

Stakeholder Engagement Plan
Khyber Pakhtunkhwa Public Resources for
Inclusive Development Multiphase
Programmatic Approach
KP-PRID MPA (Phase II)

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1. Introduction/Project Description

The Khyber Pakhtunkhwa Public Resources for Inclusive Development Multiphase Programmatic Approach (KP-PRID MPA) aims to support the Government of Khyber Pakhtunkhwa (KP) to strengthen the fiscal system to support macroeconomic stability and service delivery.

The Project will be implemented by the Finance Department (FD) of the Government of Khyber Pakhtunkhwa. Key implementing entities, besides the FD, will include Board of Revenue (BoR), Excise Taxation & Narcotics Control Department (ET&NCD), Planning and Development Department (P&DD), Bureau of Statistics (BoS), KP Department of Health (DOH), KP Elementary and Secondary Education Department (KPESED), KP Public Procurement Regulatory Authority (KPPRA) and Khyber Pakhtunkhwa Revenue Authority (KPRA).

The Khyber Pakhtunkhwa Public Resources for Inclusive Development Multiphase Programmatic Approach (KP-PRID MPA) comprises the following two components: **i) a \$180 million Program for Results (PforR) component** comprising of three results areas: (i) More efficient and effective revenue collection; (ii) Strengthened allocation, efficiency, and accountability in expenditures in health and education; (iii) Improved statistical and data landscape for policymaking and institutionalized use and, **ii) a \$20 million Investment Project Financing (IPF) component** consisting of technical assistance to support the implementing entities with, system upgrades, and capacity-building support to ensure that PforR funds are used efficiently and in a timely manner. This Stakeholder Engagement Plan (SEP), developed by the Implementing Partner, pertains to the IPF component of the program only.

The Program-for-Results (PforR) lending instrument utilizes a specialized Systems Assessment Framework to evaluate the borrower's existing institutional, technical, and fiduciary capacities. Unlike standard Investment Project Financing (IPF) which mandates the direct application of the World Bank's own Environmental and Social Standards (ESS), the PforR framework relies on and seeks to strengthen the partner country's own national, provincial, and sectoral systems. Within this overall framework, the World Bank conducts the Environmental and Social Systems Assessment (ESSA) process. This process systematically reviews the borrower's organizational capacity, regulatory legal frameworks, and implementation track record against six core environmental and social principles. The ESSA process actively identifies systemic gaps, screens out high-risk activities, and mandates structured public consultations with affected communities and civil society organizations. Ultimately, the findings from this assessment are translated into legally binding, time-bound corrective measures that are integrated directly into the Program Action Plan (PAP) or tied to financial disbursements, ensuring that the country's systems are robust enough to manage all localized risks.

The primary beneficiaries of the KP PRID-MPA are citizens of KP who stand to benefit from better-resourced and more efficient public services. Direct beneficiaries include recipients of enhanced healthcare and education services. Taxpayers and businesses will benefit from a more transparent and service-oriented tax administration. More broadly, improved own-source revenue mobilization, strengthened public finance systems, and an evidence-based approach to policymaking and planning are expected to better align allocation of resources with provincial needs and ultimately enhance the quality and equity of public service delivery and investments across KP.

The Khyber Pakhtunkhwa Public Resources for Inclusive Development Multiphase Programmatic Approach (KP-PRID MPA) is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies 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.

2. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire 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 about project activities or any activities related to the project.

3. Stakeholder identification and analysis

3.1 Methodology

To ensure a systematic rather than an ad hoc approach, stakeholders for this project were identified through a structured process combining desk reviews and preliminary consultations. A thorough desk review of Khyber Pakhtunkhwa (KP) provincial policies, legal frameworks, and environmental and social assessment reports from similar World Bank-funded projects was conducted to map out institutional and regulatory actors. This desk-based mapping was validated and expanded through targeted consultations and scoping meetings with key government line departments and civil society organizations. This dual approach ensured that project-affected parties, other interested parties, and vulnerable groups including rural landowners were comprehensively and systematically identified from the outset.

