Citizen Engagement: An Independent Review of the World Bank's Commitments in Pakistan

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The Accountability Research Center (ARC) is an action-research incubator based in the School of International Service at American University. ARC partners with civil society organizations and policy reformers in the global South to improve research and practice in the field of transparency, participation and accountability.

For more information about ARC, please visit the website: www.accountabilityresearch.org.

About Action for Empowerment and Accountability (A4EA) Research Programme

In a world shaped by rapid change, the Action for Empowerment and Accountability (A4EA) research programme focuses on fragile, conflict and violent (FCV) settings to ask how social and political action for empowerment and accountability emerges in these contexts, what pathways it takes, and what impacts it has.

A4EA is implemented by a consortium consisting of the Institute of Development Studies (IDS), the Accountability Research Center (ARC), the Collective for Social Science Research (CSSR), the Institute of Development and Economic Alternatives (IDEAS), Itad, Oxfam GB, and the Partnership for African Social and Governance Research (PASGR). Research focuses on five countries: Egypt, Mozambique, Myanmar, Nigeria and Pakistan. A4EA is funded by aid from the UK government. The views expressed in this publication do not necessarily reflect the official policies of the funder.

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Disclaimer

The findings, interpretations, and conclusions expressed here are those of the authors.

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Acronyms and Abbreviations

AF	Additional Financing
ARC	Accountability Research Center
A4EA	Action for Empowerment and Accountability
BIC	Bank Information Center
CBO	Community-based organization
CDD	Community-driven development
CE	Citizen engagement
CSO	Civil society organization
DFID	Department for International Development
DLI	Disbursement-linked indicator
EE	Enabling environment
EPI	Expanded Program on Immunization
ESMF	Environment and Social Management Framework
ESMP	Environment and Social Management Plan
ESSA	Environmental and Social Systems Assessment
FATA	Federally Administered Tribal Areas
FCV	Fragile, conflict, and violent
FY	Fiscal year
GAC	Governance and anti-corruption
GPE	Global Partnership for Education
GPSA	Global Partnership for Social Accountability

GRM	Grievance redress mechanism
GRS	Grievance Redress Service
ICT	Information and Communication Technology
IDS	Institute of Development Studies
IEG	Independent Evaluation Group
IPF	Investment Project Financing
ISR	Implementation Status and Results Reports
IVA	Independent verification agent
M&E	Monitoring and evaluation
NGO	Nongovernmental organization
OM	Operational manual
P4R	Program for Results
PAD	Project appraisal document
PDO	Project development objective
PMU	Project management unit
RAP	Resettlement Action Plan
RF	Results Framework
RPF	Resettlement Policy Framework
SME	Small and medium enterprises
TPV	Third party verification
WBG	World Bank Group

Executive Summary

In 2013 World Bank president Jim Yong Kim publicly promised that the institution would improve its engagement with citizens by incorporating beneficiary feedback into 100 percent of projects with identifiable beneficiaries. The goal took formal shape as the 2014 *Strategic Framework for Mainstreaming Citizen Engagement* (CE Strategy), which "incorporates citizen engagement, including beneficiary feedback, specifically in its treatment of inclusion, which entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key accelerators to achieving results" (Manroth et al. 2014:1). World Bank management utilized President Kim's promise as the basis for a new minimum institutional mandate requiring World Bank projects to incorporate at least one project mechanism to engage citizens and one indicator to monitor progress, as well as to report on the indicator by the third year of implementation.

How and to what degree is the World Bank putting its new institutional citizen engagement commitments into practice? This question guides an initiative being undertaken by the Accountability Research Center (ARC) at American University as part of the Institute of Development Studies' (IDS) Action for Empowerment and Accountability (A4EA) investigation into how external actors can best support local processes of and conditions for empowerment and accountability. This report provides a pilot assessment of the first step in this process—the specific citizen engagement (CE) commitments in World Bank projects at the design stage. This kind of in-depth analysis is necessary but not sufficient to assess whether and how the World Bank and government partners actually implement those commitments. Such an assessment of commitments at the project design stage is intended to help design possible national, civil society organization (CSO) strategies to monitor implementation.

For this pilot assessment ARC reviewed the World Bank's Fiscal Year (FY) 2015–17 investment project portfolios for four A4EA priority countries: Mozambique, Myanmar, Nigeria and Pakistan, which covers 57 projects that range from US$19 million to over US$600 million. The country assessment presented here focuses on Pakistan, which over this three-year period has 22 active operations that range from US$19 million to over US$390 million. In early 2019, ARC and IDS will also publish a comparative synthesis report on the results from all four country assessments.

This research is one component of A4EA's broader investigation into how external actors, particularly large donors, are supporting empowerment and accountability in fragile, conflict and violent (FCV) settings. Given its institutional clout and the proportion of development assistance the World Bank administers, it is in a unique position to protect and foster the contribution of citizen voice to development effectiveness, as civic space around the world decreases. Therefore, the CE Strategy is particularly relevant for FCV settings because it provides guidance for how large-scale development projects could encourage arenas for collective citizen action, as well as state response capacity, which otherwise might be lacking.

ARC has developed and piloted an assessment tool that examines commitments to CE in World Bank projects. First, the tool covers the World Bank's seven priority areas for citizen engagement, according to the CE Strategy. These include the following:

- Consultation during project preparation
- Collaborative decision-making during project implementation

- Citizen feedback opportunities throughout the project lifecycle
- Citizen involvement in project monitoring
- Grievance redress mechanisms (GRMs)
- Capacity building for CE
- Improved CE monitoring and results reporting.

The approach then expands the scope beyond CE project mechanisms to three additional measures that ARC hypothesizes could potentially facilitate an enabling environment for CE. These include the following:

- **Measures for proactive social inclusion** (i.e., related to gender, disability, ethnicity, age, migrant status, etc.) in CE efforts
- **Third party monitoring** for project results and citizen feedback findings—which could inform CE if accompanied by
- **Proactive public information disclosure** of project results and findings from CE efforts and the project progress.

The goal of the overall analysis is to determine whether a project commits to seek a strategic approach to CE, meaning the degree to which there is the potential for synergy across the different tactics incorporated. This assessment attempts to distinguish between projects that apply the CE framework with a minimalist, "tick the box" approach and projects that commit to pursuing multiple CE approaches ("thin" versus "thick" approaches, in the language of a recent Independent Evaluation Group [IEG] study). Part of this process includes applying an original Citizen Engagement Density Scale that ranks the varied "thickness" of project commitments to CE across five categories (Robust, Comprehensive, Intermediate, Weak, and Low).

The key overarching findings from the Pakistan review include the following:

- The 22 Pakistan projects are almost evenly and proportionately spread across each category of the CE Density Scale. Six projects constitute the Robust category with the highest number of CE and enabling environment commitments. This is followed by five projects in the Comprehensive category. The Intermediate category comprises seven projects, and finally, the Weak category has four projects with the fewest commitments. There is no project in the Low category in Pakistan. Thus, there is no easily identifiable trend regarding consistent application of the CE agenda in project design within the majority of the portfolio.

- The CE Density Scale also reveals that a low commitment to the World Bank prioritized CE areas does not necessarily mean a low commitment to the three enabling environment areas. Five of the 12 projects that commit to all three indicators of an enabling environment (proactive inclusion, third party monitoring, and public disclosure) fall in the Intermediate or Weak categories, having four or fewer CE commitments, whereas seven projects with all three enabling environment commitments, also have the highest number (seven or six) of CE commitments. Therefore, there is no direct correlation between high levels of CE and enabling environment commitments.

- Collection of citizen feedback emerges as the strongest CE category in the Pakistan portfolio, with all 22 projects incorporating it, followed by a commitment in 21 projects to create

a project-level GRM. In contrast, citizen monitoring is the weakest category, found in only 6 projects, and CE capacity building commitments found in only 11 projects or half the portfolio. These findings suggest that the focus on commitments that have the potential to put citizens in the forefront of CE activities are lacking in Pakistan.

- While the project commitments to collecting citizen feedback were both specific and concrete, commitments across the other CE areas, such as collaborative decision-making, citizen monitoring, and CE capacity building lacked clarity and specificity regarding mechanisms and execution plans.

- All 10 projects that involved the involuntary resettlement safeguard and were as such mandated by the Bank to hold consultations and create a project-specific GRM made those commitments. Additionally, these 10 projects also collected citizen feedback, and eight of them incorporated a CE indicator in their respective Results Framework.

- Comparison of CE commitments across the FY15–17 projects in Pakistan do not show a clear trend in terms of uptake of CE activities over time. Of the six projects that do not include a Results Framework indicator dedicated to reporting on CE results, four were approved in 2015 and two in 2017. Since almost half of the projects without at least one CE indicator are among the most recently approved, and therefore several years into the implementation of the CE Strategy, it shows that this shortfall cannot be explained by a lack of awareness for the Strategy's uptake.

- One hundred percent of the Pakistan portfolio commits to the proactive inclusion of women in projects' CE activities, documenting a multitude of mechanisms to do so. In contrast, the Pakistan projects only minimally encompass other socially excluded groups, such as the elderly, youth, ethnic minorities, the disabled, and migrants in eight projects, or fewer than a third of the portfolio. Project commitments to inclusion of groups other than women have minimal specificity or details about how they plan to do so.

- Commitment to third party monitoring is consistently high (86 percent) in the Pakistan portfolio, with 19 projects making a commitment to hiring third party entities to independently monitor aspects of project activities. However, a majority of these projects commit to external monitoring for compliance-related issues (i.e., social and environmental safeguards), while only four projects commit to engaging external monitors for CE activities. The content analysis of these commitments shows a level of generality which poses risks for the completeness and adequacy of implementation.

- Proactive information disclosure commitments appear in more than half of the Pakistan projects (64 percent). Fourteen of the 22 projects declare the intention to publicly disclose information on aspects of project progress and results beyond what must be reported to the World Bank management.

- Twelve of the 14 projects that commit to public disclosure of project results also commit to third party monitoring. This is significant because if projects commit to proactive, timely dissemination of the findings, third party monitoring can potentially make an important contribution to informed citizen participation.

I. Introduction

1.1   Background

"We must become a better listener," the World Bank's president Jim Yong Kim acknowledged during his keynote speech at the World Bank/IMF 2013 Annual meetings. He continued: "Last year we had beneficiary feedback on 34 percent of our projects. We promise that for our projects with clear beneficiaries, we will get feedback—from every single one of them, 100 percent" (Kim 2013). By announcing this to an audience of high-level government officials, President Kim committed the World Bank to improving how it engages with the people affected by its projects and to developing measurements of these achievements.

In 2014, World Bank management translated Kim's public promise into a set of corporate requirements for citizen engagement in Investment Project Financing (IPF) operations. IPFs are the Bank's leading lending instrument and are used for long-term operations (i.e., periods of 5 to 10 years) across all sectors, but are primarily concentrated in infrastructure, human development, agriculture, and public administration (World Bank 2018). The new CE requirements oblige IPF projects with "identifiable beneficiaries" and approved between Fiscal Years (FY) 2015 and 2017 (between July 1, 2014 and June 30, 2017) to: (1) incorporate a least one citizen engagement (CE) mechanism, (2) integrate at least one indicator to monitor CE, and (3) report on the CE indicator by the third year of project implementation (World Bank 2018a).

To provide operational guidance for meeting the new institutional CE mandate and to more systematically incorporate citizen engagement into operations, the World Bank then produced the *Strategic Framework for Mainstreaming Citizen Engagement* (abbreviated in this report as "CE Strategy").[1] As laid out in the CE Strategy, the World Bank envisions citizen engagement as

> the ***two-way interaction between citizens and governments*** or the private sector within the scope of [World Bank Group] WBG interventions—policy dialogue, programs, projects, and advisory services and analytics—that gives citizens a stake in decision-making with the objective of improving the intermediate and final development outcomes of the intervention (Manroth et al. 2014:8).

This definition establishes World Bank–fostered CE as *reciprocal* and *bounded*. It is *reciprocal* because it requires government to respond to citizen demands and not simply extract their input for consideration. Yet it is *bounded* because it applies only to government-citizen interactions "within the scope of WBG interventions" and therefore stops short of considering the implications for broader citizen-state relations and accountability.

How and to what degree is the World Bank actually embedding mechanisms for citizen engagement in project design? In 2017, the Accountability Research Center (ARC) at American University, a member of the Institute of Development Studies' (IDS) Action for Empowerment and Accountability (A4EA) program, launched a two-track approach to monitoring and advocacy regarding the World Bank's fulfillment of its CE agenda.[2] This research comprises one component of A4EA's broader investigation into whether and how external actors, particularly large donors, are

supporting empowerment and accountability in fragile, conflict and violent (FCV) settings. A4EA chose to focus this component on the World Bank because, even as civic space around the world is restricted, the World Bank has the potential to support government counterparts to protect and foster the contribution of citizen voice to development effectiveness. ARC's World Bank CE research therefore encompasses a two-track monitoring and advocacy approach:

- The first track aims to independently monitor *whether and how* the World Bank is integrating CE into project design. It relies on a desk review of publicly available World Bank documents to identify how individual projects commit to incorporating CE throughout the project life-cycle. This report contributes to this first track.

- The second track investigates project implementation, utilizing findings on project design commitments to CE to launch partner-led action research. It aims to monitor *how* CE commitments are *actually* being carried out in specific World Bank projects of concern to stakeholders and requires extensive field research that is informed by local knowledge.

To guide the independent monitoring process, ARC developed an assessment tool to identify the nature of the World Bank's commitments to citizen engagement as incorporated into project design. ARC's assessment tool utilizes the official project documents made public on World Bank's website to identify whether and how projects commit to

- **citizen engagement mechanisms throughout the project lifecycle:** i.e., public meetings, satisfaction surveys, participatory monitoring throughout the project life cycle; and

- **mechanisms that could facilitate an enabling environment for CE:** i.e., third party monitoring, procedures for social inclusion, and plans for proactive information disclosure.

By examining project commitments to specific CE activities along with mechanisms that strengthen the enabling environment for CE, the analysis seeks to answer two overarching questions: (1) To what degree do World Bank projects demonstrate a commitment to minimum standards for informed CE? and (2) To what degree do projects go beyond a minimalist "tick the box" approach and demonstrate that there is both depth and specificity in individual CE commitments and a potential for synergy across the range of CE commitments?

To pilot the assessment tool, ARC undertook a desk review of all publicly available program documents for the IPF portfolios (FY15–17) in four A4EA priority countries: Mozambique, Myanmar, Nigeria, and Pakistan, jointly selected with A4EA funder, the Department for International Development (DFID). These four country portfolios include a total of 57 projects that range from US$19 million to over US$600 million. This research has produced four independent, in-depth reports (including this one) for use by local CSOs, researchers, and policy-makers that capture each country's unique findings, alongside a synthesis report covering the four countries' findings. To then test how the CE commitments are implemented, ARC and its in-country partner, the Bank Information Center (BIC), conducted fieldwork in Myanmar on three of the FY15–17 projects that are at the most advanced stages of implementation. The country assessment presented here focuses on Pakistan, which over the three-year period in question had 22 active operations ranging from US$19 million to over US$390 million.

This A4EA research recognizes that the World Bank, in contrast to other large-scale donors, rarely finances initiatives designed to target public accountability and empowerment. Instead the institution takes a more indirect approach to empowerment and accountability by funding

government-led participation in "invited" spaces (Mansuri and Rao 2013:xi) created within projects whose main objectives are typically not empowerment-related. The World Bank's approach to civic engagement has been described in the literature as *induced participation* because it results from government- and donor-organized and/or funded efforts to which citizens are invited to partici- pate and may be bureaucratically managed (Mansuri and Rao 2013:xi).[3]

Although induced participation continues to dominate the World Bank's approach to CE, the insti- tution has also published extensive research that documents the shortcomings, including wide- spread patterns of "elite capture" of induced participatory efforts (Mansuri and Rao 2013). Indeed, the CE Strategy openly acknowledges the literature documenting these risks (Manroth et al. 2014:95; see also Haque 2008 and Gugerty and Kremer 2008). However, in the World Bank's current efforts to mainstream CE in operations, it remains unclear whether or how projects address this key risk in design or implementation. The challenges posed by the World Bank's primary approach to citizen participation underscores the relevance of independent assessment of whether and how meaningful spaces for citizen engagement are actually created in practice.

This introductory section continues by detailing the 2014 CE Strategy and its origins. It then delves into the Pakistan (FY15–17) assessment findings beginning with quantitative results at the portfolio level, including ARC's CE Density Scale, and then a qualitative analysis of each of the commitments.

1.2   Citizen engagement and the World Bank

The World Bank's 2014 CE Strategy is the outcome of more than 45 years of evolving engagement between the World Bank and civil society (for more in-depth discussion see Fox and Brown 1998; Davis 2002; World Bank 2005; Bebbington et al. 2006; World Bank 2007; Manroth et al. 2014; World Bank 2018c). Key precursors include the following:

*   Adoption of Social Safeguard policies: In 1980, setting protections and compensation standards for people affected by project-caused involuntary resettlement and 1982, setting mandated protections for Indigenous Peoples.

*   Publication of *Putting People First: Sociological Variables in Rural Development* (1985), the first World Bank publication concerned with the roles of people and local associations in develop- ment projects.

*   Formation of the Participatory Development Learning Group (1990), the first body convened to develop approaches and practices for participation in World Bank operations.

*   Establishment of the Inspection Panel (established 1993, operationalized 1994), an inde- pendent accountability mechanism to which people who believe they have been adversely affected by World Bank-financed operations (specifically those financed by the International Bank of Reconstruction/International Development Association [IBRD/IDA]) can bring their concerns. The panel determines whether World Bank projects have complied with their own policies and procedures.

*   Publication of the 1996 Participation Sourcebook, the World Bank's first official how-to publica- tion for incorporating participatory approaches into projects.

*   Formation of a Social Development network and Department (1997).

- Development of guidelines for consultation with civil society (1999, updated 2002).

- Launch of the Social Development Strategy (2005) and Governance and Anticorruption (GAC) Strategies (2007 and 2012), which prioritized social accountability and demand-side governance.

- Establishment of the Global Partnership for Social Accountability (GPSA) in 2012 to build capacity for CSOs to engage in social accountability initiatives.

