

ISLAMIC REPUBLIC OF PAKISTAN

**FATA Temporarily Displaced Persons
Emergency Recovery Project
(FATA TDP-ERP)**

GRIEVANCE REDRESS GUIDELINES





ACRONYMS

AFIS	Automated Fingerprint Identification System
ATM	Automated Teller Machine
CNIC	Computerized National Identity Card
CCT	Conditional Cash Transfer
CT	Cash Transfer
CMS	Case Management System
CWG	Child Wellness Grant
DG	Director General
DOH	Department of Health (FATA)
DQS	Data Quality Service
EAD	Economics Affairs Division
EPI	Extended Program on Immunization
FATA	Federally Administered Tribal Areas
FDMA	Fata Disaster Management Authority
FATA TDP-ERP	FATA- TDP-Emergency Recovery Project
GR	Grievance Redress
GCO	Grievance Counter Operator
HQ	Headquarter
HoF	Head of Family
LSG	Livelihood Support Grant
MIS	Management Information System(s)
MoU	Memorandum of Understanding
NADRA	National Database and Registration Authority
OSS	One Stop Shop
PMU	Project Management Unit
POS	Point of sale
PSP	Payment Server Provider
SOP	Standard Operating Procedure
UCT	Unconditional Cash Transfer
WB	The World Bank
PIN	Personal Identification Number
PIC	Public Information Campaign
PA	Political Agent
PT	Political Tehsildar



TABLE OF CONTENT

ACRONYMS.....	2
SECTION I BACKGROUND OF TDP-ERP PROJECT	4
BACKGROUND	4
Objectives of TDP-ERP	5
SECTION II GRIEVANCE REDRESS MECHANISM.....	6
Grievance Redress Management.....	6
OBJECTIVES.....	6
Types of Grants/Eligibility Criteria.....	7
A). Livelihood Support Grant (LSG).....	7
B: Child Wellness Grant (CWG)	7
Types of Grievances	8
Appeals.....	8
Registration of Appeal.....	9
Appeals for LSG	9
<i>Appeals for CWG</i>	9
Appeals for Inclusion in Program.....	9
Appeals Resolution by FDMA	9
Appeal Resolution - Timelines.....	9
Complaints	10
Policy on DUP/Fraud/ Alien	11
Complaint Resolution - Timelines	12
SECTION III ROLES & RESPONSIBILITY OF STAKEHOLDERS.....	13
NADRA.....	13
FDMA /FATA Sect/Political Administration.....	13
Payment Service Provider	14
Department of Health (DoH) Staff	14



Section I

BACKGROUND OF TDP-ERP PROJECT

BACKGROUND

In early 2009, the Government of Pakistan launched major military operations in the Khyber Pakhtunkhwa (KP) province and the Federally Administered Tribal Areas (FATA) of the country to root out the local pockets of militants. Starting from the valley of Swat, bordering the tribal areas, the military operations gradually moved westward. The offensive led to significant damage to physical infrastructure and services while creating a large population of Temporarily Displaced Persons (TDPs) who lost their homes and livelihoods. As a result, approximately 3 million people were displaced in KP and FATA in 2009. The militancy crisis affected not only the TDPs but also those who stayed behind, some of whom being just as poor and vulnerable as the TDPs.

In 2014, the Government of Pakistan led another operation called Zarb-e-Azab against the militants in five agencies of FATA. Since then, the operation in North Waziristan, Kurram, Orakzai, Khyber and South Waziristan Agencies has resulted in a large-scale displacement of the population from FATA reaching up to approximately 336,000 families. Most of the TDP families have settled in district Peshawar, Dera Ismail Khan, Lakki Marwat, Kohat and other parts of the KP province. These families have left behind their homes, properties, livestock and assets, and are currently living under difficult conditions either in camps or with host families.

