	High	High	High Interest/ High Power	Actively manage and collaborate
LG&CDD	Very High	High	High Interest/ Very High Power	Partner and coordinate consistently
FWMC	High	High	High Interest/ High Power	Actively manage and collaborate
District/Tehsil administrations	High	Medium	Medium Interest/ High Power	Keep satisfied with periodic updates
Environment Protection	High	Medium	Medium Interest/ High Power	Manage expectations and regulatory input

Department				
Planning & Development Board	Very High	High	High Interest/ Very High Power	Strategic engagement and regular briefings
Punjab Finance Department	High	Medium	Medium Interest/ High Power	Keep satisfied and aligned with financial goals
Board of Revenue	High	Medium	Medium Interest/ High Power	Inform on land acquisition and policy
Women Development Department	Medium	High	High Interest/ Medium Power	Consult and include in program design
Water and Sanitation Agencies	High	High	High Interest/ High Power	Coordinate for infrastructure delivery
Civil society and NGOs	Medium	High	High Interest/ Medium Power	Engage for advocacy and outreach
Rescue 1122	Medium	Medium	Medium Interest/ Medium Power	Inform and plan for emergencies
Differently abled citizens	Low	High	High Interest/ Low Power	Facilitate involvement with access measures
Female-headed households	Low	High	High Interest/ Low Power	Support through inclusive programming
Low-income BISP families	Low	High	High Interest/ Low Power	Prioritize through pro-poor interventions
Religious and ethnic minorities	Low	High	High Interest/ Low Power	Ensure representation and voice
Transgender people	Low	High	High Interest/ Low Power	Provide tailored engagement and inclusion

5 Stakeholder Engagement Program

The stakeholder engagement program 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 program acceptance and socio-environmental sustainability. Stakeholder engagement may be divided into two phases:

Phase-I (Program Preparation): Since the TA component primarily focuses on capacity development of ULGs, Faisalabad Waste Management Company, and other departments, stakeholder engagement during this phase focused on representatives of ULGs and other Government Departments. The purpose of stakeholder engagement during this phase was to ascertain institutional needs, improve Program design, create synergies and enhance the socio-environmental sustainability of the TA component of the Program.

In January 2025, the PMDFC E&S team conducted institutional stakeholders’ consultations, including ULGs and District administration. Institutional stakeholder were consulted to document their concerns and suggestions with respect to the formulation of the Program, their specific roles in the implementation of the Program, and their capacity assessment. These engagements facilitated discussions on environmental and social impacts, program design, planned activities, and implementation arrangements. Feedback from stakeholders played a critical role in designing and revising the Program Action Plan, indicators, and Program Operations Manuals, and appraisal documents by providing data and details on the existing situation, management status and priorities for the WASH sector in various ULGs. **Table 2** shows the ULGs and Government Departments visited, issues discussed, and feedback provided by these stakeholder institutions.

Phase-II (Program Implementation): Stakeholder engagement will be carried out during this phase with relevant groups and interested parties. **Section 5.2** provides a 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 TA implementation.

Table 2: Consultations with Institutional Stakeholders

Department	Issues Discussed and Feedback Provided
<p><u>Consultations with ULGs</u> <u>Sadiqabad, Mandi Bahuddin, Chiniot, Jatoi, Gujrat</u></p> <p>ULGs of selected cities in Punjab operate under the framework of the PLGA 2022 and primarily deal with urban local governance. Consultation meetings were held with Chief Officers, MOIs, MOPs and other staff members.</p>	<p>The main issues and concerns raised during meetings were as follows:</p> <ol style="list-style-type: none"> 1. ULGs expressed that in Punjab they have limited experience and capacity in land acquisition processes. They play a crucial role in coordinating with the Board of Revenue (BoR), which is the primary authority responsible for land acquisition under the Land Acquisition Act, 1894. Their responsibilities include preparing justifications for land acquisition for public use, submitting acquisition requirements to the District Collector, and providing technical assistance such as site maps and utility layouts. However, ULGs rely heavily on provincial authorities, including the BoR and District Administration, for legal procedures, making the process slow and cumbersome. 2. One of the major challenges mentioned by ULGs is managing displacement and resettlement, particularly in urban areas where informal settlers, shopkeepers, and other affected persons need to be relocated. The absence of clear municipal guidelines for managing informal occupiers or addressing gender-specific impacts of land acquisition further complicates the process. Additionally, there is often reluctance to compensate occupants without formal ownership due to fears of legal repercussions. These gaps in policy and practice result in delays, disputes, and resistance from affected communities. 3. ULGs also expressed that they struggle with capacity constraints, particularly a lack of expertise in participatory methodologies, conflict resolution, and the preparation of Resettlement Action Plans (RAPs) or socio-economic surveys. Securing funds for compensation or the development of resettlement sites is another significant challenge, with delays in payments leading to dissatisfaction among landowners and affected persons. Furthermore, resistance from local communities due to dissatisfaction with compensation packages and distrust in municipal processes often leads to prolonged disputes and frequent litigation, further delaying program timelines. 4. Addressing these challenges requires strengthening institutional capacity, improving financial and legal mechanisms, and developing clear municipal guidelines for managing land acquisition and

