GOVERNMENT OF SINDH

LOCAL GOVERNMENT DEPARTMENT

Sindh Property Revenues Enhancement Program (SPREP)

Proposed

DRAFT STAKEHOLDER ENGAGEMENT PLAN

September 2026

Acronyms and Abbreviations

Abbreviation	Full form
APA	Annual Performance Assessment
BoR	Board of Revenue, Sindh
CBO	Community Based Organization
CLICK	Competitive and Livable City of Karachi Project
CSO	Civil Society Organization
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
ESSA	Environmental and Social Systems Assessment
FGD	Focus Group Discussion
GBV	Gender Based Violence
GIS	Geographic Information System
GM	Grievance Mechanism
GoS	Government of Sindh
IBRD	International Bank for Reconstruction and Development
IFMIS	Integrated Financial Management Information System
IPF	Investment Project Financing
LCCU	Local Council Coordination Unit
LGD	Local Government Department, Government of Sindh
LMP	Labor Management Procedures
MIS	Management Information System
PforR	Program for Results
PDO	Program Development Objective
PIU	Program Implementation Unit
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan

Abbreviation	Full form
SPREP	Sindh Property Revenues Enhancement Program
TCC	Town Citizen Committee
TMC	Town Municipal Corporation
UIPT	Urban Immovable Property Tax
WDD	Women Development Department, Government of Sindh

1. Introduction and Project Description

The Sindh Property Revenues Enhancement Program (SPREP, P517498) is being prepared by the Government of Sindh with financing from the International Bank for Reconstruction and Development. The Program Development Objective is to improve Urban Immovable Property Tax (UIPT) revenue collection and expenditure management in 45 local councils of Sindh. Total operation financing is US$150 million, comprising a US$110 million Program for Results (PforR) component and a US$40 million Investment Project Financing (IPF) component. The implementing agency is the Local Government Department (LGD), Government of Sindh.

This Stakeholder Engagement Plan (SEP) applies to the US$40 million IPF component of SPREP. Stakeholder engagement obligations arising under the PforR component are assessed and addressed through the Environmental and Social Systems Assessment (ESSA), the Program Action Plan and the Program's performance assessment framework, and are therefore not restated in this document. Where an engagement activity serves both financing windows, this SEP identifies the point of overlap so that arrangements remain consistent across the operation.

IPF component activities

The IPF component finances four sets of activities:

- Modernization of UIPT and land administration systems in Sindh's cities outside Karachi. This includes acquisition of satellite imagery, GIS based door to door UIPT surveys, UIPT equipment, and the development and operationalization of a GIS based UIPT Management Information System. It also includes support to the Board of Revenue (BoR) for digitizing and updating land records, developing a digital master plan for Sindh integrating land and tax systems, and conducting city surveys.
- Institutional strengthening and capacity building for LGD and participating local councils, covering technical, fiduciary, social and environmental management capacity, and support to the Annual Performance Assessment of the Program.
- Rollout of the Integrated Financial Management Information System (IFMIS) to participating local councils outside Karachi, covering budgeting, accounting, payroll and expenditure management.
- Program management, including monitoring and evaluation, financial management and procurement support, environmental and social management, stakeholder engagement and information disclosure, grievance redress, and communication and public outreach.

Most of these activities were financed under the CLICK Project as an Investment Project Financing operation in Karachi. The IPF component uses the same modality to extend them to areas beyond Karachi, and additionally strengthens the capacity of the 25 local councils in Karachi to administer, manage and collect UIPT. No civil works are financed under the IPF component. The component consists of technical assistance, systems development, survey operations, equipment, training and communications. Municipal infrastructure schemes are financed under the PforR component and are addressed through that instrument's environmental and social arrangements.

Location

Survey, land administration and IFMIS activities under the IPF component are located in 20 local councils in five divisions of Sindh outside Karachi, listed below. Institutional strengthening and program management activities extend to LGD in Karachi and to all 45 participating local councils of the operation.

Table 1. Geographic scope of the IPF component

Division	Participating local councils	Number
Hyderabad	Nerun Kot, Mian Sarfaraz, Paretabad, Tando Jam, Tando Fazal, Sachal Sarmast, Shah Latifabad, Hussainabad, Qasimabad	9
Sukkur	Town Municipal Corporation I (Makki Shah), Town Municipal Corporation II (Jeay Shah), Town Municipal Corporation III (Nisar Ahmed Siddiqui)	3
Larkana	Sachal Town, Hyderi Town, Dari Town, Empire Town	4
Mirpurkhas	Mir Sher Muhammad Khan Talpur, Syed Khadim Ali Shah	2
Shaheed Benazirabad	H. M. Khoja, Old Nawabshah	2
Total		**20**

Scale of public contact

The most extensive point of contact between the IPF component and the public is the GIS based door to door property survey. Across the Hyderabad, Sukkur, Larkana, Mirpur Khas and Shaheed Benazirabad divisions only about one fifth of properties are currently surveyed and registered in the UIPT cadaster, some 397,375 records against an estimated 2.1 million properties. The survey is expected to increase the number of registered properties in the 20 participating local councils outside Karachi from 397,375 to approximately 2,149,080, a more than fivefold expansion of the recorded property base. Survey teams will visit residential and commercial premises, record property attributes and geo tag properties for entry into the UIPT Management Information System. This SEP therefore gives particular attention to notification, enumerator conduct, data privacy and complaint handling around survey operations.

The population living under the jurisdiction of the 20 participating local councils outside Karachi is approximately 4.5 million, of whom approximately 2.16 million are women. Institutional strengthening and capacity development under the component extend to all 45 participating local councils, comprising the 25 in Karachi and the 20 in the divisional headquarters of Sindh.

Environmental and Social Rating

SPREP is being prepared under the World Bank's Environmental and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agency should provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination or intimidation.

The IPF component is classified as having a Moderate overall environmental and social risk, with environmental risk rated Low and social risk rated Moderate. Because the component finances technical assistance activities only, environmental risks are limited to minor e-waste generation and to occupational

health and safety risks for field staff. Social risks relate to the inclusivity of training and awareness activities across diverse local councils, equitable staff engagement practices, and exposure to sexual exploitation and abuse and sexual harassment during field operations. The applicable Environmental and Social Standards are ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), ESS2 (Labor and Working Conditions), ESS4 (Community Health and Safety) and ESS10 (Stakeholder Engagement and Information Disclosure). Consistent with the Moderate risk rating, this SEP follows the World Bank's simplified Stakeholder Engagement Plan template for moderate risk projects.

The environmental and social instruments for the component are this Stakeholder Engagement Plan, the Environmental and Social Commitment Plan, the Environmental and Social Management Framework, the Labor Management Procedures, an occupational health and safety plan, an e-waste management standard operating procedure, and the grievance mechanism described in Section 6. Dedicated environmental and social specialists are maintained within the Program Implementation Unit. Reports on environmental, social, health and safety performance, covering stakeholder engagement and the functioning of the grievance mechanism, will be submitted to the World Bank on a quarterly basis throughout implementation.

2. Objective and Description of the SEP

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 of the IPF component. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

Three features of the IPF component shape the approach taken in this SEP. First, the component is delivered largely through institutions, so a substantial share of engagement is with local council staff and provincial departments whose procedures and systems will change. Second, the property survey brings project personnel to the doorstep of a large number of households and businesses that have had no prior contact with the operation, which makes advance notification, identification of field staff and accessible complaint channels central rather than incidental. Third, the component collects, digitizes and stores information about property and land, so the confidentiality of that information, and the ability of a person to see and correct what has been recorded about their property, are matters of direct stakeholder interest.

