GOVERNMENT OF THE PUNJAB

Punjab Education Sector Reforms Programme (PESRP)

Girls' Results Agenda for the Development of Education Sector in Punjab (GRADES) Project

(P176594)

REVISED DRAFT STAKEHOLDERS ENGAGEMENT PLAN (SEP)

Programme Monitoring and Implementation Unit (PMIU)
Punjab Education Sector Reforms Programme (PESRP)
Government of the Punjab

May 2021

GOVERNMENT OF THE PUNJAB

Punjab Education Sector Reforms Programme (PESRP)

Girls' Results Agenda for the Development of Education Sector in Punjab (GRADES) Project (P176594)

STAKEHOLDERS ENGAGEMENT PLAN (SEP)

.

Programme Monitoring and Implementation Unit (PMIU)

Punjab Education Sector Reforms Programme (PESRP)
Government of the Punjab

May 2022

LIST OF ACRONYMS

AHH	Affected Household
AP	Affected Person
AEOs	Assistant Education Officers
ARAP	Abbreviated Resettlement Action Plan
BoR	Board of Revenue
C&WD	Communication and Works Department
CBOs	Community Based Organizations
CEO	Chief Executive Officer
CSO	Civil Society Organization
DEO	District Education Officer
DDEO	Deputy District Education Officer
E&S	Environment and Social
ECE	Early Childhood Education
EDO	Executive District Officer
EDS	Environment Development Specialist
EPA	Environment Protection Agency
EPD	Environment Protection Department
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management. Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FGD	Focus Group Discussion
GBV	Gender Based Violence
GoPb	Government of Punjab
GRADES	Girls' Results Agenda for the Development of Education Sector
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanisms
HH	Household
IDC	International Development Consultants
NGO	Non-Governmental Organization

NSB	Non-salary Budget
PAI	Project Area of Influence
PDO	Project Development Objective
PEC	Punjab Examination Commission
PEF	Punjab Education Foundation
PEPRIS	Private Education Provides Registration and Information System
PESRP	Punjab Education Sector Reforms Programme
PMIU	Programme Monitoring and Implementation Unit
PPP	Public Private Partnership
PST	Primary School Teacher
QAED	QUAID-e-Azam Academy for Education Development
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SDS	Social Development Specialist
SED	School Education Department
SEP	Stakeholder Engagement Plan
SIS	School Information System
SOP	Standard Operating Procedure
UC	Union Council
WASH	Water Sanitation and Hygiene
WB	World Bank
WHO	World Health Organization

TABLE OF CONTENTS

LIST OF TABLES

LIST OF ANNEXES

Executive Summary

The Stakeholder Engagement Plan (SEP) for GRADES Project has been prepared to meet the objectives and requirements of ESS 10 as well as the national Labor Law. This SEP assesses the potential risks and impacts of assignment for the implementation of Component 1 and 2 of GRADES Project by School Education Department (SED) and addresses them through mitigation measures in light of ESS 10.

Stakeholders include both those who are clearly and unquestionably affected by the project and those who do not experience direct impacts, but those who have an interest in how the project proceeds. The key stakeholders for GRADES are government institutions, school teachers, school administration, and students including parents of enrolled students in such school, adjacent shop keepers, and routine daily mobile vendors, street hawkers, nearby schools and local communities and nearby households.

The vulnerable groups will also be identified for this project, and the stakeholder engagement process will ensure to include them in future consultations. These include women who are potentially inheritors of property around the target schools, women headed households living around the school vicinity, minorities and the landless who may either be settled on state land or in the area including the disadvantaged as well as marginalized ones present in the surroundings of target schools.

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

A Grievance Redress Committee (GRC) will be constituted at the main Programme Monitoring & Implementation Unit (PMIU), managed by the SDS. The committee will include members from community as well. An online complaint registration system will be set up for the project, which will also link with the SED's existing system. Grievances/complaints will be screened and classified into three categories by order of priority, with those requiring instant action being classified as high priority, and will be investigated and resolved within the timeframe specified, which will not be longer than ten days. If resolution demands longer than this timeframe, the complainant will be informed. Records of all grievances will be maintained in a database, including details of actions taken to resolve the issue, and dates on which resolution was affected. The system will include a system for Appeals. A monitoring unit will also be set up in the PMIU. This SEP will be periodically revised and updated as necessary in the course of project implementation.

1.   Introduction

The School Education Department, Government of the Punjab (SED) with assistance of The World Bank has developed and implemented several projects for the betterment of education reforms in the province of Punjab. Extending its efforts, Project Management and Implementation Unit (PMIU) of Punjab Education Sector Reforms Programme (PESRP) is under the phase of preparation of a new project, Girls' Results Agenda for the Development of the Education Sector in Punjab (GRADES) Project. Punjab School Education Department (SED) would be the responsible agency for the implementation of the project. SED will execute the project through Program Management and Implementation Unit (PMIU). Component 2, focusing on Civil Works, will be jointly implemented by SED and Communications and Works Department (C&W). A joint Departmental Review Committee (DRC) will be established, headed by the Secretary SED with members from all the attached departments and Secretary C&W. The committee will meet on a quarterly basis to review the progress of component 2 and address any challenges faced in the civil works component. Day-to-Day implementation will be headed by C&W department, in accordance with the 'School Construction Strategy' while also ensuring that environment and social safeguard parameters defined by the World Bank are met. Bi-annual updates on the Civil works will be presented to the Project Steering Committee (PSC) chaired by Chairman Planning and Development Department (P&D).The project will be coordinated by a Project Steering Committee chaired by the Chairman Punjab Planning & Development Board. The Government of Punjab, with Bank support, created the Punjab Education Sector Reform Program (PESRP) to coordinate the overall reform effort in the education sector which reports to the same Steering Committee

1.1.   Project Description

Punjab, with support from the Bank and other donors, has made progress in improving education outcome indicators over the past decade, but important challenges remain, particularly for girls and especially after the extensive school closures during the COVID-19 pandemic. Punjab has improved participation rates to 79% (age 5-16), from about 59% in 2001, while narrowing the gender gap to 4 percentage points in 2018, up from 11 percentage points in 2001. In Punjab, the improvement in participation rate is mostly visible in primary grades, as now 84% of girls and 87% of boys (age 5-10) enroll in primary grades. In absolute terms, an estimated 21 million school age children (age 5-16) in Pakistan are out of school, out of which an estimated 8 million live in Punjab and girls are more likely than boys to never go to school. About 13% of girls in Punjab will never go to school as compared to 9% of boys.

