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Acronyms and Abbreviations

AT	Assessment Team
DOP	Declaration of Principles
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
ESS	Environmental and Social Standards
FGD	Focus Group Discussion
GDP	Gross Domestic Product
GRM	Grievance Redress Mechanisms
GS	Government Secretariat
LAP	Land Administration Project
LGU	Local Government Unit
LWSC	Land and Water Settlement Commission
MoFAE	Ministry of Foreign Affairs and Expatriates
MoWA	Ministry of Women's Affairs
NLPF	National Land Policy Framework
PA	Palestinian Authority
PLA	Palestinian Land Authority
PLC	Palestinian Legislative Council
PLO	Palestine Liberation Organization
PMO	Prime Minister's Office
SIA	Social Impact Assessment
SLR	Systematic Land Registration
SMP	Social Management Plan

1. Introduction

1.1. Background

1. Land is one of the most valuable assets in Palestine. Competition for urban land has resulted in land prices that are amongst the highest in the region. Land tenure in Palestine, as in much of the region, reflects a gradual and deliberate withdrawal from public land ownership toward privatization. Until 1948, Communal, or Mashaa, land was predominant, whereby each inhabitant in a village was allotted an equal portion of arable land, and periodic reallocation[1]. Uncultivated lands were registered by Israel as state land after its occupation of the West Bank in 1967, which was then used a pretext for the establishment and expansion of Israeli settlements in the occupied West Bank. By 2002 about 40 per cent of the West Bank had been declared state land on which about 90 percent of the settlements were established[2].

2. Prior to the Israeli occupation of the West Bank, approximately 30 per cent of land was surveyed or registered by the Jordanian authorities Following the Israeli occupation of the West Bank in June 1967, systematic land registration and new legislation were both halted. The land registry was closed to the public, and systematic registration was suspended. The land administration functions (land adjudication, surveying, registration, and public land management) were scattered among different entities. After its establishment in 1994, the Palestinian Authority recovered three sets of land records (Ottoman, British and Jordanian), with transactions registered according to the system in which the land was originally recorded. It is worth noting here, that large swathes of land registered during the Jordanian –and particularly- the Ottoman authorities was registered as state land due to the reticence of citizen to claim ownership of these land of fear of having to pay taxes, especially since tenure security was protected by customary land-use laws in place at the time.

3. The current legal framework governing land-related issues in the Palestine is highly complex and relies on multiple laws and regulations from previous periods, including: Ottoman, British Mandate, Jordanian (in the West Bank), Egyptian Administration regulations (in Gaza), Israeli Military Orders, and, since 1994, laws promulgated by the PA. Land administration and management laws applicable in the West Bank and Gaza consist of tens of laws (at times differing between West Bank and Gaza) and reflect a mixture of common and civil law principles, which at times contradict each other. These inconsistencies and fragmentation within the sector have contributed significantly to the low levels of registration in the West Bank. Despite some modifications and updates by the PA, the overall land-related legal framework remains dated, unconsolidated, and inconsistent within itself and across jurisdictions. The existing laws address most aspects of land-related issues to varying degrees, including but not limited to: registration, immovable properties, inheritance, zoning, irrevocable powers of attorney, public land, and ownership of condominiums and apartments.

4. In the West Bank, Land settlement and registration is carried out under the Land and Water Settlement Law (No. 40 of 1952) and its amendments, which became applicable to the West Bank under Jordanian Administrative rule (1950-1967). In an effort to revamp and expedite systematic land registration, the Land and Water Settlement Commission was established through decree law (Law Number 7 of 2016) in March 2016 as a separate agency from the Palestinian Land Authority (PLA), which was responsible

[1] Warriner, D. 1948. Land and poverty in the Middle East. London, Royal Institute of International Affairs.
[2] Forni, N. 2003. Land tenure policies in the Near East. In: Land Reform- Land Settlements and Cooperatives. FAO, 2003/1. Rome

for land settlement and registration until then. A settlement judge was placed as the head of the agency and several staff were seconded from the PLA in addition to the appointment of new staff. The LWSC has adopted a decentralized approach to the land registration process by partnering with Local Government Units (LGUs) to complete settlements surveys. The PLA remains responsible for receiving and recording land titles issued by the settlement activities (undertaken by LWSC) and ensuring that they meet the spatial and legal requirements of the PLA for registration. A Unified Procedures Manual has been put in place in February 2018 to govern the settlement, cadastre, and registration activities of both the LWSC and PLA. The Manual, which has been prepared internally by LWSC, provides some detailed procedures and identifies minimum standards for land settlement activities and property registration, yet it remains a guiding –not a legally binding- document.