3. Stakeholder Identification and Analysis

3.1 Methodology

Stakeholders were identified through review of the Program design and the institutional mapping prepared for the operation, consultations with LGD and participating local councils, and the implementation experience of the Competitive and Livable City of Karachi (CLICK) Project, which the same Program Implementation Unit delivered and which included a comparable door to door property survey in Karachi.

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life cycle approach.** Public consultations for the project 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 stakeholder feedback, and for analyzing and addressing comments and concerns.
- **Inclusiveness and sensitivity.** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process 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 that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, and residents of informal settlements, and to the cultural and linguistic diversity of the participating towns.
- **Flexibility**. Where cultural context, gender dynamics, seasonal factors or local security conditions inhibit traditional face to face engagement, the methodology will adapt to other forms of engagement, including women only sessions with female facilitators, engagement through representative organizations, and telephone, SMS and radio based communication.

Consistent with ESS10, stakeholders are grouped into affected parties, other interested parties, and disadvantaged or vulnerable individuals and groups.

3.2 Affected parties and other interested parties

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the project.

Affected parties for this component are identified by working outward from what the component actually does. The activities financed are technical assistance activities: a GIS based door to door property survey and geo tagging, development and operation of a property tax management information system, digitization and updating of land records, rollout of the financial management information system, institutional strengthening, and public information and taxpayer communication. The table below maps each affected party to the activity that gives rise to the effect, the nature of that effect, and the resulting concerns.

Table 2. Affected parties, mapped to IPF activities and their effects

Affected party	Activity giving rise to the effect	Nature of the effect	Key concerns
Property owners in the participating local councils	Door to door survey and geo tagging; entry of particulars into the UIPT management information system	Attendance of survey teams at the premises; measurement and recording of property attributes, use and ownership; creation of a record that forms the basis of future assessment. Where a property was previously unrecorded, entry into the tax record for the first time.	Advance notice of the visit; identity and conduct of enumerators; accuracy of what is recorded, particularly use classification and covered area; confidentiality of ownership and property data; clarity that the survey establishes a record rather than a demand; availability of a route to inspect and correct the record.
Tenants and other occupiers	Door to door survey	Frequently the persons present when a survey team calls, and commonly the parties on whom the incidence of the tax falls through rent.	Notice and explanation of the visit; privacy of the household; clarity on what is sought from an occupier as distinct from an owner; effect on rent and on continued occupancy.
Women in surveyed households	Door to door survey; public information activities	Contact at the door by field teams that are predominantly male; likelihood of being absent from mixed public meetings at which the survey is explained.	Whether a woman alone at the premises is expected to receive the team; conduct of field staff; risk of exclusion from information; availability of a confidential route to raise a concern.
Residents of katchi abadis, goths and other informal settlements	Door to door survey; entry of particulars into the management information system	Recording of properties in areas where tenure documentation is incomplete and where street addressing may not exist.	Concern that recording is a tenure or enforcement action; risk of exclusion from information and from the correction process; access to a complaint route that does not require documents the household does not hold.
Owners and rights holders in areas covered by land record work	Digitization and updating of the record of rights; city surveys; digital master plan	Conversion of the record of rights into digital form, with the digitized entry becoming the operative record.	Accuracy of digitized entries; procedure for correcting an error; treatment of pending mutations and of parcels under dispute; security of digitized records; effect on parties to an existing dispute.
Owners and operators of commercial and industrial premises, and small businesses	Door to door survey; use classification in the management information system	Survey of commercial premises and classification by use observed on the ground, which may differ from the use recorded previously.	Accuracy of use classification; brief disruption during the visit; clarity on what a reclassification means and how it may be contested.
Persons without literacy or without digital access, including many elderly and low income owners	Management information system generated challans; digital payment channels; application based grievance channel	Reliance of the new systems on printed and digital instruments and on a mobile application.	Ability to read and act on a challan; availability of non digital payment and complaint channels; availability of assistance at a council facilitation desk.
Enumerators, supervisors and other field staff of contracted firms	Survey operations; land record and city survey field work	Engagement as contracted workers under ESS2, working outdoors across dispersed settlements.	Terms of engagement and timeliness of payment; heat exposure and road traffic; personal safety at the doorstep; identification; obligations under the code of conduct and on SEA/SH; access to a confidential worker grievance channel.

Affected party	Activity giving rise to the effect	Nature of the effect	Key concerns
Staff of participating local councils in UIPT, finance, audit, engineering and information technology functions	IFMIS rollout; UIPT management information system; institutional strengthening and the Annual Performance Assessment	Change in established procedures, introduction of new systems and of a performance assessment against which the council is scored.	Clarity of roles; adequacy and timing of training; equipment and connectivity; workload during transition; transparency of the assessment; support arrangements after handover.
Board of Revenue field offices and revenue staff	Digitization and updating of land records	Change in the way the record of rights is maintained and consulted at field level.	Role clarity; training; workload; continuity of established procedure during transition.
Recipients and handlers of equipment supplied under the component	Supply of UIPT equipment, GIS hardware and IFMIS terminals	Generation of electronic waste as equipment reaches end of life.	Arrangements for storage, handling and disposal of end of life equipment consistent with the e-waste management procedure.
PIU staff and consultants	Program management across five divisions and 20 participating local councils	Responsibility for delivery, coordination and reporting across a dispersed geography.	Staffing adequacy; coordination across councils and divisions; clarity of institutional responsibilities.

Affected parties under the Program for Results window

For completeness, the operation as a whole also affects parties who are not affected by the activities financed under this component. The municipal works financed from performance based grants in the 25 local councils of Karachi affect residents and businesses adjacent to works sites through access disruption, noise, dust and excavation; road users and pedestrians during construction and traffic diversion; workers engaged by contractors at scheme sites; users of the facilities improved, including schools and fire stations; and occupants of land where questions of ownership, demarcation or occupation arise. Those effects, and the arrangements for engaging the parties concerned, are assessed under the Environmental and Social Systems Assessment and addressed through the Program Action Plan and the performance assessment framework. They are noted here so that the boundary of this Plan is clear, and are not carried further in it.

The project's stakeholders also include parties other than the directly affected communities. These groups may not experience direct impacts but have a role in project preparation or implementation, or a broader interest in information dissemination, coordination and oversight.

Table 3. Other interested parties

Interested party	Interest in the IPF component
Finance Department, Government of Sindh	Own source revenue performance of local councils, fiscal sustainability, budget allocation and financial reporting.
Planning and Development Department, Government of Sindh	Oversight of scheme approval and development planning, and avoidance of duplication across departments.
Board of Revenue, Sindh	Record of rights, valuation, land administration reform, and integration of land and tax systems.