There are still several key constraints for girls' education in Punjab. One constraint that has been relatively neglected is the lack of physical space in schools, which is contributing to high dropout rates. The GoPb estimates that well over 50% (28,000 schools) of schools offering primary education do not have enough classrooms to accommodate every grade in a separate classroom. Another infrastructural constraint that harms girls' participation in particular is the lack of bathrooms with 48% of schools not meeting minimal sanitation facilities including clean water and soap. School construction has been proven an effective method to allow more girls to enroll in schools, given the shorter distance between families' homes and schools, while also making schools safer environments to study, especially in countries with low baseline participation rates. Location Map of Project Districts are in Figure below:

Figure: Location Map of the Project Area (Punjab)

1.2.   Project Development Objectives (PDOs)

Girls' participation in school and learning levels may also be affected by factors that are not yet addressed effectively, including the school environment and school safety concerns. For instance, the exclusion of girls from learning opportunities in Pakistan is driven by pervasive social norms. These mechanisms include unequal intra-household investments by families, biased risk perceptions, and declining but still persistent child marriage, among others. Violence against children, particularly girls, on the way to school and in schools is observed in some areas. About 9% of schools do not have a boundary wall and about a third of schools do not have safety wires on the existing boundary wall. Students are also not sometimes safe from their teachers, with well over two-thirds of students reporting that teachers often or sometimes hit their students for behavioral reasons, and about half of students report that teachers sometimes hit students for academic reasons such as for obtaining low grades. Schools can also be unsafe for health-related reasons, with about 13 percent of children reporting that they feel sick in a given environment, and 6% of children claiming they become sick from drinking water at school. Evidence from Pakistan indicates that, 35% of adolescent female students ages 13-15 years have been bullied on one or more day during the past 30 days.

This proposed project will help the education sector in Punjab deliver better results for girls, while supporting the overall reform direction for education in the province benefiting both girls and boys. The Project Development Objective (PDO) is "to improve the participation of girls and boys in early learning and primary grades Early Childhood Education (ECE-5), increase girls' retention in middle grades (6-8), while improving literacy for girls and boys in the early grades. Key activities in the three main components are briefly described as follows:

Component 1:   Reform Agenda

Sub-Component 1.1 Setting Targets, improving coordination and school-level management: The project supports setting yearly gender-disaggregated targets for school enrolment and learning levels across the delivery chain (from province down to district and school level) to improve the focus in the overall reform agenda. It also supports the collection and use of disability-disaggregated

data in schools. It will also strengthen the role of headteachers in the province by adopting a policy framework for school leadership and will implement a training program for headteachers. Further, it will support SED to improve its governance and ensure better service delivery. Support will also be provided to SED to develop and adopt a Child Protection Action plan in schools that identifies priority actions to be addressed over the immediate, medium, and longer-term; and outlines activities, timelines, resources required, and focal points.

<u>Sub-Component 1.2: Improving access by strengthening public-private partnerships:</u> The project supports a further scale-up and strengthening of the public-private partnerships model for increasing enrolment of out-of-school children. Specifically, it will strengthen the Punjab Education Foundation (PEF) model by developing a long-term strategic plan for PPPs, an updated partnership model that strengthens the management of partner schools with a focus on teacher contracts and student well-being (in particular regarding GBV), the adoption of a fundraising model to attract private sector resources, and improved school monitoring system. There will be support for further expansion of the partnerships under PEF to cover a total of 3.5 million students, which is 900,000 students above the current baseline of 2.6 million local transport to the school.

<u>Sub-Component 1.3: Strengthening teaching and learning processes:</u> The program builds on the existing set of reforms implemented across the system and further scales them up to strengthen teaching and learning processes. This component of the program will also focus on strengthening the learning materials to ensure better student learning while also combatting learning losses because of the COVID-19 crisis by providing teacher training for learning recovery programs. The program will also support the production of and quality assurance for learning materials, as well as the strengthening of business processes for learning material production and procurement. Further, it will support the enhancement of the quality of Early Childhood education in 15,000 schools to provide a stronger start for early learners. Training of the teaching force is a key priority under the program. The program will support a strengthened framework for teacher mentors and professional support for teachers focused on teacher practice. GRADES program will also support the strengthening of the student assessment system, by improving standard-setting for large-scale (sample-based) assessments, strengthening the quality of school-based assessments, and introducing monitoring of child development in Early Childhood Education. Lastly, this component will also support financing for schools through the Non-Salary Budgets which will be in line with community priorities set by the school councils and enable better coordination across the delivery chain and improved governance at the departmental level. It will also support the revision of the NSB formula to include incentives for schools to meet learning targets.

Component 2: **Building climate-smart classrooms for a sustainable expansion of the school system**

The interventions under this sub-component will construct classrooms (Grades ECE to 5), toilet facilities, a staff room and boundary wall on approximately 400 shelterless school sites. Classroom construction will prioritize girls' schools as well as schools that can enroll a large share of girls. Construction will help reduce overcrowding in existing schools and increase school safety. All classrooms will receive furniture that can be flexibly arranged to have a more engaging learning dynamic in classrooms. All schools selected for project intervention will be provided with accessible wheelchair ramps and handrails. Low-cost climate-smart features will be used which will include climate adaptation efforts (e.g., heat insulation, use of natural ventilation, use of natural lighting, raised plinths, reflective roofs,) as well as climate change mitigation for schools, including, water conservation fittings, rainwater harvesting in high-precipitation areas, and tree planting/afforestation on school grounds. Sites that are prone to flooding will use an elevated school design. All school and classroom construction will be based on identified need from the school information system, using a mapping of the out-of-school population in target areas from satellite data. The component will include supervision and technical support to the procurement process.

Component 3: *Technical Assistance*

This component will provide technical assistance to implement the Girls' Results' Agenda, including financing for project implementation, monitoring, and communication. The component will (i) finance the development of applications (micro-services) and capacity building for decision-

makers to utilize these data; (ii) financing remote learning applications for teachers, including classroom observation and modules for teachers on foundational learning and addressing corporal punishment and gender-based violence, and disability inclusion. (iii) strengthening student assessments, including an item bank and international partnerships to strengthen the capacity of PEC. (iv) provide technical assistance to support the implementation of actions of PBCs. (v) support the Program Monitoring and Implementation Unit, communications campaigns on project initiatives, and research and evaluation regarding project initiatives.

procurement.

1.3. Potential Social and Environmental Risks

The Environmental risk rating of the project is moderate. The project will involve medium scale construction activities to construct schools, classrooms in existing schools (including repair of existing classes) and WASH facilities which will pose localized, temporary, and reversible environmental, health and safety risks at surroundings, communities, construction workers, school staff and children. The potential environmental and health risks are associated with WASH facilities if there is shortage of water supply at toilets and washbasins, inappropriate treatment and disposal of sewage from the toilets, non-potable drinking water facilities and the limited supply of hygienic products (soaps, germicidal/disinfectants) and substandard hygienic services (washing, cleaning and disposal of waste) at schools. The use of IT based Education Technologies will generate electronic waste (e-waste) at the start of the program (replacing obsolete ICTs) and by the end-of-life service of the procured equipment which will generate environmental and health and safety impacts during recycling and disposal of the e-waste. As most of the project related environmental impacts will be of localized nature which can be managed by developing adequate safeguard instruments at place by the client, therefore project environmental risks are considered to be of Moderate nature.

At Concept Stage, the Social Risk rating is assessed to be Moderate, and primarily associated with civil works and potential land acquisition activities involved with new school construction and facilities' expansion. Although it is expected that any new school construction will be undertaken on public land, previous experience in Pakistan has shown that issues related to resolving encroachments, land transfer and resettlement claims tend to contentious, even if the impacts are temporary and localized. Construction and renovation activity in existing schools could also generate risks related to GBV, labor management, and community health and safety by exposing schoolchildren to their adverse impacts. Additionally, there are risks related to elite capture in site selection, which could lead to the exclusion of remote and rural communities (including ethnic and religious minorities). These risks could be mitigated by incorporating suitable provisions in contract documents and subproject design. In this way, adverse impacts and risks may be managed a predictable manner.