5. Since its establishment in 2016, LWSC had demarcated and registered close to 1.3 million dunums across the West Bank, with the majority of progress taking place in between 2018-2019. Support for land settlement and registration is very high, as land settlement and provision of land titles has resulted in positive economic and social impacts, including improving tenure security, for women and those without land title or documentation in particular.

6. The World Bank is working together with the PA to implement a Real Estate Registration Project (hereafter, the project) whose objective is enhance tenure security and improve real estate registration services in the West Bank. These objectives will be achieved through advancing systematic registration of properties in Areas A and B of the West Bank and improvements in real estate services. The project will support ongoing systematic approach comprehensively benefits citizens, businesses including small and medium enterprises (SMEs), and public entities through real estate registration and improvement of real estate services.

1.2. The Role of the Social Management Plan (SMP)

7. Under the project for which this Social Management Plan (SMP) is prepared only parcels are eligible for funding that do not require land take. Under the project's restructuring this remains the same and OP 4.12 will not be triggered, However, eligibility criteria was expanded under the project's restructuring to finance specific land taking cases concerning parcellation and the establishment of rights-of-way/access roads at the request of the owners based on the voluntary nature of land contributions by the parcel owners without any request for compensation, along with demonstrable benefits accruing to the landowner as a result of parcellation, provided that all required supporting documentation that attest to the voluntary nature of the contribution is in place to ensure transparency and accountability of these cases as part of the eligibility criteria and reimbursement process.

   The project will not support the titling of properties in the name of the State that would result in evictions. The project will support the PA to register property in Areas A and B that do not require the acquisition by the State of land to establish rights of way/access. Some Local Government Units do land adjustments for land registration based on the existing laws,

including: (i) parcel reshaping to make parcels more usable; and (ii) expropriation to establishing rights of way and access.

8. Given no parcel which requires land is excluded from funding under the project and there are no environmental issues related to land registration, OP 4.01 has been triggered for this project (but not OP4.12)but instead the Social Impact Assessment (SIA) was prepared as the basis for the SMP to document social risks related to the project and to provide necessary mitigation measures to address them. The main social risks related to land registration include (i) the possible exclusion of those without land title or documentation; (ii) possible disputes between land users and landowners that could manifest once the land is registered; (iii) possible conflict between family members; (iv) the risk of the exclusion of some of the most vulnerable groups, including female members of the households at the time of land registration; and (v) competing claims on land at the time of registration.

9. Specifically, the SMP is prepared to:

- Ensure gender and vulnerability are fully integrated into the various activities of the proposed project, Document actionable recommendations to be implemented by the project to mitigate the social risks, including those related to land settlement and registration and enhance inclusiveness, particularly for the most vulnerable groups identified by the SIA.
- Identify key stakeholders based on the SIA and provide a stakeholder mapping to categorize different stakeholders' groups based on the SIA findings, who will benefit (directly or indirectly) from the project, may lose from the project, or may be excluded from the benefits of the project all together.
- Provide analysis of groups that are vulnerable to exclusion from project benefits. Based on the analysis, detail reasons for vulnerability, and discusses elements in the proposed projects that would contribute to or compound vulnerability. The analysis includes a brief description of vulnerability, including demographic and socio-economic traits, and the interplay of these traits with the legal framework guiding land inheritance for women as well as the customary laws and traditions influencing inheritance.
- Provide analysis of national and customary laws regarding land take at the time of land registration for the creation of the access roads, draw comparisons between them and the requirements of the OP 4.12 and identify gaps.
- Provide mapping and analysis of the institutional setting. The SMP maps and analyses the roles and responsibilities of the main implementing agencies vis a vis the project and implementation of the SMP.
- Suggest grievance mechanisms based on the findings of the SIA.
- Provide costed recommendations for the management of social risks and implementation and monitoring of SMP. Specifically, the SMP offers specific recommendations (including costs and timelines) to be implemented by the project to mitigate and manage social risks, and strengthen complaints mechanism, including ways to consult with targeted communities to ensure the principles of inclusion, information dissemination and participation are adhered to.
- Include the consultation and information dissemination processes and plans.