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(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating 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 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 that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- *Flexibility:* The project recognizes that deep-rooted cultural norms, complex gender dynamics, and localized governance sensitivities in Khyber Pakhtunkhwa can, in specific contexts, restrict the ability

of certain groups to participate safely and meaningfully in traditional in-person public consultation settings. In such cases — including engagement with women in highly conservative rural areas, stakeholders in security-sensitive locations, or individuals at risk of socio-political retaliation — the project will deploy adaptive, context-specific engagement modalities as a complement to its primary in-person methods. These may include phone-based interviews, radio-based awareness campaigns in local languages, gender-segregated feedback sessions with female facilitators, and secured written feedback mechanisms. The selection of any such modality will be guided by the specific barriers faced by the target group, and will not substitute for meaningful in-person engagement where that is feasible and appropriate. Digital and remote channels serve a supplementary and protective function within the overall engagement program, not as the default approach.

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. Specifically, the following individuals and groups fall within this category:

- a) Implementing agencies staff members with low ICT literacy, disabilities, language barriers etc.
- b) women staff members
- c) women, girls and transgender citizens
- d) citizens with limited ICT access and low ICT literacy
- e) citizens with disabilities
- f) Sarhad Chamber of Commerce & industry
- g) KP Women Chamber of Commerce & industry
- h) Anjumn-e- Zamindaran
- i) Tax Equity & Economic Justice Advocacy Groups: Civil society groups working to ensure that agricultural and property tax reforms are fair and do not unfairly burden small landowners or vulnerable groups: local tax bar associations.
- j) Public Accountability & Governance Watchdogs: Civil society organizations that monitor government spending and tax collection to ensure transparency in how the new revenue is used: Centre for Governance and Public Accountability (CGPA) & Transparency International Pakistan.
- k) Digital Rights & Data Privacy Advocates: Advocacy groups that ensure the new unified digital property tax databases protect citizen privacy, secure personal data, and maintain digital safety: Digital Rights Foundation (DRF)
- L) Direct Taxpayers and Land/Property Owners. This has been merged into two groups i.e.
Agricultural Landowners: We will consult directly with small, medium, and large farmers through local farming cooperatives and the *Anjuman-e-Zamindaran*. This will help us address worries about how the new Agricultural Income Tax thresholds are calculated.
Urban Property Owners & Middle-Class Taxpayers: We will engage these citizens to explain how the unified property taxation system works, ensuring they understand how valuation is done and how to file appeals if they feel their assessment is incorrect.
Targeted Engagement Measures: Instead of generic meetings, we will hold specific town halls, public consultation workshops, and feedback sessions focused entirely on tax fairness, dispute resolution, and how to use the new digital tax filing tools.

The projects' stakeholders also include parties other than the directly affected communities, including government departments, government agencies responsible for environment protection, Law

Enforcement Agencies (LEAs) for cybercrime protection, finance/accounting professionals and Civil Society Organizations (CSOs) who have in-depth knowledge about social characteristics of the population and can identify potential risks as well as opportunities. 'Other Interested Parties' for the IPF component of the program are:

- a) KP Environmental Protection Agency (EPA)
- b) KP Information Technology Board (KPITB)
- c) Accountant General of KP (AGKP)
- d) Auditor General of Pakistan (AGP)
- e) Law, Parliamentary Affairs and Human Rights Department, KP
- f) Federal Investigation Agency (FIA)- National Response Centre for Cyber Crime
- g) Lawyers & Accountants
- h) CSOs
- i) Academia/Policy think tanks

3.3. Disadvantaged/vulnerable individuals or groups

Within the Project, vulnerable or disadvantaged groups may include but are not limited to the following: Women Empowerment & Gender Inclusive Groups, Disability Rights Advocacy Groups, and Sexual & Gender Minorities.

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

1. Women and Gender Minorities

Barriers & Impacts: Many women and transgender citizens in KP do not have formal bank accounts, mobile wallets, or personal smartphones. Cultural norms often restrict their mobility to visit government offices. Moving to e-payment platforms for property or agricultural taxes could accidentally exclude them or force them to rely on male relatives, reducing their financial independence.

Targeted Measures:

We will maintain cash or over-the-counter payment options at local bank branches or specialized citizen centers (e-Khidmat centers) so a digital account is not mandatory.

We will hold women-only consultation sessions led by female facilitators in secure, local community spaces to gather feedback safely.

2. Persons with Disabilities (PWDs)

Barriers & Impacts: New online tax portals, smartphone apps, and digital payment systems are often not designed for screen readers or lack audio/visual support for those with visual or hearing impairments.