2.   Stakeholder Identification and Analysis

Stakeholders include both those who are clearly and unquestionably affected by the project and those who do not experience direct impacts, but who have an interest in how the project proceeds.

2.1.   Stakeholder Identification, Analysis, Training and Engagement

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.

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

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire project cycle. 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 if there are any about the project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. The project stakeholders are defined as individuals, groups or other entities who:

i.   are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and

ii.   may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

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

2.2.   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*: public consultations for the project(s) will be arranged during the whole project 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 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.

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

i. **Affected Parties** – persons, groups and other entities within the Project Area of Influence (PAI)[1] that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;

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

iii. **Vulnerable Groups** – persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status[2] and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

2.3. Key Project Stakeholders

Parties affected by this project have been identified as follows.

Table 2.1: Project Affected Parties

Primary Stakeholders	Communication & works department (C&W), Local Communities, surrounding households, surrounding business community including mobile hawkers, vulnerable group (women headed households, elderly, especially abled and minorities), Academic Institutions like nearby other schools, and madrassas), students, teachers, students, parents of enrolled students and school management.
Secondary Stakeholders	QUAID-e-Azam Academy for Education Development, Punjab Examination Commission, Punjab Curriculum and Text Book Board, Punjab Education Foundation, District Education Authority, P&DD, Punjab Health Department, School Education Department, Environment Protection Department, Traffic Police, Local Govt. Officials of District Government, Councilors and NGOs/CBOs/CSOs.

This list of stakeholders is likely to expand/change in composition as the Project moves to construction, operations and maintenance.

---

[1] This refers to the overall project area under the jurisdiction of each target school as well as its locations which may have direct or indirect impacts due to project activities in these locations.

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

2.4.   Other Interested Parties

Elected Political Representatives: In an environment where promoting transparency, accountability and development in all walks of life are prime objectives of political leadership. The proposed GRADES Project provides an opportunity for elected representatives to institute incorruptible governance systems and promoting the development initiatives specifically in education sector. Regardless of political affiliation, these are goals that all people's representatives should endorse and encourage. The GRADES Project will therefore contribute to the development of early education and girls' development agenda and the government through its political representation and leadership aims to promote education at all levels in Punjab.

General Public in Punjab: The general public in Punjab will benefit from improved education systems through the proposed project.

CSOs and NGOs: There has been a paradigm shift in the development strategy and policy in Pakistan to ensure improved access to education, vocational training and other education services. Punjab government is strengthening its commitment to partnerships with civil society organizations and non-government organizations by placing an emphasis on delivering basic social services. The working towards a common goal of improving the situation of primary education in Punjab, the CSOs and NGOs use a variety of strategies such as public-private partnership; teacher training; family literacy; community participation; community supported schools; adopt-a-school; running non formal/community based schools with effective community participation; and developing human resources for the education sector. The CSOs and NGOs are clear about the fact that their role is not to replace the government but to ensure that the government effectively covers educational needs, with respect to quality, accessibility, affordability and equity in mind. These non-profit development organizations may assume several important roles such as advocacy, service delivery, capacity building, grass-root community mobilization, innovation, social experimentation and research in primary education. In addition, international non-government organizations also contribute through their programs for education development in the province. Table 2.2 below summarizes the discussion.

Table 2.2:   Other Interested Parties

Other Interested Parties	Interest in the Project
Elected Representatives	The project promotes increase in number of enrollment by the construction of new class rooms along with other Edtech interventions etc. which elected representatives will be interested in supporting the effort.
General Public	The general public in Punjab will benefit from improved early and primary education systems in Punjab.
CSOs and NGOs	Working towards a common goal of improving the situation of primary education among the provincial populace, the CSOs and NGOs use a variety of strategies such as public-private partnership; Teacher training; family literacy; community participation; community supported schools; adopt-a-school; running non formal/community based schools with effective community participation; and developing human resources for the education sector.

2.5.   Vulnerable Groups

Vulnerable groups have been identified for this project, and the stakeholder engagement exercise will be designed to ensure that they are consulted with on a regular basis, and included in key decision making processes. For all vulnerable groups (women headed households, disabled, minorities etc.), stakeholder engagement will be designed such that discussions take place within their residential neighborhoods or at their places of work, so that their access to the venue is assured. An effort will be made to either arrange discussions through NGOs or community based organizations (CSOs) who closely work with them, understand their issues, and also employ staffs

who speak the language most often used in the community, and can advise on the most suitable times of the day for consultations. Provisions for hiring stakeholders' engagement workers/specialists have already been made in the proposed project documents. The vulnerable groups identified include the following:

Minorities and Other Vulnerable Groups: Non-Muslims in Pakistan, particularly those who belong to lower socio-economic strata typically suffer multiple forms of discrimination on account of their poor socioeconomic status, and as a religious minority. As with other vulnerable groups, they can be negatively affected when the state moves to regularize land systems. The same is true for the poorest sections of society, and the landless in general. Once again, GRADES is keenly aware of the need to preserve the rights of such vulnerable groups, and the SEP, as well as the resettlement policy framework, takes them into account.

Table 2.3 summarizes the interests of vulnerable groups.

Table 2.3: Interests of Vulnerable Groups

Activities	Vulnerable Groups and Individuals	Preferred means of notification/consultation	Additional Resources Required
Preparing of ESMF	Non-muslims and minorities of local area	In person	Social organizers and links with NGOs
Development of ESMF, RPF and communication strategies	All vulnerable and marginalized groups (women headed households, disabled, minorities etc.)	Social and electronic media/in person consultations in key areas	Communications and awareness raising campaign to be developed
Preparation of GAP	Women, girls and women headed households	In-person	Gender Specialist and Social Organizers
Preparation of ESMF and SEP through communication strategies	Specially-abled affected people	In-person	Social and Environment Development Specialists and E&S field organizers

2.6. Summary of Project Stakeholder Needs

The Project Stakeholder's participation, feedback and information disclosure activities as well as their needs are summarized in Table 2.4 below:

Table 2.4: Project Stakeholder's Participation, Feedback and Needs

Stakeholder Group	Key Characteristics	Feedback about Preferred Language	Feedback on Preferred Notification Means (e-mail, phone, radio, letter)	Specific Needs (accessibility, large print, child care, daytime meetings
Low income Communities	Low income, below or close to poverty line.	Punjabi, Seraiki	In person meetings and mosque announcements	Available at specific times of day, probably in evening
Middle income communities	Range of livelihoods	As above, but probably comfortable with Urdu also	Phone, TV, social media, community leaders may be available on email or by telephone	Available at specific times of day, probably in evening
Policy makers and influencers	High level stakeholders exercising influence in media and society	English mostly or Urdu	Direct invitation and engagement PMIU officials	Availability may vary and engagement would need to be planned in advance to ensure their involvement
Expert groups	Often employed in the formal sector	English or Urdu	Email and phone	Meetings during working hours preferably
Women	May not have much freedom of association or movement	Punjabi, Seraiki and Urdu.	TV, Phone, social media, radio or NGOs	Accessible mainly to other women. Times of availability will vary for different groups

Stakeholder Group	Key Characteristics	Feedback about Preferred Language	Feedback on Preferred Notification Means (e-mail, phone, radio, letter)	Specific Needs (accessibility, large print, child care, daytime meetings
Residents of nearby local communities	May not be aware of their legal status or may be wary of state action in their abadies	Punjabi, Seraiki, some Urdu	In person through social organizers or NGOs. Social media	May only be willing to talk to NGO workers and community organizers who have been in contact with them
Vulnerable groups such as differently abled citizens, minorities, elderly people and transgender people	Often excluded from voicing concerns and/or marginalized in society	Urdu, Punjabi and Seraiki	In person through social organizers or NGOs	• Times of availability will vary for different groups Accessibility for differently abled citizens will be considered
NGOs and CSOs	Often exercise influence in local communities and can be. Important in social mobilization and awareness raising	English and Urdu	Email and phone In person meetings	Meetings during working hours preferably
Academics	Often employed in research organizations	English or Urdu	Email and phone	Meetings during working hours preferably

A detailed stakeholder mapping of the categories of stakeholders- Affected, Interested and Disadvantaged/Vulnerable Groups was undertaken which guided the consultations. The project consultations and meetings carried out to date are outlined below and detailed notes are included as annexes.