Interested party	Interest in the IPF component
Excise, Taxation and Narcotics Control Department, Government of Sindh	Historic administration of UIPT and continuity of assessment records and procedures as collection functions devolve to local councils.
Sindh Local Government Board and Directorate of Local Fund Audit	Regulatory oversight, financial rules, and audit of local council accounts under IFMIS.
Association of Local Councils	Represents participating local councils on the Program Steering Committee and in policy dialogue on revenue administration and municipal finance.
Deputy Commissioners and district administration of participating districts	District level coordination, public order during field operations, and inter agency coordination.
Women Development Department, Government of Sindh	Coordination counterpart for gender responsive engagement, outreach to women, and referral of sensitive complaints received by the PIU. Under the Program for Results window the local councils rely on the Department through their Local Council Coordination Units.
Social Welfare Department, Government of Sindh	Coordination counterpart for outreach to vulnerable groups and for liaison with registered welfare organizations at district level. Under the Program for Results window the local councils rely on the Department through their Local Council Coordination Units.
Labour and Human Resources Department, Government of Sindh	Working conditions and labour standards applicable to contracted survey and consulting firms.
Cantonment boards in participating districts	Jurisdictional boundaries of property taxation and coordination on survey coverage.
Chambers of commerce and industry and traders associations in participating towns	Treatment of commercial properties, clarity of obligations, and the relationship between revenues and municipal services.
Builders, developers and property dealers associations	Property valuation practice, transaction records, and the accuracy of property information.
Civil society organizations and community based organizations	Community representation, transparency, inclusion of vulnerable groups, awareness raising, and independent observation.
Academic and research institutions	Urban policy, municipal finance research, evidence for programme design, and independent analysis.
Local and provincial print, broadcast and digital media	Public information, transparency, and dissemination of information on the survey and on payment and grievance channels.
Contracted survey, GIS, IFMIS and consulting firms	Scope of assignments, field protocols, code of conduct obligations, and reporting requirements.
The World Bank	Compliance with the ESF, implementation support, and supervision of environmental and social performance.

Table 4. Influence and interest of stakeholder groups

The table below records the level of influence each group holds over the delivery of the component and the level of interest it has in the outcome, and the engagement implication that follows. Influence refers to the capacity to affect implementation through decision, mandate or operational role. Interest refers to

the degree to which the group is affected by, or concerned with, the outcome. A group with limited influence and high interest requires proactive and sustained engagement rather than less.

Stakeholder group	Influence	Interest	Engagement implication
Local Government Department and Program Implementation Unit	High	High	Lead implementing entity. Continuous engagement, and responsibility for delivery of this SEP.
Town Citizen Committees in the participating towns	Medium	High	Standing community interface constituted under this Plan. Monthly meetings, advance notification of survey activity, and a corresponding role in the grievance mechanism.
Participating local councils and Local Council Coordination Units	High	High	Deliver survey coordination, host facilitation desks and operate the grievance mechanism. Continuous engagement, structured training and joint planning.
Board of Revenue	High	High	Leads land record digitization. Institutional coordination and joint engagement with rights holders.
Contracted survey, GIS, IFMIS and consulting firms	High	High	Carry out field operations. Contractual obligations on conduct, communication protocol and worker grievance channel.
Finance Department and Planning and Development Department	High	Medium	Budgetary and review functions. Periodic formal engagement and written reporting.
Excise, Taxation and Narcotics Control Department	Medium	High	Continuity of assessment records as collection functions devolve. Institutional coordination at preparation and during MIS development.
Local council staff in UIPT, finance, audit, engineering and information technology functions	Medium	High	Operate the new systems. Training, helpdesk support and structured user feedback.
Property owners in the participating local councils	Low	High	Primary affected party. Advance public notification, doorstep communication, display of recorded particulars and an accessible correction route.
Tenants and other occupiers	Low	High	Frequently present at the premises during the visit. Targeted notification and clear explanation of what is sought from an occupier.
Residents of katchi abadis and informal settlements	Low	High	Dedicated outreach through community based organizations and complaint channels that do not require ownership documents.
Women, including female headed households and widows	Low	High	Women only sessions with female facilitators, female enumerators wherever practicable, and coordination with Women Development Department district offices.
Elderly persons, persons with disabilities and persons with low literacy or no digital access	Low	High	Accessible formats, retention of non digital channels and assisted filing at facilitation desks.

Stakeholder group	Influence	Interest	Engagement implication
Enumerators and other field staff of contracted firms	Medium	High	Induction, signed code of conduct, occupational safety briefings and a confidential worker grievance channel.
Women Development Department and Social Welfare Department	Medium	High	Coordination counterparts. Provide referral routes for sensitive complaints received by the PIU and access to women and vulnerable groups. Grievance handling under this component rests with the PIU.
Chambers of commerce, traders associations, and builders and property dealers associations	Medium	High	Organized voice on the treatment of commercial property. Structured meetings and briefings at each stage.
Civil society and community based organizations	Medium	High	Route to vulnerable groups and independent observation. Engagement at pre survey mobilization and during implementation.
Local and provincial media	Medium	Medium	Public information reach. Briefings, notices and press material in Sindhi and Urdu.
Academic and research institutions	Low	Medium	Independent analysis and review. Periodic consultation.
Cantonment boards and Association of Local Councils	Medium	Medium	Jurisdictional coordination and representation of councils. Formal correspondence and periodic meetings.

3.3 Disadvantaged and vulnerable individuals or groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at facilitating their participation in project related decision making, so that their awareness of and input into the overall process are commensurate with those of other stakeholders. Within the IPF component, vulnerable or disadvantaged groups may include but are not limited to the following.

Table 5. Disadvantaged and vulnerable groups, barriers and engagement measures

Group	Barrier to participation or to access	Engagement measure
Women, particularly in purdah observing households	A male enumerator at the door may not be received; women are less likely to attend mixed public meetings; unpaid care responsibilities constrain timing.	Female enumerators included in survey teams wherever practicable; women only sessions with female facilitators at accessible venues and times; coordination with WDD district offices and women's organizations.
Female headed households and widows	Property may not be recorded in the woman's name; documentation may be incomplete; reluctance to approach council offices.	Targeted outreach through WDD district offices and community based organizations; assisted filing of correction requests and complaints.

Group	Barrier to participation or to access	Engagement measure
Elderly persons and pensioner owners on fixed incomes	Limited mobility and limited use of digital channels; property holdings not matched by cash income.	Non digital information and payment channels retained; assistance at council facilitation desks; information on exemptions and relief available under the applicable law.
Persons with disabilities	Physical access to council offices; format of printed and digital information.	Information in accessible formats; doorstep assistance; complaint channels that do not require attendance in person.
Low income households, including recipients of the Benazir Income Support Programme	Anxiety about affordability; limited literacy; limited access to formal channels.	Plain language material in Sindhi and Urdu; clear explanation of what the survey does and does not determine; assisted access to the grievance mechanism.
Residents of katchi abadis and informal settlements	Concern that registration signals enforcement or eviction; documentation requirements they cannot meet.	Clear and repeated public statement of the purpose and limits of the survey; engagement through settlement level community based organizations; complaint channels that do not require ownership documents.
Religious and ethnic minority communities	Reluctance to engage with officials; risk of being overlooked in general outreach.	Engagement through representative organizations and community leaders; material in the languages in use locally.
Transgender persons	Risk of exclusion from outreach and of disrespectful treatment during field contact.	Explicit conduct requirements in the enumerator code of conduct; engagement through registered organizations working with the community.
Persons with low literacy or without digital access	Cannot use digital challans, online forms or application based grievance channels.	Verbal and pictorial material; retention of telephone, walk in and written channels; assistance desks at council offices.
Sindhi speaking residents in participating towns	Material issued only in Urdu or English is not accessible.	All public facing material issued in Sindhi and Urdu; field staff able to communicate in the language in local use.

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

4. Stakeholder Engagement Program

4.1 Summary of stakeholder engagement done during project preparation

A programme of stakeholder engagement was carried out in Karachi between 30 July and 6 August 2026 in the course of preparing the Environmental and Social Systems Assessment for the operation as a whole. Sixteen engagements were held with provincial departments, attached agencies, district administrations, emergency service providers and the participating local councils. Staff of the CLICK Program Implementation Unit, including its environmental and social staff, attended these meetings alongside the assessment team. Because the engagements addressed the operation in its entirety, matters relevant to the activities financed under the IPF component have been carried into this Plan, while matters bearing

on the municipal works financed under the Program for Results window are addressed through the Environmental and Social Systems Assessment.