	<p>resettlement. A more transparent and participatory approach, combined with timely compensation and conflict resolution strategies, can help ULGs ensure a smoother and more equitable land acquisition process.</p>
<p><u>Consultations with Line Departments</u></p> <p><u>Board of Revenue (BoR)</u></p> <p>primary land administration authority, overseeing land acquisition, revenue collection, and regulatory enforcement</p>	<ol style="list-style-type: none"> 1. BOR mentioned the bureaucratic delays in land acquisition under the Land Acquisition Act, 1894 as one of the major issues. Delays in notification, valuation disputes due to outdated pricing mechanisms, and inadequate compensation often result in resistance from landowners and informal occupants. In donor-funded projects, aligning acquisition processes with international frameworks such as the World Bank’s Environmental and Social Standards (ESS 5) remains a challenge. Additionally, identifying taxable properties is difficult as landowners frequently underreport landholdings or evade taxes, further straining revenue collection. 2. BOR also mentioned that despite digitalization initiatives like the Land Records Management Information System (LRMIS), dependence on outdated manual records continues to hamper efficiency. Many areas still lack updated land title records, leading to disputes and encroachments. Resistance to change and limited technical expertise further slows the transition to digital land administration and e-services. Weak enforcement mechanisms also contribute to unchecked encroachments on state and communal land, while prolonged adjudication processes for land disputes erode public trust in revenue and judicial forums. 3. Another pressing concern emphasized by BOR is the difficulty in addressing the compensation issues of occupants without formal land titles, particularly in urban and peri-urban areas. The BoR also struggles with a shortage of adequately trained personnel for land administration, valuation, and dispute resolution. Furthermore, delays in adopting international E&S requirements, especially in projects supported by the World Bank, create procedural conflicts between national land governance frameworks and provincial systems.
<p><u>Labor Department</u></p> <p>(Responsible for regulating labor relations, ensuring workers' rights, and improving labor welfare)</p>	<p>Below is a detailed overview of the department's main concerns:</p> <ol style="list-style-type: none"> 1. A significant portion of the workforce, particularly in the informal sector, remains unregistered, limiting their access to legal protections. 2. Limited capacity to monitor compliance due to insufficient labor inspectors and outdated mechanisms. 3. Many workplaces, especially construction sites, fail to provide adequate safety measures, leading to accidents and injuries. 4. Employers and workers often lack awareness of occupational safety and health (OSH) standards. 5. OSH enforcement remains weak, especially in the informal sector, exposing workers to health hazards. 6. Many workers, particularly in informal employment, earn less than the legally mandated minimum wage. 7. Women workers face wage gaps, lack of workplace protections, and limited employment opportunities.

	<ol style="list-style-type: none"> 8. Workers are often hesitant to raise grievances due to fear of retaliation or lack of legal knowledge. 9. Limited unionization and lack of support for collective bargaining hinder workers' ability to advocate for fair treatment. 10. Persistent issues with child labor and bonded labor, especially in brick kilns, agriculture, and domestic work. 11. The Labor Department collaborates with ULGs to enhance the living and working conditions of laborers, ensure compliance with labor laws, and promote workers' rights at the local government level.
<p>The Social Welfare Department (Responsible for promoting social welfare, providing care and support for vulnerable groups, and ensuring their integration into society)</p>	<p>Below are some key concerns:</p> <ol style="list-style-type: none"> 1. Face challenges in identifying and reaching these vulnerable populations, especially in rural or underserved areas. 2. Inadequate funding to meet the needs of vulnerable groups, and the delivery of welfare services such as shelters, healthcare, and educational opportunities. 3. Inadequate staffing levels and limited professional training for social workers and welfare officers, limiting the impact of initiatives and support programs. 4. Limited support systems or rehabilitative services to combat issues related to domestic violence, harassment, or sexual assault, including shelter, legal assistance, and rehabilitation services 5. Difficulties in implementing programs due to overlapping mandates between multiple social service entities, delays in policy approvals, and gaps in coordination with local governments and other agencies. 6. Lack of widespread awareness of the available social welfare services, making it harder for the target groups to access support and a lack of robust community outreach, particularly in underserved areas. 7. Poor enforcement of child protection laws in some areas to prevent child labor and protect children from abuse and exploitation. 8. Limited opportunities for people with disabilities in the workforce, resulting in their continued dependence on social welfare programs rather than becoming self-sufficient. 9. Limited government funding and reliance on ad-hoc financial support can create challenges in sustaining long-term social welfare programs. 10. Lack of consistency in welfare policies due to change of governments. 11. Lack of coordination between the Social Welfare Department and other organizations such as local governments, NGOs, healthcare providers, and police, especially when addressing complex social issues.
<p>Environmental Protection and Climate Change Department (EPCCD)</p>	<ol style="list-style-type: none"> 1. As per EPCCD, the ULGs will have to require an NOC from the department for the water and sanitation and sanitary landfill projects under the Program. These projects will include water supply schemes and treatment plants (submission of IEE for total cost less than Rs. 50 million, and EIA for cost above Rs. 50 million), wastewater channels/sewerage system schemes, wastewater