The overall objective of the 2014 CE Strategic Framework is

> to facilitate mainstreaming of CE in WBG-supported policies, programs, projects, and advisory services and analytics to improve their development results and, within the scope of these operations, to strengthen engagement processes between governments and the private sector and citizens at the national, regional, local, or sectoral level, as applicable (Manroth et al. 2014:1).

The World Bank claims that the CE Strategy goes beyond previous efforts because it is the first formalized framework with institution-wide reach that provides comprehensive guidance for engaging citizens from a project's inception to its completion (Manroth et al. 2014:6).

The CE Strategy outlines the following key categories of citizen engagement:[4]

1. **Consultation.** Formally, the term consultation in the context of World Bank projects captures engagement with citizens in the design or project preparation stage before an operation has been approved by the World Bank Board. The World Bank describes the objectives for citizen consultations to include receiving input about the design and implementation arrangements of a development program or project in order to contribute to improved results and sustainability. Distinct from dialogue, the World Bank defines consultation as "a more structured exchange in which the convener commits to 'active listening' and to carefully consider the comments, ideas, and recommendations received. … Common consultation methods include public hearings or meetings, focus group discussions, household surveys and interviews, electronic consultations, and advisory/expert groups." They can also include "more informal structures at the local level, such as village councils and women's groups" (Manroth et al. 2014:42).

2. **Collaborative decision-making.** This process goes beyond consultation and integrates citizens directly into decision-making processes. The goal is to make decisions more responsive to citizens' needs and improve the sustainability of program and project outcomes through increased citizen ownership. Mechanisms for collaboration include "citizen/user membership in decision-making bodies, integrity pacts, participatory planning and budgeting, and citizens' juries" (Manroth et al. 2014:43).

3. **Collecting, recording, and reporting on inputs from citizens.** This refers to citizen feedback collected periodically during and after implementation on different dimensions of provided services, including but not limited to effectiveness, inclusiveness, quality, delivery time, transaction costs, targeting, resource utilization or engagement processes. Some tools utilized in projects to capture citizen inputs include "satisfaction surveys, focus group discussions, hotlines, community scorecards, citizen report cards, or SMS/online feedback" (Manroth et al. 2014:44).

4. **Complaint and grievance redress mechanisms (GRMs).** These are complaint systems through which project-affected peoples can raise concerns, queries, or clarifications related to implementation and through which complaints and grievances are addressed. This analysis focuses exclusively on project-specific GRMs, which are intended to be designed to be context specific and not the more generic Grievance Redress Services (GRS) offered via the World Bank's online portal (Manroth et al. 2014:45).

5. **Citizen monitoring, evaluation, and oversight.** Citizen monitoring goes beyond citizen feedback processes and directly involves citizens in monitoring service delivery, revenues, budget execution, procurement, contract awards, and reform policies. The philosophy behind such intensive citizen involvement is that it can increase transparency, improve efficiency of service delivery and budget execution and reduce opportunities for corruption. Some commonly used mechanisms for citizen-led monitoring include "public expenditure tracking surveys, social audits, or citizen report cards" (Manroth et al. 2014:47).

6. **Capacity building for CE.** This capacity building is specifically designed for citizens, CSOs, communities, government officials, and national accountability institutions to strengthen their engagement and participation in project implementation (service delivery, natural resource management, public financial management, and/or community-driven development [CDD] projects).[5] This is considered particularly necessary for World Bank-supported operations where CE approaches are introduced for the first time and include a focus on building government capacity for sustainability of engagement processes, beyond the life of a project (Manroth et al. 2014:50).

7. **Improved monitoring and results reporting.** The CE Strategy states that a key objective of the framework is to develop a better understanding of and monitoring of CE outcomes in World Bank-supported operations (Manroth et al. 2014:54–55). The Strategy emphasizes that projects would benefit from incorporating dedicated CE indicators into monitoring systems, especially within their Results Framework. (The World Bank's definition of the project Results Framework, its purpose, and the mandates for public disclosure will be elaborated upon in Section 2.2.7). Furthermore, the CE Strategy suggests incorporating third party monitoring to ensure independent, accurate reporting.

The CE Strategy's status as a "strategy" rather than a "policy" means that on its own, it is not mandatory for project teams to implement it. The Strategy recognizes this and therefore links the recommended approaches to mandatory World Bank policies, such as those related to social and environmental safeguards. Specifically, "social safeguards" are policies that operations must follow when specialists determine that the projects will, or are likely to, work with either of two specific vulnerable populations—Indigenous Peoples or beneficiaries that may be required to involuntarily resettle. When fulfilling safeguard requirements, two CE activities—consultation during project preparation and GRMs for project implementation—become mandatory. Therefore, safeguards are viewed as an important and logical "entry-point" for CE activities, which can then lead to additional opportunities to integrate and expand CE measures beyond the limited requirements set by the Strategy. Furthermore, the CE Strategy identifies additional context-specific opportunities for scaling up CE.

The World Bank Group accompanied the release of the CE Strategy with a "corporate commitment" that "100 percent of Investment Project Financing with IBRD/IDA funding with clearly identi-fied beneficiaries" incorporate citizen engagement by Fiscal Year (FY) 2018 (World Bank 2018a). Investment Project Financing (IPF) is the World Bank Group's leading

lending instrument, and it is utilized for long-term operations (i.e., periods of 5–10 years) across all sectors, but is concentrated in infrastructure, human development, agriculture, and public administration (World Bank 2018d). The corporate commitment specifies that IPFs must meet the following three benchmarks:

A   Incorporate a **minimum of one mechanism** designed to engage beneficiaries in the specific context of the project.

B   Integrate a **minimum of one indicator** to monitor a particular aspect of citizen engagement during project implementation.

C   Report on the **beneficiary feedback indicator** by the third year of implementation (World Bank 2018a).

Furthermore, to be considered an acceptable CE indicator, a project indicator must meet one of the following criteria:
• Clearly capture citizen feedback and in so doing report "whether there is a tangible response to close the feedback loop;" or

• Monitor the extent to which citizens are involved in decision-making related to project design, implementation, and oversight (World Bank 2018a).

It is essential to recognize that the accompanying corporate commitment is what now makes CE compulsory for IPFs. Civil society observers acknowledge that this represents important progress; yet they have also expressed concern that project compliance with these minimal requirements will not ultimately lead to the operationalization of CE in World Bank projects. The minimal requirements, which oblige projects only to incorporate a single CE mechanism and indicator, allow for a "tick the box" approach to compliance. Therefore, World Bank monitoring risks falling short of capturing the extent to which projects are actually fulfilling the guidance laid out in the CE Strategy. Furthermore, the fact that projects are not responsible for reporting on results until the third year of implementation, significantly limits the prospects that any citizen feedback collected will meaningfully inform implementation decisions.

1.3   Independent monitoring of CE in World Bank program design

In this context, ARC developed a methodology to determine both *whether* and *how* projects operationalize the World Bank's commitments to CE in ways that tangibly contribute to empowerment and accountability. ARC's assessment tool combines two elements: an independent assessment of how projects commit to apply the World Bank Strategy's own approach and an assessment of projects through the lens of additional relevant criteria.

The first element is based on the seven commitments the World Bank laid out for itself, incorporating each of the areas of CE prioritized in the Strategy (see Section 1.2, above) and investigating each area, utilizing the criteria specified in the corporate commitments.

Second, the tool incorporates three additional areas that have the potential to create an enabling environment for CE. These include the following:

• Measures for proactive social inclusion (i.e., related to gender, disability, ethnicity, age, migrant status, etc.) in CE efforts.

- Third party monitoring and verification for project results and citizen feedback findings. The World Bank defines third party monitoring as: "monitoring by parties that are external to the project or program's direct beneficiary chain or management structure to assess whether intended outputs, outcomes, and impacts have been achieved by the project. Third party monitoring is mainly used to provide an independent perspective on project or government performance. It can be conducted by CSOs, think tanks, academic institutions, media, or private firms. These organizations generally have greater skills for monitoring than community representatives" (Van Wicklin and Gurkan 2013:2).

- Proactive disclosure of the results from CE efforts and project progress, as well as results beyond the Bank's minimal requirements.

By examining project commitments across these 10 areas, the analysis seeks to answer two overarching questions:

1. To what degree do World Bank projects demonstrate a commitment to minimum standards for informed CE?

2. To what degree do projects go beyond a "tick the box" approach and demonstrate that there is both depth and specificity in individual CE commitments and a potential for synergy across the range of CE commitments?

1.3.1 Data collection: application of the assessment tool

ARC's assessment tool relies on publicly available World Bank project documents that lay out project plans, strategies, and commitments that have been approved by the World Bank's Board. The principal documents utilized in the analysis include (where available) the Project Appraisal Document (PAD), the Project Information Document (PID), the Integrated Safeguards Sheets, the Environmental and Social Management Framework (ESMF), and related social safeguard documents (Resettlement and Indigenous People's Frameworks), when applicable. The World Bank requires that all the above-mentioned documents be publicly disclosed via its online operations portal.

In principle, this assessment would also include operational manuals (OMs), which all projects develop after receiving World Bank board approval to describe and codify the plans for implementation that are meant to achieve project goals. The OM is the primary resource for members of the public and government agencies to learn how project goals are translated into concrete actions. For government-society engagement, the OM translates World Bank project commitments into specific actions, processes, and benchmarks in each national context. This "translation" is also key for CSOs and citizens who want to observe or monitor how a project is functioning. However, the World Bank does not have an institutional mandate that OMs must be disclosed, and therefore they are typically not available to the public. In the case of Pakistan, as far as this investigation could determine, none of the 22 projects have made their OM accessible/available to the public. This means, in practice, that public access to the primary operational document that details how a project will meet the approved objectives is left to the client government's discretion. When government agencies do not proactively disclose their specific decision-making processes or project rules and performance benchmarks, it has major implications for the prospects for informed citizen engagement and for accountability.

This project assessment process is never automated, and there is a strict policy of secondary or peer review to avoid subjective decision-making about the depth and detail of individual CE commitments. Once the data have been collected from the publicly available World Bank documents, they undergo a quantitative and qualitative analysis. The processes for each are explained in the sections below.

1.3.2 Quantitative analysis: establishing a CE Density Scale

To answer the question of whether World Bank projects are operationalizing institutional commitments to CE, ARC developed and piloted a Citizen Engagement Density Scale that considers the seven World Bank priority CE indicators and three enabling environment (EE) indicators discussed above. The density scale builds from IEG findings that

"thick" approaches—those combining multiple tools to enable collective action and public sector responsiveness—are more promising than "thin" approaches—those that are not matched with vertical integration of independent monitoring and oversight or do not include support to increase a government's capacity to respond (World Bank 2018c:xiii).

A thick approach to CE commitments combines a project's inclusion of the various CE activities laid out in the World Bank's Strategy with mechanisms or practices that could create an enabling environment to further advance citizen action. The creation of an enabling environment is facilitated through the proactive social inclusion of marginalized groups in consultation processes; and the inclusion of independent/external monitoring with public disclosure of results. While the thick versus thin distinction may be intuitive and subjective, this desk review attempts to capture greater nuance by classifying the range of density of commitments according to five different categories: **Robust, Comprehensive, Intermediate, Weak, and Low**. Table 1 depicts the combined CE and EE numerical criteria for each level.

Table 1. CE Density Scale

ROBUST		COMPREHENSIVE		INTERMEDIATE		WEAK		LOW	
CE	+ EE	CE	+ EE	CE	+ EE	CE	+ EE	CE	+ EE
7	2–3	7	0–1	6	0	4	0–1	2	0–1
6	3	6	1–2	5	0–2	3	0–2	1	0–2
		5	3	4	2–3	2	2–3	0	0–3
				3	3	1	3		
Key	CE = Citizen Engagement Indicators; Maximum = 7			EE = Enabling Environment Indicators; Maximum = 3					

A project's rating on the scale depends on a combination of its CE and EE commitments. The final tally, however, is not based on a simple total of commitments within the 10 possible CE and EE options. Rather, it results from a weighted combination of two complementary approaches to enabling citizen action. In other words, a project's thickness is based on counting the number of tools for citizen action (from zero to seven) that a project describes and then determining whether and how they have matched with efforts that create an enabling environment for CE. ARC's CE Density Scale therefore reports on how mechanisms for social inclusion, external monitoring, and public disclosure can potentially reinforce the officially recognized modalities for creating enabling environments for citizen engagement and accountability.

Although the number of CE commitments is the first step in determining the thickness of a project's approach, the final determining factor is what the project contributes to the enabling environment. For example, Table 1 shows that a project that includes commitments in all seven World Bank-prioritized CE areas could fall in one of two categories: Robust or Comprehensive. Seven commitments guarantee a rank in one of the top two categories. However, these seven CE commitments, if not matched with at least two of the EE indicators, are not sufficient for a project to qualify as Robust. To be considered Robust, the project must also include commitments to at least two of the EE indicators.

1.3.3 Qualitative analysis: the quality of commitments, based on depth and detail

To answer the question of how the World Bank is operationalizing its commitments to CE in ways that could foster accountability and empowerment, this assessment then investigates the content of the commitments. First, the assessment considers the detail and depth with which CE mechanisms and processes are explained, in terms of how they will both operate and incorporate stakeholders so that their inputs shape project decisions and implementation. Examples of questions that guide the process of determining the depth and detail of CE mechanism include the following:

1. **Collaborative decision-making:** For projects that commit to collaborative decision-making, do projects specify the mechanisms and/or activities through which this would be carried out during implementation?

2. **Collecting feedback:** For projects that commit to collecting citizen feedback, do descriptions of the planned mechanisms explain how feedback solicited and collected will be integrated to inform project implementation (closing the feedback loop)?

3. **GRM:**
   a. For projects that commit to establishing a GRM, who will manage it (i.e., the same unit charged with managing the project, which could be a subject of complaints)? Will it be under the authority of, or subject to oversight by a third party organization to avoid conflicts of interest?
   b. What GRM data will be disclosed? Will disclosure involve numbers of complaints received and resolved? Will data that are released cover the nature of the grievances and their resolutions?

Second, the assessment considers the detail and depth with which the project commits to fostering an enabling environment for CE. The hypothesis guiding this approach is that the less precise a CE commitment is at the project design stage, the easier it becomes for project authorities to impose their interpretations. The risk therefore is that without sufficient specificity, CE plans can

be diluted into a "tick the box" exercise during implementation. For example, the assessment asks the following kinds of specific questions:

1. **Social inclusion:** For projects that commit to proactive inclusion, do they provide details on the approaches that will be undertaken to include marginalized and/or socially excluded groups in CE activities? What groups are specifically identified, and what are the mechanisms explained for reaching out to and incorporating them?

2. **Public disclosure:** For projects that commit to public disclosure, are specific mechanisms for the disclosure detailed? Does the project commit to frequency of public dissemination activities or explain exactly what will be shared?

3. **Funding for CE:** Has the project allocated funds to support CE commitments?

Utilizing this two-tiered approach to quantitative and qualitative analysis, ARC then determines the degree to which a World Bank project's commitments to engaging citizens throughout its life cycle add up to a strategic approach, which, if implemented, could tangibly contribute to empowerment and accountability.

II. Pakistan: Pilot Application of the Assessment Tool

2.1   Portfolio overview and analysis

To pilot this assessment tool and approach, ARC reviewed the World Bank's FY15–17 Investment Project Financing[6] portfolio in Pakistan, with 22 projects ranging from US$19 million to US$390 million. All 22 projects have an 'active' status at the time of writing this report. Table 2 shows the Pakistan FY15–17 portfolio, presenting basic operational information (i.e., year of approval, financing amount, application of social safeguards) alongside the numerical ARC assessment CE findings. The table is organized in descending order from those projects with the greatest number of CE commitments to those with the fewest. Three of the 22 projects have a classification of "Additional Financing" (AF), which means that the project provides a new infusion of financing for a project that had been approved earlier, either to extend implementation or to begin a new phase.

The following section provides a picture of the overall approach taken in the World Bank's FY15–17 Pakistan portfolio for incorporating CE, showing where commitments are concentrated and/or neglected. The discussion answers the first part of the guiding research question presented above—i.e., how does the portfolio commit to operationalizing CE at different critical moments throughout the project lifecycle? The subsequent sections cover the project level analysis, then explore the content of the range of commitments documented. This section goes beyond the existence of a documented commitment that appears to meet the criteria of the different CE areas, and assesses the commitments in terms of their potential to tangibly contribute to creating enabling environments for citizen action and bolster capacity and incentives for state response to citizen voice.