3.   Stakeholder Engagement Program

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

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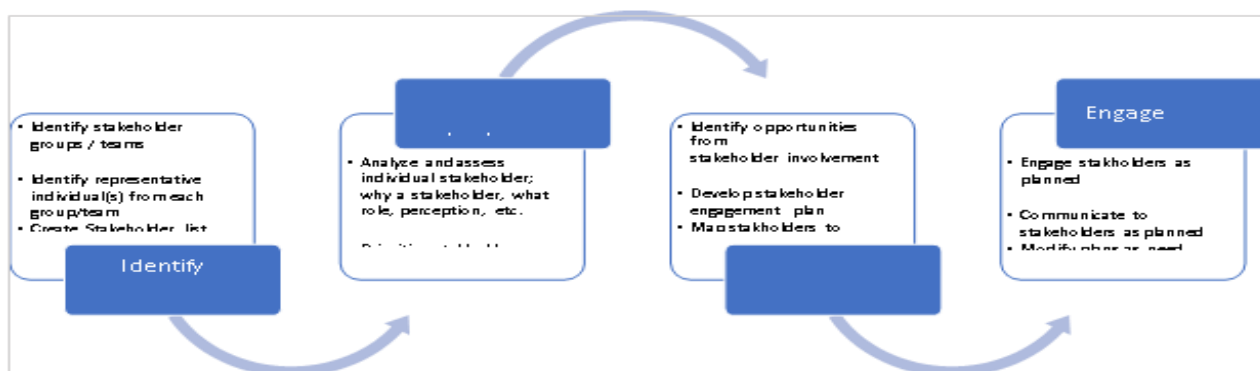

Figure 3.1:   **Process of Stakeholder Engagement**

3.1.   Engagement Methods and Tools

The project(s) intend to utilize various methods of engagement that will be used by as part of its continuous interaction with the 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. Methods used for consulting with statutory officials may be different from a format of liaising with the local communities (focus group discussions, displays and visuals with a lesser emphasis on technical aspects).

3.2.   Purpose and Timing of the Stakeholder Engagement Program

3.2.1   Purpose of Stakeholder Engagement

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

3.2.2   Timing of Stakeholder Engagement Plan

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

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

Project Implementation Stage: In the project implementation stage, consultations will be carried out with affected parties, and other interested parties. Vulnerable groups likely to be affected by

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

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

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

In general, engagement is directly proportional to the impact and influence of a stakeholder. The stakeholder analysis is used to classify stakeholders based on their level of interest and influence related to the project. Results of the analysis are used to recommend the level of engagement as under:

(i) **High Interest and High Influence (to be engaged):** These stakeholders are to be informed and engaged in the form of a formal interaction on the environmental and social aspects of the project. If they raise any concerns, they should be actively involved in identifying mitigation measures and developing subsequent plans. The aim of their engagement is to obtain their acceptance of Project activities and management plans. They are engaged at the stage of ESIA studies and in key decisions in project planning, implementation and operational phases.

(ii) **High Interest and Low Influence (monitoring of their interest):** These stakeholders have limited ability to directly influence the project but have a keen interest in one or more aspects of the project. The recommendation is that the views of these stakeholders be tracked and monitored through communications.

(iii) **Low Interest and High Influence (leverage):** These stakeholders may not seriously be concerned about the environmental and social aspects of the project, but they are critical about project success. They are recommended to be engaged in active communication on key project activities throughout the project lifecycle. The approval of these stakeholders will be critical for the Project; and

(iv) **Low Interest and Low Influence (to be informed):** These stakeholders should be provided information on key Project activities through press releases, briefings, and other modes of communications during the project lifecycle.

Figure 3.2:　　Preliminary Classification of Stakeholders

Engage	General public residing along the project area, the PAPs including students, teachers, parents of enrolled students, vulnerable and marginalized groups, public representatives, surrounding business community including vendors and hawkers, print and electronic media, World Bank, Project Steering Committee and project affected parties including teachers, parents and vulnerable groups etc.
Leverage	Academia
Monitor	NGOs/CSOs, Environment Protection Agency; Labor Department
Inform	Relevant Govt. departments

This SEP will be a living document and will need to be updated and refined throughout the lifecycle of the Project. During this process, the focus and scope of the SEP will be updated to ensure that PMIU address external changes and adhere to its strategy (which itself may change over time).

4. Feedback Assessment from Stakeholders

4.1. Concerns/Feedback

During the consultations, participants were briefed on the proposed GRADES project and its various elements as well as activities, its need and objectives, and its potential/likely impacts on the head teachers, teachers, PST and local community. Subsequently, their concerns and comments regarding the proposed project were recorded in order to identify appropriate alternatives and mitigation measures. Details of these consultations are presented in Table 4.1.

Table 4.1:   Community Consultations for Proposed GRADES Project

Concerns/Feedback	Redress Strategy
Expansion of School facilities involving new construction of class rooms, boundary wall and toilet in already existing school. New building structure should be constructed in "L" shape.	• PMIU needs to get involved in order to facilitate and expedite the process of building construction, where necessary. • This will be taken into consideration in the construction guideline.
Refurbishment / renovation of school building, earthen made playground, and WASH facilities in line with international standards i.e. World Health Organization (WHO) Guidelines. These are important to improve the participation of girls and boys in schools.	• A sustainable approach and recurrent fund allocation for maintenance is required.
Lack of a plan at school level leading to environmental and social compliance issues such as inappropriate, building shape / structure, positioning of toilets and septic pits leading to water and soil pollution.	• Ensure a robust master plan is in place before any development activity is commenced in any school.
Lack of good housekeeping practices at school sites. Liquid and solid wastes generated by students and staff members dump haphazardly-no effective waste management.	• An adequate and effective liquid as well as solid waste management practices should be introduced/ followed.
Water quality is deteriorated and safe water supply is a challenge for most of the schools in Punjab in general, and particularly schools located in the underground brackish water zones in southern Punjab. Students and teachers are facing health risks due to contaminated water supplies in schools.	• Ensure the availability of safe drinking water by installing water filtration system.
Need Solar Panel facility in most of the school due to load shedding in summer season.	• Facilitate will be considered under this project.
Projector, Multimedia and LEDs should be provided which is useful in the improvement of learning and training sessions for student and teachers.	• Facilitate will be considered under this project.
Health and safety related impacts will impose on communities, school children, staff and surrounding environment during construction phase of school building/structure.	• Ensure health and safety related mitigation measures should be taken during all project phases. The risks will be mitigated by incorporating suitable provision in contract documents and subproject design.
During disposal and recycling of the existing obsolete e-waste. Some of the environmental and health and safety issues associated.	• Ensure environmental, health and safety related mitigation measures should be taken during recycling and disposal of e-waste. SOPs and administrative measures should implement.
First Aid facility unavailable in some of schools. Need adequate facility.	• Facilitate will be considered under this project.
Especially Girls are in home after completing their primary school. In some areas need school up gradation.	• Facilitate and expedite the process of up gradation of school, where necessary.