	<p>treatment plants with treatment capacity greater than 100 m³/hour, and landfill sites (submission of EIA). There will be no objection from the department to constructing stormwater drainage at the median of the roads.</p> <ol style="list-style-type: none"> 2. The Department mentioned that they always face problems with respect to the quality of the IEE/EIA reports received from the clients. Most of the times key technical information is not described in the report. The consultants who prepare the reports only mention those aspects of the project under which they have command whereas the other aspects, where their knowledge is limited, are generally ignored. Project land is already purchased by the proponent before submitting the IEE/EIA reports, therefore, this land is justified to be the right land by presenting the biased site alternative analysis. 3. The capacity of EPCCD head office is satisfactory for processing complex projects, and it is moderate for the teams based in district offices.
<p>Housing, Urban Development and Public Health Engineering Department (HUD & PHED)</p>	<ol style="list-style-type: none"> 1. As per HUD & PHED, the district level laboratories of the department are available to test the water quality of the districts. 2. Consultants are hired to conduct IEE/EIA of the water and sanitation projects under PHED. 3. The Department mentioned that they follow local government laws for the E&S aspects of the projects. 4. Community consultation is always carried out during the designing and implementation of water and sanitation projects in any area.
<p>The Provincial Disaster Management Authority (PDMA)</p>	<ol style="list-style-type: none"> 1. As per PDMA, the flood prone areas of the Punjab province are mapped, and this information is available to the public. 2. The cities are affected by different types of floods including riverine, urban, and sheet. Authority has its presence at district and tehsil level to cope with the disasters. 3. PDMA district/tehsil level offices are in close coordination with Rescue 1122, Civil Defense, District Governments and Police for immediate rescue and rehabilitation operations. 4. PDMA's major functions are the early warning of the natural hazards to the communities, managing and response to disaster and calamities, and rescue and evacuation of the affected people in case of disaster. All the machinery to respond to the disaster, is available with the local agencies. In case of a shortage of these machineries, PDMA manages to provide it to the agency concerned.
<p>Punjab Industry Department (PID)</p>	<ol style="list-style-type: none"> 1. During the consultation, PID mentioned that contaminated wastewater is not allowed to be discharged in any of the water courses. 2. Treated wastewater is allowed to be discharged into the water courses after acquiring NOC from the concerned district office. There are also certain charges to be paid to the department for this activity.

Punjab Forest Department (PFD)	<ol style="list-style-type: none"> 1. PFD emphasized that cutting trees along roadsides is not allowed for water and sanitation projects. 2. No project activity is allowed at the forest land unless NOC is granted by the District Forest Office to the concerned MC.
Punjab Energy Efficiency & Conservation Agency (PEECA)	<ol style="list-style-type: none"> 1. As per PEECA, there is no requirement by the authority for the installation of energy efficient pumps, motors and other equipment related with the water and sanitation projects by the ULGs. 2. Authority has not worked on the energy efficiency project with any MC in the past.

5.1 Proposed Strategy for Information Disclosure

Based on consultations with the local government and Government Departments and following World Bank disclosure protocol, the following **Table 3** provides an initial outline of the information to be disclosed at the preparation stage.

Table 3: Proposed Strategy for Information Disclosure

program stage	Target stakeholders	Information to be disclosed	Methods and timelines proposed
Preparation	PMDFC, affected parties, interested groups, public at large, ULGs, FWMC, Vulnerable Groups	Appraisal stage ESCP and SEP including GRM and women empowerment initiatives	<ul style="list-style-type: none"> ✓ PMDFC website ✓ Print and electronic media ✓ One-on-one Consultation meetings ✓ Workshops
Implementation	Relevant Government Institutions (Line Departments)	Program Information, National and Provincial E&S obligations, WB E&S protocols and standards, Consultation process, Appraisal stage ESCP and SEP including GRM and women empowerment initiatives	<ul style="list-style-type: none"> ✓ PMDFC website ✓ Print and electronic media ✓ One-on-one Consultation meetings ✓ Workshops ✓ Newsletter

	Vulnerable groups (including Differently abled citizens, Elderly-headed households, female-headed households or single mothers with underage children, low-income families, dependent on state support, religious and ethnic minorities transgender people, unemployed persons and, residents of informal settlements), local community	Regular updates on Program activities and specific initiatives of the Program for vulnerable groups through SEP and GRM procedures.	<ul style="list-style-type: none"> ✓ Outreach through local community organizations ✓ Public notices and Press releases in the local media ✓ Program website ✓ Airing of key messages through programs by electronic and print media ✓ One-on-one consultation meetings ✓ Workshops
	PMDFC, Regional offices, and other relevant Government Departments, Private Institutions, Civil Society Organizations, ULGs	Program overview, Progress reports, Updated SEP and GRM, E&S obligations, ESCF implementation, SOPs for health and safety, GRM, women facilities and concerns at MC level, ARAP/RAP, E&S instruments.	<ul style="list-style-type: none"> ✓ PMDFC website ✓ Print and electronic media ✓ One-on-one Consultation meetings ✓ Workshops ✓ Newsletter
	NGOs, Academia, Media representatives, General Public	Program overview, opportunities for collaboration, updated SEP and GRM, E&S obligations, ESCF implementation, SOPs for health and safety, GRM, women facilities and concerns at MC level, ARAP/RAP.	<ul style="list-style-type: none"> ✓ PMDFC website ✓ Bi-Annual Program Dissemination Workshops ✓ Newsletter