The engagements covered institutional roles and coordination arrangements within the Local Government Department and with the Planning and Development Department, the mechanics of the property tax survey and management information system as operated under the preceding project, existing complaint handling arrangements at council and departmental level, the institutional apparatus available for handling sensitive complaints, and the capacity of the town municipal corporations to carry the functions the operation assigns to them. The session held with representatives of the town municipal corporations, attended by taxation, engineering and finance officers, addressed the transfer of property tax collection to the councils, the composition and role of the Local Council Coordination Unit, the boundaries of the grievance mechanism, and the position on property ownership and demarcation records.

The survey conducted in Karachi under the preceding project provides the operational reference for the surveys to be undertaken in the participating local councils outside Karachi. That exercise expanded the registered property base from approximately 900,000 properties to approximately 4.2 million, netted from an initial figure of between 4.7 and 4.8 million following the removal of duplicate entries, overlap with Board of Revenue records, and properties falling outside local council mandate. Assessment was made on the basis of use observed on the ground, and ownership was recorded floor by floor where applicable. A sample validation was undertaken and property level validation is proceeding as the management information system is rolled out at council level. Consultations recorded several matters that inform the design of engagement arrangements for the extension beyond Karachi. Owners are frequently reluctant to furnish documentary evidence of title to enumerators, and ownership is in many cases not documented. The content of enumerator training and the consistency of contact at household level were identified as areas for attention. Publication of the draft valuation list is expected to generate a significant volume of objections and correction claims, which places the accessibility and evidentiary fairness of the correction process at the centre of the arrangements set out in this Plan. Settlement typology, plot sizes and construction characteristics differ between Karachi and other urban centres of Sindh, and the survey approach will be calibrated accordingly. These matters are addressed in this Plan through advance notification, enumerator identification and training, the display of recorded particulars for verification, and an accessible route for correction and objection.

Engagement during preparation drew on the implementation experience of the CLICK Project, which was delivered by the same Program Implementation Unit and which included a door to door UIPT survey of approximately 4.5 million properties in Karachi. The documented experience of that project has informed the design of this SEP in four respects: the need for separate consultation sessions for women with female facilitators, because participation by women in mixed sessions was consistently lower; the need for explicit communication of the boundaries of what a scheme or activity will deliver, because community expectations regularly exceeded the scope of individual activities; the need for a defined route for complaints that fall outside the project, because a share of complaints received under CLICK were unrelated to project activities; and the need for a grievance mechanism with sufficient staffing to sustain follow up, because a number of complaints required extended coordination to close.

This Stakeholder Engagement Plan will be disclosed on the relevant website of the Local Government Department, Government of Sindh.

Lessons from earlier operations

Engagement design for this component draws on documented experience from the preceding operation in Karachi and from comparable operations in Pakistan.

- From the record of implementation experience compiled by the Program Implementation Unit for CLICK: participation by women in consultations was consistently lower than by men and required separate sessions with female facilitators and culturally appropriate arrangements; community expectations regularly exceeded the scope of what an individual activity could deliver, so that the boundaries of an activity have to be communicated explicitly at the outset; a share of complaints received through the grievance mechanism concerned matters outside the project, so that a defined route for recording and referring out of scope complaints is required; and sustained follow up on complaints required staffing that was not always available.
- From the Punjab Land Records Management and Information Systems Project: participation and communication strategies are central to a reform of this kind because it requires behavioural and institutional change rather than only a technical deployment; the field record keeping staff whose established practice is displaced must be brought into the change process rather than treated as its object; public education is a distinct workstream; and continuity of communication over time, rather than a single campaign at the outset, sustains support for the reform.
- From the same project's identification of stakeholders in land administration: tenants and leaseholders, persons occupying without documented title, women recorded or unrecorded as owners, and members of minority and collective ownership arrangements each require identification in their own right, because a record based reform affects them differently from documented individual owners.
- From the Punjab Urban Land Systems Enhancement Project: the communication strategy is the instrument through which vulnerable groups learn that a grievance mechanism and disclosure arrangements exist at all, and it is used to open channels for those groups rather than only to publish information.
- From the Sindh Floods Emergency Housing Reconstruction Project: in rural Sindh a significant number of houses carry unclear ownership status because of the informality of the housing sector, and a credible and transparent identification exercise in that setting depends on a responsive grievance mechanism operating alongside it rather than after it.
- From the evaluation of the provincial community driven development programme delivered through the Rural Support Programmes in eight districts of Sindh, several of them within the divisions covered by this component: a three tier structure of women led community organizations exists at village and union council level and provides an established route to women and to poor households, and the durability of any engagement built on it depends on how firmly the link between those organizations and government is institutionalized.

4.2 Summary of stakeholder needs and methods, tools and techniques

Methods are selected against the conditions in which engagement will actually take place. The participating local councils lie in the Hyderabad, Sukkur, Larkana, Mirpur Khas and Shaheed Benazirabad divisions, and conditions there differ from Karachi in ways that bear directly on how stakeholders can be reached.

- Language. Sindhi is the language of daily use across the participating towns, with Urdu in mixed use. Public facing material issued only in Urdu or English will not reach a substantial part of the audience, and field staff need to be able to conduct a doorstep conversation in the language in local use.
- Seasonality. Field operations and public meetings have to be planned around the monsoon period and the associated risk of flooding, and around the summer months when daytime heat limits both outdoor working hours for field teams and attendance at public gatherings. The engagement calendar for each council is set accordingly.
- Settlement pattern and addressing. Peripheral settlements and goths frequently lack street addressing, so notification cannot rely on postal or address based methods and must use announcements, notice boards at accessible points, and contact through community level organizations.
- Participation of women. Female literacy and mobility outside the household are lower than in Karachi, and mixed public meetings are unlikely to secure the attendance of women. Separate sessions with female facilitators, held at accessible venues and at times that accommodate care responsibilities, are the working assumption rather than the exception, and female enumerators are included in survey teams wherever practicable.
- Digital access. Smartphone ownership and network coverage are uneven, and reliance on an application based channel alone would exclude part of the audience. Telephone, walk in, written and box based channels are retained alongside digital ones throughout.
- Local social structure. Consultation convened only through prominent local figures risks reflecting the position of those figures rather than of the wider community. Meetings are therefore convened through more than one route in each council, including community based organizations, women's organizations and trade bodies, and attendance is recorded and disaggregated so that gaps in reach are visible.
- Institutional starting point. Property tax in these towns has been administered from outside the council for most of its history, so the council is not an established point of public contact on this subject. Public information has to establish that the council is now the point of contact before it can explain the survey.

Against these conditions, the following methods are used.

- Formal meetings and correspondence for provincial departments and regulatory bodies, including one to one meetings, written correspondence and inter agency coordination meetings.
- Structured workshops and training sessions for local council staff, combining system demonstration, hands on use and structured feedback.

- Public notification for communities in advance of survey operations, using local newspapers in Sindhi and Urdu, council notice boards, mosque and community announcements, SMS where contact numbers are available, and local cable and radio.
- Doorstep communication during the survey, delivered by identified enumerators using a standard explanation and leaving a written acknowledgement slip carrying the grievance channels.
- Focus group discussions and community meetings for residents, businesses and community based organizations, held separately for women where required.
- Facilitation and information desks at participating local council offices, staffed to explain recorded property particulars, accept correction requests and register complaints.
- Standing engagement through the Town Citizen Committee constituted in each participating town, comprising two male citizen members, two female citizen members and one member of the local council, meeting every month and serving as the routine channel between the community and the operation.
- Engagement through community based organizations, including the village and union council level women's organizations established under the provincial community driven development programme, as a route to women and to low income households that public meetings do not reach.
- Engagement with chambers of commerce, traders associations and property dealers associations in each participating town, as the organized voice on the treatment of commercial premises.
- Written and digital disclosure through the LGD and local council websites, printed material and social media.