Table 2. CE overview by project, Pakistan Portfolio FY15–17 (in descending order of CE commitments)

Pakistan Projects (FY15–17)	FATA Temporarily Displaced Persons Emergency Recovery FY16	Enhanced Nutrition for Mothers and Children FY15	Karachi Neighborhood Improvement FY17	Sindh Agricultural Growth FY15	Sindh Irrigated Agriculture Productivity Enhancement FY15	National Social Protection Program-for-Results FY17	Third Punjab Education Sector FY16	Balochistan Integrated Water Resources Management and Development FY16	Sindh Water Sector Improvement Phase 1 (AF) FY15	Sindh Public Sector Management Reform FY15	National Immunization Support FY16	
Commitment amount US$ (Million)	75	36	86	76	187	100	300	200	138	50	144	
Social Safeguards	No	No	Yes	Yes	Yes	No	No	Yes	Yes	No	No	
Consultations reported	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	World Bank CE Strategy Priority Areas
Collaborative decision-making	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Citizen feedback collection	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Citizen monitoring	No	Yes	Yes	No	No	No	No	No	Yes	Yes	Yes	
GRM	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
CE capacity building	No	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Results Framework Indicator(s) for CE	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Proactive social inclusion	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Indicators of Enabling Environment for CE
Third party monitoring	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	
Proactive information disclosure	Yes	Yes	No	No	No	Yes	Yes	Yes	No	Yes	Yes	
Total World Bank CE commitments	5	5	6	6	6	6	6	6	7	7	7	
Total Enabling Environment indicators	3	3	2	2	2	3	3	3	2	3	3	

Table 2. CE overview by project, Pakistan FY15–17 (in descending order of CE commitments) *Continued*

TOTAL COMMITMENTS	Pakistan Financial Inclusion and Infrastructure FY17	Global Partnership for Education (GPE) Balochistan Education Project FY15	Punjab Skills Development FY15	Sindh Enhancing Response to Reduce Stunting FY17	Governance and Policy Program—Balochistan FY16	Economic Revitalization of Khyber Pakhtunkhwa and Federally Administered Tribal Areas (AF) FY17	Sindh Resilience FY16	Disaster and Climate Resilience Improvement FY15	Sindh Barrages Improvement FY15	Punjab Tourism for Economic Growth FY17	Tarbela Fourth Extension Hydropower (AF) FY17	Pakistan Projects (FY15–17)	
	137	34	50	62	19	19	100	125	50	50	390	**Commitment amount US$ (Million)**	
10	No	No	No	Yes	No	No	Yes	Yes	Yes	Yes	No	**Social Safeguards**	
20	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	**Consultations reported**	World Bank CE Strategy Priority Areas
12	No	No	No	No	No	No	No	Yes	No	No	Yes	**Collaborative decision-making**	
22	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	**Citizen feedback collection**	
6	No	No	No	Yes	No	No	No	No	No	No	No	**Citizen monitoring**	
21	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	**GRM**	
11	No	No	No	No	Yes	No	No	No	No	Yes	No	**CE capacity building**	
16	No	No	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes	**Results Framework Indicator(s) for CE**	
22	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	**Proactive social inclusion**	Indicators of Enabling Environment for CE
19	No	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	**Third party monitoring**	
14	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No	No	**Proactive information disclosure**	
	2	2	3	4	4	4	4	4	4	5	5	**Total World Bank CE commitments**	
	2	3	3	1	2	2	3	3	3	2	2	**Total Enabling Environment indicators**	

2.1.1 CE Density Scale

As described in the Introduction, thick approaches to CE commitments combine a project's inclusion of the various CE activities laid out in the World Bank's Strategy, with mechanisms or practices that potentially contribute to an enabling environment for CE. ARC's original CE Density Scale establishes parameters for understanding the variations of thickness and thinness in project CE commitments (see Table 1). The density is determined based on the existence of commitments, not an interpretation of the quality or lack of quality of the documented commitment. As already discussed, determining where a project ranks is based on a balance between planned CE mechanisms and contributions toward an enabling environment for CE, and not simply an absolute total of CE + EE commitments. For the CE Density Scale, classifications for the range of CE commitments, from highest to lowest, include Robust, Comprehensive, Intermediate, Weak, and Low.

Table 3 depicts the 22 Pakistan FY15–17 projects on ARC's CE Density Scale. They are ranked as follows: **Robust (6), Comprehensive (5), Intermediate (7), Weak (4).**

Table 3. CE Density Scale, Pakistan FY15–17 (22 projects)

ROBUST 6 projects (27 percent)	COMPREHENSIVE 5 projects (23 percent)	INTERMEDIATE 7 projects (32 percent)	WEAK 4 projects (18 percent)	LOW None
7 CE + 3 EE National Immunization Support FY16 Sindh Public Sector Management Reform FY15 **7 CE + 2 EE** Sindh Water Sector Improvement Phase 1 (AF) FY15 **6 CE + 3 EE** Balochistan Integrated Water Resources Management & Development FY16 Third Punjab Education Sector FY16 National Social Protection Program-for-Results FY17	**6 CE + 2 EE** Sindh Irrigated Agriculture Productivity Enhancement FY15 Sindh Agricultural Growth FY15 Karachi Neighborhood Improvement FY17 **5 CE + 3 EE** Enhanced Nutrition for Mothers and Children FY15 FATA Temporarily Displaced Persons Emergency Recovery FY16	**5 CE + 2 EE** Tarbela Fourth Extension Hydropower (AF) FY17 Punjab Tourism for Economic Growth FY17 **4 CE + 3 EE** Sindh Barrages Improvement FY15 Disaster and Climate Resilience Improvement FY15 Sindh Resilience FY16 **4 CE + 2 EE** Economic Revitalization of Khyber Pakhtunkhwa and Federally Administered Tribal Areas (AF) FY17 Governance and Policy Program—Balochistan FY16	**4 CE + 1 EE** Sindh Enhancing Response to Reduce Stunting FY17 **3 CE+ 3 EE** Punjab Skills Development FY15 **2 CE+ 3 EE** GPE—Balochistan Education Project FY15 **2 CE+ 2 EE** Pakistan Financial Inclusion and Infrastructure FY17	

Pakistan projects are essentially proportionally spread across the scale (excluding the Low category) with four of the five categories occupying a similar percentage, or an average of 5 projects. Furthermore, projects that commit to all three mechanisms for an enabling environment (12 projects) are also spread across the portfolio, with 7 in the Robust and Comprehensive categories and 5 considered Intermediate or Weak. Therefore, there does not appear to be a direct correlation between high levels of CE and enabling environment commitments in this portfolio.

Six Pakistan projects (27 percent) can be categorized as Robust in relation to the thickness of CE commitments. Two of these projects—the *National Immunization Support (FY16)* project and the *Sindh Public Sector Management Reform (FY15)* project, commit to all seven World Bank-prioritized CE areas and the three mechanisms of an enabling environment for CE. The other four Robust projects include those having all seven CE commitments, and at least two EE commitments (as in the case of the *Sindh Water Sector Improvement AF [FY15]* project); or six CE commitments accompanied by all three EE mechanisms, in the cases of the *Balochistan Integrated Water Resources Management & Development (FY16)* project, *the Third Punjab Education Sector (FY16)* project and the *National Social Protection Program-for-Results (FY17)* project. All these projects commit to both proactive social inclusion measures, as well as third party monitoring. All projects also demonstrate commitments to proactive information disclosure, except the *Sindh Water Sector Improvement AF (FY15)* project.

Five projects (23 percent) constitute Pakistan's Comprehensive category. Three projects include six CE commitments and two EE commitments—*Sindh Irrigated Agriculture Productivity Enhancement (FY15), Sindh Agricultural Growth (FY15), Karachi Neighborhood Improvement (FY17)*; and two projects include five CE commitments and all three EE commitments—*Enhanced Nutrition for Mothers and Children (FY15) and FATA Temporarily Displaced Persons Emergency Recovery (FY16)*. All five projects commit to proactive social inclusion and third party monitoring. These projects are also mostly consistent in terms of the CE and EE areas left out. For all but the *Enhanced Nutrition for Mothers and Children (FY15)* project, the neglected CE areas are citizen monitoring and/or capacity building, both of which have the lowest commitment levels in the Pakistan portfolio. The three projects with two of the three EE commitments exclude commitments to proactive disclosure.

The Intermediate category includes seven projects (32 percent)—*Tarbela Fourth Extension Hydropower AF (FY17), Punjab Tourism for Economic Growth (FY17), Sindh Barrages Improvement (FY15), Disaster and Climate Resilience Improvement (FY15), Sindh Resilience (FY16), Economic Revitalization of Khyber Pakhtunkhwa and Federally Adminstered Tribal Areas AF (FY17), and Governance and Policy Program—Balochistan (FY16)*. These seven projects include at least four and up to five CE commitments, and no fewer than two EE commitments. All seven projects are consistent in three ways: they all commit to incorporating citizen feedback collection mechanisms; project-specific GRMs; and measures for proactive inclusion. None of the projects commit to incorporating citizens into project monitoring. Only two projects pledge commitments to collaboration in decision-making and CE capacity building. Six of the seven projects commit to third party monitoring and four to proactive disclosure.

All of the remaining four projects fall into the Weak category and there is no project in the Low category. These four are the *Sindh Enhancing Response to Reduce Stunting (FY17)* project, the *Punjab Skills Development (FY15)* project, the *GPE—Balochistan Education Project (FY15)*, and the *Pakistan Financial Inclusion and Infrastructure (FY17)* project. They commit to collecting citizen feedback and instituting proactive social inclusion measures. Among these four projects, only the *Sindh Stunting Reduction (FY17)* project has the highest number of CE commitments (four). However, since it does not commit to any EE area beyond proactive social inclusion, it is considered weak. The

GPE—Balochistan Education Project (FY15) and *Punjab Skills Development (FY15)* project commit to all three EE areas, although they are low in their CE commitments, with two or one each. The EE commitments increase the potential contribution that these few CE activites can have on ac-countability to citizens because of the possibilities for social inclusion, transparency, and sharing of information. *Pakistan Financial Inclusion and Infrastructure (FY17)* exhibits the lowest level of commitments with two CE and two EE indicators each.

Figure 1. CE Density Scale, Pakistan FY15–17

WEAK —————— 18%

ROBUST —— 27%

INTERMEDIATE —— 32%

23% —————— COMPREHENSIVE
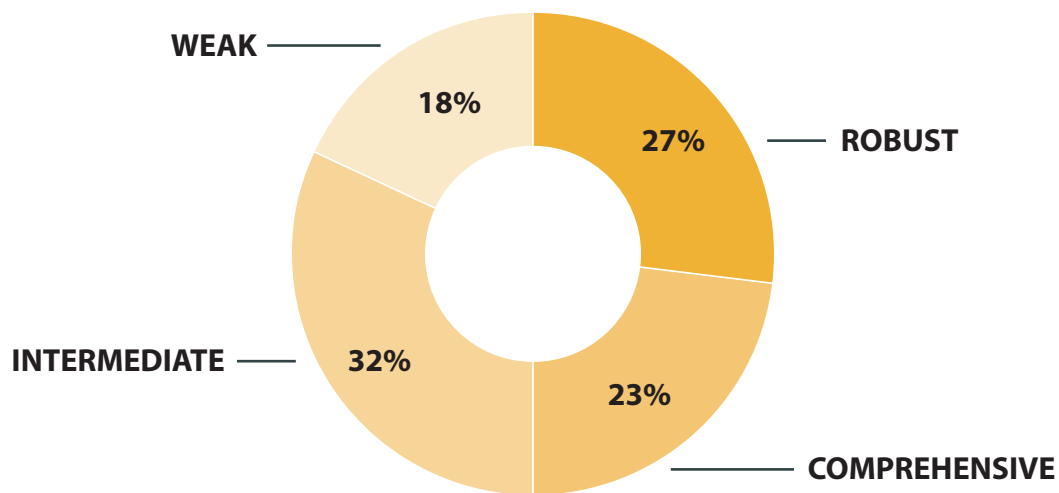
The CE Density Scale shows that CE uptake does not depend on the fiscal year of approval. Of the six projects that do not include a Results Framework indicator dedicated to reporting on CE results, four were approved in 2015 and two in 2017. The fact that almost half of the projects without at least one CE indicator are among the most recently approved, and therefore several years into the implementation of the CE Strategy, shows that this shortfall cannot be explained by a lack of awareness for the Strategy's uptake.

2.1.2   Results by CE area

Figures 2 and 3 below showcase each of the CE and EE areas, showing how many of the projects in the Pakistan portfolio include each mechanism or activity from greatest to fewest. Figure 2 focuses on the seven areas prioritized in the World Bank's CE Strategy, while Figure 3 highlights the ARC-identified indicators of an enabling environment for CE. The portfolio-level analysis only reports on the *existence* of commitments and not the *quality* or *lack of quality* of those commitments. The analysis of content will follow in the next section. However, it is important to start with the aggregate level to see the range of commitments incorporated before investigating the depth of those commitments.

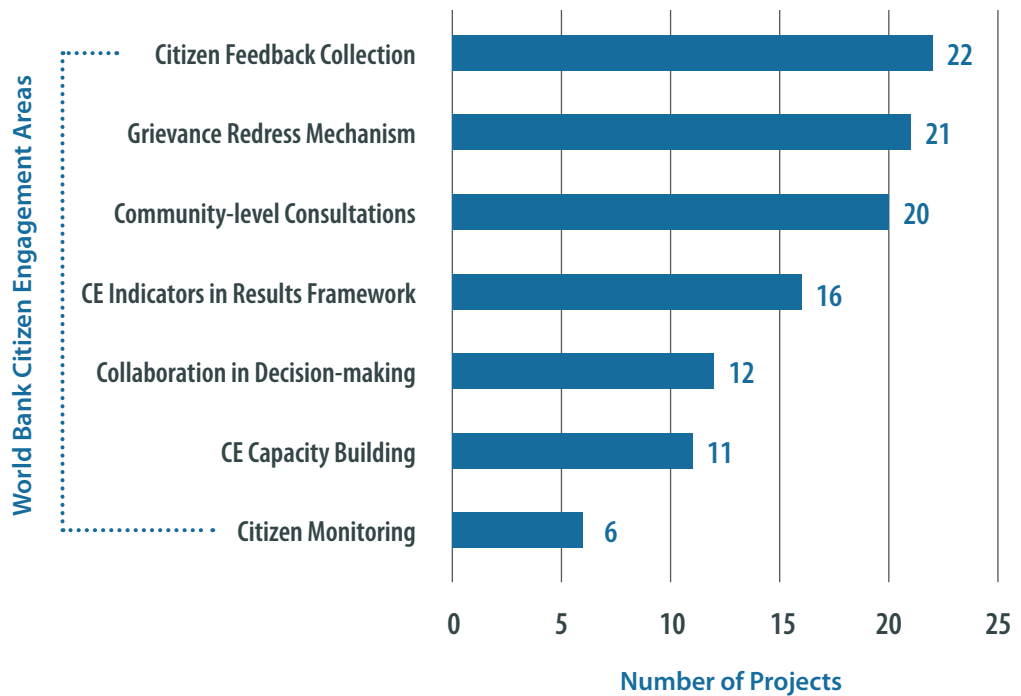**Figure 2.** **Project-level commitments to CE, Pakistan FY15–17**

Figure 2 shows that of the seven prioritized CE commitment areas, there is only a single category to which all 22 Pakistan investment projects commit—the collection of citizen feedback during and following implementation. This is followed by 21 projects committing to incorporating a project-specific GRM during implementation and 20 projects reporting to having engaged in community consultations during project preparation. In the context of all projects committing to consulting citizens for their feedback on project plans and progress, just 12 include a commitment for giving citizens a voice in decision-making for the project. In addition, 11 projects commit to capacity building for stakeholders (be it beneficiaries, government officials, etc.) to support CE activities and mechanisms. The CE category with the fewest project commitments (six) is for citizen involvement in project monitoring.

As discussed in the introduction, the World Bank's institutional mandate for CE in Investment Projects requires that projects include at least one indicator that reports on some aspect of CE in its internal reporting system, called the Results Framework. How the Bank defines the Results Framework, its purpose and the mandates for public disclosure related to indicator results will be elaborated upon in Section 2.2.7 in the project level analysis. As Figure 2 demonstrates, only 16 of the 22 Pakistan projects integrate at least one indicator to measure an aspect of CE in their project design. This means that six Pakistan projects do not meet the second requirement of the Bank-wide CE mandate. For the 16 projects that include an indicator intended to track and report publicly on CE-related activities, the full range of such activities and goals measured in the different projects will be discussed in the next section.

**Figure 3.** Indicators of an enabling environment for CE, Pakistan FY15–17
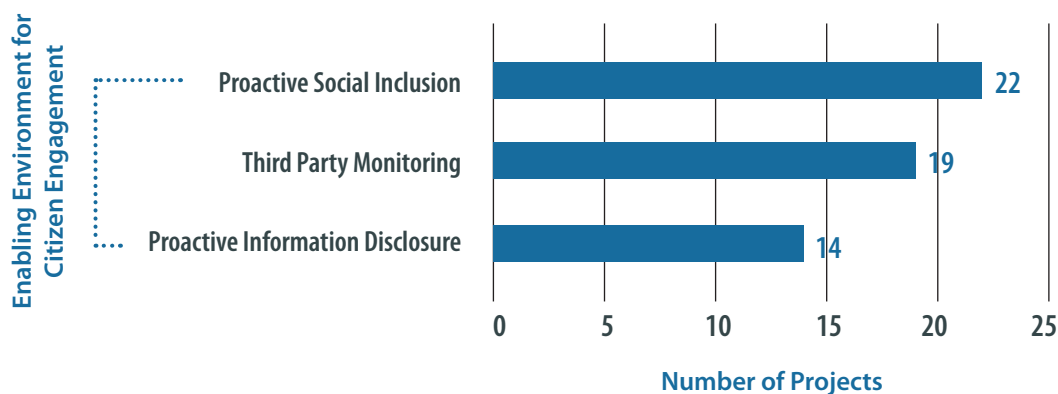
The Pakistan projects show high percentages of commitments to the three areas (proactive social inclusion, third party monitoring, and proactive disclosure) that create an enabling environment for CE as shown in Figure 3. All 22 Pakistan projects (100 percent) include commitments for social inclusion measures intended to increase the representation of, primarily, women and occasionally members from other socially excluded, vulnerable communities into CE processes. Nineteen of the 22 projects (86 percent) make a commitment to utilizing third party monitoring. This percentage shows that a majority of Pakistan projects plan to incorporate external verification for some portion of project activities and results during the life of the project. The World Bank CE Strategy asserts that third party monitors increase the likelihood that monitoring results are impartial and accurate because citizens may feel more secure to report their feedback and there are not conflicting interests. Fourteen of the 22 Pakistan projects (64 percent) document commitments to voluntarily disclose some information related to project progress and outcomes, including citizen engagement in some cases, beyond minimal World Bank requirements of disclosure of information.

As explained in the Introduction above, projects that trigger social safeguard policies relating to Indigenous Peoples (Operational Policy/Bank Procedure 4.10) and/or Involuntary Resettlement (Operational Policy/Bank Procedure 4.12) are required to include consultations with beneficiaries during project design and implement a project-related GRM during project implementation. The World Bank's social safeguard policy for Involuntary Resettlement (Operational Policy/Bank

Procedure 4.12) is applied in 10 of the 22 projects in the Pakistan (FY15–17) Investment Financing Portfolio,[7] as illustrated in Figure 4. These 10 projects therefore meet the World Bank's requirements of holding consultations with beneficiaries and also implementing a project-specific GRM.

