

**STAKEHOLDER ENGAGEMENT PLAN (SEP) -
(Updated)**

**KHYBER PAKHTUNKHWA RURAL ACCESSIBILITY
PROJECT (KPRAP)**

February 2025

Acronyms

AGP	Auditor General Pakistan
ANC	Antenatal Care
AO	Administrative Office
ASPIRE	Actions To Strengthen Performance for Inclusive & Responsive Education Program
BPO	Budget Planning
CBA	Cost Benefit Analysis
COP	Conference of the parties
COVID-19	Coronavirus Disease
CPF	Country Partnership Framework
CWD	Communication And Works Department
D&S	Design And Supervision
DA	Designated Account
DFIL	Disbursement And Financial Information Letter
DLI	Disbursement Linked Indicator
E&S	Environmental And Social
EA	Economic Analysis
EAD	Economic Affairs Department
ESCP	Environmental And Social Commitment Plan
ESMF	Environmental And Social Management Framework
ESRS	Environmental And Social Review Summary
FGDs	Focus Group Discussions
FM	Financial Management
FMS	Financial Management Specialist
GBV	Gender Based Violence
GDP	Gross Domestic Product
GEMS	Geo-Enabling Initiative for Monitoring and Supervision
GHG	Greenhouse Gas
GIS	Geographic Information System
GoKP	Government Of Khyber Pakhtunkhwa
GoP	Government Of Pakistan
GPs	Global Practice
GRM	Grievance Redress Mechanism
IBRD	International Bank For Reconstruction And Development
IC	Implementation Committee
IPF	Investment Project Financing
I-SAPS	Institute Of Social And Policy Sciences
JICA	Japan International Corporation Agency
KITE	Khyber Pakhtunkhwa Integrated Tourism Development Project
KP	Khyber Pakhtunkhwa
KPIs	Key Performance Indicators
M&E	Monitoring And Evaluation
NMDs	Newly Merged Districts
NPV	Net Present Value
PCP	Pakistan Citizens Portal
PD	Project Director
PIU	Project Implementation Unit
POM	Project Operational Manual
PPSD	Project Procurement Strategy For Development
RAMS	Road Asset Management System
RAP	Resettlement Action Plan
SDGs	Sustainable Development Goals
SEP	Stakeholder Engagement Plan
TA	Technical Assistance
TCF	The Children's Foundation

ToRs	Terms Of Reference
VOC	Vehicle Operational Costs
VOT	Value Of Time
WBG	World Bank Group

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1. Introduction / Project Description

Khyber Pakhtunkhwa (KP) is the second poorest and least urbanized province of Pakistan, with urban-rural disparities that have impacted access to education, health and markets. About 80 percent of the population resides in rural areas, where forestry and agriculture are the major economic activities. Almost 40 percent of the rural population in the province have to travel more than one hour to access a health and even education facility, 80 percent of the rural KP population require more than 30 minutes of driving distance to primary schools. Low accessibility has a direct effect on the mortality rate, student enrolment and quality of agri-produce reaching markets.

Roads play a pivotal role in developing the rural and urban infrastructures. The Khyber Pakhtunkhwa Rural Accessibility Project (the project) will improve access to education, health and market in district centres of KP and create synergies to improve intra-inter village connectivity. It will improve rural roads including farm to markets and will increase economic opportunities, increase in human development due to access to education, health, etc. for the unattended districts of KP.

KP RAP is aligned with the World Bank Group's Country Partnership Framework (CPF, FY22-26) and its objectives to strengthen Pakistan's Human Capital Base and Grow Sustainably and inclusively the project will improve access to schools, healthcare facilities, and markets in KP. The road's rehabilitation and improvement works are an integral part of the KPRAP. The overall subproject of road has been divided in twelve packages for the road's rehabilitation and improvement works. Eight packages have already been awarded for the civil works.

The proposed project will improve access to education, health and market in district centers of KP and create synergies to improve intra-inter village connectivity. It will improve rural roads including farm to markets and will increase economic opportunities, increase in human development due to access to education, health, etc. for the unattended/deprived districts of KP, mainly Northern region (Chitral Lower and Upper, Dir Lower and Upper, Kohistan, Torghar, Shangla), Southern region (Hangu, Bannu, Karak, Lakki Marwat, Tank, D.I. Khan) and Newly Merged Districts (Bajaur, Khyber, Kurram, North Waziristan, South Waziristan, Mohmand and Orakzai) which are selected by the World Bank.

The project will improve access to schools, healthcare facilities, and markets in KPK. Boosting access to schools and healthcare facilities will contribute to human capital development in KPK, and support CPF Focus Area 1 (Girls and Boys Education) and 2 (Growing healthy). Increasing the resilience of road infrastructure against climate change and extreme weather events, reducing pollution, promoting the use of sustainable resources, and mainstreaming climate resilience practices in infrastructure planning and investments, will contribute to achieving Focus Area 3 of the CPF PLR, which aims to promote green and clean Pakistan.

Program Development Objective: The Project Development Objective (PDO) is to improve rural access to schools, health facilities, and markets through safe and climate resilient infrastructure in Khyber Pakhtunkhwa.

Program Description

The project aims to improve all weather access to schools, healthcare facilities and markets in 18 priority districts. The project will directly benefit two groups: better roads for 5 million inhabitants out of which 2.4 million are women in 18 priority districts and better roads and safe transport to school for 80,000 girls in 9 priority districts.

The project comprises three components, as presented below:

Component 1: Safe and climate resilient access. This component would include financing, upgradation and rehabilitation of selected rural roads in priority districts across the province, including the NMDs. It will ensure provision of climate resilient roads providing improved all-weather accessibility to basic services.

Component 2. Safe Girl' journey to school. (The project activities for this component will focus on 9 priority districts of KP, with the major enrolment and attendance gaps of girls. The specific short list of schools and beneficiary girls (primary, middle and high schools) will be selected by the Department of Education of the GoKP in the first year of the project implementation during the rehabilitation of roads. In the second year the component will be fully implemented in the 9 districts and the results will be assessed from the beginning of the third year of project implementation. This component will integrate road access (financed by Component 1) and improvement of school transport services to improve access to schools for girls in 9 priority districts.

Component 3: Project management and institutional strengthening. This component will cover two subcomponents:

Sub-component 3.1 Project Management. The loan resources will finance, inter alia, the administrative and operational costs related to implementation and monitoring of Component 1 and 2, technical assistance (TA), the core staff of the project implementation unit (PIU), auditing costs, capacity building for the PIU staff, education department and implementation and monitoring of the environmental and social safeguards standards (E&S)

Sub-component 3.2 Institutional Strengthening Program. The loan will finance a comprehensive road sector reforms to improve policies for road sustainability, road funding, financing and the capacity of CWD to select, prepare, allocate efficient resources, procure and manage road works contracts including emergency works¹.

Institutional Arrangements

The PIU has been created and is headed by a Project Director (PD) who is a senior CWD staff. The PD is assisted by a team comprised of procurement specialist, infrastructure engineer, environment and social safeguards specialist and a financial specialist. And education specialist and Gender Specialist has also joined the PIU. The PIU is also supported by Project Administration, Contract Administration Construction Supervision Consultant (PACACSC), firm.

An implementation committee (IC)/Project Steering Committee has been notified to oversee the project. Considering the project had involve different departments, the GoKP (Planning and Development Department), with the assistance of CWD, has notified the PSC to organize and coordinate the project activities from construction to operation. The PSC is led by the ACS P&D Department and is comprised of the Departments of Education, Health and Agriculture. The obligation of each department is to allow actions to be taken to carry out and provide the necessary technical and institutional support for the timely preparation and implementation of the project.