To alleviate these challenges, the Government of Pakistan, National and International organizations are providing relief assistance to meet the immediate needs of the TDP families. In this regard, NADRA in collaboration with The World Bank, Economic Affairs Division (EAD), FDMA, DOH and other Government counterparts are in the process to launch TDP-ERP sites. NADRA as lead Implementation Entity is providing the Technical Assistance (TA) component in TDP-ERP project. NADRA in close liaison with EAD, FATA Secretariat, FDMA, DoH and other stakeholders shall establish One Stop Shops (OSS) in order to biometrically enroll, verify and facilitate payments i.e. Livelihood Support Grant (LSG) and Child Welfare Grant (CWG) to beneficiaries. Additionally, NADRA shall establish Grievance Redress Counters at each OSS to handle complaints and appeals lodged by beneficiaries.

The Grievance Redress and Case Management Mechanisms at the One Stop Shops (OSS) shall be dealt with in light of approved business rules and in coordination with concerned stakeholders. Each OSS established at Khyber, Kurram, Orakzai, North and South Waziristan Agencies will include designated Grievance Redress counters that would lodge appeals and



complaints to ensure that grievances of beneficiaries are smoothly managed; hence strengthening the overall program effectiveness.

Objectives of TDP-ERP

The main objective of the FATA Temporarily Displaced Persons Emergency Recovery Project (FATA TDP-ERP) is to provide LSG and CWG to all beneficiaries, after applying the approved business rules.

The general objectives are following:

- I. To support the return of Temporarily Displaced Persons of FATA by assisting the GoP in strengthening the implementation of FATA TDP-ERP and restoration of livelihoods and income support for affected TDP beneficiaries.
- II. To provide LSG and CWG cash grants to TDPs as per the Project Guidelines.



SECTION II

Grievance Redress Mechanism

Grievance Redress Management

Grievance Redress (GR) mechanism is an intricate part of TDP-ERP project and measure to ensure fairness and transparency towards returning TDP's. GR mechanism ensures that each eligible family returning to their native lands is provided with adequate financial means to assist them in restoring their livelihoods and introducing them to Child Wellness Package to facilitate health outcomes. In this regard, the design and implementation of an adequate Case Management System (CMS) is fundamental that complements a robust Grievance Redress mechanism for FATA TDP-ERP beneficiaries. Through this mechanism, beneficiaries shall be able to submit grievances concerning to Enrolments, Verification, LSG/ CWG payments, **INCLUSION** and the quality of services, in a highly organized and apt manner. These guidelines further supplement the Operational Manual for the FATA TDP-ERP.

OBJECTIVES

The FATA TDP-ERP envisages a Grievance Redress and Case Management system that:

- Guides concerned stakeholders (i.e. NADRA, FDMA, DOH FATA, Payment Service Provider(s), Local Administration and Beneficiaries) on their key functions, roles and responsibilities to resolve beneficiaries' complaints in relation to enrolment, payments and quality of service, and updating household information.
- Lodge (NADRA) and resolve (FDMA) appeal of non-beneficiaries as well as Next of Kin cases.
- Enables beneficiaries and non-beneficiaries to understand the procedures to lodge GR cases and complaints.



Types of Grants/Eligibility Criteria

Mainly two types of grants are available for returning TDP's as follows:

A). Livelihood Support Grant (LSG)

This grant is provided to only those beneficiaries that are part of the FDMA list generated at the time of provision of Early Recovery Grant (ERG). The CNIC of the potential beneficiary, for LSG shall be verified through NADRA's database as under:

- I. CNIC must be Unique and Part of FDMA TDP lists.
- II. CNIC must be Valid.
- III. CNIC must be clear in NADRA database (not marked as suspect, alien, fraud, Dup).
- IV. CNIC must be Unique within Family.
- V. Permanent and Temporary address on the CNIC must be from the affected area of FATA (identified and notified by FDMA).

B). Child Wellness Grant (CWG)

CWG is provided to those beneficiaries that possess a CNIC having both (permanent and temporary) addresses of a notified agencies of FATA in case of non TDP beneficiary. Both TDPs and non TDPs should have children between the age of 0 and 24 months to be considered eligible for CWG. The CNIC of the potential beneficiary for CWG shall also be verified through NADRA's registration database as under:

- I. CNIC must be Valid.
- II. CNIC must be clear in NADRA database (not marked as suspect, alien, fraud, Dup).
- III. CNIC must be Unique within Family.
- IV. Permanent and Temporary address on the CNIC must be from the affected area of FATA¹.