4.3 Stakeholder engagement plan

Table 6. Stakeholder engagement plan for the IPF component

Project stage	Timing	Topic of consultation or message	Method used	Target stakeholders	Responsibility
Preparation	Prior to appraisal	Component design, scope of the survey and the IFMIS rollout, the environmental and social instruments, and the grievance mechanism.	Meetings and focus group discussions with LGD and participating local councils; meetings with the Board of Revenue, Finance Department and Excise and Taxation Department; consultations with business associations, academia and civil society.	LGD, participating local councils, provincial departments, business associations, academia, CSOs	LGD and PIU
Preparation	Prior to appraisal	Disclosure of the draft Plan and related instruments for public comment.	Publication on the LGD website; hard copies at participating council offices; public notice in local Sindhi and Urdu newspapers.	All stakeholders	LGD and PIU
Establishment of engagement structures	Within three months of effectiveness	Constitution of the Town Citizen Committee in each participating town: its composition, its role in engagement and in the grievance mechanism, and its monthly meeting schedule.	Public call for citizen members through council notice boards, community based organizations and women's organizations; nomination of the local council member; notified constitution order; orientation session for members.	Community members, women's organizations, CBOs, participating local council	PIU with the LCCU
Establishment of engagement structures	Monthly thereafter, throughout implementation	Standing agenda: engagement activities planned for the coming month, survey progress in the town, summary of grievances registered and their status, and concerns raised by residents.	Monthly meeting of the Town Citizen Committee, minuted, with minutes transmitted to the PIU and reflected in the monthly report from the town.	Town Citizen Committee members and, through them, residents of the town	Town Citizen Committee, convened by the LCCU with PIU support
Establishing the council as point of contact	Ahead of and alongside mobilization in each town	Property tax administration now rests with the participating local council, and what the council does and does not do.	Announcements through local cable and radio in Sindhi and Urdu; council notice boards; briefings to traders associations and community based organizations; information desk at the council office.	General public, businesses and community organizations	PIU communication specialist with the LCCU
Pre survey engagement	At least one week before the survey begins in each town	Purpose and limits of the survey; what data is collected and how it is protected; enumerator identification; the correction process; and the grievance channels.	Stakeholder engagement session convened jointly by the PIU and the participating local council, with the Town Citizen Committee, community based organizations, women's organizations, traders associations and community members. Minuted and published.	Property owners, tenants and occupiers, businesses, CBOs, community members	PIU jointly with the participating local council, with the Town Citizen Committee
Pre survey engagement	At least two days before survey activity begins in each locality	The survey plan for the coming locality: which blocks are to be covered, on which dates, and by whom.	Notification issued to the community through the Town Citizen Committee; council notice boards; local announcements; SMS where contact numbers are available.	Property owners, tenants and occupiers, and businesses in the locality concerned	Town Citizen Committee with the LCCU and the PIU

Project stage	Timing	Topic of consultation or message	Method used	Target stakeholders	Responsibility
Pre survey engagement	Same period, in each town	Purpose of the survey, the presence of enumerators at the door, and how to raise a concern.	Women only sessions with female facilitators, at accessible venues and at times that accommodate care responsibilities, convened with the female members of the Town Citizen Committee and with women's organizations.	Women, female headed households, widows	PIU social and gender specialist with the LCCU
Survey implementation	Throughout the survey period in each town	Doorstep explanation of the visit, enumerator identification, and issue of an acknowledgement slip carrying the grievance channels.	Door to door contact by enumerators carrying photographic identification and operating under a signed code of conduct; acknowledgement slip issued at each visit; information desk at the council office.	Property owners, tenants and occupiers, businesses	Contracted survey firm, supervised by the supervision consultant, the PIU and the LCCU
Record verification and correction	Following entry of each survey block into the management information system	Availability of the recorded particulars and the procedure for seeking correction of an error.	Display of recorded particulars at the council facilitation desk; written, telephonic and in person correction requests; assisted filing for those who need it; the Town Citizen Committee informed so that it can direct residents to the desk.	Property owners, tenants, and the vulnerable groups identified in Table 5	PIU with the participating local council
Land record digitization	During Board of Revenue activities under the component	Digitization of the record of rights, the procedure for correcting entries, and the treatment of pending mutations.	Consultations with Board of Revenue field offices; public notice at revenue offices; engagement with local bar associations and landowner representatives.	Landowners and rights holders, Board of Revenue field staff	Board of Revenue with the PIU
IFMIS rollout and institutional strengthening	Throughout implementation	System adoption, roles and responsibilities, training, support arrangements, and the handling and disposal of equipment reaching end of life.	Training workshops; helpdesk support; one to one support during transition; structured user feedback sessions.	Local council staff in finance, audit, UIPT, engineering and information technology functions	PIU with participating local councils
Worker engagement	On mobilization of each contracted firm and at regular intervals thereafter	Terms of engagement, code of conduct, occupational safety in field conditions, SEA/SH obligations, and the worker grievance mechanism.	Induction sessions; periodic field briefings; posted code of conduct; separate and confidential worker grievance channel.	Enumerators and other staff of the survey firm, supervision consultant staff, consultants	Contracted firms and the supervision consultant, overseen by the PIU
Public awareness and taxpayer communication	First year of implementation and recurrent thereafter	The relationship between property revenues and municipal services, payment channels, exemptions and relief available under the applicable law, and the grievance channels.	Radio and local cable; print media; social media; council information desks; community meetings.	General public in participating towns	PIU communication specialist with participating local councils
Annual consultation	Once in each year, in each participating town	Progress of activities in the town, results of engagement, grievance statistics, feedback received and the action taken	Annual consultation convened jointly by the PIU and the participating local council, with the Town Citizen Committee,	All stakeholders in the participating town	PIU jointly with the participating local council

Project stage	Timing	Topic of consultation or message	Method used	Target stakeholders	Responsibility
		on it, and matters raised by the community.	community based organizations, women's organizations, traders associations and community members. Minuted, with the record published.		
Ongoing implementation	Quarterly	Implementation progress, grievance statistics, and feedback received and action taken.	Quarterly progress reporting; feedback sessions with stakeholder representatives; publication on the LGD website.	All stakeholders	PIU
Annual review	Annually	Annual stakeholder engagement report, and review and update of this Plan.	Published annual report; review meeting with stakeholder representatives.	All stakeholders	PIU

Information disclosure

Information will be disclosed as follows. The documents to be disclosed are this SEP, the Environmental and Social Commitment Plan, the Environmental and Social Management Framework, the Labor Management Procedures, the occupational health and safety plan, the grievance mechanism procedure and complaint form, survey notifications and the survey code of conduct, recorded property particulars for verification by the person concerned, quarterly progress information on stakeholder engagement and grievances, and the annual stakeholder engagement report.

This Plan will be disclosed on the relevant website of the Local Government Department, Government of Sindh. Disclosure will use the following formats and channels: publication on the LGD website and, where available, on the websites of participating local councils; hard copies available for inspection at each participating local council office and at the PIU; public notices in newspapers circulating locally; notice boards at council offices and union council offices; leaflets and brochures distributed during pre survey mobilization; announcements through local cable and radio; SMS to registered contact numbers; social media; and consultation meetings and focus group discussions, including separate sessions for women.