5.2 Summary of program stakeholder needs and methods, tools and techniques for stakeholder engagement

Informed citizen and community engagement are preconditions for the effectiveness of the program. Accordingly, different tools, techniques and methods will be used for engagement to cover different needs of the stakeholders. Given the nature of the program, the strategy for stakeholder engagement is heavily focused on on-going information disclosure and dissemination that is efficient, transparent, and addresses the needs of different stakeholders.

In this regard, the program will utilize various methods of engagement that will be used by the implementing agencies as part of their continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of techniques need to be applied that are specifically tailored to the identified stakeholder groups. Methods used for consulting with Government officials may be different from a format of liaising with the local

communities (e.g. focus group discussions, displays, and visuals with a lesser emphasis on technical aspects).

The format of every engagement activity should meet general requirements on accessibility, i.e., should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization, cultural appropriateness (i.e., with due respect to the local customs and norms), and inclusivity, i.e., engaging all segments of the project affected parties including the vulnerable individuals. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the program.

Ensuring the participation of vulnerable individuals and groups in program consultations may require the implementation of tailored techniques. The vulnerable groups identified by the program include the rural population, people living with disabilities, women, and disadvantaged youth. Attention will be given to the vulnerable groups to ensure that they are not denied program information and benefits. This will be done by focus group discussions, monitoring participation rates, undertaking beneficiary assessments, using online platforms to allow access to otherwise disadvantaged groups, and ensuring that at least 30 percent of participant trainees are females.

Information that is communicated in advance of public consultations primarily includes an announcement thereof in the public media – local, regional and provincial, as well as the distribution of invitations and full details of the forthcoming meeting well in advance, including the agenda. It is crucial that this information is widely available, readily accessible, clearly outlined, and reaches all areas and segments of the stakeholders. These parameters can be achieved through the following approaches:

Advance public notification of an upcoming consultation meeting follows the same fundamental principles of communication. That is, it should be made available via publicly accessible locations and channels. The primary means of notification may include mass media and the dissemination of posters/ advertisements in public places. The program keeps proof of the publication (e.g. a copy of the newspaper announcement) for accountability and reporting purposes. Existing notice boards in the implementing agencies, the ULGs' offices and FWMC may be particularly useful for distributing the announcements. When the notifications are placed on public boards in open air, it should be remembered that the posters are exposed to weather, may be removed by by-passers or covered by other advertisements. The program's staff will, therefore, maintain regular checks to ensure that the notifications provided on the public boards remain in place and legible.

Another critical aspect of the meeting preparation process is selecting the methods of communication that reaches the potential audience with lower levels of literacy or those who are not well-versed in the technical aspects of the program. Oral communication is an option that enables the information to be readily conveyed to such persons. This includes involving the selected stakeholder representatives and institutional heads to relay up-to-date information on the program and consultation meetings to the various target audiences.

5.3 Description of Engagement Methods

International standards increasingly emphasize the importance of a consultation being 'free, prior and informed', which implies an accessible and unconstrained process that is accompanied by the timely provision of relevant and understandable information. To fulfil this requirement, a range of consultation methods are applied.

A summary description of the engagement methods and techniques that will be applied by the PMU is provided in **Table 2** below. The summary presents a variety of approaches to

facilitate the processes of information provision, information feedback as well as participation and consultation.

An attendance list should be made available at the commencement of all engagement activities to record all participants who are present at the meeting. Wherever possible, attendees’ signatures should be obtained as a proof of their participation. Details of the attendees who were not initially on the list (e.g. those participating in place of somebody else, or public) should be included in addition to those who have registered for the meeting in advance.

In most cases and as a general practice, the introductory initial part of the meeting should be delivered in a format that is readily understandable to the audience not literate and should be free of excessive technical jargon. If necessary, preference should be given, whenever possible, to oral and visual methods of communication (including presentations, pictorials, illustrations, graphics and animation) accompanied by hand-out materials imparting the relevant information in understandable terms rather than as text laden with technical intricacies.

For consultations with different stakeholders, vulnerable individuals and groups, the following are some considerations for selecting channels of communication:

- a. Diversify means of communication and rely more on social media. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- b. Employ channels of communications (TV, newspaper, radio, dedicated phone lines, and mail) in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions. Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.
- c. Government Departments/NGOs/Civil Society who are directly involved in program activities will be consulted by using structured interview tools such as questionnaires (to gather quantitative data) and key informant interviews or consultative workshops (for qualitative information).
- d. Vulnerable groups will be consulted in-person through multiple methods e.g., Focus Group Discussions (FGD), individual interviews of physically challenged people, elderly people and transgender.