Figure 4. **Projects applying social safeguards (involuntary resettlement), Pakistan FY15–17**
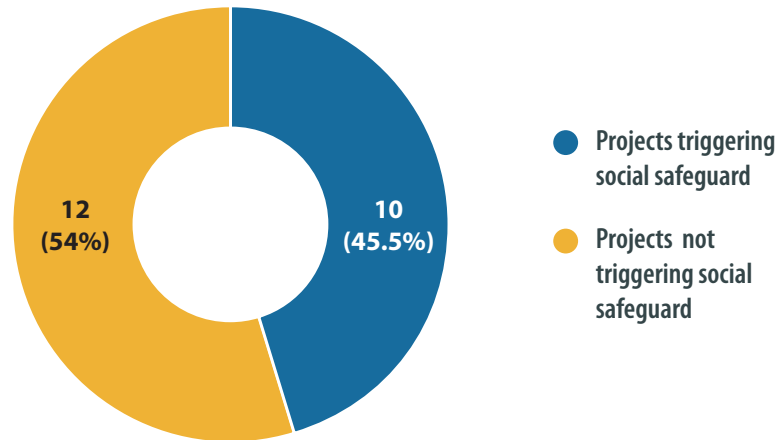
Furthermore, social safeguard policy requires that the community-based consultation proceedings be documented and disclosed via publications in both English and any official, national languages (Urdu in Pakistan), which are then shared in live presentations to audiences of invited stakeholders. The published documentation of these safeguard-required consultations were included in the project documents reviewed for this analysis. It is important to note that Pakistan's legal system does not recognize the existence of Indigenous Peoples within its population, although there are some constitutional and legal provisions for minority ethnicities known as tribal peoples. The lack of a legal definition of who are indigenous peoples in Pakistan has led to varying claims by different societal groups within Pakistan, but there has been no systematic categorization and therefore a minimal application of the Indigenous People's Safeguard (Operational Policy/ Bank Procedure 4.10) in World Bank projects.

The World Bank's social safeguard mandates pre-dated the CE Strategy and President Kim's increased attention to these issues. In principle they are seen as strengthening incentives for implementing certain CE activities in projects applying social safeguards. However, as noted in the World Bank's 2018 Independent Evaluation Group (IEG) assessment of citizen engagement, the application of social safeguards does not in practice mean that these "required" CE activities are carried out well or in full or reported on as expected (World Bank 2018c:21). Therefore, it remains critical to investigate what the CE commitments actually include, even while recognizing the additional mandate that the application of social safeguards is assumed to add.

2.2   Analysis of CE commitment trends across projects

The previous section provided an overall picture of how the FY15–17 Pakistan portfolio has integrated the different components of the World Bank's CE Strategy into project design. In this section, the discussion moves beyond identification of the range of CE commitments to analyze their content as far as possible, based on published plans versus evidence from implementation. The discussion will proceed according to the CE priority areas identified in the World Bank Strategy (i.e., consultation in project design, citizen monitoring, GRM, etc.). The next section focuses on the three ARC-identified indicators of a potential enabling environment for CE (i.e., proactive social inclusion, third party monitoring, and proactive information disclosure). Where relevant, the discussion draws on the projects that have committed to undertaking activities in those respective areas.

2.2.1   Consultations

In the context of World Bank projects, *consultation* refers to engagement with citizens in the design/project preparation stage *before* an operation has been approved by the World Bank Board. Distinct from dialogue, the World Bank defines consultation as "a more structured exchange in which the convener commits to 'active listening' and to carefully consider the comments, ideas, and recommendations received" (Manroth et al. 2014:42). The objectives for citizen consultation therefore include receiving input for improved decision-making in project design and implementation arrangements, which therefore should contribute to improved results and sustainability. Since citizen consultations are required for projects that apply social safeguards, this CE activity has historically been the most frequently incorporated into Bank operations.

In principle, citizen consultations undertaken during project preparation would inform the project design and implementation planning that is submitted to the World Bank Executive Board for approval. Therefore, unlike the CE data that are the basis for the rest of this report, information on consultations held with citizens comes from what Bank teams report they have done versus commitments to what they say they *will* do.

In the Pakistan portfolio, 91 percent of the FY15–17 projects (20 of 22) reported holding community-based consultations during project preparation. It is important to note that 10 of these 20 projects had applied the involuntary resettlement social safeguard, which made community consultations with stakeholders/beneficiaries mandatory in accordance with World Bank policies. However, for the remaining 10 projects, this was an option exercised by the respective project team.

2.2.2   Collaboration in decision-making commitments

Collaboration in decision-making is intended to go beyond consultations that seek input and integrate citizens directly into decision-making. The CE Strategy explains that this process seeks to "make decisions more responsive to citizens' needs and improve the sustainability of program and project outcomes through increased ownership by citizens" (Manroth et al. 2014: 43). It is important to note that the language of "collaboration" and "collaborative decision-making" as conveyed in the CE Strategy is not vocabulary that project teams use in public documents to describe specific CE efforts. Projects typically continue to employ the term *consultation* in guiding documents for participatory decision-making exercises that occur throughout implementation and not only during preparation, which is the definition of consultation used in the CE Strategy and therefore employed in this analysis.

This assessment determined that a project had committed to "collaboration in decision-making" if it described intentions and/or mechanisms that went beyond solicitation of feedback and would directly enable citizens and/or citizen organizations to be involved in decision-making processes for the project. Table 4 captures the projects in the Pakistan portfolio that include such commitments and explains what the commitments involve.

TABLE 4. Collaborative decision-making commitments, Pakistan FY15–17 (12 of 22 projects)

Project title	Collaborative decision-making commitments
National Immunization Support FY16	Coordination with established CSO consortium for immunization; contract CSOs at the federal and provincial levels to inform policy and planning, conduct community engagement and awareness raising, social mobilization, analytical work and research.
Sindh Public Sector Management Reform FY15	Development of strategic engagement process to build community ownership of project and to solicit input into design/implementation decisions. **Mechanism:** Not specified
Sindh Water Sector Improvement (AF) FY15	Engagement with farmer organizations/water user organizations (pre-existing and/or developed by project); participatory consultations in preparing regional plan for drainage and flood management.
Balochistan Integrated Water Resources Management and Development FY16	Farmer organizations or water user associations, formalized in Memorandums of Understanding (MoUs) between farmers and government project; primarily creating an infrastructure via community participatory procurement.
Third Punjab Education Sector FY16	Involvement of school councils in some decision-making activities.
National Social Protection Program-for-Results FY17	Benazir Income Support Program beneficiary committees made up of mothers.
Sindh Irrigated Agriculture Productivity Enhancement FY15	Support for formation of Water Course Associations (WCAs), including legal registration, as means to mobilize farmers/water users for participation, including decision-making.
Sindh Agricultural Growth FY15	Development of a consultation framework for inclusive integration of underserved populations: landless, tenants, women share-croppers. To "identify roles and opportunities for the marginalized populations." **Mechanism:** Not specified
Karachi Neighborhood Improvement FY17	Participation in decision-making only for those affected by resettlement (limited).
FATA Temporarily Displaced Persons Emergency Recovery FY16	Conflict-sensitive, social mobilization strategy prepared at project start; local CBOs (including women-led) and local institutions (i.e., council of elders) to mobilize outreach to the household level—conduits between the local people, government, and military.
Tarbela Fourth Extension Hydropower (AF) FY17	CBOs will be formed at village/settlement level to hold consultations with beneficiary communities. They would be involved in the identification, implementation, and monitoring of schemes.
Disaster and Climate Resilience Improvement FY15	Community engagement on sub-project identification, design, implementation, and monitoring. **Mechanism:** Not specified

In the Pakistan portfolio, 55 percent (12) of the investigated projects describe "consultation" activities that, as documented, would go beyond feedback provision and would incorporate citizens into decision-making processes during implementation. Seven of the 12 projects report that this commitment would be fulfilled through the involvement of organized groups of citizens. The kinds of organizations differ across the projects. Four of these projects—*Balochistan Integrated Water Resources Management and Development, Sindh Water Sector Improvement Phase1(AF), National Social Protection Program-for-Results, and Sindh Irrigated Agriculture Productivity Enhancement*, specify that community-level "associations" or "committees" will serve in this partnership capacity.

The three projects dedicated to developing/improving water resources and/or agriculture, name water user and/or farmer organizations as the organizational vehicles through which beneficiaries participate in project-related decisions. In what appears to be a similar model for a different sector, the *National Social Protection Program-for-Results* identifies that beneficiary committees, whose members are mothers, will contribute to project decision-making. Notably, the *Balochistan Integrated Water Resources Management and Development* project commits to formalizing the relationships with farmer and water user associations through Memorandums of Understanding (MoUs) and specifies that they will be involved in accountability activities such as participatory procurement processes. All four of these projects detail that such associations already exist in the target project areas and therefore each project would first work with established entities. However, the projects also proactively acknowledge that such pre-existing community bodies can be exclusionary toward marginalized groups, and so they commit to supporting expanded participation. Where community-based groups are not present or have become defunct, these projects plan to support the development of citizen-based advisory groups for decision-making.

Three of these 12 projects—*Tarbela Fourth Extension Hydropower (AF), National Immunization Support, and FATA Temporarily Displaced Persons Emergency Recovery*—commit to fostering citizen participation in decision-making by hiring or forming community-based organizations to both directly contribute to and manage wider citizen engagement in these processes. The difference between these project plans versus those for previously discussed projects is that these commitments give CSOs/CBOs an implementation or management role. In other words, the selected or created CSOs/CBOs would be charged with carrying out processes where community members outside of the groups would have the opportunity to contribute to some project decisions. An important difference in the plans laid out for three projects is that the *National Immunization Support* and *FATA Temporarily Displaced Persons Emergency Recovery* projects commit to working with established CSOs/local institutions while the *Tarbela Fourth Extension Hydropower* project describes creating new CBOs for this purpose.

Finally, in the *Karachi Neighborhood Improvement, Sindh Public Sector Management Reform*, and *Disaster and Climate Resilience Improvement* projects, documented commitments to community involvement in project decision-making are presented in general terms. The *Sindh Public Sector Management Reform and Disaster and Climate Resilience Improvement* projects include clearly stated commitments to broad citizen involvement in project related decisions, although they do not specify the mechanisms for such involvement. It is also important to note that while the *Karachi Neighborhood Improvement* project declares intentions to give community members voice in some project decisions, this opportunity is only extended to people determined to be affected by resettlement and, therefore, may only apply to project decisions about resettlement. When considering safeguard frameworks in terms of CE, for issues like resettlement, it is important to understand that safeguard CE mandates are only required to apply to the specific populations being displaced. Therefore, the collaborative decision-making commitment for the *Karachi Neighborhood Improvement* project might exclude the majority of community members affected by the project from decision-making.

2.2.3 Commitments to citizen feedback opportunities throughout the project lifecycle

The CE Strategy recommends that project teams solicit feedback from citizens on a vast range of issues important to project success, including "effectiveness, inclusiveness, quality, delivery time, transaction costs, and targeting, as well as on resource utilization or engagement processes" (Manroth et al. 2014:44). The CE Strategy shares examples of standard tools used for feedback collection, such as "satisfaction surveys, focus group discussions, hotlines, community scorecards, citizen report cards, or SMS/online feedback" (Manroth et al. 2014:44).

Table 5 captures the projects in the Pakistan portfolio that include such commitments to collecting citizen feedback during project implementation and explain what the commitments involve.

TABLE 5. Commitments to feedback collection, Pakistan FY15–17 (22 of 22 projects)

Project title	Feedback collection commitments
National Immunization Support Project FY16	• Periodic: CSO-facilitated consultation, including outreach to beneficiary families in remote areas. • Ongoing: Via SMS and a dedicated help line.
Sindh Public Sector Management Reform Project FY15	• Ongoing: Formal consultations on construction quality, experience with internal and external stakeholders, focus on citizens in the project's catchment areas. • Development of "scheme" to regularly reach citizens for feedback and encourage their engagement, including proactive collection of citizens' mobile numbers (i.e., from public schools).
Sindh Water Sector Improvement Phase 1 (AF) FY15	• Baseline survey and end-line surveys on user satisfaction.
Balochistan Integrated Water Resources Management and Development FY16	• Periodic: Satisfaction survey implemented every 2 years. • Ongoing: Consultations.
Third Punjab Education Sector FY16	• Ongoing: Consultations.
National Social Protection Program-for-Results FY17	• Citizen Report Cards. • Consultations with beneficiary committees.
Sindh Irrigated Agriculture Productivity Enhancement Project FY15	• Periodic: Consultations and surveys. • Ongoing: Feedback submission via project website, information and communication technology (ICT) options.
Sindh Agricultural Growth FY15	• Development of consultation framework for inclusive integration of underserved populations (landless, tenants, sharecroppers, women). • Farmer feedback collected through satisfaction surveys.
Karachi Neighborhood Improvement FY17	• Design and development of web-based platform for government to: (a) provide citizen access to information on city management and budgeting, planning, and programs/activities; and (b) solicit/accept ongoing citizen feedback on services. • Consultation strategy to incorporate citizen input for design of public spaces in selected neighborhoods.
Enhanced Nutrition for Mothers and Children FY15	• Periodic: Community scorecards to obtain feedback on communities' perceptions of the nutrition services provided. • Ongoing: Consultations.

Project title	Feedback collection commitments
FATA Temporarily Displaced Persons Emergency Recovery FY16	• Real-time monitoring and compliance utilizing mobile telephones, SMS, and IVR (Instant Voice Response) system. • Beneficiary feedback surveys.
Tarbela Fourth Extension Hydropower (AF) FY17	• Periodic: Annual beneficiary feedback survey. • Ongoing: Consultations.
Punjab Tourism for Economic Growth FY17	• Periodic: Consultations.
Sindh Barrages Improvement FY17	• Water users' satisfaction surveys. • Consultations.
Disaster and Climate Resilience Improvement FY15	• Setting up communication channels to engage and receive feedback on impacts and concerns from the beneficiaries.
Sindh Resilience FY16	• Beneficiary feedback surveys. • Consultations.
Economic Revitalization of Khyber Pakhtunkhwa and FATA (AF) FY17	• Periodic: Consultations.
Governance and Policy Program for Balochistan FY16	• No mechanism specified but Results Framework indicator on feedback collection.
Sindh Enhancing Response to Reduce Stunting FY17	• Weekly village-level monitoring includes beneficiaries (but unclear how). • District-level meetings. • Twice monthly review.
Punjab Skills Development FY15	• Tracer studies and student satisfaction surveys. • Proactive ICT-based means of engagement with identified beneficiaries. • Regular, formal consultations with internal and external stakeholders to refine implementation.
GPE—Balochistan Education Project FY15	• The Parent Teacher School Management committees will track simple tasks. • Innovative methods to be piloted to provide scalable models of collecting information in a geographically and security-challenged area.
Pakistan Financial Inclusion and Infrastructure FY17	• Satisfaction survey. • Consultations.

All 22 Pakistan projects (100 percent) incorporate commitments to gathering citizen feedback during and following the project's implementation. Multiple mechanisms are specified in 19 of the 22, with only three projects (*Third Punjab Education Sector, Punjab Tourism for Economic Growth* and *Economic Revitalization of Khyber Pakhtunkhwa and FATA*) limiting their commitments to a single feedback mechanism.

Periodic feedback collection mechanisms (those made available to citizens based on project decisions) rather than ongoing mechanisms (those available for citizens to utilize at their convenience) are the most common feedback methods reported in project documents.

Consultation, whether periodic or ongoing, is the most common activity for seeking beneficiary feedback, included in 15 of the 22 projects. Most of the projects do not provide details about the parameters for these consultations; for example, related to format (i.e., focus groups, public forums, individual meetings). The *Sindh Public Sector Management Reform* project is an exception as it describes a commitment to regularly reaching citizens for their feedback and encouraging their ongoing engagement by proactively collecting their mobile numbers (from public school records) and utilizing these mechanisms to stay in contact. Several projects specify the issues that would be topics for citizen feedback through consultations. For example, the *Karachi Neighborhood Improvement* project plans to utilize consultations to gather citizens' input on the design of public space while the *Enhanced Nutrition for Mothers and Children* project describes consultations that focus on soliciting program-specific feedback on their range of program offerings.

As described in project documents, consultation opportunities to gather feedback would appear to allow attending citizens to engage in project-related discussion. However, it seems unlikely that these engagement mechanisms would offer anonymity or opportunities to provide individual, personalized feedback. Furthermore, the consultation opportunities appear to be entirely dependent on when the projects choose to implement this mechanism and on who they invite, rather than on beneficiaries' interest in reporting their experience.

Consultations are planned for 19 of the 22 projects, along with at least one (if not more) additional mechanism for feedback collection. Only three projects—*Third Punjab Education Sector, Punjab Tourism for Economic Growth and Economic Revitalization of Khyber Paktunkhwa and FATA*—plan to only collect feedback via consultations.

Beneficiary surveys are the second-most cited feedback collection mechanism (11 projects), following consultation. In this category, six projects specify that they will carry out satisfaction surveys, one will implement citizen report cards, and the remaining four do not specify the format for their surveys.

Six projects in the portfolio describe plans for ongoing, technology-driven opportunities to engage citizens. For example, the *FATA Temporarily Displaced Emergency Recovery* project details a commitment to real-time monitoring by community members who would be able to do so via mobile telephones, SMS, and IVR (Instant Voice Response) system. Several of the technology-based mechanisms would allow for beneficiaries to provide feedback on their own timetable (versus when the project holds consultations or carries out surveys). The *National Immunization* project commits to sponsoring a hotline, while the *Sindh Irrigated Agriculture Productivity Enhancement* and *Karachi Neighborhood Improvement* projects commit to hosting websites with portals through which community members can submit feedback, ask questions, and reach the project team for other issues. *Punjab Skills Development* project employs ICT-based means and the *Disaster and Climate Resilience Improvement* project uses communication channels to engage and receive feedback from beneficiaries.

Two projects (the *GPE—Balochistan Education* Project and the *Governance and Policy Program for Balochistan*) provide very little information regarding feedback collection mechanisms, but the documents suggest that they intend to collect feedback. While the latter project does not specify the mechanism, it does have indicators pertaining to feedback collection in its most recent Implementation Status Results Report.