Targeted Measures:

We will mandate that all new digital tax platforms and web portals comply with international web accessibility standards.

We will run user-testing workshops directly with local disability rights groups (Friends of Paraplegics KP) to test software prototypes before they go live.

3. Citizens with Low ICT Access and Literacy

Barriers & Impacts: Rural farmers and low-income property owners in KP may struggle with low literacy or a lack of internet connectivity. Digitizing property records and agricultural tax filing without assistance could cause them to miss deadlines, face unfair penalties, or fall victim to middlemen who charge fees to help them navigate the system.

Targeted Measures:

We will set up manned digital help desks at local district offices and Tehsils where staff will guide citizens through the digital filing process for free.

We will launch a radio-based awareness campaign in local languages (Pashto and Hindko) to explain the new tax system simply, bypassing the need for internet access.

4. Stakeholder Engagement Program

4.1. Summary of stakeholder engagement done during project preparation

During project preparation, the following public consultation meetings were conducted with Key implementing entities, the Finance Department (FD), Board of Revenue (BoR), Excise Taxation & Narcotics Control Department (ET&NCD), Planning and Development Department (P&DD), Bureau of Statistics (BoS), KP Department of Health (DOH), KP Elementary and Secondary Education Department (KPESED), KP Public Procurement Regulatory Authority (KPPRA) and Khyber Pakhtunkhwa Revenue Authority (KPRA).

Since the TA component primarily focuses on installation of IT systems and associated capacity development of key implementing partners, stakeholder engagement during this phase focused on representatives of FD, BoR, P&DD, DoH, KPE&SED, KPPRA, KPRA through KIIs and consultations. KP EPA was also engaged during this phase to address the issue of e- waste generation. The purpose of stakeholder engagement during this phase was to ascertain institutional needs; apprise GoKP institutions about planned activities/reforms; improve project design; create synergies; and enhance the socio-environmental sustainability of the TA component of the project.

The environmental and social reports and plans were disclosed through consultations, meetings and focus group discussions. Feedback received during consultations was to determine institutional needs, apprise the government of Khyber Pakhtunkhwa institutions about proposed activities and enhance the socio environmental sustainability of the TA component. Besides, the association of landowners expressed the likelihood of protests taxation of agricultural income which may be perceived as exposing them to higher income tax obligations as evident from historical and recent experiences. The tax may impose undue burdens on small and credit constrained farmers already grappling with high input costs, climate risks, and limited access to formal credit, potentially driving them into deeper poverty and debt.

The association for property dealers asserted that the proposed improved and harmonized update to immovable property valuation may encounter resistance from politically influential groups who benefit from the existing opaque system, potentially leading to opposition against reforms that threaten entrenched interests. Additionally, middle-class property owners could face sudden and disproportionate increases in tax liabilities if updated valuations outpace their actual income-generating capacity, creating affordability challenges and potential discontent. Moreover, the outdated land record systems will further exacerbate these risks, as inaccuracies in capital value assessments may necessitate frequent corrections, undermining public trust in the process.

4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs as stated below: Focus group meetings/discussions and formal meetings with key government departments, key informant interviews/one on one interview with other affected parties and other interest groups besides disadvantage and vulnerable groups.

To align the engagement strategy with the local context of Khyber Pakhtunkhwa (KP), the project will adjust its methodology to prioritize culturally appropriate, in-person consultation methods as the primary mode of engagement. These in-person methods will be specifically designed and scheduled to ensure safe, culturally sensitive, and meaningful participation for rural landowners, low-literacy individuals, and women who would otherwise be excluded by digital-only approaches.

During the project preparation and scoping phase, the Finance Department conducted multiple meetings and Key Informant Interviews (KIIs) with representatives of key government stakeholders and partner institutions which will be most significantly impacted by the TA. The aim of these KIIs/meetings was to ascertain their unique needs, apprise them about planned activities/reforms, improve project design, create synergies, and enhance the socio-environmental sustainability of the TA component of the project. The findings of these meetings and KIIs provided the basis for the development of this SEP.