Objectives of SEP

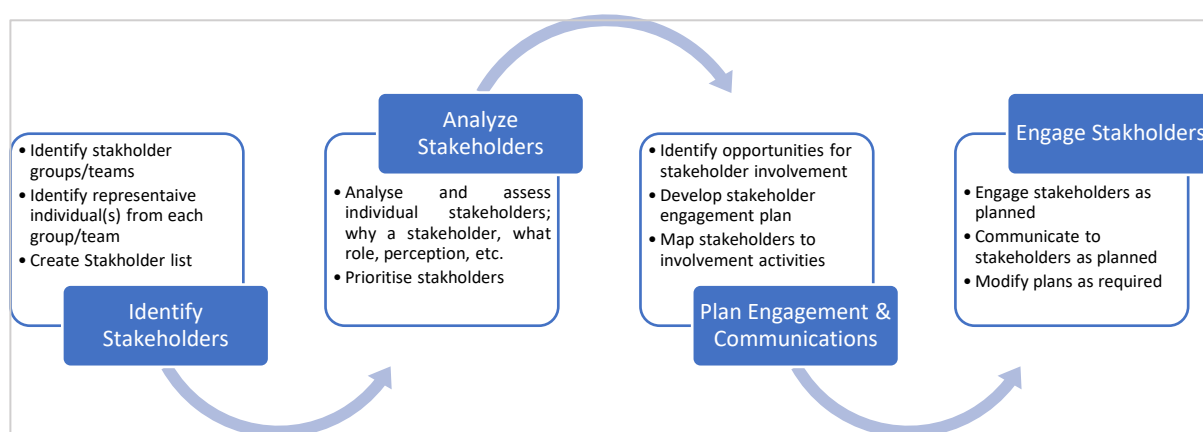
Under World Bank-financed projects, a Stakeholder Engagement Plan (SEP), and project level Grievance Redress Mechanism (GRM) has been developed and will be updated in the additional financing in accordance with ESS10 (Stakeholder Engagement and Information Disclosure) of the World Bank's Environmental and Social Framework (ESF) and any corresponding national legislation. ESS10 requires that Borrowers engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement

¹ In event of floods, landslides, earthquakes and other natural disasters etc.

have to be proportionate to the nature and scale of the project and its potential risks and impacts.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the 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 the project and any activities related to the project. The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities.

Figure 1: Process Of Stakeholder Engagement



2. Brief Summary of Previous Stakeholder Engagement Activities

Various consultations were conducted in 2023-24 as part of the Khyber Pakhtunkhwa Rural Accessibility Project (KPRAP), particularly with reference to the Kalash community. The project also involved construction and maintenance of road infrastructure in some of the geographical area covered under KP RAP.

Consultations were held with the Kalash people and an Indigenous Peoples Planning Framework was developed, which included some of their general concerns and provided insights into the culture, norms and issues faced. The major stakeholders of the project were the Communication and Works Department, Department of Tourism (DoT), local community, owners, relevant Government departments, EPA, Irrigation and NGOs etc.

The outcomes of public consultation process summarize the apprehensions, fears, suggestions, and concerns related to the project/subprojects which include temporary issues in construction phase like dust emissions, traffic congestion, accessibility issues, surface water contamination etc. and long term cultural and privacy issues for instance incoming influx of labour in this case. According to local people due to restricted mobility, friendly grievance mechanisms at the village level would be better suited to address their concerns- specifically those who are elderly, single or with no male support. A synopsis of consultations held for the KPRAP various packages is presented in Table 2 below. These include some feedback from Kalash people as well.

Table 1: Public Consultations Held Under the KPRAP Various Packages and Subprojects

Sr. No.	Location of consultation	Package/Lot No & District	Date	Issues/ Feedback of Stakeholders	Response
1	Kaghozi / Maroi / Bumbagh	Package 12 Lot 1, Chitral	24-09-2024	The community welcomed the subproject project, anticipating it will align with local development goals and enhance tourism opportunities.	The early execution of the subproject will be carried out in close coordination with the local community.
2	Kosht/ Brumkagh Gohkir	Package 12 Lot 1, Chitral	25-09-2024	The local community demonstrated a positive attitude toward the subproject and expressed their full support, offering various forms of assistance to ensure its success.	The subproject will be implemented with close coordination and collaboration with the local community to ensure its seamless execution.
3	Baghwal Pirabad	Package 12 Lot 1, Chitral	25-08-2024	People were not aware about the subproject. However, after the briefing given to them, they appreciated the subproject activities.	It is suggested that consultation process during the subproject implementation may be continued and communities of subproject may be involved through disclosure of subproject activities and regular meetings with locals.
4	Cheena	Package 12 Lot 2, Tank	25-08-2024	People of Cheena appreciated the subproject and hoped that jobs will be provided to the locals.	The implementation of the subproject will create the jobs (around 300-400 direct and indirect jobs for labors) opportunities for which locals should be provided preferences especially the non-technical jobs and if available for technical jobs as well for local communities.
5	Ranwal	Package 12 Lot 2, Tank	26-08-2024	People of Ranwal appreciated the subproject and hoped that jobs will be provided to the locals	Locals will be preferred for jobs during the subproject implementation.
7	Gara Shehbaz/ Pepal wala	Package 12 Lot 2, Tank	26-08-2024	In Gara Shehbaz people of the subproject area demanded the jobs on preference basis.	Locals will be preferred for jobs during the subproject implementation.
8	Bara khel/ Pirwana	Package 12 Lot 2, Tank	26-08-2024	During the consultation the locals showed concern that during the implementation the road blockage may cause disturbance to business.	It is suggested that ESMP may be implemented with letter and spirit during the implementation of the subproject.
9	Pathan kot	Package 12 Lot 2, Tank	26-08-2024	Less knowledge of the subproject observed in the community. The community of appreciated the subproject activities and hope that it will cause increase business opportunities early transportation of their products to market (especially Marble products).	The implementation of the subproject will create the job opportunities for which locals should be provided preferences especially non-technical jobs and if available for technical jobs as well.
10	Shah Alam	Package 12 Lot 2, Tank	26-08-2024	The communities demanded that during subproject implementation there should not be any hindrance in the movement of residents or their animals, the approach toward their farms / agri-land should remain uninterrupted.	Residents will be notified prior to the commencement of construction activities and alternate routes will be provided. Farming and other activities will not be hindered

Sr. No.	Location of consultation	Package/Lot No & District	Date	Issues/ Feedback of Stakeholders	Response
11	Sabirabad	Package 12 Lot 2, Tank	27-08-2024	There should not be any damage / loss of public infrastructure / utilities, property, structure, livelihood etc.	The loss will be prevented or minimized by taking corrective measures as proposed in the ESMP of the subproject. Contractor will be bound to restore the site back to its original conditions before handing over.
		Package 12 Lot 2, Tank		The dust emission should be controlled to avoid the air borne diseases.	Strick implementation of ESMP and regular water sprinkling is recommended during the subproject implementation.
12	Jabbar	Package 4 lot 2 Dir Lower	11-4-23	They informed during the consultation that many people of other provinces visit the area due to its natural environment. The community of the Jabbar and Nishan Banda urged to start the work at the earliest, they believe that the subproject will bring the prosperity and business opportunities through tourism in the subproject areas.	The design and implementation of the subproject will be started soon after the approval of codal formalities.
13	Nishan Banda	Package 4 lot 2 Dir Upper	11-4-23	Construction activities must not hinder the movement of residents or their domestic animals for farming	The business and other activities will not be hindered. Residents will be notified prior to the commencement of construction activities and alternate routes will be provided for the schools and other sensitive receptors.
14	Daskor Bala	Package 4 lot 2 Dir Upper	12-4-23	Any sort of damage to crops or trees is not acceptable to the community.	The piped network will be placed along the Right of Way (RoW) and agricultural fields will not be disturbed. Only some vegetation or wild bushes may need to be cut during construction works. Contractor shall be instructed not to disturb the existing trees. In case of any loss compensation will be provided.
15	Badalai	Package 4 lot 2 Dir Upper	12-4-23	Priority for employment should be given to residing communities;	Yes, opportunities for employment will be generated for the locals and contractors shall be instructed to preferably hire local labor if sufficient skilled labor is available in the project area.
16	Garah issa khan Kulachi	Package 5 lot 1 DI Khan	11-11-23	During the consultation the local community showed little interest in the road construction instead showed interest in provision of medical interest.	Education and medical facilities will be provided as part of the other component of the subproject.
17	Kulachi Guldad	Package 5 lot 1 DI Khan	12-11-23	The community of the NR-14 and NR10 demanded the jobs on preference basis. They believed that the road development will improve the infrastructure development in the area and resultant increase economic development.	The implementation of the subproject will create the job opportunities for which locals should be provided preferences especially non-technical jobs and if available for technical jobs as well.
18	Rangpur janobi	Package 5 lot 1	13-11-23	The communities demanded	Residents will be notified prior to