Note:

- a) The beneficiary should be the member of family (unique within family) belonging to and having both temporary and permanent addresses on CNIC from the affected area of FATA. In case of the TDP the first instalment amount shall be paid for LSG and the beneficiary can further proceed for CWG payment on first visit if he/she are fulfilling all other rules.
- b) The CWG or top-up to the base amount shall be admissible depending upon attendance in child wellness session by the mother of the child(ren) under the age of 2 years for both TDP families and those non -TDPs with both addresses on CNIC from affected area.

1. Affected areas are notified agencies of FATA that are South Waziristan, North Waziristan, Kurram, Orakzai, Khyber.



Types of Grievances

Appeals

These are grievances related to eligibility where a household has not been included as “Beneficiary” in the FDMA list² and the household feel that they fulfill the eligibility criteria mentioned in the preceding sections. Potential beneficiaries are entitled to appeal, if they believe they are unfairly excluded from the program. For this purpose, the applicant should submit the appeal in person at the relevant Grievance Redress Counter of the OSS manned by NADRA. In addition to holding a valid CNIC, the basic eligibility criteria (i.e. Clear in NADRA database, both addresses from Affected Area etc.) for grant(s) being claimed shall be applicable at the time of lodging an appeal at GR counter. FDMA GR coordinator will be responsible for the validation of appeals from concerned Political Administration. In this regard, appellant can be asked to provide relevant evidence to prove his/her eligibility. Verified appeals will be uploaded by FDMA GR Coordinator on given MIS. An Appeal will be processed as follows:

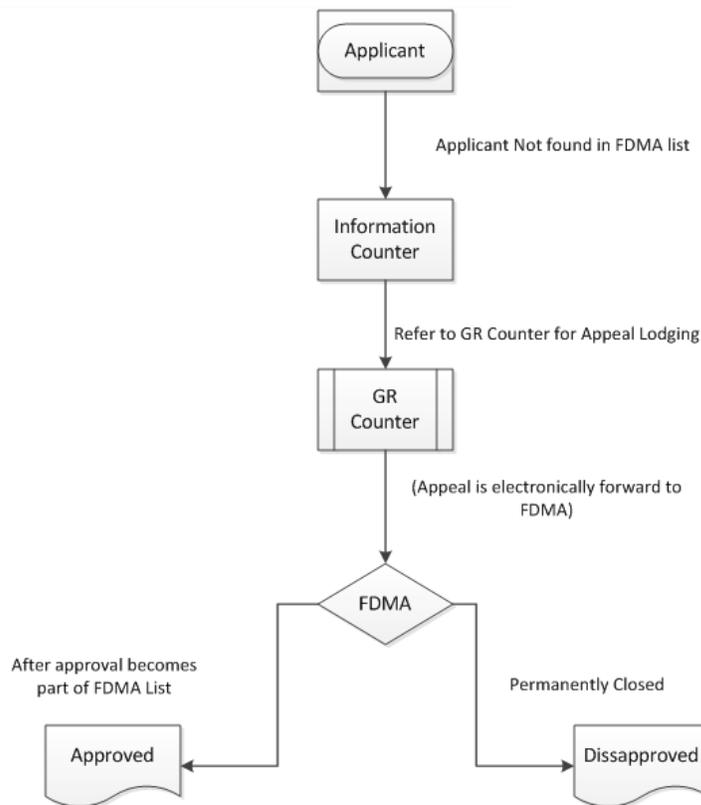


Figure 1.1 - Process Flow for Appeals through CMS

2. FDMA List means particulars of registered TDPs of affected areas electronically communicated to NADRA by FDMA



Registration of Appeal

1. The Appeal is submitted by the concerned appellant at the Grievance Redress Counter located at OSS where the Appeal will be registered and recorded by the NADRA officer.
2. At the time of Appeal lodging in CMS, NADRA shall check that CNIC of appellant is Valid, Not Marked as Dup, Fraud, Suspect and the addresses on CNIC are from the affected area. Appeals satisfying above mentioned business rules will be forwarded to FDMA for further verification/inclusion electronically. CNIC number shall be used for tracking of any appeal(s)/complaint(s) lodged in the system.
3. The system shall electronically forward all Appeals to FDMA for validation. Furthermore, CMS will display the accepted and rejected appeals counts.