Although these meetings primarily focused on the PforR component of the program, many of their findings are of relevance to the IPF component as well due to the interconnectedness of the two components. The feedback provided an avenue to flag potential environmental and social risks posed by the program; identify mechanisms for mitigating these risks; propose measures for addressing institutional/policy challenges and identify stakeholders requiring extensive engagement in the future. These meetings were attended by representatives of FD, P&DD, DOH, KPESED, KPPRA, ET&NCD, BoS, BoR, KPPRA and the World Bank.

During these consultations FD, DOH, KPESED and KPPRA provided feedback that low ICT literacy is not likely to create significant issues in the use of IT systems. The use of E-Systems, e-bidding, and MIS for monitoring by DOH and KPESED are currently in use. The departments conduct training courses for staff required to use these systems. While network connectivity in remote areas is a problem, this is overcome by systems being used offline and data uploaded by visiting areas with network connectivity. P&DD, DOH and KPESED agreed that remote and historically underserved districts often struggle to get equal program benefits, which must be addressed by the Project. The need to strengthen Grievance

Redressal Mechanism (GRM) was also highlighted, as the departments primarily receive grievances and feedback through Pakistan Citizen's Portal.

The Bank-sponsored multi-stakeholder disclosure and consultation workshop was held in Peshawar on 7th July 2026. During ESSA preparation, the Shared Services Unit social specialist undertook recurrent meetings and consultations with different stakeholders, including relevant government institutions at the provincial level. Key details from the formal and informal consultations held as part of the ESSA process. Over thirty-one (31) stakeholders and experts from government, academia, the private sector, and civil society representing citizens, women and disabled participated in the Multi-Stakeholder Workshop.

The ESSA Team received key inputs and recommendations concerning the program design; citizens' engagement, GRM, transparency and accountability; inclusion of women, disabled and e- waste management; and capacity of government departments in managing environmental risks. These contributed to the improvement and finalization of the draft ESSA and the design of the Program Action Plan (PAP).

During these consultations, the ESSA Team received key inputs and recommendations concerning lagging districts, citizens facilitation, engagement, identification and targeting of vulnerable groups, presence of GRMs, and use of E-Systems. These contributed to the design of the Program Action Plan (PAP)

4.3. Stakeholder engagement plan

SR#	Investment Project Financing (IPF) Activities	Relevant stakeholders	Topics of engagement	Method used	Location; Frequency	Responsibilities
1	Pre-Budget Survey/Consultation During Implementation Phase of Project	FD All Line Departments of KP CSOs Academia/Think tanks MNAs/MPAs (Including Public Representatives at local government level also)	Macroeconomics factor and other economic challenges that have adversely affected business in KP Impact of Fiscal Policies of the Government on business Priority policy initiatives for budget allocation in various sectors	Consultative Workshop Online Survey Instruments	FD, Peshawar, Annually	PMU PRID KP; Social Specialist hired by the FD.
2	Use of e- payments, and online bill submission During Implementation phase of the project	KPPRA DOH KPESED KPRA	Digitization limitations for staff and PAPs with low IT literacy Challenges related to cyber security GRM for PAPs under ESS10	Consultative Workshop	FD, Peshawar, Quarterly	PMU PRID KP; Social Specialist hired by the FD.
3	Use of e-procurement During the implementation phase	KP Chambers of Commerce & Industry Business sector associations	Procurement digitization.	Consultative Workshop	FD, Peshawar, Quarterly	PMU PRID KP; Social Specialist hired by the FD

SR#	Investment Project Financing (IPF) Activities	Relevant stakeholders	Topics of engagement	Method used	Location; Frequency	Responsibilities
		SMEs Traders Unions CSOs representing vulnerable/disadvantaged population segments (women, low literacy, low ITC literacy, limited access to ICT, disabled persons, transgender etc.) All government departments. KPPRA				
4	Improved inventory management and use of e- platforms During the implementation phase	DOH, KPESED, KPITB, KPPRA	Needs and challenges related with inventory management Digitization limitations for staff with low IT literacy Challenges related to cyber security	Consultative Workshop	FD, Peshawar, Quarterly	PMU PRID KP; Social Specialist hired by the FD.
5	Health-tech and ED-tech: Digitizing services in KP for inclusive and equitable delivery During implementation phase of the project	Facility level practitioners from all districts of KP – from health and education department Secretariat level officials from Health and Education Departments KP. Private sector tech firms/service providers;	Promoting inclusive digital access and outreach for grassroots service delivery in education and healthcare sectors	Thematic panel discussions, Tech exhibition Networking sessions Real-time showcasing of relevant	Peshawar, Biannually	