Sr. No.	Location of consultation	Package/Lot No & District	Date	Issues/ Feedback of Stakeholders	Response
	<ul style="list-style-type: none"> Adil Sipra Essa khan 	DI Khan		that during subproject implementation there should not be any hindrance in the movement of residents or their animals, the approach toward their farms / agri-land should remain uninterrupted.	the commencement of construction activities and alternate routes will be provided. Farming and other activities will not be hindered
19	<ul style="list-style-type: none"> Saggu Akhmad Attal Sharif. 	Package 5 lot 2 DI Khan	14-11-23	There should not be any damage / loss of public infrastructure / utilities, property, structure, livelihood etc.	The loss will be prevented or minimized by taking corrective measures as proposed in the ESMP of the subproject. Contractor will be bound to restore the site back to its original conditions before handing over.
20	Landikotal	Package lot 1 Orakzai	25-09-2023	People were not aware about the subproject. However, after the briefing given to them, they appreciated the subproject activities.	It is suggested that consultation process during the subproject implementation may be continued and communities of subproject may be involved through disclosure of subproject activities and regular meetings with locals.
21	Qamber Khel	Package 7 Package 8 lot 2 Orakzai lot 2 Orakzai	25-09-2023	People of Qamber khel appreciated the subproject and hoped that jobs will be provided to the locals.	The implementation of the subproject will create the jobs (around 300 for labors) opportunities for which locals should be provided preferences especially the non-technical jobs and if available for technical jobs as well for local communities.
22	Sarkai kamber	Package 8 lot 2 Orakzai	26-09-2023	People appreciated the subproject and hoped that jobs will be provided to the locals	Locals will be preferred for jobs during the subproject implementation.
23	Machni	Package 8 lot 2 Orakzai	26-09-2023	In Machni people of the subproject area demanded the jobs on preference basis.	Locals will be preferred for jobs during the subproject implementation.
24	Saparay and Banglow kaly	Package 7 lot 2 Mohmand	27-09-2023	During the consultation the locals showed concern that during the implementation the road blockage may cause disturbance to business.	It is suggested that ESMP may be implemented with letter and spirit during the implementation of the subproject.
25	Kado Kor	Package 7 lot 2 Mohmand	27-09-2023	The community of appreciated the subproject activities and hope that it will cause increase business opportunities early transportation of their products to market (especially Marble products).	The implementation of the subproject will create the job opportunities for which locals should be provided preferences especially non-technical jobs and if available for technical jobs as well.
26	Jhangirabad and Kuladhand	Package 7 lot 2 Charsadda	28-09-2023	The communities demanded that during subproject implementation there should not be any hindrance in the movement of residents or their animals, the approach toward their farms / agri-land should remain uninterrupted.	Residents will be notified prior to the commencement of construction activities and alternate routes will be provided. Farming and other activities will not be hindered
27	Khora Kalli and Peshawar (Chota puli)	Package 7 lot 2 Charsadda	28-09-2023	There should not be any damage / loss of public infrastructure / utilities, property, structure, livelihood	The loss will be prevented or minimized by taking corrective measures as proposed in the ESMP of the subproject.

Sr. No.	Location of consultation	Package/Lot No & District	Date	Issues/ Feedback of Stakeholders	Response
				etc.	Contractor will be bound to restore the site back to its original conditions before handing over.
				The dust emission should be controlled to avoid the air borne diseases.	Strick implementation of ESMP and regular water sprinkling is recommended during the subproject implementation.

Table 2: Institutional Consultations Held Under the KPRAP Various Packages and Subprojects

Sr. No.	Department Name	District	Date	Consultation and Responses
1.	Environment Protection Agency, (Divisional Directorate)	DI Khan, Swat/Peshawar	15-05-2024	<ul style="list-style-type: none"> Meeting with the Director EPA held and details of subproject was discussed. He appreciated the subproject and demanded the subproject should comply all the EPA laws and the national environmental quality standards (NEQS), during the implementation.
2.	KP Forest /Wild life Department	Peshawar	15-05-2024	<ul style="list-style-type: none"> The District Forest officer was consulted as part of institutional stakeholder. He appreciated the project and confirmed that no potential threatened or endangered species are available in the subproject COI.
3.	Irrigation Department	Peshawar	16-05-2024	<ul style="list-style-type: none"> Meeting with Irrigation Department was held and the subproject details were shared with them. Moreover, the data of nullah that runs through project areas was taken from them. They provided discharges of nullahs in the subproject area and their runtime. No concern was shown by the official.
4	KP C&W Department	Peshawar	16-05-2024	<ul style="list-style-type: none"> All the Chief of the C&W appreciated the subproject and desired to expedite the design and final documentations.

The Kalash is recognized as Indigenous Peoples (IP) under WB Operational Policy OP 4.10 and Environmental and Social Standard (ESS) 7 under the Environmental and Social Framework (ESF). This policy requires that Bank-financed programs do not cause adverse impacts on/for IP and when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts. Its aim is to promote sustainable development benefits and opportunities for IPs in a manner that is accessible, culturally appropriate and inclusive.

2.1. Summary of Stakeholder Engagement done during Project Preparation

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

The SEP has been updated by the PIU and will be disclosed publicly (website of the implementing agency CWD, KPRAP) and will be implemented during the implementation phase. CWD will also strengthen its existing GRM to enable stakeholders to air their concerns/ provide feedback/ suggestions.

Various community consultations were held, one in Khyber, Diana, Swat, Chitral, Buner, Dir, Landi Kotal and Mula Gori, etc. A total of 800 people were engaged with through these focus group discussions. The feedback obtained is presented in Table 1.

In all FDGs, specific concerns voiced by the women in the sessions are outlined below.

- Community females were not aware of any forum to raise grievances regard the road quality.
- The condition of the roads is very bad and there are breakers potholes in some places which makes it difficult to travel.
- Some roads are broken from place to place as a result some children slip and get injured and absent from school for many days.
- In some areas there are no roads at all, which making it very difficult to travel school, market and hospitals.

The CWD also had a meeting with the officials of the forest department who asked for compensatory trees to be planted, for the improvement of the area and the environment.

The specific objectives for conducting the FDGs were:

- i. Engagement with relevant education stakeholders and participants including but not limited to parents, education officials, education leaders, representatives of civil society, etc. from the select districts in Khyber Pakhtunkhwa.
- ii. To understand and map stakeholders' perceptions and experiences on the barriers to girls' participation in education.
- iii. To understand education accessibility gaps for girls, particularly from the transport angle and
- iv. To capture the contextual nuances of why girls prefer to stay at homes rather than attending schools.

A mix of districts with moderate to high level of educational challenges were selected based on gaps in accessibility and girls' participation in education so that a good coverage of voices is ensured. In addition, logistical considerations were also kept in mind, such as distance and travel time to the FGD venues. Participants from rural areas of the identified districts were prioritized for these FDGs.