9. The SMP presents the commitments of the Project to comply with the policy principles and standards to which the PA/LWSC holds itself accountable and presented in the SMP. This SMP reflects LWSC's commitment to:

   - Avoid, and where avoidance is impossible, mitigate adverse impacts to people and the environment within the framework of systematic land settlement and registration, including through:
     - defining and communicating safeguards that the project will put in place to mitigate and manage social risks;
     - ensuring effective community engagement and participation in the settlement process, including in dispute resolution and validating of tenure claims;
     - where needed, developing plans to address social impacts
     - monitoring social impacts as part of Project interventions and adapting the Project accordingly; and
     - establishing accessible and effective grievance mechanisms;

   - Enhance equitable and inclusive access to development benefits of systematic land settlement and registration; and

   - Give due consideration to vulnerable populations, groups, and individuals (including women, children, and people with disabilities, and people marginalised by any other virtues), local communities, and other marginalized groups of people and individuals that are affected or potentially affected by Project activities.

2. Land Use and Tenure in the West Bank in Context

10. Land use in Palestine may be characterized by limited arable land and shifting land uses, primarily in the form of urbanization leading to conversion of agricultural land, all driven by population growth and growing scarcity of water which is exacerbated by climate change. Agriculture has been losing substantial ground in terms of productivity, employment and contribution to gross domestic product. The share of the agriculture sector has declined from 12 to 2.9 per cent between 1994 and 2016, while agricultural productivity was cut by half over the same period. These trends have created a lack of jobs for those entering the workforce, and stubbornly high rates of unemployment. Private investment levels, averaging about 15 per cent of GDP in recent years, have been low and concentrated in low-capital and low productivity activities less affected by political risk. Consequently, the services sector currently accounts for close to 51 per cent of GDP, which is unhealthy because of the limited room for further expansion.

11. Palestinian land ownership has two main characteristics: first it is widely prevalent with an estimated 80 percent of all Palestinians owning some land; second land properties belong collectively to extended families that have occupied the land for a number of generations. Through inheritance, family land ownership has become fragmented with the original parcel of family land owned by a large number of heirs.

12. Current land tenure in Palestine falls under five categories, namely: (1) privately owned land that is registered and documented either in the name of individuals or entities; community owned land, which is commonly cropland without any written title; (2) abandoned land within or in the proximity of built-up areas and whose right of use gets registered to the community. These lands can only be used for the public benefit. (3) state land-*miri*, which is typically croplands close to inhabited areas and sometimes privately operated; (4) *Waqf* land, which are lands owned by the Islamic Awqaf

Department and Christian churches; and (5) abandoned land not in the proximity of built-up areas that is not used or owned by anyone.

13. Property valuation in Palestine is in a very underdeveloped state. There are no full-time qualified valuers either in the private sector nor in the public sector, a unified methodology for property valuation is lacking, and legislation from the British Mandate era that requires licensing of valuers exists but is not enforced. There is neither quality control nor compliance with international valuation standards. As such, the process is believed to result in registration of lower-than-market values, and may have negative consequences for vulnerable land owners. No reliable, objective data sources are available as the basis for estimating real market values of properties or for analyzing market trends. The current process, together with non-harmonized valuation practices, has an impact on available market information, the expansion of the property market, the risks of investment, and, when agricultural lands are reclassified as urban development lands, on equity of property taxation.

14. With support from the Word Bank's Land Administration Projects (LAP I and LAP II), an extensive policy review was undertaken in order to address consolidation and harmonization of land policies and the corresponding laws. The National Land Policy Framework (NLPF), which consisted of 32 policy statements, was prepared and approved by the Cabinet in April 2008. It covered areas relating to land management, land tenure and access, institutional responsibilities, land markets, land dispute resolution, and land administration. A legal framework of four draft laws were drawn up to accompany the policy framework: (i) Land Rights Law; (ii) PLA Law (Land Authority Institutional Framework); (iii) Land Registration Law; and (iv) Eminent Domain Law. Despite approval by the Ministry of Planning at the time when these laws were prepared, little action has been implemented so far from the proposed policy reforms, and the draft laws are not in effect.

15. More recently, in March 2016 the Prime Minister's Office (PMO) drafted the Road Map for Reforming the Palestinian Land Sector (Road Map), to demonstrate the seriousness of the PA to implement short and long-term sector reforms. The Road Map, which was approved by the Cabinet in September 2017, outlines a comprehensive, multiphase, multi-stakeholder approach to reforming the land sector, including the specific policy, legal and institutional reforms needed. The document addresses the following Key Land Reform Pillars: (i) completing systematic registration for Areas A and B; (ii) institutional reform of land sector agencies, including governance arrangements; (iii) transparent, effective, and accountable management of public land; (iv) property tax reform; (v) establishing a national spatial data infrastructure; and (vi) preparing an inventory and mapping rights in Area C.