SR#	Investment Project Financing (IPF) Activities	Relevant stakeholders	Topics of engagement	Method used	Location; Frequency	Responsibilities
		international, national and start ups Academia and programmers from universities Donors – corporate, bilateral and multilateral Sponsors – primarily digital companies including PTCL, Jazz, etc. and pharma companies		services, products, and ideas by national as well as international service providers		
6	Implementation of introducing a unified form of digital system for collection of property related taxes and tax liabilities. During the implementation phase	FD BoR, ET&NCD, KPRA, Lawyers Associations etc	Identifying challenges and developing strategies to effectively implement the system	Consultative Workshop	Peshawar	PMU PRID KP; Social Specialist hired by the FD.
7	Introduction of data driven Agricultural Income tax (AIT) assessment, quantification and digitization. During the implementation phase	FD BoR, ET&NCD, KPRA, Lawyers Associations/ landowners/farmers association etc	Identifying challenges and developing strategies to effectively implement the system	Consultative workshop	Peshawar	PMU PRID KP; Social Specialist hired by the FD.

Information will be disclosed in strict compliance with World Bank Environmental and Social Standard 10 (ESS10) to ensure a transparent, inclusive, and culturally appropriate engagement process throughout the project life cycle. Under this framework, the specific outcomes, feedback logs, and structural strategies outlined within the Stakeholder Engagement Plan (SEP) will be reported and disseminated through formal minutes of meetings and structured workshop reports. To guarantee accessible grievance redressal, the comprehensive, step-by-step procedures of the Grievance Redress Mechanism (GRM) will be prominently hosted on the official project website, displayed on physical notice boards at the offices of all implementing agencies, and communicated directly through targeted, barrier-free discussions tailored specifically for vulnerable and marginalized groups. Furthermore, regular updates regarding ongoing project developments, milestones, and social and environmental data will be consistently published via digital platforms, including the project's official website and dedicated Facebook account. To ensure maximum local comprehension, literacy inclusivity, and institutional transparency, all core information materials, public notices, and digital disclosures will be made available using a dual-language strategy in both English and Urdu/Pashto.

4.4. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

The Project Management Unit Khyber Pakhtunkhwa Public Resources for Inclusive Development, Multiphase Approach Program (PMU KP-PRID MPA) will oversee stakeholder engagement activities.

The budget for the SEP is PKR 741 M and is included in component-2 (IPF) of the project.

Budget Category	Quantity	Unit Costs/PKR	Times/Years	Total Costs	Remarks
1. Workshops					
1a. Consultative Workshops	35	8.00 M	During Implementation	280 M	
1b. Workshop on Reforms	15	15.00 M	During Implementation	225 M	
2. Events					
2a. FGDs	30	1.5 M	Preparation/implementation	45 M	
3. Communication campaigns					
3a. posters, flyers, backdrop etc	25	0.4 M	As above	10 M	
3b. social media campaign	10	5.00 M	During Implementation	50 M	
4. Trainings					

4a. training on social/environmental issues for PIU and contractor staff	10	2.00	As above	20 M	
4b. training on gender-based violence (GBV) for Project Implementing Unit (PIU) and contractor staff	2	2 M	As above	4 M	
5. Beneficiary surveys					
5a. perception survey	2	15 M	As Above	30 M	
6. Grievance Mechanism					
6a. training of GM committees	2	1 M	As Above	2 M	
7. Other expenses					
7a. Other emerging Events/Workshops etc	5	15 M	As Above	75 M	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:				PKR 741 M	

Note: *Salary costs can be indicative.

5.2. Management functions and responsibilities

The Project Management Unit (PMU) Pakistan Public Resources for Inclusive Development- Khyber Pakhtunkhwa in coordination with the implementing partners (IPs) is responsible for carrying out the stakeholder engagement activities described in this document. The stakeholder engagement activities will be documented through written minutes and video records, as appropriate, by PRID-KP.