The Stakeholder Engagement Plan outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders. The detailed consultations will suggest the modes of communication and frequency of future engagements, suitable for each type of stakeholder. Summary of Stakeholder Engagement Activities and Responsibilities is provided in **Table 4**.

Table 4: Summary of Stakeholder Engagement Activities and Responsibilities

Program Stage	Target Stakeholders	Topics of Consultation	Method Used	Responsibilities	Frequency and Timeline
Preparation (Program Design)	Affected parties including ULGs and FWMC	<ul style="list-style-type: none"> • Program objectives and design • Need for the program 	<ul style="list-style-type: none"> • Virtual meetings providing background information • One-on- 	PMDFC with input from other implementing departments and	At appraisal stage

		<ul style="list-style-type: none"> • E&S principles, risk and impact, management • Grievance Redress mechanisms (GRM) including GBV/SEA/SH • Women empowerment at MC level and provision of gender sensitive facilities • Appraisal stage ESCP, SEP, ARAP/RAP 	<p>one meetings and FGDs</p> <ul style="list-style-type: none"> • 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.) • Workshops 	organizations	
	Other interested groups	<ul style="list-style-type: none"> • Program Description • E&S principles, risk and impact, management • Grievance Redress Mechanisms (GRM) • Women empowerment at MC level • Role of interested departments in the program 	<ul style="list-style-type: none"> • Virtual meetings providing background information • One-on-one meetings and FGDs • Phone • Emails <p>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.)</p> <ul style="list-style-type: none"> • Workshops 	PMDFC with input from other implementing departments and organizations	At appraisal stage
Implementation	All affected parties, other interested groups	<ul style="list-style-type: none"> • Progress on TA activities/targets and outputs • SEP & GBV implementation • Environmental and social concerns and monitoring and Evaluation Plan 	<ul style="list-style-type: none"> • Program progress Reports • Emails, Meetings • Electronic publications as well as dissemination of hard copies • Information resource portal on 	PMDFC with the support from ULGs and FWMC	Program implementation phase – quarterly

			the PMDFC website		
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5.4 Proposed strategy to incorporate the views of vulnerable groups

Vulnerable stakeholders are not a homogenous group. Some may be receptive to immediate and direct contact with a government department and may be vocal about their concerns. On the other hand, there may be some groups who are reluctant to be contacted at all, perhaps because of their vulnerable status or any other reason. Consultations using FGD as a tool, will be carried out with representatives of disabled citizens, women, minorities, transgenders and accordingly engagement mechanisms and frequencies, will be designed and customized for vulnerable people. This will continue throughout the program cycle.

5.5 Timelines

The frequency of stakeholder engagement will vary across the program activities depending on the nature/pace of activity design/implementation, its social and environmental risk and impact and its relevance to the stakeholders. The Program 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 World Bank.

5.6 Review of Comments

All stakeholder engagement activities will be recorded and transcribed and made available to stakeholders as per the template provided as **Annex 1**. 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 PMDC and the relevant stakeholders for further action. Stakeholders will be kept informed throughout the program life cycle. The modes and frequency of reporting to stakeholders will be determined by the Team during the first quarter of program implementation after conducting initial consultations with the stakeholders.

6 Resources and Responsibilities for Implementing Stakeholder Engagement

6.1 Implementation Arrangements and Resources

The implementation of all ESF instruments, including the SEP, will be financed from the overall program budget. The indicative annual budget to implement the SEP is estimated at **PKR 26.0 million** per annum (US\$ 92,857). This budget encompasses all costs associated with ongoing engagement with stakeholders, information disclosure, grievance redress, and other activities described in the SEP. The breakup is attached as **Annex 2**. However, the budget for SEP is indicative and will be finalized once the activity plans for the program components are finalized.

Under the PICP, the following institutional arrangements will be implemented. These arrangements aim to create a structured governance framework, ensuring efficient coordination, monitoring, and financial accountability across all levels. This multi-tiered approach aims to build institutional resilience, foster improved municipal governance, and deliver sustainable urban infrastructure and services across Punjab's intermediate cities.

- A Program Steering Committee will be established to ensure efficient cooperation and strategic oversight under the Program. The PSC will be chaired by the Chairman Planning Board, and will include leadership from LG&CDD, PMDFC, and departments of Excise and Taxation, Finance, Public Health and Engineering, and Planning and Development.