Key findings² from these focus group discussions are as follows:

- Parents cannot afford the cost of education, especially transportation related costs. Therefore, if the families are provided some financial support for transportation, girls' enrolment will increase in higher grades.
- People wanted the jobs for the locals especially in the area where the subproject implementation are in process.
- The drivers and vendors for transportation service are available in all target locations, however the drivers and vendor should be local so that they are well known by parents, and they can trust them. The mode of transport can vary according to the topography of the area.

² The detailed findings outlining attitudes and barriers to girls education are available in the Aide Memoire: Focus Group Discussions on Transport Barriers and Solutions to Girls' Participation in Education

- Since early marriage is one of the major reasons for school dropout, there is a dire need for awareness raising in parent for continuation of education for their girl child.
- Some of the schools do not have boundary walls, toilets and safe drinking

3. Stakeholder Identification and Analysis

For meaningful and substantive engagement, it is necessary to determine who the stakeholders are and understand their needs and expectations for engagement, as well as their priorities and objectives in relation to the Project. This information will then be used to tailor engagement to each type of stakeholder. As part of this process, it is particularly important to understand how each stakeholder may be affected – or perceives they may be affected – so that engagement can be modified accordingly.

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 the project and any activities related to the project. It does this by:

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

The involvement of the local population is essential to the success of the project in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities

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

- i. are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as ‘affected parties’); and
- ii. may have an interest in the Project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.
- iii. are highly vulnerable to potential project impacts and do not have a voice to express concerns or understand the project’s risks and impacts. Aspects of vulnerability may include: gender, ethnicity, religious identity, health conditions, disabilities, economic marginalization, financial and food insecurity, disadvantaged status, and dependence on natural resources. Stakeholders in this category are referred to as “disadvantaged/vulnerable individuals and groups”

Cooperation and negotiation with the stakeholders throughout the Project development often also require the identification of persons within the groups who act as legitimate representatives of their respective stakeholder group, i.e. the individuals who have been entrusted by their fellow group members with advocating the groups' interests in the process of engagement with the Project. Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks.

Methodology

The project intends to utilize various methods of engagement that will be used as part of its continuous interaction with project stakeholders. For the engagement process to be effective and meaningful, a range of various techniques need to be applied that are specifically tailored to the identified stakeholder groups. In accordance with best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach:** public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- **Informed participation and feedback:** information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- **Inclusiveness and sensitivity:** stakeholder identification is undertaken to support better communication and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, indigenous people (Kalash living in 3 valleys of Chitral district in Khyber Pakhtunkhwa province) internally displaced persons (IDPs), returnees, drug addicts, persons with disabilities, youth, elderly and the cultural sensitivities of diverse ethnic and religious minority groups and those living in remote or inaccessible areas.

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

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

status³, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

3.1. Affected Parties

ESS10 refers to Identifying individuals, groups, and other parties that may be directly or indirectly affected by the project, positively or negatively. Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the Project. The SEP focuses particularly on those directly affected, positively or adversely by the project activities. At this time, the following have been identified as directly affected parties under this category, and these will be further confirmed during program implementation:

- a. C&W Provincial Headquarters
- b. C&W District Offices
- c. Elementary and Secondary Education Department
- d. School bus drivers/ Transport Service Providers
- e. Small farmers
- f. Teachers, in particular female teachers
- g. Students, in particular female Students
- h. Parent Teacher Councils
- i. Communities adjacent to targeted roads

3.2. Other Interested Parties

There may be broader stakeholders who may be interested in the project because it indirectly affects their work or has some bearing on it. As elucidated in the ESS10, while these groups may not be directly affected by the project, they may have a role in the project preparation or have a broader concern including for, but not limited to, information dissemination, awareness raising, community mobilization, and feedback. Interested parties under this category may be identified as:

- a. KP Planning and Development Department
- b. Office of the District Administration (Deputy Commissioner)
- c. Right to Public Services Commission, KP
- d. Provincial Environmental Protection Agency
- e. KP Labor department
- f. KP Agriculture Department
- g. KP Health Department
- h. Environment Conservation Organization
- i. KP Archaeological Department
- j. KP Forest, Fisheries and Wildlife Departments
- k. Pakhtunkhwa Highways Authority
- l. KP Department of Finance
- m. Private transport providers in target districts
- n. The Children's Foundation(TCF)
- o. Social Welfare, Special Education & Women Empowerment Department Khyber Pakhtunkhwa
- p. Provincial Commission on the Status of Women (KPCSW)
- q. Workers Welfare Board

³Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

- r. KP NGOs like Sarhad Rural Support Programme (SRSP), Kalam Development Foundation (KDF)
- s. Organizations with outreach to the Kalash Community like Kalash Peoples Development Network (KPDN), Aga Khan Rural Support Program (AKRSP)
- t. Village organizations in target areas of districts
- u. Community Organizations in target areas of district
- v. Peoples Commission for Minorities Rights
- w. Academia such as University of Peshawar, Sarhad University and Institute of Management Sciences (IMS)
- x. Media such as journalists reporting on roads, infrastructure, economy and employment in KP

The SEP process will include conducting consultations with representatives of each of these groups and defining a strategy for continual engagement with each of them throughout the project life.

3.3. Disadvantaged / Vulnerable Individuals or Groups

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impact of a project. The vulnerability may stem from person's origin, gender, age, health condition, literacy levels, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., religious and ethnic minorities or fringe groups), dependence on other individuals or natural resources, especially those living in remote, insecure or inaccessible areas, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

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

- a. Women and girls in beneficiary households
- b. Female staff from implementing departments
- c. Religious and ethnic minorities
- d. Elderly people
- e. Differently abled citizens
- f. Transgender people
- g. Indigenous People of Kalash (living in Chitral District in KP province)
- h. IDPs
- i. Refugees (for example Afghans)
- j. Female-headed households, especially within IDPs

Some of the organizations representing the groups listed above include NOWDP⁴, Akhuwat etc. The stakeholders listed are usually amongst the lowest income groups or those often excluded and likely to face difficulties accessing technology. The project will promote active citizen engagement to identify project-relevant gaps and monitor outcomes. Extensive consultations will be undertaken with disadvantaged communities during project design and implementation, including focus groups, field visits and round table discussions. Feedback mechanisms, such as regular consultation on project implementation and satisfaction surveys on the accessibility and safety of rehabilitated roads and improved transport to school will also be in place. These vulnerable groups can offer insights on barriers and bottlenecks to services

⁴ Disability inclusion initiative which is focused on inclusion through empowerment

in terms of access and otherwise. Consultations with them would be critical to inform program design and implementation.

Vulnerable groups within the communities affected by the project will be 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.

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

The following table lists the key stakeholder categories and identifies their specific needs for engagement during the additional financing as well.

Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs accessibility, large print, child care, daytime meetings
Government department directly involved in implementing the project	CWD management and staff) that are involved in project implementation, EPA, Forest, etc.	<ul style="list-style-type: none"> • Pashto for field work. • English and Urdu are both used as working languages in Government Departments. 	<ul style="list-style-type: none"> • Email and phone • In person meetings • Virtual meetings, • Workshops 	<ul style="list-style-type: none"> • Meetings during working hours preferably
Government/institutional Other Interested parties	Stakeholders not directly involved in or affected by project activities, but may be consulted for technical support or collaboration during the design and implementation of the project.	<ul style="list-style-type: none"> • English and Pashto in the case of provincial level institutions • Pashto at the district level 	<ul style="list-style-type: none"> • Email and phone • In-person individual/ small group meetings 	<ul style="list-style-type: none"> • Meetings during working hours preferably

Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs accessibility, large print, child care, daytime meetings
Low income/remote Communities	Low income, below or close to poverty line.	<ul style="list-style-type: none"> • Pushto • In urban settings in provinces Urdu may also be used. 	<ul style="list-style-type: none"> • Radio, TV, media and text messages • In person through social organizers or NGOs 	<ul style="list-style-type: none"> • Available at specific times of day, probably in evening. • May only be willing to talk to NGO workers and community organizers who have been in contact with them
Middle income communities	Range of livelihoods	As above, but probably comfortable with Urdu also	<ul style="list-style-type: none"> • Email and phone • social media, • community leaders may be available on email or by telephone 	<ul style="list-style-type: none"> • Available at specific times of day, probably in evening
Academics	Often employed in research organizations and Universities	English, Urdu, Pashto	Email and phone	<ul style="list-style-type: none"> • Meetings during working hours preferably
NGOs and CSOs	Often exercise influence in local communities and can be. Important in social mobilization and awareness raising	<ul style="list-style-type: none"> • English and Urdu with larger NGOs at the provincial level • Pashto and Urdu at district level when engaging with CSOs 	<ul style="list-style-type: none"> • Email and phone • In person meetings 	<ul style="list-style-type: none"> • Meetings during working hours preferably
Women	May not have much freedom of association or movement	<ul style="list-style-type: none"> • Pashto • Urdu in urban areas 	<ul style="list-style-type: none"> • Phone, social media or radio • Community meetings organized by local CSOs working in rural areas 	<ul style="list-style-type: none"> • Accessible mainly to other women. • Times of availability will vary for different groups • Younger married women may need child-care

The SEP will also highlight methods to involve citizens voices and feedback and will suggest differentiated measures of engagement across Pakistan.

4. Stakeholder Engagement Program

4.1. Purpose and timing of stakeholder engagement program

The approach for the stakeholder engagement analysis will be underscored by three elements: (i) belief in the primacy of qualitative data; (ii) commitment to participatory methods; and (iii) flexible responsive methods. An inclusive and participatory approach has been followed taking the main characteristics and interests of the stakeholders into account, as well as the different levels of engagement and consultation that will be appropriate for different stakeholders.

In general, engagement is directly proportional to the impact and influence of a stakeholders. As the extent of impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used.

The different combinations of influence and importance that a stakeholder may exercise are elucidated in the diagram below. This formulation is based on individual interviews with representatives from the various organizations, which have been consulted to date. The table may be populated as more interviews and group consultations are conducted throughout the project cycle. A majority of the interviewees play an important role in the power sector and have considerable influence. Their input is therefore critical for this project to highlight important issues that the project may address in its implementation phase.

Figure 2: Stakeholder Influence and Importance

		Degree of Influence	
		High influence	Low influence
Degree of Importance	High Importance	<p>Box A: Stakeholders who stand to lose or gain significantly from the project AND whose actions can affect the project's ability to meet its objectives</p> <ul style="list-style-type: none"> • Communication Works Department • Elementary and Secondary Education Department • Health Department • Agriculture Department 	<p>Box B: Stakeholders who stand to lose or gain significantly from the project BUT whose actions cannot affect the project's ability to meet its objectives</p> <ul style="list-style-type: none"> • School bus drivers • Small farmers • Female teachers • Female Students • Parent Teacher Councils • Communities adjacent to targeted roads • Beneficiaries of the project • Other vulnerable groups such as the Kalash
	Low Importance	<p>Box C: Stakeholders whose actions can affect the project's ability to meet its objectives BUT who do not stand to lose or gain much from the project</p> <ul style="list-style-type: none"> • Relevant ministries and Government departments and organizations such as KP Planning and Development Department, Office of the District Administration (Deputy Commissioner); Right to Information Commission, KP; Right to Public Services Commission; KP ;Provincial Environmental Protection Agency; Labor department; KP Archaeological Department; Forest, Fisheries and Wildlife Departments; Peshawar Electric Supply Company (PESCO) • NGOs 	<p>Box D: Stakeholders who do not stand to lose or gain much from the project AND whose actions cannot affect the project's ability to meet its objectives</p> <ul style="list-style-type: none"> • Academia • Local CSOs

This matrix provides the framework for stakeholder analysis which will be updated within 90 days of project effectiveness and will continue as needed through the project cycle.

The stakeholder engagement program for the project aims to: establish a systematic and inclusive approach to stakeholder engagement; build and maintain a constructive relationship with stakeholders; incorporate stakeholders' views and concerns into design/implementation; mitigate possible negative social and environmental downstream impacts; and, enhance project acceptance and socio-environmental sustainability. Stakeholder engagement may be divided into two phases:

- **Phase I (Project Preparation):** Stakeholder engagement during this phase focused on representatives of the implementing agencies, and other relevant provincial organizations as well as some community consultations. The purpose of stakeholder engagement during

this phase will be to: ascertain institutional needs; apprise all stakeholders about planned activities/reforms; improve project design; create synergies; and, include the perspective of vulnerable groups who would be affected by project activities.

- **Phase II (Project Implementation):** Extensive stakeholder engagement will be carried out during this phase with PAPs, disadvantaged/vulnerable groups and other interested parties. Section **Error! Reference source not found.** provides an exhaustive list of topics for stakeholder engagement during this phase along with the corresponding tools and techniques for conducting them. These will be further refined during project implementation and the finalised engagement topics, methods and frequencies will be presented in the revised SEP within 90 days of project effectiveness.

4.2. Proposed Strategy for Information Disclosure

Based on consultations with the implementing agency and following World Bank disclosure protocol, the following table provides an initial outline of the information to be disclosed at the preparation stage.

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
Preparation	CWD, affected parties, interested groups, public at large, vulnerable groups, Government entities	Appraisal stage SEP, Appraisal stage ESCP.	<ul style="list-style-type: none"> • Website of CWD before project effectiveness • One-on-one meetings, • Consultation meetings
Implementation	CWD, and other relevant Government ministries and entities	PAD, E&S principles and obligations, Consultation process/SEP, ESCP, project information	<ul style="list-style-type: none"> • Website of CWD • One-on-one meetings • Consultation meetings
	Local communities and Vulnerable groups (including minorities, women, people with disabilities)	Regular updates on project activities and specific interventions for vulnerable groups (through KP RAP), SEP and GRM procedures.	<ul style="list-style-type: none"> • Outreach through local community organizations • Public notices • Press releases in the local media and on the project website • Airing of key messages through programs on local FM radio, television and text messages • Dissemination of information through social media
	Other ministries and relevant public agencies	Project overview, Progress reports, SEP and GRM procedures.	<ul style="list-style-type: none"> • Consultation meetings • Electronic publications • Information leaflets and brochures
	NGOs, , Academics, Organizations working on	Scope of Project, social protection interventions, opportunities for collaboration, ESMP,	<ul style="list-style-type: none"> • Information Resource portal on project website • Bi-Annual Project Dissemination Workshops

Project stage/ Components	Target stakeholders	List of information to be disclosed	Methods and timing proposed
	Technology and Digitization	updated SEP and GRM procedures.	press releases and announcements in the media, notifications of the disclosed materials to local, regional, and national NGOs
	General public	<ul style="list-style-type: none"> • FAQs, • Updated SEP and GRM procedures 	<ul style="list-style-type: none"> • Website of CWD • Print, electronic, broadcast, and social media • Brochures, leaflets, posters, nontechnical summary documents and reports • Mosque announcements in rural areas • Local influential (councilors, community workers etc.)

For the implementation stage, detailed consultations will suggest the modes of communication and frequency of future engagements, suitable for each type of stakeholder. The information per target stakeholder will be provided during the update of this SEP to be carried out within a month of the project effectiveness date.