6. Grievance Mechanism

The main objective of a 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 GM

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	At the national level Pakistan Citizen Portal (PCP) and at the regional level the province operates Ekhtyar Awam Ka Besides a project specific and a separate GRM for the workers be developed as indicated in the ESCP.	To be developed within three months of the Project Effectiveness	Social Safeguards Specialist
Grievance uptake	Grievances can be submitted via the following channels: - Toll-free telephone hotline - E-mail - Application/Letter to Grievance focal points		Social Safeguards Specialist/Focal Person

Step	Description of Process	Time Frame	Responsibility
	- Complaint form to be lodged via any of the above channels - Walk-ins may register a complaint in a grievance logbook at a facility or suggestion box		
Sorting, processing	Any complaint received is forwarded to complaint officer, logged in data base, and categorized according to the following complaint types: low, medium and high risk.	Upon receipt of complaint	Local grievance focal points
Acknowledgment and follow-up	Receipt of the grievance is acknowledged to the complainant by the complainant officer	Within 2 days of receipt	Local grievance focal points
Verification, investigation, action	Investigation of the complaint is led by resolution committee. A proposed resolution is formulated by complaint resolution committee and communicated to the complainant by the complaint officer	Within 10 working days	Complaint Resolution Committee composed of the staff at PMU Chaired by PD (Tier-1) Committee
Monitoring and evaluation	Data on complaints are collected in grievance database and reported to the World Bank every quarter.		Complaint Officer
Provision of feedback	Feedback from complainants regarding their satisfaction with complaint resolution is collected by the complaint officer		Complaint Officer

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint from the tier-2 level resolution committee. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

a) Pakistan Citizen's Portal (PCP) — National level

Headed by the Prime Minister's Performance Delivery Unit (PMDU), Pakistan Citizen's Portal is an online integrated GRM which connects all government organizations at the federal and provincial level through a mobile application. Available on both Android and iOS, PCP is used for lodging complaints against any government department or functionary, seeking guidance/information regarding government procedures and providing suggestions to the government for the resolution of any issue pertaining to the interest of the public. User Guidelines Manual for PCP is available in both Urdu and English.

Despite being a robust GRM, PCP's utility to the project's disadvantaged and vulnerable stakeholders is limited due to low female coverage and because of it being a mobile app-based platform which cannot be accessed by persons with no access to mobile phones, with low ICT literacy, or those living in areas

with no network connectivity.

b) Government of KP Online Portal (Ekhtyar Awam Ka) Provincial Level

The "**Ekhtyar Awam Ka**" (Power to the People) portal is a centralized digital grievance redressal system launched by the Government of Khyber Pakhtunkhwa (KP) to bridge the gap between citizens and public institutions. The platform was officially inaugurated on **September 18, 2024**. This integrated system unifies previous complaint cells into a single cohesive platform. It is designed to enhance transparency, enforce administrative accountability, and improve public service delivery across all provincial departments, ranging from health and education to land revenue and law enforcement.

The system stands out due to its accessible, multi-channel approach and advanced backend infrastructure. Residents and overseas Pakistanis alike can register grievances through a mobile app, WhatsApp, email, telephone, or written applications. Once a complaint is submitted, the citizen receives an automated tracking ID to monitor progress in real-time. On the administrative side, the portal uses artificial intelligence to generate performance analytics, track departmental responsiveness, and map regional complaint trends. The backend is monitored directly by the Chief Minister's office to ensure public servants take accountability seriously, all while maintaining strict user data privacy.

To ensure swift action, "Ekhtyar Awam Ka" operates on a strict, time-bound automatic escalation matrix. The designated focal person or officer of the relevant department is legally mandated to resolve an assigned complaint within an initial **15-day timeline**. If the grievance remains unresolved by the 16th day, the system automatically escalates the issue to the **Divisional Commissioner** for direct intervention. If the matter is still left unaddressed by the 23rd day, it scales up to the highest provincial administrative level, the **Chief Secretary**. Crucially, a complaint cannot be marked as permanently closed until the citizen provides final feedback confirming whether they received adequate relief.

To operationalise anonymous reporting, the project will implement specific physical and digital channels that guarantee complete identity protection:

- **Offline Channels:** Secure, locked complaint boxes will be placed in public areas of local tax offices outside of security camera view. No identification forms will be required.
- **Online Channels:** The project web portal will feature a dedicated feedback form that allows name/contact fields to be left blank and automatically blocks IP address tracking.
- **SMS Channel:** A dedicated text line will accept complaints, and the system will automatically mask phone numbers before routing them to reviewers.
- **Tracking and Feedback:** Anonymous grievances will follow the standard 14-day resolution timeline. Because direct replies are impossible, resolution updates will be published monthly on public bulletin boards and the project website.