- The LG&CDD, with assistance from the PMDFC, will have overall responsibility for Program reporting, administering the Independent Verification Agency (IVA) contract, results monitoring and evaluation, regulation setting, and coordination. The LG&CDD will also be responsible for ensuring coordination with the PHED, which is tasked with water and sanitation improvements in larger cities through a set of existing and newly established WASAs.
- A Program Management Unit will be established in the PMDFC, as the lead technical agency to provide capacity-building support and technical assistance to selected Urban Local Government (ULGs). Its tasks will include: Capacity-building and technical assistance to ULGs to ensure effective program implementation and the achievement results, management and oversight of investment design, as well as supervision during implementation, monitoring and reporting, including grievance resolution mechanisms, managing, and overseeing environmental and social safeguards, provide technical expertise to improve service delivery standards and enhance own-source revenue mobilization strategies, assist in preparing comprehensive mid-year and annual reports ensuring that stakeholders are regularly updated on Program milestones and deliverables, assist in program coordination through ongoing collaboration with key stakeholders, ensuring smooth communication, timely issue resolution, and effective delivery of Program interventions.

PMDFC will house the requisite technical specialists and systems and will implement the SEP. The program will be administered as per the POM.

7 Grievance Mechanism

In compliance with applicable local and national laws and essentially the World Bank's ESS10, a program specific mechanism is set up to handle complaints and issues. This process would be specially designed to collect, collate, review and redress stakeholders' concerns, complaints and grievances. This process will be carried out using dedicated communication materials (specifically, a GRM brochure or pamphlet) which will be developed to help stakeholders become familiar with the grievance redress channels and procedures. Locked suggestion/complaint boxes will be installed in each implementing agency and ULGs, and they will maintain a grievance register to capture and track grievances from submission to resolution and communication with complainants. Project website (and that of the implementing agencies) will include clear information on how feedback, questions, comments, concerns, and grievances can be submitted by any stakeholder. It will also provide information on the way grievances will be handled, both in terms of process and deadlines.

The main objective of a Grievance Redress Mechanism (GRM) will be to assist in resolving 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 the program.
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.

7.1 Description of Grievance Mechanism (GRM)

The GRM is a vital component of citizen-centric governance, designed to ensure

transparency, accountability, and responsiveness in public service delivery. Its core objective is to assist citizens and local governments in effectively managing the registration, tracking, and resolution of complaints in a timely and efficient manner. The GRM enables structured, two-way communication between the public and local government institutions, allowing grievances to be addressed systematically and fairly.

PMDFC has developed and implemented a well-structured GRM in PCP. In order to maximize accessibility, a multi-channel approach has been adopted. Citizens can submit complaints through the *Baldia Shikayat* mobile application via text or voice messages or by physically visiting designated complaint cells established at local government offices and ULGs. Complaints can also be lodged through telephone calls, written letters, and the online forms available on the websites of the local governments. To improve transparency and ensure accountability, the system is equipped with automated SMS alerts and notifications, allowing complainants to track the status of their grievances in real time. The GRM system has been successfully implemented in PCP local governments and is currently active. As part of the long-term sustainability plan, the system is proposed to be replicated and further strengthened for PICP local governments through digital upgrades, improved integration, and capacity-building of staff.

A designated GRM Focal Person is responsible for managing the centralized grievance database, which ensures a systematic record of all submitted complaints. This database logs critical information including the complainant's name or organization, the date and nature of the grievance, actions taken by relevant stakeholders, and the final outcome. The database also documents how and when the resolution was communicated back to the complainant. These processes help ensure transparency, improve service quality, and foster a responsive environment where citizens feel empowered to raise their concerns and receive timely redress. **Table 5** provides GRM steps and the online complaint form is attached as **Annex 4**.

Table 5: GRM Steps

Step		Timeframe	Responsibility
GM implementation structure	<p>PMDFC have a dedicated grievance redress mechanism developed under PCP and will be adopted in PICP with upgradation through digital upgrades, improved integration, and capacity-building of staff. A formal Grievance Redress Committees (GRC) with members nominated by ULG//PMDFC will be established. The focal person of Grievance complaint cell (GCC), to be established at each ULG, will be responsible for receiving, tracking and recording and updating status of all grievances received. An electronic database of all grievances will also be maintained at the PMDFC level.</p> <p>GRM Process will include receiving the Complaint/Grievance, Initial Review of Grievance, Resolution or Escalation of Grievances, Monitoring, Review, and Grievance Records & Documentation. The details of GRM process are given in subsequent steps.</p>	<p>Within one months of Effectiveness thereafter maintain and operate it throughout Program implementation.</p>	<p>PMDFC/ULGs</p>
Grievance uptake	<p>Grievance uptake will take place at multiple levels through a broad range of channels.</p> <ul style="list-style-type: none"> ✓ GRM app (<i>Baldia Shikayaat</i>) developed under PCP at local level. The same system will be adopted in PICP. ✓ Voice message at local levels ✓ WhatsApp ✓ E. Mail ✓ Trough posting a letter ✓ Walk in: Complaint cell has been established at ULG offices with designated complaint cell in charge. complainants can visit the MC office and submit the written complaints to GRM focal person. ✓ Regular telephonic call ✓ MC Website: Online form is available. ✓ Grievances and suggestion boxes are available at website and in the app. <p>Citizen can easily download the GRM app from google play store and can register complain through cell No./email etc.</p> <p>Link:</p>	<p>Within one months of Effectiveness thereafter maintain and operate it throughout Program implementation.</p>	<p>PMDFC/ULGs</p>