Concerns/Feedback	Redress Strategy
Furniture facility provided as per students strength	• School furniture facilitate will be considered under this project.

4.2.   Consultation Meetings with Departments (Institutional Consultations)

In addition to the community consultations discussed in Section above, the institutional consultations were carried out with related departments. The feedback of these consultation meetings is summarized in Table 4.2.

Table 4.2:   Institutional Consultations

Concerns/Feedback	Redress Strategy
Building more classrooms, increase access to water, sanitation and hygiene (WASH) facility, rural community education identified as key concerns. Somewhere school boundary wall and sanitary situation is meager.	• Extensive consultations have been carried out with the CEOs, AEOs and head teachers' district wise. • EMSF will be implemented in a participatory manner involving all stakeholders. • Liaison will be maintained with all relevant stakeholders and departments during ESMF implementation as needed.
Budgetary Provisions/allocation is not ground reality based in all district of the Punjab. NSB Budget is only for paying to temporary teachers. More budgetary requirements are felt especially in care of any pandemic like COVID-19, dengue, etc. No rapid response from head offices in emergency situation.	• Provision of budget in response to emergency and pandemic situation should add in project at school level. • Develop and mitigation measure include in the Emergency Response Plan.
Overall situation reflect the shortage of teachers. Single teacher schools exist in rural areas of Punjab. Recruitment of Quran education teacher is not yet hired yet.	• New and trained teacher staff should recruit in this project.
3-5% permanent drop outs in 5th class due to early marriages in village areas especially.	• Awareness session about education importance and early age marriages complication should be held.
Schools information system (SIS) and IT related teacher training need more mandatory considerations.	• This will be taken care by the ESMF

4.3.   Consultations and Communication Guidelines

In accordance with World Bank Guidelines, the consultations were carried out keeping in view the following major objectives:

▪ Sharing of information with stakeholders on the GRADES project activities and provide key project information to the stakeholders, and to solicit their views on the project and its potential or perceived social and environmental impacts;

▪ Identification of likely social and environmental impacts,

▪ Developing and maintaining communication links between the project proponents (SED) and stakeholders;

▪ Ascertaining the most acceptable solutions and mitigation measures for possible issues that could arise during the implementation of SEP;

▪ Possible Redress of specific issues associated with the implementation of SEP;

▪ Understanding the stakeholders' concerns regarding various aspects of the project, including the existing situation, construction works and the potential social and environmental impacts of the construction-related activities and operation of the project;

- Receiving feedback on social and environmental impacts and verifying their significance;

- Ensuring that views and concerns of the stakeholders are incorporated into the GRADES project design and implementation as much as possible with the objectives of reducing or offsetting negative impacts and enhancing benefits of the proposed project.

- Managing expectations and misconceptions related to the project;

- Interaction with the stakeholders, teachers and local community for the collection of primary and secondary data on social and environmental; and

- Engaging stakeholders for maximization of the project benefits.

Stakeholder engagement plays a vital role in studying project effects and their successful mitigation. This provides an opportunity for the stakeholders to share their views associated with the project and propose possible solutions. Stakeholder engagement is an essential element of SEP preparation, leading to a better and more acceptable SEP implementation.

4.4. Community Engagement and Stakeholders Participation

4.4.1 Consultations with Government Officials

A total of 12 consultations were carried out with the district and tehsil level officials to ensure their participation and cooperation while preparing the SEP but also during the project implementation. Lists of consultations with these officials are given in Table 4.3, while the details are given in Annexures. The pictorial presentation of officials' consultation events is provided at the end of SEP.

Table 4.3:   Consultations with Government Officials

No.	Date	Location/ Venue	No of Participants
1	December 22, 2021	Office of the Chief Executive Officer, District Kasur	4
2	December 23, 2021	Office of the Chief Executive Officer, District Gujranwala	4
3	December 23, 2021	Office of the Executive District Officer(EDO), District Narowal	1
4	December 24, 2021	Office of the Chief Executive Officer, District Sheikhupura	6
5	December 27, 2021	Office of the Assistant Director (Education), District Nankana Shahib	3
6	December 28, 2021	Office of the Chief Executive Officer, District Faisalabad	3
7	December 28, 2021	Office of the Chief Executive Officer, District Sargodha	4
8	December 29, 2021	Office of the Chief Executive Officer, District Rawalpindi	6
9	December 29, 2021	Office of the Chief Executive Officer, District Jehlum	2
10	December 30, 2021	Office of the Punjab Education Foundation, District Lahore	5
11	December 30, 2021	Office of the Punjab Examination Commission, District Lahore	6
12	December 30, 2021	Office of the Quaid-e-Azam Academy for Education Development, District Lahore	8
Total			**52**

4.4.2 Consultations with School Teachers and Community Consultations

The SEP team conducted a series of 27 consultations/FGDs covering 73 participants including vulnerable groups, representatives of local community and households (HHs); either directly or indirectly affected households (AHHs). During the survey, very few vulnerable groups were reported by the stakeholders. Though, number of vulnerable groups in target schools' areas is low in number; the consultations would for sure be done during ESIA. These consultations were carried out in

different districts belonging to province Punjab (see Table 4.4 for a summary; details including dates, venues and number of participants are presented in **Annexures**. The pictorial presentation of consultation events is provided at the end of SEP in Annexures**.**