Public facing material will be issued in Sindhi and Urdu. Institutional material and documents prepared for the World Bank will additionally be issued in English. Material for persons with low literacy will use plain language and pictorial formats, and field staff will be able to communicate in the language in local use.

4.4 Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance, implementation of this SEP and of the grievance mechanism, and the project's overall implementation progress. Where a consultation produces recommendations, the PIU will record which recommendations were adopted, which were not, and the reason, and will communicate this to the participants of that consultation through the same channel by which they were engaged.

5. Resources and Responsibilities for Implementing Stakeholder Engagement

5.1 Resources

The Local Government Department, Government of Sindh, acting through the Program Implementation Unit established within the Department, will be in charge of stakeholder engagement activities under the IPF component. The PIU that implemented the CLICK Project has been retained for this purpose.

The estimated budget for implementing this Plan over the five year implementation period is US$536,000, equivalent to approximately PKR 150 million at prevailing exchange rates. The budget is financed under the program management activities of the IPF component. Unit costs are indicative and are set at levels comparable to those applied to stakeholder engagement and grievance redress activities under other World Bank financed operations in Pakistan. They will be reviewed at annual work planning in line with actual procurement outcomes and prevailing rates.

Table 7. Stakeholder engagement budget

Budget category	Quantity	Unit cost (US$)	Times or years	Total cost (US$)	Remarks
1. Staff					
1a. Junior Social Specialist (grievance mechanism focused), PIU	1	1,200 per month	60 months	72,000	One of three Junior Social Specialists in the PIU, dedicated to the grievance mechanism across the 20 participating towns. The Senior Social Specialist and the other two Junior Social Specialists are funded from program management
2. Events					
2a. Annual consultation in each participating town	20 towns	400 per event	5 years	40,000	Convened jointly by the PIU and the participating local council
2b. Monthly meetings of the Town Citizen Committee	20 towns	50 per meeting	60 months	60,000	Venue, refreshment, stationery and travel support for citizen members
2c. Pre survey stakeholder engagement sessions	20 towns	350 per session	2 rounds	14,000	Held at least one week before the survey begins in the town
2d. Women only consultation sessions with female facilitators	20 towns	300 per session	4 rounds	24,000	Facilitator fee, venue and transport support
2e. Focus group discussions with vulnerable groups	40 sessions	300 per session	1	12,000	Convened through community based and women's organizations
3. Communication campaigns					
3a. Public notices in local Sindhi and Urdu newspapers	20 towns	500 per round	4 rounds	40,000	Pre survey notification and record verification notices
3b. Leaflets, brochures and notice board material	Lump sum	30,000	1	30,000	In Sindhi and Urdu, including plain language and pictorial formats
3c. Radio, local cable and social media campaign	Lump sum	12,000 per year	5 years	60,000	Taxpayer communication and awareness of grievance channels
4. Training					
4a. Enumerator training on code of conduct, data privacy and doorstep communication	20 batches	800 per batch	1	16,000	Delivered before mobilization in each town

Budget category	Quantity	Unit cost (US$)	Times or years	Total cost (US$)	Remarks
4b. Training on SEA/SH and GBV for PIU, council, contractor and supervision staff	20 sessions	700 per session	1	14,000	Includes orientation on referral pathways
4c. Orientation and training of Town Citizen Committee and grievance committee members	20 towns	600 per round	2 rounds	24,000	On the grievance procedure, confidentiality and inclusive engagement
5. Beneficiary surveys					
5a. Baseline and mid term perception surveys	2 surveys	25,000 per survey	1	50,000	Awareness, accessibility and satisfaction across the 20 towns
6. Grievance mechanism					
6a. Upgrade and operation of the grievance database and dashboard	Lump sum	9,000 per year	5 years	45,000	Extension of the existing system to the participating towns
6b. Complaint and suggestion boxes and signage at council offices	20 towns	250 per town	1	5,000	Installed at facilitation desks and council entrances
6c. Grievance mechanism communication materials	Lump sum	3,000 per year	5 years	15,000	Posters, slips and forms in Sindhi and Urdu
7. Other expenses					
7a. Annual stakeholder engagement report, documentation and record keeping	1 per year	3,000 per year	5 years	15,000	Includes publication and translation
Total stakeholder engagement budget				**536,000**	Approximately PKR 150 million

5.2 Management functions and responsibilities

The entities responsible for carrying out stakeholder engagement activities are set out below.

- The Local Government Department holds overall responsibility for stakeholder engagement, disclosure and grievance redress under the component, and for reporting on them to the World Bank.
- The Program Implementation Unit within LGD manages day to day implementation of this Plan. Its social and environmental staffing comprises one Senior Social Specialist, three Junior Social Specialists, an environment specialist and a communication specialist. The Senior Social Specialist leads implementation of this Plan and holds overall responsibility for the grievance mechanism. One of the three Junior Social Specialists is dedicated to the grievance mechanism and is responsible for its day to day operation across the participating local councils, including the electronic database, the monthly returns from the councils and the quarterly consolidation. The communication specialist leads disclosure, public notification and the taxpayer communication campaign.
- Local Council Coordination Units (LCCUs) coordinate Program activities at local council level and are responsible for community and stakeholder engagement in their council. Each LCCU is chaired by the head of the local council, includes the Municipal Commissioner, and comprises representatives with expertise in engineering, sanitation, finance, audit, environment and social, UIPT, and media management and public relations. Each LCCU will designate a grievance focal person.
- Participating local councils host the grievance complaint cells, which form part of the Grievance Resolution Cell, and the facilitation and information desks. They designate focal persons for grievance receipt and tracking, display recorded property particulars for verification, convene the annual consultation jointly with the PIU, and submit a monthly report from their town to the PIU covering engagement activities, Town Citizen Committee minutes and grievances. The grievance database is maintained by the PIU.
- A Town Citizen Committee is constituted in each of the 20 participating towns, comprising two male citizen members, two female citizen members and one member of the local council. It meets every month. It is the standing community interface for the component: it receives advance notice of survey activity and transmits it to the community, participates in the pre survey engagement session and the annual consultation, and acts as the Town Level Citizen Grievance Redress Committee, being informed of grievances registered in the town and able to forward a resident's concern into the mechanism. It does not investigate or decide complaints, and sensitive complaints are not placed before it.
- The supervision consultant sits on the Grievance Resolution Cell at each participating local council and on the grievance redress committee for project workers, and supervises the conduct of field operations by the contracted survey firm. Grievances requiring higher oversight, including any matter concerning the conduct of the supervision consultant itself, are determined by the Grievance Redress Committee at PIU level.
- Contracted survey, GIS, IFMIS and consulting firms are responsible for the conduct of their field staff, for doorstep communication in accordance with the agreed protocol, and for maintaining a worker grievance channel. These obligations will be reflected in bidding documents and contracts.

- The Board of Revenue leads engagement associated with land record digitization, with support from the PIU.
- Provincial departments, including the Women Development Department and the Social Welfare Department, are engaged by the PIU as coordination counterparts. They provide referral routes for sensitive complaints and access to particular constituencies. Under this component grievances are received, handled and closed by the PIU and no adjudicative or resolution function rests with these departments. The arrangement under which local councils rely on these departments through their Local Council Coordination Units belongs to the Program for Results window and is addressed through the Environmental and Social Systems Assessment and the Program Action Plan.