Step		Timeframe	Responsibility
	https://play.google.com/store/apps/details?id=baldiashikayaat.pmdfc.org.pk&hl=en		
Sorting, processing	<p>Complaint received through any channel (WhatsApp, app, walk in, message, website, Telephone/) will have unique code to allow for easy tracking. Once a grievance is recorded, the code will be shared with the complainant, as well as a tentative timeline for its resolution. This would be taking place on the same day the grievance is received.</p> <p>The focal person of GCC will track the complaint on dashboard and will forward the complaint to GRC who will then conduct an inquiry into the grievance to identify its root cause, and subsequent resolution measures. The administration of local government (head & Chief Officer) is provided with the dashboard facility to actively monitor the progress. The escalated complaints are popped up on the dashboard as an alert for the local government administration for their timely disposal.</p>	Upon receipt of complaint	Complaint cell In-charge at MC level/CO
Acknowledgement and follow-up	Once the complaint is registered, the system sends auto generated email and SMS/ alert messages with code for acknowledgement of the received complaints and in app notifications.	Upon receipt of complaint	Auto generated
Verification, investigation, action	<p>The complaint received will be forwarded to GRC committee for investigation. Each targeted MC will notify a GRC committee, consisting of three to four members and one chairman/women from MC. At least one member of the GRC must be a female. GRC members will devise a methodology to solve grievance and conduct an inquiry of the grievance to identify its root cause, and subsequent resolution measures as per devised methodology.</p> <p>In case the issue is unresolvable at MC GRC level, the GRC shall forward it to the head of Local Government and the complainant shall be notified, and an updated resolution timeline shall be communicated to the complainant.</p>	Within 10 days depending upon the nature of complaint	GRC/PMDFC E&S team/Complainant cell In-charge at ULG

Step		Timeframe	Responsibility
Monitoring and evaluation	<p>Separate log-ins have been created for all the relevant officers to review the status of complaints. In addition, reports on the status of complaints will be submitted to the Chief Officer of ULGs on periodic basis and on need basis.</p> <p>The GCC focal person will also update the status of complaint in GRM dashboard, and the citizens receive periodic updates on complaint progress through SMS and Emails accordingly. For grievances that are resolved, the details of the resolution will be entered into the database, and the decision will be communicated to the complainant.</p> <p>To monitor the effectiveness of grievance mechanism, appropriate measures will include monthly reporting on the number of grievances received, resolved and outstanding. This will be undertaken by the GCC focal person at MC level. A biannual sex-disaggregated review of a sample of complaints processed will also be conducted to assess the overall efficacy of GRM system.</p>	Daily basis	Focal person of GCC at ULG
Provision of feedback	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 15 days. This feedback from the complainant shall also be added to the database.	Within 15 days after complaint resolution	GRC
Training	<p>Training needs are:</p> <ol style="list-style-type: none"> 1. Environment & Social Management of Infrastructure Projects 2. Grievance & Complaint handling 3. Performance & Accountability 4. Operation & Maintenance of Municipal Services 5. IT related trainings 	During the program implementation	PMDFC, PIU, ULGs,
If relevant, payment of reparations following complaint resolution	As per decisions of GRC and rules and regulations, the process will be completed.	01 day to one month depending upon the nature of complaint	ULGC/ PMDFC
Appeals process	If the complainant will not satisfy with the decision of GRC committee and program steering committee, he has the provision to		

Step		Timeframe	Responsibility
	<p>submit his grievances against that complaint and appeal for further action.</p> <p>Appeal rules (2017) are also available as an alternate forum for the redressal of complaint.</p>		

The GRM will be responsive to SEA/SH and workplace harassment and complaints. A code of conduct for workers and training of staff to address SEA/SH concerns will also be conducted.

8 Monitoring and Reporting

8.1 Monitoring of SEP

The SEP will be periodically revised and updated as necessary during program implementation to ensure that the information presented herein is consistent and is the most recent, and that the identified stakeholders and methods of engagement remain appropriate and effective in relation to the program context and specific stages of the implementation. Any significant modifications to the program activities or its schedule will be appropriately documented in the SEP.

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance. SEP reporting will include the following:

- (i) Progress reporting on the Stakeholder Engagement commitments under the ESCP
- (ii) Cumulative qualitative reporting on the feedback received during SEP activities, in particular (a) issues that have been raised that can be addressed through changes in program scope and design, and reflected in the basic documentation such as the program Appraisal Document, Environmental and Social Assessment, Resettlement Plan (b) issues that have been raised and can be addressed during program implementation; (c) issues that have been raised that are beyond the scope of the program and are better addressed through alternative projects, programs or initiatives; and (d) issues that cannot be addressed by the program due to technical, jurisdictional or excessive cost-associated reasons. Minutes of meetings summarizing the views of the attendees will also be annexed to the monitoring reports.
- (iii) Quantitative reporting based on the indicators included in the SEP. An illustrative set of indicators for monitoring and reporting is included in **Annex 3**.