Labor and GBV/SEA/SH Provisions

A GRM accessible to Program workers will be established under the Labor Management Procedures (LMP), in line with ESS2 requirements.

Outline of the Worker GRM Framework

- **Relationship to the Project-Specific GRM:** The Worker GRM will be separate and independent from the citizen-facing portals (PCP and Ekhtyar Awam Ka). This ensures that workplace disputes, safety issues, and labor concerns are kept confidential and handled by internal human resource and labor specialists, rather than public tax handlers.
- **Structure:** A dedicated internal grievance committee will be established within the Project Management Unit (PMU), overseen by the Social Specialist, to review and resolve worker complaints neutrally.
- **Intake Channels:** Workers will have access to secure and direct channels to file complaints, including a dedicated internal email, physical grievance boxes in staff areas, and a secure phone line. The system will allow for anonymous reporting to protect workers from any form of retaliation.
- **Timeline for Resolution:** The framework commits to a swift process: complaints will be acknowledged within 2 working days, investigated within 7 days, and a final resolution will be provided within 14 days.

GBV/SEA/SH Provisions

To address any complaints related to GBV/SEA/SH, the program will ensure that GBV related grievances received by the GRM are referred to relevant GBV service providers. Dedicated trained female staff will be appointed to receive and process GBV related complaints. Special considerations will be taken to ensure that the complainant's identity is treated as privileged information, and the option to lodge the complaint anonymously will also be provided. Additionally, all GRM response teams will be trained in GBV, SEA and SH. Detailed protocols for receiving, managing and addressing complaints related to GBV/SEA/SH will be developed under the P for R component and added to the GRM. The SEP will be updated to include the protocols on managing GBV/SEA/SH complaints once established.

Handling Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) Complaints

Guiding Principles

The KP-PRID Project will establish a survivor-centered, safe, confidential, and accessible mechanism for handling complaints related to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH). All SEA/SH allegations will be managed in accordance with the World Bank Environmental and Social Framework (ESF), the World Bank Good Practice Note on SEA/SH, national laws, and ethical standards for survivor protection.

The project GRM shall not investigate SEA/SH allegations or seek evidence from survivors. Its primary role shall be to receive complaints safely, ensure confidentiality, facilitate referrals to qualified service providers, and monitor whether appropriate support has been provided.

Dedicated SEA/SH Reporting Channels

The project will establish multiple safe and confidential channels for reporting SEA/SH incidents, including:

- Dedicated telephone helpline;
- Confidential email address;
- Complaint boxes located in project areas;
- Direct reporting to designated Gender Specialist or Social Safeguards Specialist;
- Reporting through community focal persons, female facilitators, or partner organizations;
- Anonymous reporting options.

Information on available reporting channels shall be disseminated through community meetings, awareness campaigns, project information materials, and stakeholder engagement activities.

Designated SEA/SH Focal Persons

The Project Management Unit (PMU) shall appoint trained female SEA/SH Focal Persons responsible for receiving and managing SEA/SH-related complaints.

The focal person shall receive specialized training on:

- Survivor-centered approaches;
- Psychological first aid;
- Confidentiality and informed consent;
- Referral pathways;
- Data protection and record management;
- Ethical handling of SEA/SH disclosures.

Only authorized personnel shall have access to SEA/SH complaint records.

Receipt of SEA/SH Complaints

Upon receiving a SEA/SH complaint:

1. The focal person shall listen respectfully and without judgment.
2. No detailed questioning or investigation shall be conducted.
3. The survivor shall be informed of available support services.
4. Informed consent shall be obtained before any referral is made.
5. Anonymous complaints shall also be accepted/entertained.
6. No survivor shall be required to provide evidence as a condition for receiving support.

The focal person shall record only minimal non-identifying information necessary for referral and reporting purposes.

Confidentiality and Data Protection

The project shall apply strict confidentiality measures, including:

- No disclosure of survivor identity without informed consent;
- Secure storage of SEA/SH records in password-protected systems;
- Restricted access to designated personnel only;

- Use of coded case numbers instead of names;
- Separate SEA/SH database from the general project GRM.