Table 4.4:   Consultations Summary

No.	Date	Location/ Venue	No of Participants
1	December 23, 2021	GPS Siran Wali, Tehsil Daska , District Sialkot, Province Punjab	5
2	December 23, 2021	GGPS Marhana, Tehsil Daska ,District Sialkot	5
3	December 23, 2021	GPS Satuwal, Tehsil Shakargher, District Narowal	2
4	December 23, 2021	GGPS Mandran Wala, Tehsil Narowal, District Narowal	2
5	December 23, 2021	GPS Manshi Wala No.2, Tehsil Jalalpur Pirwala, District Multan	2
6	December 23, 2021	GPS Kalar Wala, Tehsil Tunsa, District D.G. Khan	1
7	December 23, 2021	GPS Basti Nau Dakhli , Tehsil Saddar, District Multan	1
8	December 23, 2021	GGPS Jungle Bhera No.1, Tehsil Multan City, District Multan	8
9	December 24, 2021	GGPS Bakhari Taunsa, Tehsil Taunsa Shrif , District D.G Khan	5
10	December 24, 2021	GPS Sheikh Jivenda, Tehsil Taunsa Shrif , District D.G. Khan	5
11	December 24, 2021	GPS Kareem Abad, Tehsil & District D.G. Khan	2
12	December 24, 2021	GPS Basti Bhai, Tehsil & District D.G. Khan	1
13	December 25, 2021	GPS Basti Wadera Abdul Razzaq, Tehsil Rojan, District Rajanpur	4
14	December 25, 2021	GPS Basti Bhora, Tehsil Rojan, District Rajanpur	2
15	December 25, 2021	GPS Thairi, Tehsil & District Rajanpur	2
16	December 25, 2021	GPS Muhammad Horra, Tehsil Jampur, District Rajanpur	2
17	December 25, 2021	GPS Sadiq Abad, Tehsil Jampur, District Rajanpur	2
18	December 25, 2021	GPS Haji Abad, Tehsil Jampur, District Rajanpur	2
19	December 25, 2021	GPS Chak Chhina, Tehsil Jampur, District Rajanpur	2
20	December 27, 2021	GPS Abdul Rehman, Tehsil Khanpur, District Rahim Yar Khan	2
21	December 27, 2021	GPS Ghaleeja, Tehsil Khanpur, District Rahim Yar Khan	3
22	December 27, 2021	GPS Ahmed Yar, Tehsil Khanpur, District Rahim Yar Khan	4
23	December 27, 2021	GPS Kolyaran, Tehsil Khanpur, District Rahim Yar Khan	4
24	December 27, 2021	GPS Ghulam Mustafa Lolai, Tehsil Khanpur, District Rahim Yar Khan	3
25	December 27, 2021	GGPS School Mian Irshad Ahmed ,Tehsil Khanpur, District Rahim Yar Khan	1

No.	Date	Location/ Venue	No of Participants
26	December 27, 2021	GPS Ghulam Sarwar Shah, Tehsil Khanpur, District Rahim Yar Khan	1
27	December 27, 2021	GPS Abdul Ghani Lar, Tehsil Khanpur, District Rahim Yar Khan	1
Total			**73**

4.5.   Proposed Strategy for Information Disclosure

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

An uninterrupted two-way flow of information is crucial to the success of any stakeholder engagement program. This is particularly true for projects which are likely to have widespread impacts across a range of stakeholders covering almost all income groups. Since GRADES is such a project, it is vital that accurate information is disseminated to the relevant stakeholders and the affected parties at the beginning, and updates are provided at regular intervals as the project proceeds. It is also necessary to give stakeholders ample time to formulate their response and provide feedback during the engagement process. Various modes of communication would be used to disseminate the necessary information to the relevant stakeholders as given in the table below. The Stakeholder Engagement Plan will be summarized, translated in Urdu and also be disclosed after finalization. Key messages will be conveyed in the national as well as relevant regional languages to facilitate a broader audience. This is summarized in the table 4.5 below.

Table 4.5:   Information Disclosure

Project Activities	List of Documents/ Information to be disclosed	Methods proposed	Timetable: Locations/ Dates	Target Stakeholders	Percentage reached	Responsibilities
Sub-Component 1.1: Ed-Tech to Strengthen Management	ESMF, RPF and SEP will be disclosed in local language (Urdu) once approved Safeguards Documents i.e. ESMPs, RAP/ARAPS (if any), Public information broachers, flyers etc.	Stakeholders' workshops and inter-departmental meetings FGD Interviews	Program planning and pilot phase of the project Project implementation phase For government officials the interviews at their offices and for local communities at their place (work/home/school)	Project Affected Parties Vulnerable Groups Local Communities	N/A	PMIU-Communication Specialist
Sub-Component 1.2: Improving access by strengthening public-private partnerships	ESMF and RPF included both Udru Summery, Safeguards Documents i.e ESMPs, RAP/ARAPS (if any), Public information	Stakeholders' workshops and inter-departmental meetings Field Community interactions	Program planning and pilot phase of the project Project implementation phase	Project Affected Parties Vulnerable Groups Local Communities	N./A	PMIU-Communication Specialist

Project Activities	List of Documents/ Information to be disclosed	Methods proposed	Timetable: Locations/ Dates	Target Stakeholders	Percentage reached	Responsibilities
	broachers, flyers etc.	FGD Interviews Public Display of information at relevant schools and respective Tehsil or UC office.	For government officials it will be at their offices and for local communities at their place (work/home/school)			
Sub-Component 1.3: Strengthening teaching and learning processes	ESMF and RPF included both Udru Summery, Safeguards Documents i.e ESMPs, RAP/ARAPS (if any), Public information broachers, flyers etc.	Stakeholders' workshops and inter-departmental meetings Field Community interactions FGD Interviews Public Display of information at relevant schools and respective Tehsil or UC office.	Program planning and pilot phase of the project Project implementation phase For government officials it will be at their offices and for local communities at their place (work/home/school)	Teachers, DEOs, AEOs	N./A	PMIU-Communication Specialist
Component 2: climate-smart classrooms for a sustainable expansion of the school system	ESMF and RPF included both Udru Summery, Safeguards Documents i.e. ESMPs, RAP/ARAPS (if any), Public information broachers, flyers etc.	Stakeholders' workshops and inter-departmental meetings Field Community interactions FGD Interviews Public Display of information at relevant schools and respective Tehsil or UC office	Program planning and pilot phase of the project Project implementation phase For government officials it will be at their offices and for local communities at their place (work/home/school)	Project Affected Parties Vulnerable Groups Local Communities	N./A	PMIU-E&S Specialist
Sub-component 3: Technical Assistance	ESMF and RPF included both Udru Summery, Safeguards Documents i.e ESMPs, RAP/ARAPS (if any), Public information broachers, flyers etc.	Stakeholders' workshops and inter-departmental meetings Field Community interactions FGD Interviews	Program planning and pilot phase of the project Project implementation phase For government officials it will be at their offices and for local	Project Affected Parties Vulnerable Groups Local Communities	N./A	PMIU-Communication Specialist

Project Activities	List of Documents/ Information to be disclosed	Methods proposed	Timetable: Locations/ Dates	Target Stakeholders	Percentage reached	Responsibilities
		Public Display of information at relevant schools and respective Tehsil or UC office.	communities at their place (work/home/school)			

4.6. Proposed Strategy for Consultation

As given in the table above, there is a variety of information that is to be disclosed to stakeholders over the course of project preparation and implementation. The information will be disseminated using relevant strategies depending on the stakeholder group and the program stage. Stakeholders will be provided draft documents in advance of consultations. This is summarized in the table 4.6 below.