8.2 Reporting back to stakeholder groups

It is critical to follow up with stakeholders at different stages of the program 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. This follow-up can include meetings/forums, brochures, and consultative committees. Other means such as short message service (SMS), radio, television, social media handles, website of PMDFC may also be employed to share updated information with stakeholders.

ULGs will provide PMDFC with 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 Program. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Program's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Program during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on program's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the program on a regular basis, including the following parameters:
 - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
 - Frequency of public engagement activities;
 - Geographical coverage of public engagement activities – number of locations within ULGs covered by the consultation process;
 - Number and details of vulnerable individuals involved in consultation meetings;
 - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those grievances resolved within the prescribed timeline;
 - Type of public grievances received;

The SEP will be periodically revised and updated as necessary during the course of program implementation 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 program context and specific phases of the development.

Any major changes to the Program 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 actions will be collated by responsible staff and referred to the senior management of the program. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the program's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the program during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on program interaction with the stakeholders.
- A number of KPIs will also be monitored by the program 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.

Annexes

Annex 1. Template for minutes/records of consultation meetings

Annex 2. Tentative SEP Budget Table

Annex 3. Monitoring and Reporting on the SEP

Annex 4. Complaint Form

Annex 1: Template for Feedback during Consultation Meetings

Date and Location (Institution/Community and City)	Stakeholder (Group or Individual)	Summary of Feedback	Response of Program Implementation Team	Follow-up Action/Next Steps

Annex 2 : SEP Indicative Annual Budget for first year

Budget categories	Times/Years (Yearly)	Lump sum costs Million	Remarks
1. Estimated Staff salaries* and related expenses			
The salaries of social staff at the PMDFC level will be included in the overall PCIP budget.			
2. Consultations/ Participatory Planning, Decision-Making Meetings			
2a. program <i>launch meetings</i>		5	
2b. <i>Organization of focus groups</i>		3.3	
3. Communication campaigns			
3a. <i>Posters, flyers and social media campaign</i>		1	
4. Trainings			
4a. <i>Training on TA components including Gender-Based Violence (GBV)</i>		4	
5. Beneficiary surveys			
5a. <i>Perception survey</i>		4	
6. Grievance Mechanism			
6a. GRM operational costs		6	
6b. Training of GRM committees		2	
6c. <i>Suggestion boxes at ULGs</i>		0.2	
6d. <i>GM communication materials</i>		0.5	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:		26	

*Note: These initial costs are indicative and will be updated during implementation.

Annex 3: Table: Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
<p>Grievance Mechanism:</p> <p>To what extent have Program - affected parties been provided with accessible and inclusive means to raise issues and grievances?</p> <p>Have the ULGs responded to and managed such grievances?</p>	<ul style="list-style-type: none"> • Are program-affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> • Usage of GM and/or feedback mechanisms • Requests for information from ULGs. • Use of suggestion boxes placed at ULGs. • Number of grievances raised, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the program areas, which were referred for health, social, legal and security support according to the referral process in place. • Number of grievances that have been (i) opened, (ii) opened for 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	<p>Records from the ULGs and database of PMDFC</p>
<p>Stakeholder engagement impact on Program design and implementation</p>	<ul style="list-style-type: none"> • Was there interest and support for the Program? • Were there any adjustments made during Program design and 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with 	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p>

<p>How have engagement activities made a difference in Program design and implementation.</p>	<p>implementation based on the feedback received?</p> <ul style="list-style-type: none"> • Was priority information disclosed to relevant parties throughout the Program cycle? 	<p>Program affected parties.</p> <ul style="list-style-type: none"> • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in Program design and implementation. • Number of disaggregated engagement sessions held, focused on at-risk groups in the Program. 	<p>Social media/traditional media entries on the Program results</p>
<p>Implementation effectiveness. Were stakeholder engagement activities effective in implementation.</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve program' outreach, inclusion and effectiveness. 	<p>Communication Strategy</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

Annex 4: Complaint Form



Welcome, Dear Citizen / Member
خوش آمدید عزیز شہری / ممبر

Username / نام *
Enter Username / Mobile Number

Password / پاس ورڈ *
Enter password

Remember me


[Forgot password?](#)

Don't have an account? [Register](#) / رجسٹر

بلدیہ شکایات

آپ کی شکایت کا بروقت ازالہ

پنجاب گورنمنٹ نے آپ کے لئے میونسپل سروسز سے متعلقہ شکایات درج کرانے کے لیے آن لائن سسٹم متعارف کروا دیا ہے، اب آپ کو سماجی، ماحولیاتی یا دوسری میونسپل سروسز مثلاً واٹر سپلائی، کوڑا کرکٹ، سیوریج، سٹریٹ لائٹس اور پارکس سے متعلقہ کوئی بھی مسئلہ ہو تو فوراً اپنی شکایات درج کروائیں اور اپنے مسائل کا فوری حل پائیں۔



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PMDFC [Complaint Tracking System]

1. Recording and Tracking Citizen's Complaints
2. Periodic reporting over various Parameters
3. Managemnet of Citizen's Complaints

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Password

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