4.3. Proposed Strategy for Consultations

Project stage	Topic of consultation message	Method used	Target stakeholders	Responsibilities
Preparation	<ul style="list-style-type: none"> • Need of the project • Planned activities • E&S principles, risk and impact, management/ ESMF • Grievance Redress mechanisms (GRM) 	<ul style="list-style-type: none"> • Virtual meetings providing background information • Phone • Emails • Appropriate adjustments were made to take into account the need for social distancing (use of audio-visual materials, technologies such as telephone calls, WebEx, Microsoft Meetings, SMS, emails, etc.) 	Officials from CWD	E&S Staff and GRM focal point at CWD

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

Project stage	Topic of consultation / message	Method used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> • Project ongoing and planned activities • Implementation of ESMPs • Updated SEP & its implementation • GRM for public • Environmental and social concerns 	<ul style="list-style-type: none"> • Information resource portal on the CWD website with data pertaining to project activities and GRM information • Social media platforms(e.g. Facebook and twitter) of CWD 	<ul style="list-style-type: none"> • General public, • Project area Beneficiaries 	<p>GRM Focal Points at CWD- GRM Procedures</p> <p>E&S Staff at CWD – Project progress, implementation of the ESMP and the SEP, and E&S concerns</p>
	<ul style="list-style-type: none"> • Project progress on activities. • Opportunities for collaboration • E&S Instruments such as the LMP • Updated SEP & its implementation • GRM Procedures • Health and safety concerns • Environmental and social concerns 	<ul style="list-style-type: none"> • Bi Annual Provincial consultative meetings • Review of Project progress Reports • Information resource portal on the CWD website with data pertaining to project activities and GRM information • Print, electronic and social media 	<ul style="list-style-type: none"> • Other ministries and public bodies, • Universities and research organizations • Print and Electronic Media, • NGOs and CSOs in each province/area • International Organizations such as, ADB etc. 	<p>Safety Department at CWD -OHS Concerns</p> <p>GRM Focal Points at CWD - GRM Procedures</p> <p>E&S Staff at CWD – Project progress, implementation of the ESMP and the SEP, and E&S concerns</p>
	<ul style="list-style-type: none"> • Information on safety and prevention measures in the LMP • ESMP • Updated SEP and its implementation • GRM Procedures • Environmental and social concerns 	<ul style="list-style-type: none"> • Community meetings in disadvantaged/ vulnerable areas through local CSOs • Project Brochures, posters 	<ul style="list-style-type: none"> • Affected individuals and their families • Local communities • Vulnerable groups 	<p>GRM Focal Points at CWD - GRM Procedures</p> <p>E&S Staff at CWD – Project progress, implementation of the ESMP and the SEP, and E&S concerns</p>

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

4.4. Proposed Strategy to incorporate the view of vulnerable groups

Consultations using FGD as a tool, will be carried out with representatives of disabled citizens, women, and minorities, and accordingly engagement mechanisms and frequencies, will be

designed and customized for vulnerable people. This will continue throughout project implementation. A few such representative bodies have been identified in the design phase, which will be further verified and validated in the inception (first six months) phase of the project. These have been mentioned in section 3.3

4.5. Timelines

The frequency of stakeholder engagement will vary across the project activities (quarterly, bi-annual or annual), depending on the nature/pace of the activity design/implementation, its social and environmental risk and impact and its relevance to the stakeholders. As consultations are held with stakeholders these timelines will be ascertained accordingly when the SEP is reviewed and updated following project effectiveness.

The project will review its stakeholder engagement against the SEP bi-annually, and this review will be a part of the progress report that will be shared with the client management and the World Bank.

4.6. Review of Comments

All stakeholder engagement activities (FGDs, KIIs and consultations) will be recorded and transcribed. Comments provided by stakeholders will be collated and reviewed following each engagement activity. These comments will be analyzed and formulated into a report which will be shared with CWD for further action.

4.7. Future Phases of the Project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism which will be conducted biannually.

5. Resources and Responsibilities for implementing stakeholder engagement activities

5.1. Resources

Implementation of all ESF instruments including the SEP will be financed from the program budget. An estimated budget will be provided in an updated SEP at the start of program implementation. The detailed costs will be calculated once the activity plans are developed.

5.2. Management Functions and Responsibilities

The CWD is leading the project execution with the support of the PIU. The financial management of the proposed project will be the responsibility of the GoKP. **The GoKP and CWD has created a PIU which will be:** (a) carrying out technical, legal, monitoring and reporting, communications activities, and environmental and social risk management to facilitate project implementation (as detailed in ESMF and the ESCP); (b) preparing and regularly updating the program execution plan, the annual works plan, and the procurement plan, when necessary; (c) supporting the selection process for works, goods, and consulting services; (d) interfacing with the CWD to prepare the budget for the proposed project; (e) supervising works and consultancy contracts and their compliance with the developed environmental and social instruments; and (f) monitoring progress based on the results framework and GRM, carrying out consultations and surveys, as well as reporting and communication.

To support project implementation, the GoKP has hired a core team for the PIU, including a project director, a senior financial management specialist, a senior procurement

specialist, a senior environmental and social specialist, an environmental specialist, a social specialist, , financial management assistant, communications specialist, and field staff to work proactively with local authorities.

The departments of Education, Health and Agriculture of KP will play an active role in the proposed project implementation. These departments will support the implementation of works in Components 1 and 2, including RAP and SEP activities. The IC/PSC has been established.

The GoKP, with the assistance of CWD and the PIU, has hired a construction supervisory firm. The supervisory firm will oversee the quality of works and progress, including the supervision of project ES aspects and the project equipment, and function as a technical interface and a conduit to transfer knowledge by coordinating interactions between the PIU, CWD, GoKP, other entities, and civil works contractors. The firm will have a field-based supervision team, including an environmental specialist, a social specialist, and a health and safety specialist. The supervision firm will report to the PIU.

Transport operators. To implement the School Transport Program the PIU has hired and will hire (as per requirement) selected transport operators that should fulfill the key performance indicators (KPI) for the provision of transport service for girls and female teachers. After the project is completed, the sustainability of these services will be co-financed by the GoKP and users.

6. Grievance Mechanism

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects.
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and

6.1. Description of GRM

A number of existing grievance redress mechanisms are available within relevant Government departments for citizens to lodge complaints. The KPRAP GRM may leverage these existing mechanisms, which may be supplemented as needed with project-specific arrangements. However, considering the substantial environmental and social risks associated with the project, the dedicated project GRM will be the primary avenue for grievance resolution, with existing systems being leveraged as and when required.

Pakistan Citizen's Portal (PCP) — National level

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

Guidelines Manual for PCP is available in both Urdu and English. The overall public satisfaction rate with the PCP is low (39%) and only 6.8% of registered PCP members are women. Despite being a robust GRM, PCP's utility to the project's disadvantaged and vulnerable stakeholders is limited due to low female coverage and because of it being a mobile app-based platform which cannot be accessed by persons with no access to mobile phones, with low ICT literacy, or those living in areas with no network connectivity.

KP Citizen's Portal

The KP Citizen's Portal is a highly interactive mobile application aimed at serving information and services, dissemination of information, citizen engagement, and redressal of public complaints. The effective use of modern ICT-based and e-governance tools helping citizen in getting latest information about essential citizen services, i.e. domicile, fard, and birth certificate, etc. Besides, the system implements a closed loop regarding complaint management works as the helping hand for the government officers supervised by the Secretaries, Commissioners and Deputy Commissioners in the Districts in effective resolution of citizen grievances. The system is implemented in 1500 offices of Khyber Pakhtunkhwa where actual complaints are received, reviewed and resolved.