Any breach of confidentiality shall result in disciplinary action.

Referral Pathway

Following informed consent, survivors shall be referred within 24–48 hours to appropriate service providers based on their needs, including:

- Health and medical services;
- Psychosocial counseling;
- Legal aid services;
- Police or law enforcement agencies (if requested by the survivor);
- Shelter and protection services;
- Social welfare and livelihood support services.

The project shall maintain an updated directory of qualified GBV service providers operating within project districts.

Cases Involving Project Workers

Where allegations involve project workers, contractors, consultants, community workers, or primary suppliers:

- The complaint shall be referred confidentially to the designated authority within the PMU.
- Appropriate administrative action shall be initiated in accordance with Codes of Conduct and labor management procedures.
- Any disciplinary action shall be taken without compromising survivor confidentiality.
- The survivor's consent shall remain central throughout the process.

Cases Involving Children

Where a complaint involves a person under 18 years of age:

- Child safeguarding procedures shall be immediately activated.
- Mandatory reporting requirements under applicable law shall be followed.
- Referrals shall be made to specialized child protection services.
- The best interests of the child shall guide all decisions.

Monitoring and Reporting

The project shall maintain anonymized records of SEA/SH complaints for monitoring purposes.

Reporting shall include only non-identifiable information such as:

- Number of SEA/SH complaints received;
- Number of referrals made;
- Type of services provided;
- Resolution status.

No information that could identify survivors shall be included in project reports.

Awareness Raising

The project shall conduct regular awareness activities to ensure stakeholders understand:

- What constitutes SEA/SH;
- Available reporting mechanisms;
- Survivor rights;
- Available support services;
- Confidentiality safeguards.

Information shall be provided in culturally appropriate formats and local languages.

Timeframe for Response

Action	Timeline
Acknowledge receipt of complaint	Within 24 hours
Obtain informed consent and provide information on services	Within 24 hours
Referral to service providers	Within 24–48 hours
Follow-up on referral completion	Within 7 days
Case closure (if survivor agrees)	Based on survivor decision

Non-Retaliation

The KP-PRID Project shall enforce a zero-tolerance policy toward retaliation against survivors, complainants, witnesses, or anyone reporting SEA/SH concerns. Any retaliation shall be treated as a serious violation of project policies and Codes of Conduct.

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

Several Key Performance Indicators (KPIs) will also be monitored by the Project regularly, including the following parameters: number consultation meetings and other public discussions/forums conducted within a quarterly reporting period; frequency of public engagement activities; the number of public grievances received within a quarterly reporting period and number of those resolved within the prescribed timeline.

7.2. Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the project implementation course to ensure that the information presented herein is consistent and the most recent. The identified engagement methods should be revised to remain appropriate and adequate for the project context and specific development phases. Any significant changes to the Project-related activities and its schedule will be duly reflected in the SEP.

In alignment with the World Bank's Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure, this Stakeholder Engagement Plan (SEP) is a living document that will be updated periodically throughout the project lifecycle. Specifically, the SEP will be revised and re-disclosed to reflect any significant changes to the project design, scope, implementation arrangements, or its overall environmental and social (E&S) risk profile.

Quarterly summaries and internal reports on public grievances, inquiries, and related incidents, together with the status of implementation of associated corrective/preventative actions, will be collated by responsible staff and referred to the senior management of the Project. The quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders via virtual or face-to-face meetings via project websites and official Facebook of the project. Local media outlets will also be engaged in crucial project milestones. To ensure inclusivity for stakeholders without internet access, a printed summary of each consultation session will be translated into the local language of the consultation (e.g., Urdu or Pashto) and shared directly with participants within 30 days of the event.

To transition the monitoring and evaluation framework from purely output-focused tracking to outcome-oriented assessment, the project has integrated specific qualitative measures into its Stakeholder Engagement Plan (SEP). First, the project will track the percentage of stakeholder suggestions and feedback successfully incorporated into project design or implementation adjustments, ensuring that a clear rationale is documented for all inputs. Second, the project will measure overall stakeholder satisfaction regarding project communication and engagement through periodic perception surveys. These two outcome indicators will allow the project team to evaluate the actual effectiveness, inclusivity, and impact of its engagement strategies over time.