Table 4.6:   Strategy for Stakeholder Consultation

Activities	Target stakeholders	Topic of engagement	Method used	Location/Frequency	Responsibilities
Sub-Component 1.1: Ed-Tech to Strengthen Management	SED,PEF, District Education Authority, Punjab EPA , School Teachers, enrolled students' Parents and Local communities	Role of information technologies to strengthen the school management	Training Workshops, Field Community interactions Public Display of information at relevant places and informing the public through newspapers and other media sources.	Sample of communities for in person interaction Key persons from individual union councils for community interaction. Focus Group Discussions at two different levels i.e. first with the Government and stakeholders departments and the second with the community preferably at Union Council level. Information dissemination through following means. 1- Dedicated Project information dissemination Website 2- Through GSM services 3- Sensitization through district level facilitation centers	PMIU

Activities	Target stakeholders	Topic of engagement	Method used	Location/Frequency	Responsibilities
	SED, EDOs, DDOs, School Teachers, and Local communities General public	Participatory Rapid Appraisal	Stakeholders' workshops	Workshops at district level monthly meetings	PMIU
	General public	Process of hiring village member as member of GRM	Advertisements and announcements through mosques	Media outlets Frequency as required	PMIU
	General public	Dispute resolution mechanisms	Advertisements and infomercials Circulation of info-sheets and one pagers	Social media as well as print and electronic media Frequency as required	PMIU
Sub-Component 1.2: Improving access by strengthening public-private partnerships	PEF officials		Stakeholders' workshops and inter-departmental meetings Advertisements and infomercials	Workshops at district level Quarterly workshops to keep relevant officials updated Media outlets including social media	PMIU
	District AEO, DEOs and general administration	Identification of areas to be surveyed	Consultations and meetings	Government offices Frequency as required	PMIU
Sub-Component 1.3: Strengthening teaching and learning processes	District AEO, DEOs and general administration	Training need Assessment	Consultations and meetings	Government offices Frequency as required	PMIU
Sub-Component 2: Building climate-smart classrooms for a sustainable expansion of the school system			Stakeholders' workshops and inter-departmental meetings.	Government offices Stakeholders workshop at the beginning of process and departmental meetings as required	PMIU-C&W
Sub-component 3: Technical Assistance			Stakeholders workshops	At the beginning of the activity, and second workshop to present results	PMIU

Activities	Target stakeholders	Topic of engagement	Method used	Location/Frequency	Responsibilities
			As above	As above	PMIU
			With focal points in relevant organizations/departments	Monthly	PMIU

4.7. 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 agency, and may be vocal about their concerns. At the other extreme, there may be some groups who are reluctant to be contacted at all, perhaps because of their legal status or any other reason. Varying strategies will thus have to be adopted.

The PMIU has appointed SDS in the PMIU who will work on the consultations with vulnerable groups. The Specialist will formulate a strategy for engagement at project commencement in consultation with the focal points, but will broadly follow the steps below.

4.8. Identification of Potential Partners

As a first step, the SDS will identify NGOs and community based organizations working with vulnerable groups, including women's groups. This identification exercise will classify these partners by a) area/location of operations; b) nature of intervention or type of activity; and c) sector(s) of interest. A total of five or six organizations will be shortlisted for further engagement, and to develop potential partnerships through the life of the project. The selection will be made in consultation with PD from the World Bank.

4.9. Consultation with Partners

At the next stage, meetings will be organized with representatives of the chosen partners, at first individually, and then in a group, to apprise them of the objectives of the stakeholder engagement program. The requirements of the stakeholder engagement program, with regard to consultations with different groups, and vulnerable groups in particular, will be shared with them, and their inputs sought on how best to establish contact and create an atmosphere of mutual trust.

While the more detailed strategy for interaction with vulnerable groups will be chalked out once partners are on board, the SDS will not only guide the partners, but will also chalk out a program of regular contacts with stakeholder groups which he or she will lead in person. The Specialist will also prepare a work plan and strategy, giving the timelines for outreach with different groups, linked to different phases of project implementation. At each stage of project implementation, and for each type of outreach activity, the Specialist will define how consultations will take place (in person, through community based organizations in the field), how records of consultation will be maintained, and how concerns raised etc.

5. Implementing Stakeholder Engagement Activities

5.1. Resources

It is estimated that the SEP will require technical assistance every year throughout the project life. A certain amount has been estimated and included in the total cost of ESMF which comprise the cost of deploying social outreach specialists, the cost of hiring venues and arranging facilities such as meals etc. for participants of consultations, research studies and surveys and other miscellaneous expenses.

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

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

5.2. Roles and Responsibilities

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

Table 5.1:   Roles and Responsibilities

Activities	Responsibilities
Component 1: Reform Agenda Sub-Component 1.1 Setting Targets, improving coordination and school-level management	PMIU-M&E Specialist
Sub-Component 1.2:Improving access by strengthening public-private partnerships	PMIU
Sub-Component 1.3: Strengthening teaching and learning processes	PMIU-Research Wing
Component 2: Building climate-smart classrooms for a sustainable expansion of the school system	PMIU-E&S Specialist
component 3 : Technical Assistance	PMIU-FMS

6.   Grievance Redress Mechanism

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

6.1.   Existing Mechanisms

Grievance redress mechanisms are now a fundamental element in all service delivery departments of the GOPb. In case of SED, the Web Portal where citizens can log in suggestions and complaints on all school related issues will be established. Complaints are automatically forwarded to the concerned person of PMIU for appropriate remedial actions. Citizens can files or even handwritten text files in support of their complaints. The portal also enables the SED to communicate directly with citizens to make routine and urgent announcements. Under this system the citizens can lodge a complaint through the following three methods:

•   Citizen's Call Centre which is functional and can be easily accessed on their dedicated number.
•   Citizens can also walk project civil works locations, and lodge a complaint.
•   The complaint (s) can also be lodged through the online portal, where basic information like nature of complaints, departments, CNICs and phone number is required to lodge a complaint.

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

6.2.   GRM Systems for GRADES

The grievance redress mechanism established for GRADES will be disclosed to all concerned stakeholders. A grievance redress cell will be established in the PMIU/Safeguards Office under the supervision of Programme Director with its committees at districts level following a tiered approach. The GRM will be set up with a two-tiered structure; one at district level enabling immediate local responses to grievances and another at PMIU level for review, and addressing more difficult cases not resolved at local level.

District-level GRC

As the GRADES is encompassing to almost whole of the Punjab province comprising 36 districts. The district-level GRC (D-GRC) consisting of 5 members will be formed. It will review all unresolved grievances and resolve the cases after careful scrutiny. The composition of the District-level GRC is proposed in Table 6.1 below:

Table 6.1:   Composition of the District-level GRC

Chair	District CEO (Education)
Member	Concerned District Education Officer (Male/Female)
Member	PMIU Environment / Social Development Specialist
Member	Concerned Assistant Education Officer (AEO)
Member	The Affectee / Complainant

The scope of work and TORs for GRC at district level shall include:

(i)   Any grievances presented to the district level GRC should ideally be resolved within 3 weeks from the date of receiving the case(s).

(ii) In case of complicated cases, the GRC members can request additional information or carry out field level verifications.

(iii) Resolutions should be based on consensus among members, failing which the decision may be taken on 2/3 majority vote.

(iv) Any decision made by the GRC must be within the purview of E&S policy framework and entitlements and other safeguard documents like ESMF and ESMP/s.

(v) In considering any environmental grievances by any of the GRCs, the GRC would be guided by the following: (i) review the merit of the complaints/case received for consideration; (ii) review the case in the light of related Project activity and within the context of applicable laws/guidelines in Pakistan and/or Project E&S Management Frameworks guidelines; and/or Contractor's ESMP; (iii) undertake field level investigations, if necessary for review of the case at hand; and (iv) review and resolve the case and recommend necessary measures or mitigation, if required. The GRC will not deal with any matters pending in the court of law.

(vi) A minimum of four members are required to form the quorum for the meeting of the GRC.

The District-level GRC will forward any unresolved cases to the PMIU for resolution.

PMIU-level GRC

The Project-level GRC is at the apex of the GRM. It is a committee of four members as given in Table 6.2, chaired by the Programme Director.