Complaint Process

- i. The citizen has to download the mobile application available for Android and iPhone smartphones from Google Play Store and Apple AppStore with title "KP Citizen's Portal"
- ii. The Citizen has to install the app, get registered, afterward obtain information, submit complaints and track revenue cases, and applications submitted to government offices.
- iii. The user who registered their complaint receives an automatic complaint code through which the citizen can track the status of his complaint
- iv. The complaint is automatically assigned to Deputy Commissioner of the concerned district through an online dashboard-based portal. The focal person either assign the complaint to the concerned officer(s) or resolved by himself. The officer has to resolve the complaint from 0 to 15 days, after 15 days the complaint is escalated to Commissioner and after 22 days the complaint is escalated to the Chief Secretary
- v. The citizen is informed about the decision on his complaint
- vi. The citizen rates his level of satisfaction in term of time and quality rendered in the processing of his complaint.
- vii. Through a central dashboard, the complaints are categorized. Several analytics include registration status, complaint status (new, pending and resolved), Citizen feedback analysis, complaint analysis, category wise complaints, and citizen satisfaction

GRM for KPRAP

KP RAP is proposing that a robust GRM be established to ensure that stakeholders across the board are able to avail to a simple, accessible and effective platform for having their

complaints addressed and resolved. The GRM will be a part of the CWD website and will be highly visible. The process is illustrated below in Figure 3.

Figure 3: Steps for the GRM



The GRM framework for KPRAP will provide mechanisms for project beneficiaries, citizens, and project staff (including contractor staff) to lodge their concerns and complaints. Given that the nature of complaints and resolution mechanisms for different stakeholders may vary, the KPRAP project GRM will house the following sub-GRMs:

- Community GRM – to handle grievances from local communities and beneficiaries as directed by the SEP
- Project staff GRM – for handling grievances raised by project workers, including direct and indirect workers, as directed by the LMP
- GBV and SEA/SH GRM – as per the requirements of the GBV Action Plan

Use of audio-visuals including photos, video materials with captions and edutainment materials will be encouraged for outreach and dissemination of information on the project and the GRM, and the step-by-step GRM submissions for the illiterate or undereducated people or people with disabilities. Toll-free call centers and automated voice systems will be provided as uptake channels for digitally illiterate people and people who do not own or have access to internet or smart phones. For grievances related to Gender-Based Violence, all levels of GRM will have a female officer who will be specially trained in the handling of GBV and SEA/SH related grievances.

GRM Structure

The GRM will function as a multi-tier system with designated staff at the PIU, district, and field levels. Formal Grievance Redress Committees (GRCs) with members nominated by the Project Director will be set up at each level. An electronic database or complaint register of grievances will be maintained at the PIU, with data fed in by the field/district level GRCs or PIU level. Field level GRCs will maintain electronic data base or written registers for grievances received. District GRCs will—in addition to directly receiving grievances—compile and digitize (if field GRCs maintain written registers) field level grievances and share those with the PIU GRC. The GRCs will also be responsible for tracking and recording the status of all grievances received.

To address GBV and SEA/SH related complaints, the project will ensure the availability of specially trained female staff at each GRM level. The PIU gender specialist will be responsible for managing GBV and SEA/SH related complaints at the project/PIU level. The PIU will develop specific procedures to ensure complainants are able to register their grievances anonymously, and in a survivor-centered and discreet manner. The GRM will assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor. A list of GBV service providers will already be available with the GRM personnel before project work commences.

KP Rural Accessibility Project (KP-RAP) which has a substantial risk rating for SEA/SH and GBV due to labor influx in component 1 and human development operations in component 2.

The GBV firm has been hired in September 2024 for a period of two years and the objectives of this firm are to provide support to component 2 (and Component 1) of the KP-RAP project in rolling out the SEA/SH risk mitigation, prevention and response measures. These would include the filling of gaps in the provision of services, developing strong response and referral pathways for survivors who disclose incidents of GBV and SEA/SH project related cases. Component 2 entails the provision of transport services to enhance girls' accessibility to schools creating the risk of SEA/SH incidents by male transport providers to the girls. It is expected to provide a robust SEA/SH prevention and response for component 2 of the project, primarily, and to a limited extent for component 1 which has labor influx and foresees the hiring of women in some technical positions thereby creating a need for SH prevention, development of code of conduct, GBV and SH awareness-raising and training.

Complaint Process

Step 1: Receive the Complaint/Grievance

Grievances from stakeholders or their representatives may be lodged at the project, district, or field level. Stakeholders will be able to raise their grievances verbally (in person, or through a dedicated phone number), or in written form. All grievances will be recorded at the level they are received. Field level grievances may be recorded in written registers and will be shared with the district level GRC on a monthly basis, while district and project level grievances should be immediately entered into a digital grievance register. All grievances will have unique identifiers (UIDs) to allow for easy tracking.

Grievances related to GBV and SEA/SH will be forwarded to the staff specifically trained to handle these types of complaints.

Once a grievance is recorded, the UID will be shared with the complainant, as well as a tentative timeline for its resolution. This should take place on the same day the grievance is received.

Step 2: Initial Review of Grievance

The Grievance Officer (who will be a member of the relevant GRC) will identify the party responsible for resolving the grievance. The responsible party and the Grievance Officer will then conduct an inquiry into the grievance to identify its root cause, and subsequent resolution measures. At this stage, grievances related to GBV and SEA/SH will be supervised by the PIU's gender specialist.

Step 3: Resolution or Escalation of Grievances

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

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

Step 4: Monitoring and Review

It is critical to monitor the effectiveness of the comment response and, grievance mechanism. Appropriate measures/KPIs for this include monthly reporting on the number of grievances received, resolved and outstanding. This will be undertaken by the GRM focal point.

The Grievance Officers at the district and field levels will update the Complaint/Grievance Register on a weekly basis to indicate resolved (closed-out) and unresolved cases, those pending with the GRC or with courts. The Grievance Officer will ensure that the status of all complaints/grievances is kept current and will brief the Project Director on a weekly basis on the status of all current complaints/grievances. On a monthly basis, the district and field Grievance Officers will produce a summary status report and share with the PIU.

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

As part of the annual review/report, analyzing the trends and time taken for grievance resolution will help to evaluate the efficacy of the comment response and, grievance mechanism. As part of stakeholder engagement and consultation, involving the views of the stakeholders for whom the Comment Response and, Grievance Mechanism is designed in this monitoring and review will help to improve effectiveness and stakeholder buy-in.

Grievance Records and Documentation

The CWD will nominate a GRM Focal Point to manage a grievance database to keep a consolidated record of all grievances received at the different levels. The database will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; where it was received, any follow-up actions taken; the solutions and corrective actions implemented by CWD and any other relevant party; the final result; and how and when this decision was communicated to the complainant.

7. Monitoring and Reporting

7.1. Involvement of stakeholders in monitoring activities

A monitoring and evaluation plan to ensure transparency and accountability will be concomitantly strengthened and updated on an ongoing basis, with national and provincial partners to monitor the implementation process of the SEP based on the performance indicators for the project.

7.2. Reporting back to stakeholder groups

It is critical to follow-up with stakeholders at different stages of the project cycle. Once consultations have taken place, stakeholders will want to know which of their suggestions will be used, what risk or impact mitigation measures will be put in place to address their concerns, and how, for example, project impacts are being monitored.

Often the same methods used in information disclosure are applied to reporting back to stakeholders. This follow-up can include COVID-19 SOP compliant meetings/forums, brochures, and consultative committees. Given the current context and the need for social distancing, alternate means such as short message service (SMS), radio, television, social media handles, website of CWD may also be employed to share updated information with stakeholders.

The SEP will be periodically revised and updated as necessary in the course of project implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project activities and to its schedule will be duly reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together

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

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis. Based on the data collected regularly, these indicators are:
 - Number of consultation meetings (virtual) and other public discussions/forums conducted monthly, quarterly, and annually;
 - Frequency of public engagement activities;
 - Number of public grievances received (monthly, quarterly, and annually) and number of those resolved within the prescribed timeline.