2.2.4 Commitments to involving citizens as monitors

According to the CE Strategy, involving citizens in project monitoring "can increase transparency, improve efficiency of service delivery or budget execution, and reduce opportunities for corruption" (Manroth et al. 2014:47). As discussed in the Introduction, the World Bank calls this CE category "citizen-led monitoring," even though the definition only calls for citizen participation and not leadership. For example, such approaches could limit citizens' roles to atomized data-gathering without involvement in agenda setting. Therefore, ARC refers to this simply as citizen monitoring, given the lack of evidence that the citizens involved would actually have the opportunity to lead and make decisions about these processes.

Nevertheless, participation in project monitoring activities gives citizens opportunities to go beyond serving as feedback providers and take part in gathering this feedback, as well as other project related data on progress, results, and outcomes. This allows beneficiaries access to the big picture of project performance and service provision. Table 6 captures the projects in the Pakistan portfolio that include such commitments and explains what they involve.

TABLE 6. Citizen monitoring commitments, Pakistan FY15–17 (6 of 22 projects)

Project title	Citizen monitoring commitments
National Immunization Support FY16	Contracted CSOs to collect beneficiary feedback, provide inputs to the project, and serve on Multi-donor Trust Fund (MDTF) governance mechanism; report on beneficiary feedback regularly.
Sindh Public Sector Management Reform FY15	Employ third parties (can be CSOs) to audit the photo data for improved assessment of quality; enable citizens to directly access up-to-date information about the progress of development schemes.
Sindh Water Sector Improvement Phase 1 (AF) FY15	Involvement of farmer organizations in monitoring. Participation of farmers and stakeholders to provide accountability together with an external monitoring and evaluation (M&E) arrangement.
Karachi Neighborhood Improvement FY17	Citizens to be part of monitoring teams (roles unclear, so there is a potential but not a clear commitment).
Enhanced Nutrition for Mothers and Children FY15	Involvement of community members in data collection (expressed as an option not a commitment) to increase ownership and providers' accountability.
Sindh Enhancing Response to Reduce Stunting FY17	Weekly village-level monitoring includes beneficiaries (but unclear how) and district-level meetings twice monthly, to review GRM and monitoring.

A mere 27 percent (6 of the 22) of the Pakistan projects take the commitment to collecting feedback from communities a step further and involve community members in an aspect of the project monitoring process. As Table 6 shows, overall, these six projects use general and simplistic language to convey how the projects envision citizen involvement as project monitors. For example, the *Karachi Neighborhood Improvement* project commits to granting citizens a position on monitoring teams, while in the *Sindh Water Sector Improvement* project, the farmer organizations involved in project decisions would be given a monitoring role.

Only one project, the *Sindh Response to Stunting Program*, notably provides specific timelines for the citizen monitoring commitments, stating citizens will be involved on a weekly basis at the village-level monitoring and bi-monthly at the district level. This therefore captures a commitment for ongoing, regular citizen involvement, which could not claim to have been "achieved" with one-time citizen inclusion.

In the *National Immunization Support and Sindh Public Sector Reform* projects, the citizen monitoring commitment centers around the CSOs contracted by the project. Therefore, in these projects the mechanism will be pursued by professionals rather than lay entities. Among all six projects only the *National Immunization Support* project specifies that citizen involvement in monitoring would also include having a role in beneficiary feedback collection.

As the numerical results show, citizen monitoring of projects appears to be the weakest area of CE commitments in the Pakistan portfolio. Compared to the robust commitment from all 22 projects to involve citizens in the collection of feedback, only 6 of the 22 projects commit to citizen monitoring. Furthermore, as the data demonstrates, the information provided relating to citizen monitoring is often vague, without clear explanations of citizen monitoring roles, or how the activities will be carried out.

2.2.5   GRM commitments

As with beneficiary consultation during project design, the World Bank requires all projects that have triggered social safeguards for involuntary resettlement or for Indigenous Peoples to incorporate a project-specific GRM (see Operational Policy/Bank Procedure 4.12). According to World Bank policy, this must be accessible, free, easily understood, transparent, responsive, and effective; must not restrict access to official grievance channels (such as the courts, including traditional courts); and must not cause fear of negative consequences for its recourse among users. Therefore, while all projects in a country portfolio are encouraged to include project-specific GRMs so that beneficiaries can share grievances and seek redress for adverse project experiences, projects that involve either of these social safeguards, in principle, are required to include this specific CE mechanism. This policy nuance is important to understand the GRM results in the Pakistan portfolio, shown in Table 7, because 10 of the 21 projects that commit to including a project-level GRM also triggered (or had the potential to trigger) the involuntary resettlement safeguard.

The standard format for a GRM is that citizen complaints are filed at the community level and, if necessary, they will have opportunities to escalate their grievances to higher-level authorities, with the final level being the institution of the World Bank. Program documents lay out general details related to the structure, time frame, and some guidelines (for example, a majority of projects will accept oral complaints as well as written ones). More specific details relating to how communities can learn about a project's GRM and tangible instructions for submitting grievances and following up, for example, is often provided in a project's operational manual.

TABLE 7. GRM commitments, Pakistan FY15–17 (21 of 22 projects)

Project title	Social Safeguards triggered	Commitment to create GRM	Does the GRM include a commitment to publicly report on number/percentage of grievances reported/resolved? If so, via what commitment?
National Immunization Support FY16		Yes	Yes, proactive disclosure
Sindh Public Sector Management Reform FY15		Yes	No
Sindh Water Sector Improvement Phase 1 (AF) FY15	Yes	Yes	No
Balochistan Integrated Water Resources Management and Development FY16	Yes	Yes	No
Third Punjab Education Sector FY16		Yes	No
National Social Protection Program-for-Results FY17		Yes	No
Sindh Irrigated Agriculture Productivity Enhancement FY15	Yes	Yes	No
Sindh Agricultural Growth FY15	Yes	Yes	Yes, Results Framework indicator
Karachi Neighborhood Improvement FY17	Yes	Yes	No
Enhanced Nutrition for Mothers and Children FY15		Yes	No
FATA Temporarily Displaced Persons Emergency Recovery FY16		Yes	Yes, Results Framework indicator
Tarbela Fourth Extension Hydropower (AF) FY17		Yes	No
Punjab Tourism for Economic Growth FY17	Yes	Yes	Yes, Results Framework indicator
Sindh Barrages Improvement FY15	Yes	Yes	Yes, Results Framework indicator
Disaster and Climate Resilience Improvement FY15	Yes	Yes	No
Sindh Resilience FY16	Yes	Yes	Yes, Results Framework indicator
Economic Revitalization of Khyber Paktunkhwa and Federally Administered Tribal Areas (AF) FY17		Yes	No
Governance and Policy Program - Balochistan FY16		Yes	Yes, Results Framework indicator
Sindh Enhancing Response to Reduce Stunting FY17	Yes	Yes	No
Punjab Skills Development FY15		Yes	No
Pakistan Financial Inclusion and Infrastructure FY17		Yes	No

A clear majority of projects (21, or 95% of the country portfolio) commit to creating a project-specific GRM. Ten of the assessed 22 projects have been determined to involve (or potentially involve) resettlement and are as such required to incorporate a project-specific GRM. Of the remaining 12 projects in the portfolio that do not involve resettlement, 11 projects specify plans to incorporate a project-level GRM. Therefore, a total of 21 projects in this portfolio commit to the creation and implementation of a grievance redress mechanism.

Out of the 21 Pakistan projects that commit to creating a GRM, 6 projects developed Results Framework indicators to measure aspects of their GRM's functionality. These projects—*Sindh Agricultural Growth, Punjab Tourism for Economic Growth, Sindh Barrages Improvement, Sindh Resilience, FATA Temporarility Displaced Persons Emergency Recovery,* and the *Governance and Policy Program for Balochistan*—are therefore required to report the tracked results publicly. This process of reporting on Results Framework indicators will be discussed in greater depth in Section 2.2.7.

Among the other projects that commit to incorporating a GRM but do not include a GRM-related Results Framework indicator, only the *National Immunization Support* project declares the intention to make its GRM data public. This commitment relates to issues such as the number of complaints submitted, the nature of complaints, GRM responsiveness, and so on.

2.2.6   Capacity building for CE commitments

World Bank projects often incorporate capacity-building activities related to project content and management, but activities dedicated to training on CE—for implementers or participants—are far less common. The CE Strategy therefore, specifically emphasizes the importance of extending capacity-building investment to include CE-related capacity building, particularly for project teams, sectors, and in country settings with limited experience incorporating meaningful citizen engagement into development operations. It includes activities specifically designed for citizens, CSOs, communities, government officials, and national accountability institutions to strengthen their engagement and participation in project implementation (service delivery, natural resource management, public financial management, and/or community-driven development (CDD) projects. Table 8 demonstrates such commitments to building capacity for CE activities in the various projects in the Pakistan portfolio.

Half of the Pakistan projects (11 of 22) document proactive commitments to capacity building for CE in their project documents. As Table 8 illustrates, five projects specify that the CE capacity building will be for beneficiaries/groups, two for CSOs/NGOs contracted to have a role in implementation, and one for government officials. In several projects, CE capacity building is dedicated to building skills among members of the citizen committees who have been appointed to decision-making roles for the project, as in the case of farmer organizations in the *Sindh Agricultural Growth* and *Sindh Water Sector Improvement* projects, and the mother representatives on the citizen committees in the *National Social Protection Program-for-Results*. This capacity building is intended to support community members' decision-making and interactions with project management and therefore relates to strengthening their "soft skills" of engagement as well as "hard skills" related to executing any necessary technical responsibilities.

For the CE capacity building aimed at implementers (government entities or contracted NGOs), the activity is intended to increase their readiness to bring citizens into project implementation processes. In the *National Immunization Support* project, CE capacity building intends to help the contracted CSO implementers pre-emptively understand the needs and concerns of beneficiaries. Two of the projects that describe CE capacity-building commitments, the *Sindh Public Sector*

TABLE 8. **Capacity Building for CE, Pakistan FY15–17 (11 of 22 projects)**

Project title	CE capacity-building commitments
National Immunization Support FY16	Capacity building for CSOs working with beneficiaries, key issues facing beneficiaries.
Sindh Public Sector Management Reform FY15	Strengthening citizen engagement and information disclosure practices.
Sindh Water Sector Improvement Phase 1 (AF) FY15	Water user and farmer organizations "strengthened."
Balochistan Integrated Water Resources Management and Development FY16	Tailored training programs and awareness raising activities and investment in "social mobilization" to strengthen participatory skills development.
Third Punjab Education Sector FY16	Training to mobilize parents on using engagement mechanisms.
National Social Protection Program-for-Results FY17	For mother representatives on Benazir Income Support Program beneficiary committees.
Sindh Irrigated Agriculture Productivity Enhancement FY15	Mobilization of farmer groups.
Sindh Agricultural Growth FY15	Capacity-development strategy for beneficiaries (commitment to inclusivity for marginalized groups) to include awareness trainings on community mobilization.
Enhanced Nutrition for Mothers and Children FY15	Measures for capacity building for implementing NGOs.
Punjab Tourism for Economic Growth FY17	For government officials, some beneficiaries on CE.
Governance and Policy Program - Balochistan FY16	Training to strengthen the GRM and expand outreach to citizens on behalf of the Office of the Balochistan Ombudsman, to build capacity and raise awareness of the GRM. The activities include fostering access for groups that are often socially excluded, including women and youth.

Management Reform and the *Balochistan Integrated Water Resources Management and Development* projects, frame the commitments in very general terms. Therefore, despite declarations that the project will invest in building skills related to this issue, the project documents do not clarify whether such capacity-building activities would be intended for the project implementers on how to engage citizens or for citizens on how to strengthen their involvement.

2.2.7 CE indicator commitments

Results Framework is the overarching term used by the World Bank to describe the context in which results are internally measured and monitored. In practice, it includes only a small number of indicators that together are intended to explain how the project development objective (PDO) is to be achieved. What is significant is that the indicators included in a project's Results Framework must (1) explain how the data collected will be used over the course of project implementation and (2) be publicly disclosed. Therefore, if the Results Framework includes an indicator on CE, the project must disclose information publicly, at least about this particular area.[8]

As discussed in the introduction, A CE Results Framework indicator must one of the following criteria must be met:

- Clearly capture citizen feedback and in so doing report "whether there is a tangible response to close the feedback loop"; or
- Monitor the extent to which citizens are involved in decision-making related to project design, implementation, and oversight (World Bank 2018a).

The discussion below will therefore consider these criteria when analyzing the projects' CE indicators. Table 9 matches the projects with their respective CE indicator(s).

TABLE 9. CE indicator commitments, Pakistan FY15–17 (16 of 22 projects)

| Project title	Indicator	CE area
National Immunization Support FY16	1. Number of contracts awarded with CSOs to provide immunization services in urban slums, by province (commitment to explicitly codify CE responsibilities in contracts; i.e., collect beneficiary feedback and provide to the project).	Citizen feedback (potentially this could also be considered citizen monitoring)
Sindh Public Sector Management Reform FY15	1. Number of Departments with proactive feedback mechanisms established (mechanisms through which government contacts citizens for views on service delivery, to increase citizen oversight).	Citizen feedback
Sindh Water Sector Improvement Phase 1 (AF) FY15	1. Improved user satisfaction with water distribution practices. Captured in sample surveys conducted before and after project activities in each Area Water Board (AWB).	Citizen feedback
	2. Number of operational water user associations created and/or strengthened.	Capacity building
Balochistan Integrated Water Resources Management and Development Project FY16	1. Beneficiary satisfaction with project implementation. Surveys implemented every two years.	Citizen feedback
Third Punjab Education Sector Project FY16	1. Number of school committee (SC) members (mostly parents) reached through citizen engagement initiatives (measuring access to forums/mechanisms to voice needs, feedback and complaints; i.e., school mobilization programs, ICTs, etc.).	Citizen feedback
National Social Protection Program-for-Results FY17	1. Number of Union Councils in Waseela-e-Taleem districts with at least one Benazir Income Support Program beneficiary committee formed and respective mother-leader trained.	Capacity building
Sindh Irrigated Agriculture Productivity Enhancement FY15	1. Number of operational water user associations created and/or strengthened.	Capacity building
Sindh Agricultural Growth Project FY15	1. GRM established and being tracked (measures number of complaints received, responses, and timelines of response)	GRM
	2. Percentage of user satisfaction with the modernized services (gender disaggregated).	Citizen feedback

Continued

Project title	Indicator	CE area
Karachi Neighborhood Improvement FY17	1. Number of participants involved in consultation activities during project implementation (gender disaggregated).	Citizen feedback
	2. Percentage of beneficiaries that feel project investments reflected their needs.	Citizen feedback
FATA Temporarily Displaced Persons Emergency Recovery FY16	1. Percentage of grievances attended to within 60 days.	GRM
	2. Percentage of beneficiaries satisfied with the Early Recovery Package program.	Citizen feedback
	3. Percentage of beneficiaries satisfied with the Child Health Grant Program.	
Tarbela Fourth Extension Hydropower (AF) FY17	1. Percentage of project schemes that reflect women's priorities (target is at least 50 percent according to priorities identified by women during consultations).	Collaborative decision-making
	2. Percentage of respondents reporting overall satisfaction with the implementation of Resettlement Action Plan (RAP) and Social Action Plan (SAP) in annual beneficiary feedback surveys.	Citizen feedback
Punjab Tourism for Economic Growth FY17	1. Number of citizens or communities involved in planning/implementation/evaluation of program.	Collaborative decision-making
	2. Percentage of complaints and grievances received by the project that are recorded, addressed satisfactorily, and the actions documented through the established GRM.	GRM
Sindh Barrages Improvement FY15	1. Percentage of addressed registered grievances on delivery of project benefits.	GRM
Sindh Resilience FY16	1. Percentage of respondents to beneficiary surveys reporting that the public consultation and information sharing process was satisfactory.	Citizen feedback
	2. Percentage of respondents indicating satisfaction with the timelines and transparency of the GRM.	GRM
Economic Revitalization of Khyber Pakhtunkhwa and Federally Administered Tribal Areas FY17	1. Number of Small and Medium Enterprise owners satisfied with the processing of the matching grants.	Citizen feedback
Governance and Policy Program for Balochistan FY16	1. Percentage increase in the resolved cases of education sector, filed with the Office of Balochistan Ombudsman.	GRM
	2a. Number of districts where schools and irrigation facilities are monitored with regular beneficiary feedback.	Citizen feedback
	2b. Percentage of women among feedback providers.	Citizen feedback
	3. Number of schools and irrigation facilities for which follow up actions are taken.	Citizen feedback (potentially this could also be considered citizen monitoring)

Sixteen of the 22 projects include at least one indicator within their respective compliance-oriented Results Frameworks designed to measure an aspect of citizen engagement. Of the 16 projects that commit to disclosing a CE indicator, 8 projects include an indicator covering a single CE area while the other 8 include two or more independent CE indicators covering distinct, multiple areas. Of these 8, 6 projects include two distinct CE indicators, while 2—the F*ATA Temporarility Displaced Persons Emergency Recovery* project—includes three distinct CE indicators. These 8 projects utilize their multiple CE indicators to measure efforts across distinct CE areas, and/or different kinds of efforts undertaken to collect citizen feedback during implementation.

Even though 6 projects in Pakistan do not include any CE indicators, the total number of CE indicators among the 16 projects (some of which have multiple indicators) totals 26. Figure 5 shows the division across the CE categories.