Table 6.2:   GRC at the PMIU Level

Chair	Programme Director - PMIU
Member	District CEO (Education)
Member	Concerned District Education Officer (Male/Female)
Member	PMIU Environment / Social Specialist

The scope of work and the Terms of Reference for Independent GRC at Project level shall include:

(i) The GRC shall review and consider unresolved grievances forwarded by District-level GRC related to social/resettlement issues.

Any grievances forwarded to the PMIU-level GRC should be quickly resolved, preferably on the first day of hearing or within a period of fifteen days from the date of receiving the case/s. PMIU-level GRC can conduct field investigations in case of complicated issues. Grievances of indirectly affected persons and/or persons affected during Project implementation may also be reviewed by PMIU-level GRC, furthermore;

a. GRM integrates GBV service provider in its model to support response to complaints to the overall project GRM and to worker's GRM
b. SEA/SH action plan will also include Accountability and Response Framework to guide incident response protocols

If any disputant remains dissatisfied with GRC outcome up to the project level GRC, the disputant can seek redress by the formal court. In other words, the affected persons are allowed to take the help of the court provided the GRC processes have been followed and exhausted.

6.3.   Grievance Redress Mechanism System

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

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

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

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

6.3.1 GBV/SEA/SH Complaints

To address GBV-related complaints, the Gender Specialist (GS) of PMIU will be the focal person for properly handling GBV allegations including assessment of the nature of the complaint, seeking support from various law enforcement agencies to enact sanctions to be applied to the perpetrator. The GS shall ensure specific procedures for GBV to ensure confidential reporting with safe and ethical documentation of GBV cases.

6.3.2 The Mechanism for GBV/SEA/SH Complaints

Once the GBV/SEA/SH-related complaint is received to PMIU from the site, it is directly entered/enrolled in Tier-2 i.e GRC will directly deal with it. The GS will visit the complainant at his/her place and enquire about the grievance on the same day. The GS will prepare the report accordingly and intimate the PD-PMIU. The GBV complaint will be resolved with-in 24 hours with necessary action(s) as directed by PD-PMIU. There will be a committee constituted within PMIU which deal with the GBV related complaints specifically.

6.3.3 GBV Committee Members

The GBV committee will be constituted duly notified by PD-PMIU, following are the GBV Committee Members

1) Programme Director PMIU (Convener)

2) Gender Specialist PMIU (Secretary)

3) Social Development Specialist PMIU (Member)

4) Concerned CEO of School Education Authority (Member)

7.   Monitoring and Reporting

7.1.   Monitoring

Monitoring and evaluation of the stakeholder engagement process is considered vital to ensure PMIU are able to respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. Adherence to the following characteristics/ commitments/activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement;

- Inclusivity (inclusion of key groups) of interactions with stakeholders;

- Promotion of stakeholder involvement;

- Sense of trust in PMIU shown by all stakeholders;

- Clearly defined approaches; and

- Transparency in all activities.

Monitoring of the stakeholder engagement process allows the efficacy of the process to be evaluated. Specifically, by identifying key performance indicators that reflect the objectives of the SEP and the specific actions and timings, it is possible to both monitor and evaluate the process undertaken. Two distinct but related monitoring activities in terms of timing will be implemented:

- **During the engagement activities**: short-term monitoring to allow for adjustments/improvements to be made during engagement; and

- **Following completion of all engagement activities:** review of outputs at the end of engagement to evaluate the effectiveness of the SEP as implemented.

A series of key performance indicators for each stakeholder engagement stage have been developed. Table 7.1 shows the indicators, and performance against the indicators will show successful completion of engagement tasks.

Table 7.1:   Key Performance Indicators by Project Phase

Key Indicators	Responsibility
Construction Phase	
▪ Share updates on project activities ▪ Bill Boards displayed in allocated locations by time specified	PMIU
▪ Community stakeholders, with at least 30% women, have received and understand the SEP information disclosed and attended the public meetings ; ▪ Communities provided feedback. ▪ No complaints about non-receipt of information dissemination material.	PMIU
Implementation Phase	
Confirmation that the SEP tasks are defined as specific individual or grouped environmental and social clauses in contract bid documents.	PMIU (Director Procurement) to draw on SEP for bidding documents
Confirmation that environmental and social management criteria are included as part of the contractor selection process, including their experience preparing and implementing SEP, etc.	PMIU (Director Procurement) to draw on SEP for Contractor selection process
E&S specialists hired and retained by PMIU, providing assistance with SEP implementation, contractor supervision (including observations during construction), and participation in meetings with community/affected persons, general public consultations and institutional stakeholder	PMIU safeguard strengthening
Compliance monitoring checklists prepared and being used by the contractor and IC consultant relevant staff and due diligence notes, completed as defined in the SEP, and making the notes available in an easily accessible file for the contractor, ES and technical staff of PMIU, IC and others to use.	SEP to guide management and monitoring processes

The identification of subproject related impacts and concerns are a key element of stakeholder engagement that will occur over the complete subproject life-cycle. As such, the identification of new concerns and impacts as the Project progresses will serve as an overall indicator for the utility of the stakeholder engagement process.

In the SEP progress and monitoring reports, there will be a review of the engagement activities conducted; levels of stakeholder involvement (particularly for affected persons and affected communities, women and vulnerable groups); the issues discussed and outcomes; and the extent to which stakeholder issues, priorities and concerns are reflected in the SEP Reports, particularly with respect to mitigation and monitoring strategies contained in the Environmental and Social Plans.

7.2.   Reporting

7.2.1   Monthly Reports

The E&S of PMIU, ICs, and Contractor will prepare brief weekly and monthly reports on stakeholder engagement activities to report to the PMIU that will include:

▪ Activities conducted during each month;
▪ Public outreach activities (meetings with stakeholders, dissemination of information education and communication material i.e. leaflets, posters brochures, newsletters, local radio and TV channels, non-technical summary of documents and reports etc.);
▪ Number of feedback forms;
▪ Entries in stakeholder engagement activity register;
▪ Entries to the grievance register;
▪ Number of visitations to the Information Centers;
▪ Number of meetings with CEO & AEOs;
▪ Monthly stakeholder engagement activity plans.

7.2.2   Six Monthly and Annual Reports

Monthly reports will be used to develop six monthly and annual reports; E&S staff of IC will compile a report summarizing stakeholder engagement activities and their results on an annual basis and will submit to the PMIU for review. This report will provide a summary of all public consultation issues, grievances, Corrective Action Plans and their implementation status/resolutions. The report will provide a summary of relevant public consultation findings from informal meetings held with stakeholders.

The external monitoring of SEP implementation will be done by a third-party monitoring agency. A midterm and end of the project evaluation will be conducted by a third-party consultant/firm using a perception survey, which will use same set of indicators over time to achieve continuity. The first survey to assess stakeholder perceptions should be conducted before major construction work to provide a baseline of stakeholder perceptions.

7.2.3   Reporting Back to the Stakeholders (Disclosure)

PMIU will report back to the affected persons and other stakeholders on matters relating to:

▪ main findings from the annual monitoring;
▪ progress on implementation of the mitigation measures;
▪ Overall progress on the SEP implementation;
▪ Corrective Action Plan to address any outstanding issues.

The exact reporting mechanism and formats will be finalized during initial stage of project implementation, and upon finalization, the SEP will be updated. The annual monitoring reports will be disclosed to the PMIU and WB websites and will be accessible to all interested stakeholders.