Appeals for LSG

Beneficiaries can lodge an appeal to receive LSG. Moreover, applicant(s) can lodge an appeal under next of kin category, in case the eligible LSG Beneficiary (TDP only) is deceased during the tenure of the program. These appeal(s) can be lodged by next of kin claimant(s) at the OSS.

Appeals for CWG

All applicants fulfilling the eligibility criteria and conforming to the conditions of CWG shall be eligible to receive the grant by registering at the OSS. However, if a registered CWG beneficiary is deceased during the tenure of the program, appeal shall allowed to be launched at GR counter established at the OSS under next of kin category.

Appeals for Inclusion in Program

A displaced person belonging to the affected area and not included in FDMA List of TDPs may be allowed to launch an appeal, if the claimant fulfills the basic eligibility criteria (i.e. Clear in NADRA database, both addresses from Affected Area etc.). These appeal(s) can be lodged by claimants at the OSS. The timeframe for allowing lodging of such appeals shall be decided by EAD in consultation with relevant stakeholders. Federal Government reserves the right to allow/disallow lodging of such appeals during the tenure of the program.

Appeals Resolution by FDMA

All appeal(s) shall be forwarded to FDMA for verification and decision. All such appeal(s) may be verified by FDMA through concerned Political Administration. The appellant(s) may need to provide additional documentation to FDMA office/rep in concerned Agency.

Appeal Resolution - Timelines

All lodged appeals shall be resolved by FDMA within 30 working days.



Note:

1. Each TDP family is eligible for 01 X benefit in conjunction to eligibility criteria. In case of more than one appellant from the same family lodge appeal(s) to receive grant(s) under the program, then in such a case FDMA through political administration shall decide and approve only one case while the rest shall be disapproved by FDMA.
2. Similarly, in case of human error where an approval is granted for multiple appeals from the same family by FDMA, in such case NADRA shall only process the first electronic approval received from FDMA for the benefit.

Disclaimer: NADRA shall not be liable for any error or wrong decision made by concerned stakeholders that may result in either inclusion or exclusion of beneficiaries/non-beneficiaries from the program.

Complaints

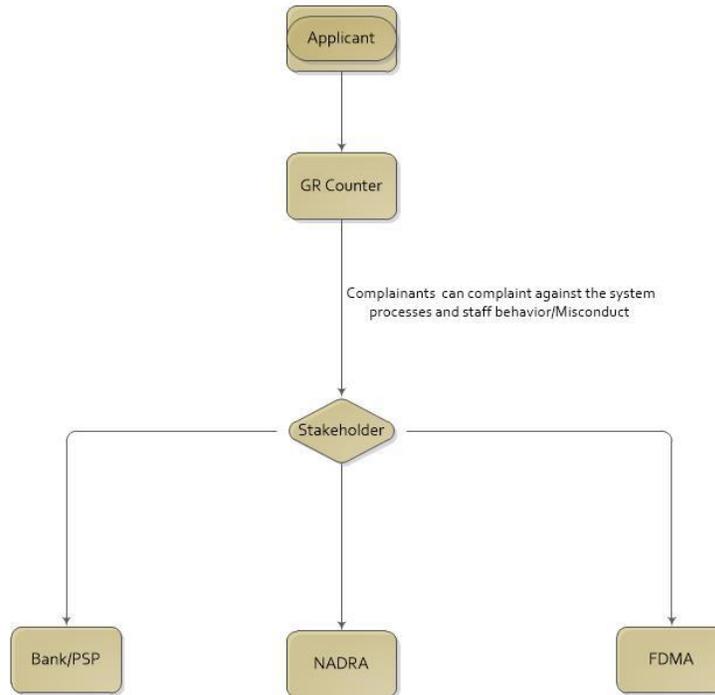
These include grievances against the system or processes which have been put in place to assist the applicants/beneficiaries but are not functioning properly or catering to the complainants' needs. These can both include complaints against the enrolment and payment processes, and may also include complaints on behavioral issues, malpractices / bribery, etc.