Figure 5. Classification of CE indicators, Pakistan FY15–17
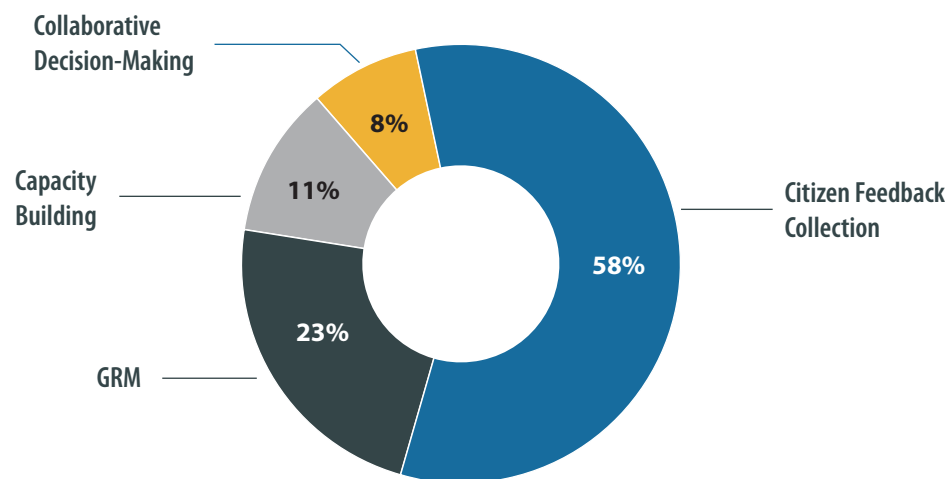
Collecting citizen feedback: As demonstrated in Figure 5, 58 percent, or 15 of the total 26 CE indicators, have been designed to track the collection of citizen feedback. These 15 indicators come from 12 projects (wherein 3 projects incorporate two different indicators to measure different aspects of this CE area). Since all 22 Pakistan projects commit to collecting citizen feedback in some capacity, it is logical that the majority of those that integrate CE indicators would do so for this category. As captured in Table 9, the majority of the indicators developed to track the collection of citizen feedback focus on measuring beneficiaries' reported satisfaction with projects' delivery of services and plan to collect feedback by using satisfaction surveys. The plans for survey design are not shared in the project documents. Three citizen feedback indicators measure the reach of CE mechanisms rather than the results by either measuring the number of beneficiaries reached through feedback collection/consultation activities or the number of mechanisms operational to collect feedback. For example, in the *Sindh Public Sector Reform* project, the mechanism measures the number of departments in the Sindh government that can demonstrate functional accountability mechanisms for capturing citizen feedback. The *National Immunization Support* project's CE indicator is designed to track the number of CSO contracts awarded per province, detailing their responsibilities for collecting and reporting on beneficiary feedback. The *Third Punjab Education*

Sector Project measures the number of school council committee members reached. These three indicators incorporate a variety of approaches to measure the breadth of feedback collection, but as output indicators these do not capture how the systems are functioning, only that the mechanisms exist or that people have been reached.

Finally, the *National Immunization Support* project's citizen feedback collection indicator could be considered to also track citizen monitoring because the CSOs' responsibilities involve managing and overseeing the beneficiary feedback collection. However, because the reporting does not clarify whether the contracted CSOs will actually be from the beneficiary communities (versus national or international organizations), and the indicator itself is output oriented (reporting numbers of contracts rather the results of feedback collection), it was determined that this indicator could not be considered to capture meaningful data on citizen monitoring.

GRM: Four of the six indicators designed to report on projects' GRMs measure how they are functioning, including the numbers of grievances registered, the timeliness of responses (according to project guidelines), and the proportion of registered grievances addressed or attended. In contrast, the GRM indicator presented within the *Sindh Resilience* project commits to measuring users' satisfaction with the complaints-redress process (with a goal of 80 percent). This satisfaction-measuring indicator is planned alongside an additional CE indicator that measures citizen satisfaction with project-provided services. Thus this project chose to approach the GRM in the same way as it did project services—evaluating the GRM based on how users perceive their experience. The criteria for satisfaction is not specified in either case. In the last case—the *Economic Revitalization of Khyber Pakhtunkhwa and Federally Administered Tribal Areas* project—the GRM indicator is designed to measure the percentage increase in the resolved cases of the education sector filed with the Office of Balochistan Ombudsman.

For this assessment the remaining five CE indicators have been categorized as pertaining to capacity building (three) and collaborative decision-making (two).

Capacity building: As discussed above, the *National Social Protection Program-for-Results, Sindh Irrigated Agriculture Productivity Enhancement,* and *Sindh Water Sector Improvement Phase 1 (AF)* projects all commit to developing and/or building the capacity of user associations and committees that will be the main vehicles through which citizens will contribute to project decision-making and provide feedback throughout the life of the project. Given the central nature of these participatory bodies for the project, it is appropriate that each project's CE indicator commits to tracking their formation and subsequent capacity building. Therefore, the assessment categorizes these indicators as measuring an aspect of CE capacity building because the commitment is that they will gain the capability of taking on these collaborative responsibilities. However, these indicators are designed to only track whether citizen associations/committees have been created and supported, they do not measure the extent to which these key participatory mechanisms actually contribute to making project operations responsive to beneficiary needs.

Collaborative decision-making: The collaborative decision-making indicator is found in two projects. One of two indicators designed for the *Tarbela Fourth Extension Hydropower (AF)* project measures an aspect of collaborative decision-making because it tracks whether women's priorities, conveyed in consultations, determined project decisions. This indicator not only tracks that the consultation happened but also how the results of consultations with women directly informed the course of project implementation. The *Punjab Tourism for Economic Growth* project measures collaborative decision-making by assessing the number of citizens or communities involved in planning, implementation, and evaluation of the program.

Across the 16 projects with CE indicators, all 26 indicators measure a certain aspect of citizen involvement in the projects to which they belong. However, according to the descriptions in project documents, the majority do not appear to meet either of the requirements set by the World Bank—to "close the feedback loop" or demonstrate the extent to which citizens are involved in decision-making.

Of all 26 indicators, only one—the collaborative decision-making indicator in the *Tarbela Fourth Extension Hydropower (AF)* project—clearly demonstrates both the "closing of the feedback loop" and captures participation in decision-making. This is because the indicator measures, not only the collection of feedback but how the feedback influenced the project.

Many of these indicators, at the same time, respond to CE areas prioritized by the World Bank's CE Strategy. Therefore, it is not clear to what extent these criteria are realistically being considered for project design.

2.3 Analysis of commitments to an enabling environment for CE

This research is based on ARC's hypothesis that a project's inclusion of CE activities is not sufficient on its own to guarantee meaningful citizen engagement and therefore an "enabling environment" is needed to facilitate and shape such engagement. Although individual projects do not have the power or influence to shape the general context in which they are implemented, they can take actions that potentially (favorably or unfavorably) contribute to an enabling environment for CE. Therefore, the overall opportunity for citizen engagement is not only determined by the existence of discrete mechanisms and activities for citizens to provide input, make decisions, and be involved in monitoring, for example, but also by the circumstances in which these activities are carried out.

Although not guaranteed, projects have the potential to influence these enabling circumstances in at least three ways: (1) by fostering social inclusion, (2) by promoting accountability through incorporating independent monitoring mechanisms, and (3) by promoting transparency through disclosure of project information. The discussion below covers the assessment findings from the 22 Pakistan projects across these three areas.

2.3.1 Proactive social inclusion commitments

Groups that have experienced social marginalization and exclusion could be omitted from participatory processes without proactive measures to ensure their engagement. These groups include women, children and youth, people with disabilities, the elderly, and migrants. Therefore, this section analyzes how and to what extent projects commit to incorporating "proactive social inclusion measures" for vulnerable groups in planned CE processes. Table 10 outlines the proactive inclusion measures described within Pakistan portfolio operations.

TABLE 10. Proactive social inclusion commitments, Pakistan FY15–17 (22 of 22 projects)

Project title	Population group	Proactive social inclusion commitments
National Immunization Support FY16	Pregnant women, children	Gender Action Plan addresses challenges faced by women in accessing services and proposes strategies to engage women; enhance access, skills, and capabilities; and improve gender sensitization. Equitable access to immunization services between genders will also be monitored through the first project development objective (PDO) level results indicator. Explicit commitment to women's participation in consultations, gender-disaggregated data collection.
Sindh Public Sector Management Reform FY15	Women	Community feedback is proactively sought from women to monitor the quality of construction schemes and problems faced by female staff during processing of pension cases at various district treasury offices.
Sindh Water Sector Improvement Phase 1 (AF) FY15	Women in farmers organizations	Gender-informed design to increase women's participation in farmers organizations and land ownership.
Balochistan Integrated Water Resources Management and Development FY16	Women	A Gender Action Plan (GAP) that sensitizes project staff on gender and increases women's participation in decision-making.
Third Punjab Education Sector FY16	Women and vulnerable population groups	Commits to inclusive growth and reduced inequality for marginalized and vulnerable population groups, including women; participation in school councils.
National Social Protection Program-for-Results FY17	Women beneficiaries, poor	Through improved financial inclusion for SMEs and women, the program enables millions of Benazir Income Support Program women beneficiaries' access to banks to receive benefits; facilitate social and productive opportunities for the bottom 40 percent of the population; provide income support to the poor, including women's empowerment; and reduction in the poverty gap by potential savings and accumulation of productive assets.
Sindh Irrigated Agriculture Productivity Enhancement FY15	Women, landowners, small and landless farmers (sharecroppers), and female farmers	Social assessment (SA) conducted on socio-economic and cultural barriers faced by small and landless farmers and women to effectively participate and benefit from project interventions. SA identified strong demand by female farmers.
Sindh Agricultural Growth FY15	Women	Social assessment (SA) clarified nature and extent of potential impacts and benefits that would lead to reduction in poverty and vulnerabilities of poor, women, and children, particularly girls.
Karachi Neighborhood Improvement FY17	Women, children, elderly, persons with disabilities	Public space and mobility improvement to provide universal access to safe, inclusive, and accessible green and public spaces. Women represent 50 percent of beneficiaries consulted for creation/ rejuvenation of safe public spaces.

Project title	Population group	Proactive social inclusion commitments
Enhanced Nutrition for Mothers and Children FY15	Women, children, and socially excluded groups—poor and marginalized households, landless, religious minorities, ethnic, occupational groups	Consultations with women, addressing general malnutrition among children and pregnant & lactating women and developing interventions around it.
FATA Temporarily Displaced Persons Emergency Recovery FY16	Women, persons with disabilities, remote & displaced communities	Mobilization of women through outreach methods (e.g., radio and SMS messages in local language and dialects). Computerized National Identity Cards (CNICs) and biometric data to ensure that widows and women-headed households are included and receive payments directly. Health care provision to displaced female populations. Raising awareness about vaccination and child health, use of facilitators to enable women and female-headed households to avail cash grants.
Tarbela Fourth Extension Hydropower (AF) FY17	Women	Under the Social Assistance Program: - CBOs to include women as members and as office holders. At least one woman office holder in each CBO management committee to ensure women's voices in decision-making. - Consultations to be carried out with women to identify schemes, at least 50 percent of which will be based on their priorities. -Women's views to be captured separately in the annual beneficiary feedback surveys.
Punjab Tourism for Economic Growth FY17	Women	- A specific training program for staff to understand how growing tourism affects women, specifically focusing on factors that facilitate female entry into the labor force and promote female enterprise development. - Extensive consultations with women for Social and Resettlement Framework preparation.
Sindh Barrages Improvement FY15	Women	Gender-informed design: Under the ongoing Sindh Water Sector Improvement Project, women's participation in farmer organizations has increased. Proactive inclusion in consultations and feedback.
Disaster and Climate Resilience Improvement FY15	Vulnerable populations—women, families below poverty line, families headed by female, socially excluded minorities, disabled people	A social inclusion and gender plan outlined in the social assessment, which prioritizes vulnerable families/communities in early recovery and risk-reduction activities. A school awareness program to teach students and teachers the disaster risks and actions required in emergencies.
Sindh Resilience FY16	Women	Specific interventions related to women, such as awareness raising, disaster risk management training, and targeted women-friendly health and sanitation services in the aftermath of disasters. Separate consultations involving CSOs for outreach to women.

Continued

| Project title	Population group	Proactive social inclusion commitments
Economic Revitalization of Khyber Pakhtunkhwa and Federally Administered Tribal Areas (AF) FY17	Women entrepreneurs	Separate consultations with women; increase in the number of women beneficiaries; commitment to strengthening project outreach to women entrepreneurs, involving them in economic activities, job creation to financially empower them.
Governance and Policy Program for Balochistan FY16	Women	Addressing gender disparities by including women in consultations, building capacity, and raising awareness about GRM. Forty-two percent women gave feedback on 773 service delivery units.
Sindh Enhancing Response to Reduce Stunting FY17	Women, children, and vulnerable Groups	Indigenous Peoples and technical support partners to ensure active participation of women in project interventions and consultations: - Development of Female Farmer Field Schools. - Construction of girls' toilets. - Focus on women as the main agriculture producers. - Lady extension workers to work with women beneficiaries. - Women's share should exceed men's in awareness raising under Saaf Suthro Sindh scheme.
Punjab Skills Development FY15	Women, poor	Inclusion of women in labor force, giving them access to skills-development training and increasing their participation and employability.
GPE–Balochistan Education Project FY15	Girls	To increase school enrollment and retention in project-supported schools, with a special focus on girls' participation.
Pakistan Financial Inclusion and Infrastructure FY17	Women entrepreneurs	Consultations with women; particular focus on financial inclusion for women and on women entrepreneurs' access to finance. Sixty percent loan disbursement to women borrowers.

Gender is a cross-cutting theme in all of the Pakistan projects with all 22 projects committing to the proactive inclusion of women in at least one mechanism or activity for citizen engagement. However, other vulnerable communities are not addressed in the same measure (barring one or two projects). Based on social analysis and periodic feedback of stakeholders, especially female beneficiaries, participatory approaches have been integrated into the project designs. All projects make overarching commitments to capture impacts on women through separate consultations and gender-disaggregated data collection.

Some noteworthy examples: In the *Enhancing Nutrition for Mothers and Children* project, extensive efforts will be made to overcome social and gender constraints through counseling of women and men, especially those who influence the decision-making at the community and family levels, regarding household expenditures, food consumption patterns, and health-seeking behaviors. All data to be collected for the project will be disaggregated by gender. The *Pakistan Financial Inclusion and Infrastructure* project aims to allocate 60 percent of its total microfinance lending

to women entrepreneurs and women-owned microenterprises. The project seeks to substantially increase access and usage of financial services by women and support women-owned micro, small, and medium-size enterprises (SMEs) and involve them in consultations. The *Sindh Resilience* project aims to positively impact women, who are especially vulnerable during floods and drought. Support for disaster planning, training, and outreach mechanisms will include specific measures for women, who will be proactively included in any field level/community-based consultations and disaster planning system. The *Sindh Water Sector Improvement Phase 1 (AF)* project has made substantial achievements in enhancing women's participation in farmer organizations. About 2,000 women landowners in selected regions have been identified, 41 percent of whom have been successfully mobilized in their local farmer organizations, and eight women have been elected in the farmer organizations' board of management, including one chairperson.

While women's roles have been prioritized, and gender takes precedence in this portfolio, efforts to involve other marginalized communities—disabled people, the elderly, and particularly the youth—appear to be lacking in these projects with only a few projects referencing their inclusion, in very limited terms, as can be seen in Figure 6.

Figure 6. **Proactive social inclusion commitments, by population group, Pakistan FY15–17**
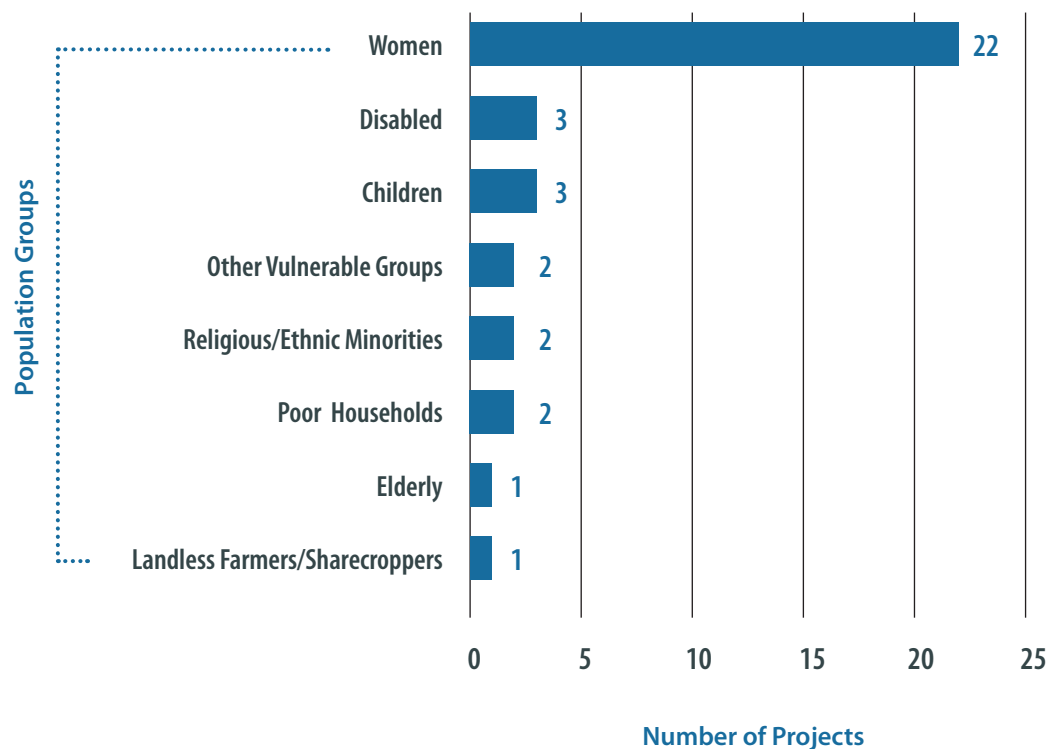
2.3.2 Commitments to third party monitoring

The World Bank defines third party monitoring as "monitoring by parties that are external to the project or program's direct beneficiary chain or management structure" (Van Wicklin and Gurkan 2013:2). It recommends that projects incorporate third party monitoring in order "to provide an independent perspective on project or government performance" (Van Wicklin and Gurkan 2013:2). It is because of the independence of these external monitoring entities that the incorporation of third party monitoring can potentially contribute to an enabling environment for CE.

The ARC assessment tool identifies first whether a project commits to incorporating an external third party monitoring entity (professional or community-based). If so, the assessment then ascertains the purpose for which the entity has been recruited (i.e., monitoring safeguards compliance, impact evaluation, collection of citizen feedback, etc.) and whether there is a documented intention to share findings with the public. These three steps are collectively considered to determine the potential contribution of third party monitoring to an enabling environment for citizen engagement.