Stakeholder engagement activities will be documented through minutes of meetings and consultations in a standard consultation record format, attendance sheets disaggregated by sex, photographic records where participants consent, the grievance register and database, and the quarterly and annual reports prepared by the PIU.

6. Grievance Mechanism

The main objective of a grievance mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

6.1 Description of the grievance mechanism

Under the preceding Competitive and Liveable City of Karachi Project (CLICK, Loan No. IBRD 89980-PK), a grievance redress mechanism was established and operated at project level by the Program Implementation Unit within the Local Government Department. It provided defined channels for the receipt of complaints, a register maintained centrally, assignment of cases for inquiry and follow up, and dedicated social development staffing within the project management structure. The mechanism was mandated to address grievances arising from project financed activities, and staff of the town municipal corporations participated as a coordinating point for receipt, transmission and field follow up.

The mechanism for the IPF component is that mechanism, adopted and continued by the same Program Implementation Unit with digital upgrades, improved integration and staff capacity building, and extended to the participating local councils outside Karachi. It is managed by the PIU and operates through three committees: the Town Citizen Committee, constituted in each participating town and acting as the Town Level Citizen Grievance Redress Committee; the Grievance Resolution Cell, constituted at each participating local council; and the Grievance Redress Committee, constituted at PIU level. A fourth body, the grievance redress committee for project workers, handles grievances of project workers only. The mechanism covers grievances arising from activities financed under the IPF component, in particular the property survey, the digitization of records, and the deployment of the management information systems.

Consistent with ESS10, the mechanism is readily accessible to all project affected parties, is available at no cost and without retribution, accepts complaints submitted anonymously, is proportionate to the risks and impacts of the component, and does not impede access to judicial or administrative remedies. Complaints concerning sexual exploitation and abuse or sexual harassment, and other sensitive matters,

are handled through the confidential channel described below and are not placed before the Town Citizen Committee or the Grievance Resolution Cell.

Step	Mechanism	Time frame	Responsibility
GRM implementation structure	The grievance redress mechanism developed under PIU-CLICK is adopted for the IPF component with digital upgrades, improved integration and staff capacity building, and is managed by the PIU. It operates at three levels. (a) Town Citizen Committee, acting as the Town Level Citizen Grievance Redress Committee. Constituted in each of the 20 participating towns and comprising two male citizen members, two female citizen members and one member of the local council. It meets every month. It holds a corresponding role: it is informed of the grievances registered in its town and of their status, it may receive a concern from a resident and forward it into the mechanism on that resident's behalf, and it may satisfy itself that registered complaints are being addressed. It does not investigate complaints and does not decide them. (b) Grievance Resolution Cell. Constituted at each participating local council and comprising a citizen member drawn from the Town Citizen Committee, a member of the local council, and the supervision consultant. The designated grievance complaint cell of the participating local council, and its focal person, form part of the Grievance Resolution Cell and constitute its point of intake. The Cell receives, registers, investigates and resolves grievances at town level, and convenes as required and at least once a month. (c) Grievance Redress Committee at PIU level. Comprising the Senior Social Specialist, the Junior Social Specialist responsible for the grievance mechanism, the environment specialist and relevant technical staff of the PIU, chaired by the head of social development. It investigates and resolves grievances escalated from town level, grievances of a cross cutting nature, and grievances requiring higher oversight, including any matter concerning the conduct of the supervision consultant or otherwise unsuitable for determination at town level. It maintains the electronic grievance database for all participating towns. A separate grievance redress committee for project workers is constituted with representatives of the contractor, the supervision consultant and the PIU. Appeals from decisions of the Grievance Redress Committee lie to the Program Steering Committee.	All three committees constituted within three months of effectiveness. Town Citizen Committee meets monthly; Grievance Resolution Cell meets at least monthly; Grievance Redress Committee at PIU level convenes as required	PIU with participating local councils and local councils
Grievance uptake	A grievance may be submitted through any of the following channels, at no cost to the complainant: 1. The grievance application, Sindh Hamari Awaz. 2. Voice message or WhatsApp to the designated number. 3. Electronic mail to the designated address. 4. Written letter to the PIU or to the participating local council. 5. Walk in at the grievance complaint cell at the PIU or at the participating local council.	Available at effectiveness; maintained throughout implementation	PIU with participating local councils

Step	Mechanism	Time frame	Responsibility
	6. Telephone to the designated number. 7. The online form on the local council or LGD website. 8. Grievance and suggestion boxes placed at council offices and facilitation desks. 9. The acknowledgement slip issued by the survey team at each visit, which carries the complaint channels. 10. Referral by a member of the Town Citizen Committee on behalf of a resident. Complaints may be submitted anonymously through any of these channels, and no complainant bears any cost or suffers any retribution for making a complaint. Assistance is available at the council facilitation desk for persons who cannot read or write or who require help to file.		
Sorting and processing	A complaint received through any channel is assigned a unique tracking code, which is shared with the complainant together with an indicative resolution timeline. The focal person records the complaint in the database and tracks it through the dashboard. Complaints are categorized as: survey conduct or field staff behaviour; accuracy of recorded property or land particulars; data privacy; information and disclosure; worker related, which is routed to the grievance redress committee for project workers; SEA/SH and other sensitive matters, which are routed directly to the confidential channel at the PIU and are not placed before the Town Citizen Committee or the Grievance Resolution Cell; or falling outside the scope of the component, in which case the complainant is informed and the matter referred to the competent office.	Upon receipt of complaint	Focal person of the grievance complaint cell, within the Grievance Resolution Cell
Acknowledgement and follow up	The system issues an automatically generated electronic mail, short message or alert and an in application notification carrying the complaint code. Where a complaint is received in person or by telephone, acknowledgement is given by the same means.	Upon receipt of complaint	Automatically generated by the system, with the focal person responsible for non digital acknowledgement
Verification, investigation and action	Investigation and resolution rest with the Grievance Resolution Cell and, on escalation, with the Grievance Redress Committee at PIU level. The Grievance Resolution Cell investigates the complaint, formulates a resolution and communicates it to the complainant. Where a matter cannot be resolved at town level it is escalated to the PIU Grievance Redress Committee and the complainant is notified with an updated resolution timeline. The Town Citizen Committee is informed of the grievances registered in its town and of the status of their resolution, in summary form and without disclosing the identity of a complainant who has not consented to disclosure or who has submitted anonymously. Corrections to recorded property particulars are effected in the management information system and the corrected record is shown to the complainant.	Within 10 days at town level; escalated matters within a further period notified to the complainant	Grievance Resolution Cell; Grievance Redress Committee at PIU level
Monitoring and evaluation	Each participating local council submits a monthly report from its town to the PIU on grievances received, resolved and outstanding, disaggregated by category, sex of complainant and channel of receipt, together with the minutes of the monthly meeting of the Town Citizen Committee. The PIU	Monthly reporting from each participating local council to the PIU; quarterly	Town municipal corporations; PIU