Complaints involve the inconveniences that beneficiaries experience in the quality of service and payment system delivered by the Project. These inconveniences affect the Project's efficiency and limit the control of processes. Complaints can be lodged and tracked through CNIC as follows:

- I. At the Grievance Redress Counter which will have representatives of NADRA;
- II. Through telephone calls to Helpline.

All complaints related to TDP ERP program and concerned stakeholders shall be dealt through either telephone (help line) and / or by registering the complaint at the GR counter at the local OSS. These complaints will be systematically documented and the action that is taken will be recorded and reported. All complaints will be registered in Case Management System (CMS) developed by NADRA.

Complaints Process Flow



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Page 1

Figure 1.2- Process Flow for Complaints through CMS

Beneficiaries may submit complaints during the Project’s implementation regarding, for example, the following issues:

- I. Information/status request
- II. CNIC Update request
- III. Service request
- IV. General complaints.

As a last resort for unanswered grievances or maladministration, the Federal Ombudsman is available to the public to settle disputes. The Federal Ombudsman is empowered to investigate the affairs of all Federal agencies; it should provide administrative justice where there is poor service delivery or lack of quality in governance by the Federal Government.

Policy on DUP/Fraud/ Alien

It needs to be clarified that if any person is marked DUP/Fraud/Suspect after receiving any tranche of LSG, NADRA will electronically intimate the partner bank to stop the remaining payments. The beneficiary would be asked to visit NADRA’s Registration Centre to clear his/her record. Only when the beneficiary is cleared from NRC would he/she be eligible for



benefit. Similarly, the record of beneficiary would be automatically updated and the beneficiary can visit OSS to receive the benefit.

Note: In case of **biometric failure** at the enrolment counter. The counter representative would ask the beneficiary to approach the GR counter; where he would be asked to visit NADRA's registration centre for updating his/her biometrics.

Complaint Resolution - Timelines

All complaints shall be resolved by concerned stakeholder within 30 working days.



Section III

Roles & Responsibility of Stakeholders

NADRA

NADRA shall ensure the following roles and responsibilities in lieu of the Operation Manual:

- Establish grievance counters at all OSS in coordination with FDMA/FATA Secretariat and Political Administration.
- Collaborate with relevant stakeholders for resolution of grievances.
- Develop and maintain the case management module for FATA TDP-ERP including MIS reporting.
- Provide Grievance Counters and workforce to register grievances within case management system.
- Electronically share all registered appeals with FDMA on daily basis through MIS
- NADRA shall establish a Helpline number for beneficiaries to register grievances and provide information about the program.

FDMA/FATA Sect/Political Administration

- Facilitate NADRA in setting up grievance counters at OSS for lodging grievances.
- Provide dedicated resource for the review and redress of the forwarded GR cases as per the approved case management guidelines.
- Responsible to resolve GR cases within stipulated time.
- Electronically share feedback of all resolved cases with NADRA to update on central database.
- Coordinate with PA/PT offices for grievances resolution if relevant.
- Ask beneficiary to provide supporting documents, if deemed necessary.



Payment Service Provider

- Nominate a focal person for the review and redress of the forwarded grievances as per approved case management guidelines.
- Facilitate beneficiaries in resolution of payment related complaints e.g. lost ATM card/ Personal Identification Number (PIN) or corrupt/rent seeking behaviour associated with a bank staff member.

Department of Health (DoH) Staff

- Nominate a focal person for the review and redress of the forwarded grievances as per the approved case management guidelines.
- Facilitate beneficiaries regarding Child Wellness Grant (CWG)/ immunization relevant queries and awareness sessions.