The assessment revealed that projects commit to third party monitoring for a range of different activities and mechanisms. While some projects include a single commitment to third party monitoring in just one area, many include multiple commitments to third party monitoring across several areas during the project life cycle. The assessment identified five broad categories for which World Bank-supported operations utilize third party monitoring, as follows:

(i)   **Social Safeguard compliance** for projects that have been determined to involve or have the potential to involve resettlement and/or Indigenous Peoples.

(ii)   **Project M&E** of general project processes, results and outcomes to accompany the project monitoring undertaken by project management units (PMUs).

(iii) **Disbursement Linked Indicator (DLI) Monitoring**. DLIs are project indicators whose achievement triggers the release of a new tranche of funds to continue project implementation. These are utilized by projects to incentivize the achievement of key program milestones and improve performance. Since funding provision is linked directly with goal achievement, the World Bank requires that these indicators be monitored by external entities. Therefore, projects that incorporate DLIs rather than traditional project indicators are required to contract third party monitoring.

(iv)   **CE activity monitoring** involves the external monitoring of the CE project activities and mechanisms designed to provide affected peoples with opportunities to provide feedback, make decisions, submit complaints (i.e., management of a project-level GRM by an entity separate from the PMU or the client government).

(v)   **Impact Evaluation** to determine whether the changes in outcomes can be attributed to the World Bank–supported project that was implemented.
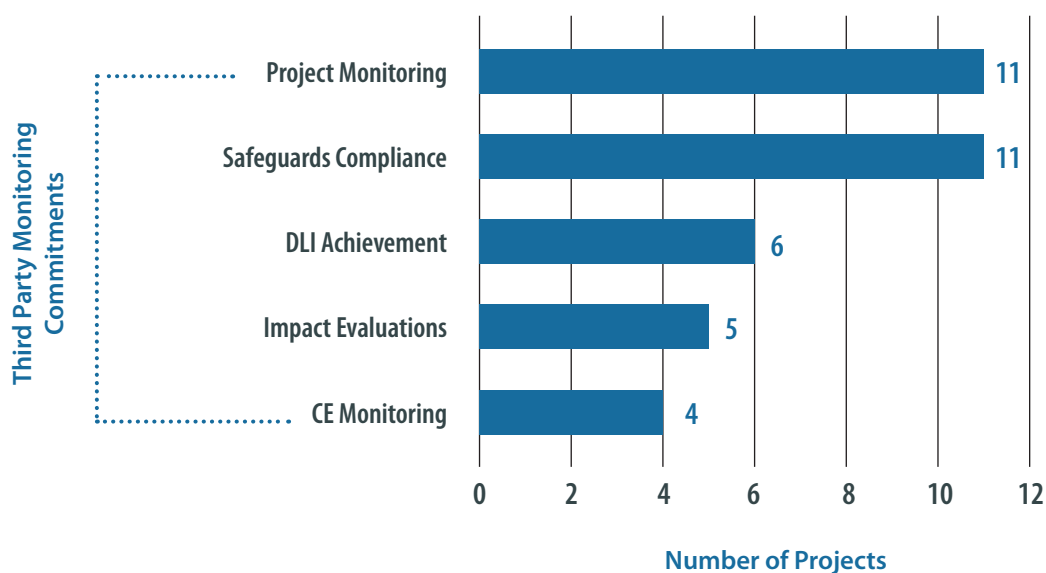
An overview of third party monitoring commitments across these 5 categories in the 22 projects in Pakistan is outlined in Table 11.

TABLE 11. Third party monitoring commitments by Type, Pakistan FY15–17 (19 of 22 projects)

Project title	Safeguard compliance	Disbursement Linked Indicators (DLI) monitoring	Project M&E (process and/or outcomes)	CE monitoring	Impact Evaluation	Proactive information disclosure
National Immunization Support FY16		■				■
Sindh Public Sector Management Reform FY15		■				■
Sindh Water Sector Improvement Phase 1 (AF) FY15	■			■		
Balochistan Integrated Water Resources Management and Development FY16	■		■			■
Third Punjab Education Sector FY16		■			■	■
National Social Protection Program-for-Results FY17		■	■			■
Sindh Irrigated Agriculture Productivity Enhancement FY15	■		■	■		
Sindh Agricultural Growth FY15	■		■			
Karachi Neighborhood Improvement FY17	■		■		■	
Enhanced Nutrition for Mothers and Children FY15			■	■		■
FATA Temporarily Displaced Persons Emergency Recovery FY16		■			■	■
Tarbela Fourth Extension Hydropower (AF) FY17	■		■			
Punjab Tourism for Economic Growth FY17	■					
Sindh Barrages Improvement FY15	■				■	■
Disaster and Climate Resilience Improvement FY15	■		■			■
Sindh Resilience FY16	■					■
Economic Revitalization of Khyber Pakhtunkhwa and Federally Administered Tribal Areas (AF) FY17			■		■	
Punjab Skills Development 2015		■		■		■
GPE—Balochistan Education Project FY15	■					■
TOTAL	**11**	**6**	**11**	**4**	**5**	**12**

As demonstrated in Table 11, 19 of Pakistan's 22 projects commit to some form of third party monitoring, involving more than one category in most cases. External monitoring of project-related activities (project progress, implementation, quality control, and similar aspects related to its process and/or results) is the most frequently cited category in half, or 11, of Pakistan's 22 assessed projects. Similarly, 11 projects (10 of which involved involuntary resettlement safeguard) also included third party monitoring for safeguards compliance. Six projects that incorporate Disbursement Linked Indicators (DLIs) commit to external monitoring for DLI achievement to ensure further disbursement of loans. Five projects commit to contracting third party monitoring to oversee or execute impact evaluations. A mere 18 percent, or only 4 of the 22 projects, commit to third party monitoring of certain aspects related to their CE activities, thus being the weakest category for external monitoring in the country. Figure 7 depicts these categories of third party monitoring commitments in Pakistan.

Figure 7. Classification of third party monitoring commitments, Pakistan FY15–17

The details regarding third party monitoring commitments across the various categories in Pakistan are further described in Table 12.

TABLE 12. Third party monitoring commitments, Pakistan FY15–17 (19 of 22 projects)

Project title	Category	Third party monitoring commitments
National Immunization Support FY16	DLI	DLI Certification: Institution of a comprehensive system of independent third party assessment of program performance will also be supported to verify achievement of DLIs. As requested by the Government of Pakistan, these Third Party Validations will be implemented by the Federal Expanded Program on Immunization (EPI) cell and the World Bank. The Bank shall contract a firm to undertake a yearly coverage evaluation survey and to validate program data generated in the districts, to be collated at the provincial and national levels.

Project title	Category	Third party monitoring commitments
Sindh Public Sector Management Reform FY15	DLI	Third party validations, wherever appropriate, will also be deployed to verify DLI results and also to assess performance of the intermediate results indicators.
Sindh Water Sector Improvement (AF) FY15	Safeguards, CE monitoring	The original project has also introduced an independent M&E system to assess the functioning and effectiveness of farmer organizations. To ensure quality assurance, area water boards (AWBs) are monitored by independent M&E consultants. The AF would continue to support M&E and supervision of the environment management plan and the social action plan. The current consulting services contract will be extended for the duration of the AF (supposedly third party).
Balochistan Integrated Water Resources Management and Development FY16	Safeguards, project monitoring	An annually conducted third party validation of Environment Management Plan (EMP) implementation. An independent consulting team to monitor and evaluate (i) implementation progress, including spot checking of works and quality of construction, and targeting of works as compared to agreed criteria; (ii) project impacts; and (iii) environmental and social impacts, particularly on small/marginalized and women farmers.
Third Punjab Education Sector 2016	DLIs, project monitoring, impact evaluation	Measurement of program implementation progress and performance on a regular basis through third party reviews, validations, and evaluations, embedded into the DLIs. Collection of survey and test data by a third party organization as part of impact evaluations to aid in evaluating behaviors.
National Social Protection Program-for-Results FY17	DLI, project monitoring	External verification of evidence for DLIs. Third party reviews covering various operational aspects are carried out regularly and disseminated.
Sindh Irrigated Agriculture Productivity Enhancement FY15	Safeguards, project and CE monitoring	An ICT-based M&E system will be established to improve monitoring of project outputs delivery, enhance transparency, and gather feedback of the project beneficiaries. This system will be managed by an independent third party M&E consultants team hired from the market. At the end of every 2-year period, the M&E consultant will conduct a third party verification (TPV) of the Environmental Impact Assessment (EIA) implementation and shall submit a detailed TPV report commenting also on the effectiveness of the EIA toward ensuring compliance with Bank safeguards policies.
Sindh Agricultural Growth FY15	Safeguards, project monitoring	A third party will be deployed for quality monitoring of works and compliance on social and environmental aspects. Annual TPV will also be conducted to validate compliance with the Environment and Social Management Frameworks (ESMF) and Resettlement Policy Framework (RPF), and implementation of related safeguard instruments.

Project title	Category	Third party monitoring commitments
Karachi Neighborhood Improvement FY17	Safeguards, project monitoring, impact evaluation	M&E will be conducted by a team of professional consultants who will monitor and evaluate project performance and impacts—including Environmental and Social Management Plans (ESMPs), Resettlement action plans (RAPs), and a gender action framework—during and after construction. M&E consultants will be responsible for (i) monitoring physical progress; (ii) M&E of the project impact; (iii) review and supervision of the environmental and social aspects of the project; and (iv) provision of guidance to management in early identification and resolution of problems in the project.
Enhanced Nutrition for Mothers and Children FY15	Project and CE monitoring	The project will support the timely generation, analysis, and use of data for decision-making through streamlined monitoring and evaluation systems. Data will also be collected by independent third parties, including on community satisfaction. Additionally, third parties will be contracted to verify annually the results reported through the routine system. The information obtained from the third party monitoring will serve to confirm the routine system data and will be used to issue performance-based payments.
FATA Temporarily Displaced Persons Emergency Recovery FY16	Impact evaluation, Results Framework indicators	A third party monitoring agent is proposed to be hired to provide additional input and bolster the project's M&E system. The agent will provide feedback on Results Framework indicators. Client M&E efforts will be complemented by the quarterly reports and an independent impact evaluation.
Tarbela Fourth Extension Hydropower (AF) FY17	Safeguards, project monitoring	Project will engage qualified consultants to conduct third party monitoring initially on a six-month basis to carry out an independent assessment and validation of ESMP implementation. They would also supervise implementation of the resettlement and social and environmental action plans and provide independent monitoring of various activities, as well as assess positive and negative impacts and propose alternatives to address any long-term or, during construction, social and environmental issues.
Punjab Tourism for Economic Growth FY17	Safeguards	The ESMF requires an annually conducted third party validation of site-specific ESMP implementation. The implementation agency does not have adequate skills to address the social and environmental issues of the project satisfactorily; it will hire dedicated full-time Social and Environmental Specialists (one each) to oversee environmental monitoring of ESMF and site-specific ESMPs and provide technical support to works' consultants in the development of site-specific ESMPs.

Project title	Category	Third party monitoring commitments
Sindh Barrages Improvement FY15	Safeguards, impact evaluation	Project will also finance the independent Panel of Experts (PoE), who will review, monitor, evaluate, and help guide the rehabilitation process with regard to the safety of the barrage. For project impact evaluation studies, independent third party consultants will be recruited who would be responsible for monitoring the project impact, as well as supervision of the safeguards implementation. They will review the baseline and then provide reports every six months on the progress on the indicators, as well any other issues that may arise during project implementation. The M&E consultants to be appointed under the project will have environmental and social experts and shall carry out intermittent third party monitoring of the implementation of the Social Management Framework, any resettlement against the proposed program, and the ESMP.
Disaster and Climate Resilience Improvement FY15	Safeguards, project monitoring	A third party will be deployed for quality monitoring of works and compliance on social and environmental aspects. Annual third party validation will also be conducted to validate compliance with the ESMF and RPF, and implementation of safeguard instruments such as RAPs and ESMP.
Sindh Resilience FY16	Safeguards, project monitoring	The project will engage entities for third party monitoring/validation to ensure that the required outcomes as per acceptable standards have been achieved. Innovative supervision strategies such as geo-referenced photographs and videoconferencing are expected to be utilized since the geographic scope of the project is widely spread. For environmental/social monitoring and evaluation, a consultant (for Resettlement Framework) will be hired.
Economic Revitalization of Khber Pakhtunwa and Federally Administered Tribal Areas FY17	Impact evaluation, project monitoring	Client M&E efforts will be complemented by the quarterly third party monitoring agent reports and an independent impact evaluation.
Punjab Skills Development FY15	DLIs, CE monitoring	To ensure the quality of data and verify DLI achievement, results are to be validated through TPVs. Specific third party independent monitoring activities will be carried out through the course of project implementation to verify results-based performance, such as evaluation of partnership agreements, employer satisfaction surveys, third party validations of enrollment and pass-out data, employment tracer studies, and monitoring of training providers.
GPE—Balochistan Education Project FY15	Safeguards	External monitoring will ensure that both construction and the operational-phase activities have been undertaken in line with the ESMP recommendations. TPV through an independent monitoring agency will be carried out on annual basis to evaluate the overall ESMP implementation progress, and to ensure that the mitigation measures are implemented as per mitigation plan. For TPV, environmental and social specialists having relevant expertise and previous experience will be engaged.

Third party monitoring appears in a majority of projects (19 of 22) in the Pakistan portfolio. Where this approach is combined with an explicit commitment to timely, proactive disclosure of reliable, relevant, and actionable findings, third party monitoring can contribute to informed citizen engagement. Of the 19 projects that intended to include third party monitoring, 12 projects committed to some degree of public information disclosure as shown in Table 11.

2.3.3 Commitments to proactive information disclosure

Proactive information disclosure entails letting the public know not just about the mere existence of a World Bank project but about its ongoing progress and outcomes. This enabling environment indicator therefore measures whether a project proactively releases results to the public, including those from CE efforts, over and above World Bank–mandated minimal requirements pertaining to social safeguards or Results Framework indicators. In other words, this indicator seeks to determine whether a project commits to "reporting out" its progress and results to the public rather than only "reporting up" to World Bank officials and, if so, how it commits to doing so. This is a crucial aspect of the enabling environment for CE because the capacity of project-affected peoples to shape a project increases when they are accurately and appropriately informed about implementation progress and achievement. Table 13 gives details of each project's disclosure commitments and their associated mechanisms.

TABLE 13. Proactive information disclosure, Pakistan FY15–17 (14 of 22 projects)

Project title	Proactive information disclosure commitments
National Immunization Support FY16	Improving Expanded Program on Immunization (EPI) functionality to enable regular dissemination of results to public and media. Mechanism: Not specified
Sindh Public Sector Management Reform FY15	Disclose Public Financial Management Reform Strategy and Sindh Tax Revenue Mobilization Reform Plan on project website with key information for public oversight. Mechanism: Website disclosure
Balochistan Integrated Water Resources Management and Development FY16	The project website and the transparent sharing of all project-related information, including complaints and independent complaint redress mechanism, will assist with citizen engagement. Mechanism: Website disclosure
Third Punjab Education Sector FY16	Data dissemination for public access; school performance information shared with school councils. Mechanism: Not specified
National Social Protection Program-for-Results FY17	According to project documents, information on program outcomes drawn from a multiyear third party impact evaluation has been disseminated publicly. Mechanism: Not specified
Enhanced Nutrition for Mothers and Children FY15	The official websites of the project in provinces will be developed for dissemination of key project information and evaluation reports. These websites will be launched soon after loan effectiveness. Mechanism: Website disclosure
FATA Temporarily Displaced Persons Emergency Recovery FY16	Dissemination of M&E report on a semiannual basis by the end of the project. Mechanism: Not specified

Project title	Proactive information disclosure commitments
Sindh Barrages Improvement FY15	Information dissemination regarding possible canal closures, citizens' engagement and feedback, and the implementation of safeguard-related action plans. Mechanism: Communication program
Disaster and Climate Resilience Improvement FY15	To inform the population about availability of mechanisms, such as grievance redress and information disclosure systems. Mechanism: Communication strategy
Sindh Resilience FY16	The project's website would be used to disclose and disseminate information on the status of evaluation, complaints, and actions taken. Mechanism: Website disclosure
Governance and Policy Program—Balochistan FY16	Public disclosure of citizen monitoring reports on service delivery on project website, which led to reopening of nonfunctioning schools. Mechanism: Website disclosure
Punjab Skills Development FY15	The project website will be used to widely disseminate information and third party evaluations to public and interested stakeholders. Mechanism: Website disclosure
GPE—Balochistan Education Project FY15	Regular reports generated and made public annually on selected indicators for schools. Mechanism: Not specified
Pakistan Financial Inclusion and Infrastructure FY17	The project will incorporate a CE feedback loop for micro, small, and medium-size enterprises by surveying a sample of beneficiaries using two CE questionnaires. The results will be shared with government partners, financial institutions, and other relevant stakeholders to inform the feasibility of overall project implementation. Mechanism: Not specified

Over half of the projects (14 out of 22), commit to voluntarily disclosing certain aspects of the project information for public oversight, in order to promote accountability and transparency. None of these projects, however, signal that they will be disclosing their respective operational manuals.

The *National Immunization Support* project commits to investing in M&E for regular dissemination of results to the public and the media for accountability, as well as third party evaluation. Similarly, the *FATA Temporarily Displaced Persons Emergency Recovery* project commits that once the project is rolled out, it will publicly disclose information about project activities. However, both these projects do not specify the mechanisms for sharing the information with the public.

Six projects (*Balochistan Integrated Water Resources Management and Development, Governance and Policy Program—Balochistan, Sindh Resilience, Punjab Skills Development, Sindh Public Sector Management Reform,* and the *Enhanced Nutrition for Mothers and Children)* pledge to disseminate project-related information, evaluations, and complaint mechanisms through their respective websites, but limited information is provided in the project documents in this regard. Notable outcomes in the *Governance and Policy Program— Balochistan* include the reopening of three schools in the Quetta district after citizen monitoring reported that they were not functioning.