7.3. FUNCTIONING OF PROJECT GRM

A robust Grievance Redress Mechanism (GRM) has been established to ensure the timely, transparent, and fair resolution of grievances related to environmental and social (E&S) management throughout the project. This includes addressing concerns related to resettlement and other project impacts. In addition, grievances concerning gender-based violence (GBV), including sexual exploitation and abuse (SEA) and sexual harassment (SH), are treated as a separate category within the GRM to ensure sensitive handling and appropriate action.

Under the Grievance Redress Mechanism (GRM), two tiers have been established to ensure an effective and structured approach to resolving grievances. These tiers are designed to provide a clear process for addressing concerns at both the project and local levels, ensuring timely and fair resolution for all stakeholders.

7.4. Contact Details of GRM Focal Persons

The following are the details of the GRM focal persons responsible for immediate response:

Sr. no.	Designation of the Focal person	Contact Details
1	Project Director	+92 91 9224272 (Hotline)
2	Deputy Director (Environment & Social)	+92 332 9943475
3	Deputy Director (Construction) Engr. Shariq	+92 345 9141686
4	Deputy Director (Construction) Engr. Ferman	+92 300 5927277
5	Deputy Director (Construction) Engr. Irshad	+92 333 9156471
6	Deputy Director (Construction) Engr. Usman	+92 321 5212116
7	Gender Specialist	+92 332 9954457
8	Environment Specialist (PACACSC)	+92 3028462412

STATISTICS OF THE GRM

S. No	Complaint/Description	Forwarded by	Forwarded to	Proceedings	Status	Relevant Officer	GRC Level
1	SHANGLA: The residents of Kana Tehsil (here on Monday) blocked the Bisham-Swat Road in Karora area for about six hours to protest the slow pace of reconstruction work on an important artery.	World Bank through Email	PIU through Email	Due to conflict in technical specification of an item, the contractor had slowed down the work. However, the issue had been resolved and work has been resumed.	Resolved	Mr. Abdul Wadood	PIU Level
2	Package 2 Lot 2 Chakisar to Karora Road Content: Sub standard Work	World Bank through Email	PIU through Email	Complaint forwarded to DD Construction/CSC who visited the site and looked into the concerns raised by the complainant.	Resolved	Mr. Farman Bangash	CSC/Field Level
3	Delay in the project implementation especially the suspension bridge and 02 km roads to my village Darolai, Bahrain Swat	World Bank through Email	PIU through Email	It is a suggestion rather a complaint	--	Mr. Farman Bangash	CSC/Field Level
4	CHR-5, Utmanzai, Jehangir abad to Punjab Khan Killi" Charsadda Package 7 Lot 2 Content: construction of the road will lower the floor level of their homes	The complainant forwarded application to PD	DD Construction, DD E&S/CSC	Application forwarded by DD Construction to SC for taking the issue in consideration while finalizing the design. Drawings revised.	Resolved	Mr Shariq	CSC/Field Level
5	Choti Pull to Shabara, Charsadda Package 7, Lot 2	World Bank through Email	DD Construction, DD E&S/DGRC	Matter was discussed in DGRC and all grievences of complainant were addressed and resolved	Resolved	Mr Shariq	DGRC

S. No	Complaint/Description	Forwarded by	Forwarded to	Proceedings	Status	Relevant Officer	GRC Level
6	Choti Pull to Shabara, Charsadda Package 7, Lot 2 Content:construction of the road will lower the floor level of their homes	The complainant forwarded application to PD	DD Construction, DD E&S/SC	Application forwarded by DD Construction to SC for taking the issue in consideration while finalizing the design. Drawings revised.	Resolved	Mr Shariq	CSC/Field Level
7	Darwazgai Khwar Road (require change of site i-e link roads about 300 m	The complainant forwarded application to PD	DD Construction, DD E&S/DGRC/PIU GRC	Application forwarded by PD to DGRC which recommended case to PIU Level GRC. Matter will be forwarded to World Bank for final approval.	under process	Mr Shariq	PIU Level
8	Substandard work at DIKhan	Citizen Portal	DD Construction/DD E&S/csc	Complaint forwarded to DD Construction who visited site and found the work as per standards. The complainant has been informed.	Resolved	Mr. Irshad Khattak	CSC/Field Level

Annex 1 List of Documents Consulted

1. Template for ESS10: Stakeholder Engagement Plan for Projects in Response to COVID-19
2. Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings
3. The GRM Template available at <http://pubdocs.worldbank.org/en/909361530209278896/ESF-Template-ESS10-SEP-June-2018.pdf>
4. The GRM Checklist available at (<http://pubdocs.worldbank.org/en/354161530209334228/ESF-Checklist-ESS10-GRM-June-2018.pdf>)
5. Guidance Note on ESS10 for Borrowers available at: <http://pubdocs.worldbank.org/en/476161530217390609/ESF-GN10-June-2018.pdf>
6. Project Appraisal Document for the Khyber Pakhtunkhwa Rural Accessibility Project (KPRAP):P177069
7. Concept Environmental and Social Review Summary (ESRS) for the Khyber Pakhtunkhwa Rural Accessibility Project (KPRAP):P177069
8. Aide Memoire: Focus Group Discussions on Transport Barriers and Solutions to Girls' Participation in Education; Institute of Social and Policy Sciences (I-SAPS) 3 January 2021.

Annex 2: Consultation Guide

The Stakeholder Engagement Plan is being prepared by CWD as one of the social safeguard documents for the Khyber Pakhtunkhwa Rural Accessibility Project (KPRAP). The purpose of these consultations is to seek feedback from affected, interested parties and vulnerable groups at the preparation stage of the project on the advantages of implementing this project and/or any issues they foresee. Also, this is not a one-time exercise, through CWD, the project would engage with stakeholders through the life of the project and seek their views and concerns as the project moves forward.

1. What do you see as the benefits/advantages of KPRAP ? Are there any issues you see arising from this?
2. In your opinion, what is the main area/s of concern that need to be addressed in the context of rural roads?
3. How would you describe the situation/status of roads in the districts being targeted through KPRAP?
4. How are communities (or other beneficiaries) impacted by absence of roads/ poor roads in rural areas?
5. In terms of accidents and work-related injuries do you believe that there are specific aspects that need to be strengthened? (probe: safety mechanisms in place)
6. Do you think that CWD complies with Pakistani labor laws and what areas do you think need improvement?
7. Do you think there would be any environmental and or social consequences of this kind of project focused on improving rural roads?
8. How do you see the planned project including reforms and technical assistance affecting your organization? How would they benefit your ministry/department/organization?
9. What concerns/issues does your organization have with CWD? Does the proposed project address some/all of these concerns?
10. Have you been able to address any of these? If not, what do you think has been the main obstacle/hindrance due to which you could not overcome it?
11. In your view ideally what steps would be needed for you to address these concerns and how do you see your organization exercising influence in this regard?
12. Do you know of/ have any grievance/redressal mechanisms in place should you have any concerns? Have you ever faced any such issues with regard to CWD?
13. In your view, what are the key benefits and risks of a road improvement project?
14. Do you have any experience of engaging with a similar project in the past with World Bank or other international organizations ? Could you share examples of best practices as well as lessons learned from any other similar projects?

15. Do you think there are any gaps in provisions in implementation arrangements between the World Bank's requirements and Pakistan laws and regulations which would need to be addressed?
16. In terms of gap filling measures, based on your experience what is your recommendation for best implementing these ? Any best practices and/or risk minimizing techniques you could tell us about?
17. In terms of your role in the implementation of this project, do you think you have adequate capacity to do so or are there areas which need strengthening ? (Probe: if there is a monitoring or compliance role)
18. Is there any other point related to the project that you would like to share with CWD at the preparation stage of the project ? (Probe: to improve project design, to reduce risks, to invoke best practices)
19. How would you like to be informed about the project if at all (Probe: forum/method and frequency)?