Step	Mechanism	Time frame	Responsibility
	consolidates these reports in the electronic grievance database and reports quarterly to the World Bank as part of the Quarterly Progress Report. A quarterly review of a sample of closed complaints assesses the quality of resolution and the accessibility of the mechanism to women and to vulnerable groups.	reporting from the PIU to the World Bank within the Quarterly Progress Report	
Provision of feedback	Resolved grievances are flagged for follow up. The Grievance Resolution Cell checks the satisfaction of the complainant and the outcome is recorded in the database. Where the complainant is not satisfied, the case is reopened, escalated to the PIU Grievance Redress Committee, or referred to appeal.	Within 15 days after resolution	Grievance Resolution Cell, with the PIU
Training	Training is provided on the Environmental and Social Management Framework, grievance handling and the electronic database, confidentiality and the handling of sensitive complaints, doorstep communication and the code of conduct, data privacy and the handling of property information, conflict management, and the SEA/SH and GBV code of conduct. Training covers PIU staff, members of the Town Citizen Committees and of the Grievance Resolution Cells, grievance focal persons, and staff of the contracted survey firm and the supervision consultant. Referral pathways and district level service providers are onboarded by the PIU before the initiation of activities in each participating town.	Before mobilization in each participating town and refreshed periodically during implementation	PIU with participating local councils, the contracted firms and the supervision consultant
Payment of reparations, if relevant	The IPF component finances technical assistance activities and no civil works, land acquisition or resettlement is envisaged, so reparations are not anticipated. Where a substantiated complaint discloses a loss caused by activities under the component, the matter is determined in accordance with the decision of the Grievance Redress Committee and the applicable rules and regulations, and the outcome is recorded in the database.	One day to one month depending on the nature of the complaint	Grievance Redress Committee at PIU level, with the participating local council
Appeals process	Where a complainant is not satisfied with the decision of the Grievance Redress Committee, an appeal may be submitted for further action to the Program Steering Committee.	As required	Program Steering Committee; Grievance Redress Committee at PIU level

The mechanism provides an appeals process where the complainant is not satisfied with the proposed resolution. Appeals lie to the Program Steering Committee, which is chaired by the Chairperson of the Planning and Development Board and includes the Secretary of the Local Government Department, the Special Secretary or Director Technical of the Department, the Secretary Finance or equivalent, representatives of the Association of Local Councils and of the Board of Revenue, and the Program Director. Once all possible means of resolving a complaint have been exhausted and the complainant remains dissatisfied, the complainant is advised of the right to legal recourse. Recourse to this mechanism does not preclude any statutory remedy, including the objection procedures available under the applicable property tax law and the remedies available before the revenue authorities.

Sensitive and confidential complaints, including SEA/SH

The project will have separate measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse and Sexual Harassment, in line with the World Bank ESF

Good Practice Note on SEA/SH. A confidential channel will be designated and publicized, operated by a female focal person at the PIU. Complaints of this nature are not investigated by the Grievance Redress Committee. The mechanism records only that a complaint of this category was received, the date, and whether referral was offered and accepted, and applies a survivor centred approach in which the complainant decides what action is taken. Complaints of this nature are received and managed by the PIU. Referral pathways and district level service providers shall be identified and onboarded by the PIU before the initiation of activities in each participating local council, so that a complainant can be offered health, psychosocial, legal and security support at the point of receipt. The Women Development Department maintains the institutional apparatus through which cases of this nature are addressed in the province, comprising the Sindh Commission on the Status of Women constituted under the Sindh Commission on the Status of Women Act 2015, the office of the Ombudsman established under the Protection Against Harassment of Women at the Workplace Act 2010, a departmental helpline in continuous operation, and Assistant Directors present in each district. The Department is engaged by the PIU in a coordination and referral capacity for the purposes of this component. It is under the Program for Results window, where local councils carry service delivery responsibilities through their Local Council Coordination Units, that the councils rely on the Women Development Department, the Social Welfare Department and other provincial departments for the handling and onward referral of such cases. The code of conduct signed by all project workers, including survey enumerators, sets out prohibited conduct and the consequences of breach.

Worker grievance mechanism

A separate grievance mechanism is available to all project workers, including PIU staff and consultants, and staff of contracted survey, GIS, IFMIS and consulting firms. Workers are informed of the channel at induction and it is posted at field assembly points and offices. It handles matters including terms of engagement, timeliness of payment, working hours and field conditions, occupational safety, and treatment at work, and it operates without prejudice to the public channels above. Workers may use the mechanism without retaliation. Under the ESCP the worker grievance mechanism must be operational before any project worker is engaged, which is earlier than the date by which the public mechanism must be established. It is described in detail in the Labor Management Procedures, which form part of the ESMF.

World Bank grievance redress

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to the existing project grievance mechanism or to the World Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address pertinent concerns. Affected communities and individuals may also submit their complaint to the World Bank's independent Accountability Mechanism, which houses the Inspection Panel and the Dispute Resolution Service. Complaints may be submitted to the Accountability Mechanism at any time after concerns have been brought directly to the attention of World Bank Management and after Management has been given an opportunity to respond. Information on how to submit complaints to the GRS is available at www.worldbank.org/GRS, and to the Accountability Mechanism at accountability.worldbank.org.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank financed projects.

7. Monitoring and Reporting

7.1 Summary of how SEP implementation will be monitored and reported

Implementation of this Plan is monitored by the PIU. Each participating local council submits a monthly report to the PIU covering engagement activities held, the minutes of the monthly Town Citizen Committee meeting, and grievances received, resolved and outstanding. The PIU consolidates these into a quarterly report submitted to the World Bank as part of the Quarterly Progress Report, and into an annual stakeholder engagement report which is published. Monitoring uses both qualitative reporting on the feedback received and the action taken on it, and quantitative reporting against the indicators below.

- Number of consultation meetings, focus group discussions and public meetings held, by stage, location and stakeholder group.
- Number of participants in engagement activities, disaggregated by sex, and the number of women only sessions held.
- Number of participating local councils in which pre survey public notification was completed before survey mobilization, against the number in which the survey commenced.
- Number of information and facilitation desks operational at participating local councils.
- Number of Town Citizen Committees constituted, against the 20 participating towns, and the proportion with the full complement of two male and two female citizen members and one local council member.
- Number of monthly Town Citizen Committee meetings held and minuted, against the number due.
- Number of participating towns in which the survey plan was notified to the community through the Town Citizen Committee at least two days before activity began in a locality.
- Number of participating towns in which a stakeholder engagement session was held at least one week before the survey began.
- Number of annual consultations held jointly by the PIU and the participating local council, against the 20 participating towns.
- Number of disclosure items published, by document, language and channel.
- Number of grievances received, and the number resolved within the prescribed timeline, disaggregated by category, sex of complainant, location and channel of receipt.
- Number of grievances open for more than 30 days, and the number of appeals received and determined.
- Number of correction requests to recorded property particulars received and effected in the MIS.
- Number of complaints recorded as outside the scope of the project and referred onward.

- Number of SEA/SH complaints received and referred for health, psychosocial, legal or security support, recorded without identifying detail.
- Number of project workers, including enumerators, trained on the code of conduct and on SEA/SH obligations, disaggregated by sex.
- Number of participating local councils in which engagement was convened through more than one route, and the number in which community organizations were engaged.
- Proportion of public facing material issued in Sindhi and in Urdu.
- Number of complaints received through non digital channels as a proportion of all complaints received, as a measure of the accessibility of the mechanism.
- Number of adjustments made to engagement methods as a result of monitoring findings.

Stakeholder representatives will be involved in monitoring through quarterly feedback sessions at which grievance statistics and engagement results are presented, and through the perception surveys included in the SEP budget.

7.2 Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. Quarterly summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective and preventive actions, will be collated by responsible staff and referred to the senior management of the project. The quarterly summaries will provide a mechanism for assessing both the number and nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner.

Information on public engagement activities undertaken by the project during the year will be conveyed to stakeholders through: a standalone annual stakeholder engagement report published on the LGD website; summary information posted on notice boards at participating local council offices in Sindhi and Urdu; feedback sessions with the stakeholder groups consulted during the year; and announcements through local media, SMS and social media. Where recommendations made by stakeholders have been adopted, the report will identify them and record the resulting change.