Three projects lay down more concrete and ambitious plans regarding disclosure of information for public oversight. The *Third Punjab Education Sector* project commits to regular delivery of information through different channels on program implementation status, progress, and performance; open display at school of key information, such as school council grants and expenditures; and school performance cards. It aims to facilitate this data dissemination through biannual district report cards generated by the Project Management and Implementation Unit (PMIU) using core indicators. Public access will be provided to research conducted using the integrated data sets, and school performance information will be shared with school councils.

In the *Sindh Public Sector Management Reform* project, the Government of Sindh pledges to disclose the Public Financial Management Reform Strategy and Sindh Tax Revenue Mobilization Reform Plan on the project's website and to document and disclose comprehensive quarterly and annual Sindh Revenue Board progress reports on implementation. Key performance information on debt collection, appeals resolution, tax payer facilitation, preservice and in-service training conducted, annual taxpayer satisfaction survey for increased management, and public oversight will be disclosed. These transparency initiatives will purportedly help to implement the dormant Sindh Freedom of Information Act 2006.

Finally, the *Financial Inclusion and Infrastructure* project commits to incorporating a CE feedback loop for micro, small, and medium-size enterprises (MSMEs) by surveying a sample of beneficiaries through two custom-designed CE questionnaires given to a select subset of beneficiaries to assess overall satisfaction of services (including ease of access, quality, process, disclosure, responsiveness of needs, etc.). The results will be analyzed and drafted into a project report containing key recommendations to improve the project. It will be shared with government partners, financial institutions, and other relevant stakeholders and will inform them as to whether the overall project implementation is feasible. Again, the use of the term *relevant stakeholders* in project documents when talking about dissemination of information is ambiguous and may not necessarily include project beneficiaries. Figure 8 demonstrates the categorization of mechanisms used by various projects for proactive disclosure in Pakistan.

Figure 8. Mechanisms for proactive information disclosure, Pakistan FY15–17
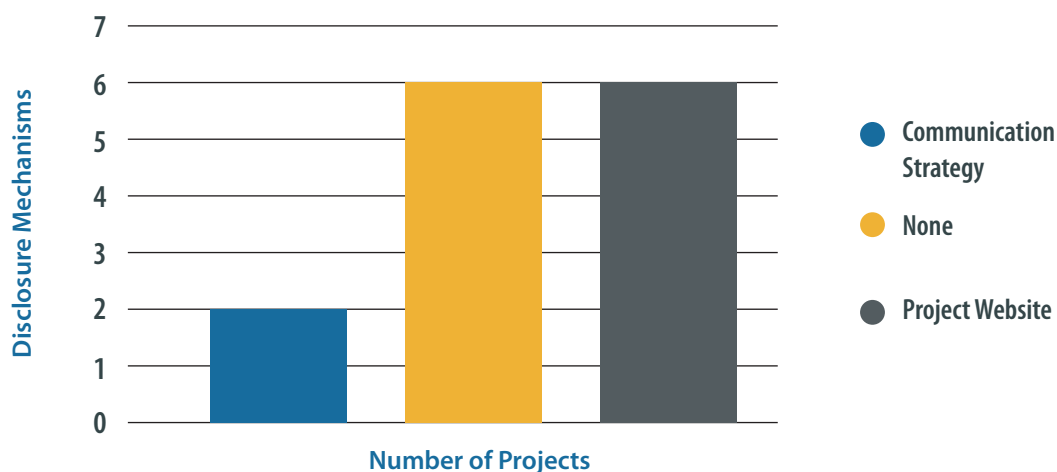
As represented in Figure 8, a majority of projects (six) that commit to disclosing project information to the public, rely on doing so via their websites. Two projects commit to such disclosure by adopting a communication strategy or plan. Six other projects that commit to proactive information disclosure in Pakistan fail to specify the mechanisms for doing so. As a result, there remains a question about how citizens will be ensured access to information about the projects, and how the projects consider the best options to inform and consequently engage citizens.

Third party monitoring for CE activities and public information disclosure

Given the importance of public access to accurate and timely project implementation information for fostering a conducive environment for CE, the ARC investigation examined whether and how projects planned to disclose information about the World Bank–prioritized CE activities or other enabling environment indicators. Significant for each of these areas, public disclosure has particular value for results collected by entities external to and potentially independent from project management. ARC's guiding hypothesis is that in projects where third party monitoring results are made public, this helps to advance a conducive or enabling environment by encouraging public accountability and transparency in project operations. As a result, these two areas are complementary and mutually reinforcing in creating an enabling environment for citizen engagement.

This assessment therefore delves further into the intersection of third party monitoring of CE activities and proactive disclosure commitments within projects across the Pakistan portfolio, and Figure 9 depicts the relationship between the two. In Pakistan, 12 of the 14 projects that committed to proactive disclosure also pledged commitment to some form of third party monitoring during the project lifecycle. Information that these projects commit to share with the public includes project data on progress or outcomes, third party assessments or evaluation reports, grievances and action taken, and CE monitoring and feedback (in some cases). Only two Pakistan projects commit to hiring a third party to monitor CE activities and to proactively disclose results publicly. This is depicted is Figure 9 with details provided in Table 14.

Figure 9. Intersection of third party monitoring for CE and proactive information disclosure commitments, Pakistan FY15–17 (2 of 22 projects)

KEY: 3PM(CE)—   **Third Party Monitoring of CE Activities**
        PID—   **Proactive Information Disclosure**
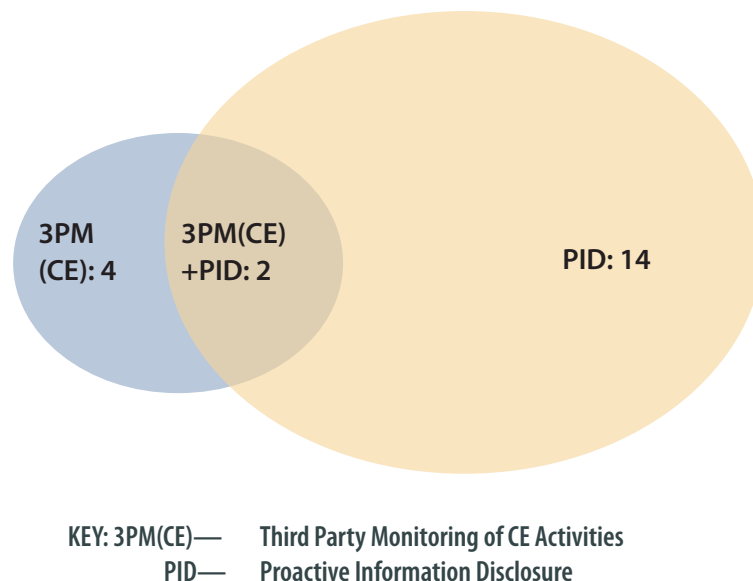
In Figure 9, the blue circle denotes the number of projects committing to third party monitoring of CE activities and the orange circle denotes proactive disclosure of project information. The overlapping circles depict the number of projects in Pakistan that commit to both third party monitoring as well as the proactive disclosure of information. Table 14 highlights the relevant project commitments made by these two projects in Pakistan.

TABLE 14. **Project commitments to third party monitoring of CE and proactive information disclosure, Pakistan FY15–17**

Project title	Third party monitoring of CE	Proactive information disclosure
Enhanced Nutrition for Mothers and Children FY15	Data will be collected by independent third parties, including on community satisfaction.	The official websites of the project in provinces will be developed for dissemination of key project information and evaluation reports. Mechanism: Website disclosure
Punjab Skills Development FY15	Specific independent third party monitoring activities will be carried out to verify employer satisfaction surveys, third party validations of enrollment and pass-out data, and employment tracer studies; monitoring of training providers.	The project website will be used to widely disseminate information and third party evaluations to public and interested stakeholders. Mechanism: Website disclosure

III. Conclusion

This report provides the first insights into whether and how the World Bank is incorporating CE commitments into the project design of 22 active Pakistan projects (FY15–17). The overarching findings from the seven World Bank–prioritized citizen engagement areas and the three ARC-identified potential areas for fostering an enabling environment are as follows:

3.1   World Bank-prioritized CE areas

Pakistan projects are proportionally spread across the CE Density Scale. Six projects constitute the Robust category, followed by five projects in the Comprehensive and seven projects in the Intermediate category. Four projects fall in the Weak category and there is no project in the Low category. Moreover, projects that commit to all three mechanisms for an enabling environment (12) are also spread across the portfolio, with seven in the Robust and Comprehensive categories and five considered Intermediate or Weak. Therefore, there does not appear to be a direct correlation between high levels of CE and EE commitments.

The quantitative analysis found that there is wide variation in how the 22 projects in Pakistan commit to integrating citizen engagement throughout the project lifecycle. At the highest level, there are three projects that commit to integrating CE at each of the seven stages prioritized in the CE Strategy, while at the lowest level there are two projects that include only two CE commitment throughout the project lifecycle.

Project commitments to collecting citizen feedback—the only CE category to which all the Pakistan projects committed—were both specific and concrete. All 22 Pakistan projects (100 percent) incorporated commitments to gathering citizen feedback during and following the project's implementation, using multiple mechanisms in 19 projects, and only 3 projects limited their commitments to a single feedback collection mechanism. The most commonly reported feedback mechanisms were periodic—in the form of consultations—rather than ongoing feedback mechanisms, followed by beneficiary surveys. While citizen feedback collection emerges as the strongest CE category, citizen monitoring turns out to be the weakest with only 6 out of 22 projects committing to operationalize it.

Project commitments across the three areas of collaborative decision-making, citizen monitoring, and CE capacity building lack clarity and specificity in mechanisms and execution plans. Twelve of the 22 Pakistan projects, or slightly more than 50 percent, commit to creating opportunities for citizen collaboration in project decision-making. However, only 6 of these 12 projects, or slightly more than 25 percent of the portfolio, provide information about the mechanisms through which this commitment would be carried out. Commitments to citizen monitoring, which is already the weakest CE category, involving only six projects, also follow the same trend—only three projects document specific roles and mechanisms through which citizen involvement in project monitoring would take place. Similarly, commitments to CE capacity-building efforts, documented in half of the portfolio (11), use rather simplistic language without elaborating upon what these efforts would involve.

Eight projects commit to including more than the minimum monitoring requirement of at least one CE indicator in their Results Framework, while six projects do not meet this minimum requirement. This indicates that individual project managers may drive CE agendas more than the institutional CE mandate. Only 16 projects have developed Results Framework indicators to internally monitor CE progress that will then be reported back to World Bank management. This means the remaining six projects (those with no Results Framework indicators) will not track any CE activities and have thus exempted themselves from the accountability related to tracking or disclosing even minimal information about their CE efforts, as mandated by the Bank's "corporate commitment." At the opposite end of the spectrum, there are seven projects that have adopted at least two indicators, and one project that includes three indicators, designed to measure distinct aspects of CE commitments. The fact that eight of the 16 projects go beyond the minimum requirement of one indicator, while six projects do not meet that requirement at all, reveals that individual teams, and not an institutional mandate, determine how projects pursue engagement with citizens.

Comparison of CE commitments across the FY15–17 projects do not show a clear trend in terms of change over time. For example, of the six projects that do not include a Results Framework indicator dedicated to reporting on CE results, four were approved in 2015 and two in 2017. The fact that one-third of the projects without at least one CE indicator are among the most recently approved, and therefore several years into the implementation of the CE Strategy, shows that this shortcoming cannot be explained by a lack of awareness of the Strategy and its mandates.

3.2   ARC-identified enabling environment indicators

Within proactive social inclusion, projects consistently commit to address gender, but not to other dimensions of social exclusion. All 22 projects commit to including women in the realm of their CE activities in some form, which drives the percentage of proactive social inclusion to 100 percent. However, this percentage drastically falls when considering other commonly socially excluded populations like the elderly, youth, displaced communities, the disabled, and the poor, who only find a passing mention in 8 of the 22 projects. Thus, the positive findings on proactive social inclusion in the Pakistan portfolio only speak to comprehensive attention to women (gender), but not to other vulnerable groups.

Commitment to third party monitoring is consistently high (86 percent) in the Pakistan portfolio. Nineteen of the 22 projects document a commitment to hiring third party entities to independently monitor project activities. If these 19 projects were to follow through with these independent monitoring commitments and publicly disclose the results, it could encourage informed participation throughout the portfolio. However, overall content analysis of these commitments shows a level of generality in many that suggests a risk of incomplete or inadequate implementation measures. Moreover, half of the projects (11) with this commitment utilize third party monitoring for social and environmental safeguard compliance and general project monitoring, while only 4 projects declare the intention for these external monitors to specifically monitor CE activities. Therefore, the extent of the commitments to third party monitoring in the Pakistan portfolio shows some potential, but the fact that the majority appear to be planned for limited compliance purposes, reveals that this may not contribute to creating an enabling environment for CE.

Proactive information disclosure commitments appear in more than half of the projects (64 percent) in Pakistan, going beyond the minimum World Bank mandates. The assessment on proactive disclosure seeks to determine whether a project commits to "reporting out" its progress and results to the public rather than only "reporting up" to Bank officials and if so, the ways in which it commits to doing so. Fourteen of the 22 projects declare the intention to publicly disclose information on aspects of project progress and results beyond what must be reported to World Bank management. Six projects pledge to disseminate this information through their respective websites, two via communication strategies, and another six through unspecified mechanisms. None of these 14 projects, however, signal that they will be disclosing their respective operational manuals, the main project document that provides detailed guidelines for how a project will proceed with its implementation. Therefore, even those projects with some transparency commitments prevent the public from accessing the most informative project document.

Twelve of the 14 projects that commit to public disclosure of project results also commit to third party monitoring. This is significant because if projects commit to proactive, timely dissemination of the findings, third party monitoring can potentially make an important contribution to informed citizen participation.

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Endnotes

1.   See   https://consultations.worldbank.org/Data/hub/files/consultation-template/engaging-citizens-improved-resultsopenconsultationtemplate/materials/finalstrategicframeworkforce.pdf, accessed 2 February 2019.

2.   The WBG encompasses five distinct international organizations including: **The International Bank for Reconstruction and Development (IBRD)** and **the International Development Association (IDA)**, which work primarily with governments; **the International Finance Corporation (IFC)** and **the Multilateral Investment Guarantee Agency (MIGA)**, which support private sector investment, and **the International Centre for Settlement of Investment Disputes (ICSID)**, which adjudicates investment disputes that arise international private sector companies and governments. This CE investigation focuses on the two government-serving WBG branches, **IBRD** and **IDA**, which together are most commonly known collectively under the umbrella moniker the "World Bank". This oftentimes confusing title of World Bank for just two of the five entities that comprise the WBG results because "the IBRD and IDA constitute the World Bank proper, while the ICSID, IFC and MIGA are 'afiliates' that 'are closely associated with the World Bank'" (Bebbington et al 2006:10). Owned and managed by its 189 country members, IBRD/IDA (henceforth referred to as the "the World Bank") provided 71 percent of the WBG's 2017 global financial assistance ($42.1 billion of the total $59 billion provided, World Bank 2017:4). The primary vehicles through which the World Bank provides financial assistance are autonomous projects, also called operations

3.   Induced participation is differentiated from organic participation, which can be spontaneous or, when organized, done so "by civic groups outside government, sometimes in opposition to it" (Mansuri and Rao 2013:xi)

4.   The CE Strategy describes categories of citizen engagement mechanisms as follows: *Consultations; GRMs; collecting, recording, and reporting on inputs received from citizens; collaboration in decision-making; citizen-led monitoring, evaluation, or oversight; empowering citizens with resources and authority over their use; and citizen capacity building for engagement* (Manroth 2014:31). The ARC assessment includes all CE Strategy categories except "empowering citizens without resources and authority over their use" for several key reasons. First, as described in the strategy, the only kinds of Bank projects that are in the position to implement mechanisms in this category are those designed to be community-driven development and therefore does not pertain to the majority of World Bank operations. By creating a CE category that only projects utilizing a CDD approach can fulfill, the strategy privileges this particular development model and creates a high-level category into which, by definition, no other types of projects could reach. Furthermore, this framing takes for granted that the kinds of participatory mechanisms that comprise CDD approaches will lead to empowerment among those participating in the project. Although this study does not discount the benefit of CDD approaches and the embedded participatory opportunities it creates, it does not accept the underlying premise that by their implementation empowerment is achieved (see Mansuri and Rao 2013). Therefore, the ARC assessment did not utilize this category, understanding that participatory mechanisms that are part of the design of CDD operations will be captured in the other categories.

5.   CDD is defined at the World Bank as "an approach that gives control over planning decisions and investment resources for local development projects to community groups" (World Bank 2018b).

6.   This assessment focuses on IPF operations, the subject of the World Bank's CE corporate mandate, but it includes one Program-for-Results (P4R) operation. P4R differs from IPF because, in principle, financing is dedicated to a client country's own development program rather than an autonomous World Bank project (i.e., Investment Project Financing "supports specific projects and disburses against specific expenditures and transactions" while P4R "supports government programs and disburses against results" (World Bank 2015:1). The P4R "disbursement against results" means that funds transfer depends upon the achievement of agreed upon interim results (DLIs—a financing mechanism IPF operations are now increasingly tilizing). Furthermore, P4R is not subject to Social Safeguard policies but instead must undertake Environmental and Social Systems Assessment (ESSA World Bank 2012:23). Although the World Bank is not monitoring P4R operations as part of the corporate mandate for citizen engagement, these operations are still of considerable concern for the public in borrowing countries. Since the World Bank has steadily increased its use of P4R financing since creating the instrument in 2012, it is important to also understand the opportunities (and/or obstacles to CE) that exist in P4R-based operations, and where relevant, ARC includes P4R operations in the analysis. See http://www.worldbank.org/en/programs/program-for-results-financing for more information.

7.   Pakistan does not legally categorize any of its different ethnic populations as "indigenous," and therefore this social safeguard (O.P./B.P. 4.12) does not apply in the World Bank's work in Pakistan.

8.   The World Bank requires that the outcomes for indicators included in a project's Results Framework be made public. However, the process by which these results are considered to meet this requirement is through biannual Implementation Status and Results Report (ISRs). These short documents, which typically include basic numerical reporting and minimal accounting of process or explanatory detail, are made available only via the project pages of the World Bank's website.