16. Nearly everyone in the fast-growing and young Palestinian population has basic education, including girls. However, due to the confluence of stubbornly high structural unemployment, protracted economic stagnation, and social attitudes, female participation in the labor force is among the lowest in the world, with only 14 per cent of women (against 67 per cent for men) formally employed, a large proportion of them in low paid jobs. The gender gap in the labor market is reflected in women's lower access to land. Only 7 per cent of women own a house or real estate property, compared to 57 per cent of men.[3] These statistics have recently drawn attention to the issue of inheritance

[3] "Cross-Sectoral National Gender Strategy: Promoting Gender Equality and Equity 2011-2013", Palestinian National Authority, Ministry of Women's Affairs & United Nations Women.

and women often not receiving their fair share, however, the problem is often more of a cultural dilemma than a legal one.

17. **Land Acquisition and Access:** While there are no consolidated global figures on how Palestinians access land tenure, stakeholder interviews conducted within the framework of the SIA suggest that it is not infrequent that the overwhelming majority of land is acquired by men and women through inheritance, especially in rural areas where women are less likely to have a source of income to accumulate personal wealth. Similarly, there is strong evidence that inheritance is the key avenue for women to acquire independent ownership of land and property in both rural and urban areas, pointing to the importance of better understanding, for the purposes of this assessment, how to ensure that systematic land settlement and registration procedures do not overlook women's inheritance rights.

18. **Land Inheritance:** In Palestine, inheritance distribution is governed by Sharia Law, where the proof of inheritance is documented through a Legacy Restriction Certificate issued by the Chief Justice of the Sharia Court at the request of the living beneficiaries. This certificate shows the valid beneficiaries and the shares to which each are entitled under the Sharia Law. Generally, beneficiaries are blood relatives or are spouse(s) of the deceased. Automatic beneficiaries are the parents, spouse(s) and children of the deceased. Where the deceased does not have a living son or father, part of the estate may go to other non-automatic beneficiaries (grandparents (except mother's father); siblings, son's children; uncles on the father's side; nephews; and male cousins). The Inheritance Distribution Certificate is a key document in the land settlement and registration process.

19. Women who inherit land have full ownership rights by law. Under Sharia Law, a woman's inheritance share is generally half of that of man, although in some cases, they may have equal or an even bigger share than a male relative: a son takes double the share of a daughter. If there is no brother, a daughter gets half a share. It is legally hers to manage, control, and to dispose it as and when she wants. Till a daughter is not married, she enjoys the right to stay in her parents' house and seek maintenance. In case of a divorce, charge for maintenance reverts to her parental family after a period of approximately three months is over. However, if her children are in a position to support her, the responsibility falls on them. In the event of the death of her husband, a widow gets the one-eighth share (in case there are children) but will get one-fourth share (if there are no children). If there is more than one wife, the share may come down to one-sixteenth. Muslim women's lesser rights in inheritance in Islam are often justified by their lesser financial responsibilities for the maintenance of the family.

20. The patriarchal hierarchy can be considered as much a marker of the Christian communities as it is of the Muslim communities across Palestine. The general perspective in both communities is such that wealth should be kept within the male line of the family and women should not disseminate it upon marrying. Land is valuable to both Christians and Muslims, and similar strategies are developed to keep control of the land within the male line of the family. This is increasingly more important within an environment in which land fragmentation is increasingly widespread as a consequence, and given that there is no clause within the canon laws of the Christian churches of Palestine concerning the distribution of shares, Christian communities adhere willingly to Islamic laws for matters of inheritance. This notwithstanding, a frequent practice among Muslims and Christians alike is to either deprive girls of the half share of the inheritance accorded to them under Shari'a, or to relegate their inheritance to lower value property.

21. Customary inheritance rules and male-dominated practices that shape customary dispute-resolution mechanisms add a layer of complexity that, in some contexts, render the condition of women even more difficult. The SIA found that *mukhtars* (family leaders and clan elders) and *islah* men (traditional mediators) are often part of the extended family of disputants and therefore have a personal interest in the disputes, making them less impartial and effective. In some communities visited by the team, these family leaders and clan elders were also part of the local committees established to support the settlement process at the local level. However, in spite of the visible shortcomings, customary dispute-resolution mechanisms continue to be seen by women as filling many of the gaps in the formal system, providing a viable – although imperfect – solution to land and property rights conflicts for the short to medium term.

22. Although Palestinian women have a fairly good knowledge of their inheritance rights and wish to claim them, they are not fully aware of how to claim them within the framework of systematic land settlement and registration activities and the consequences for doing so are high. Women face the risk of being cut off from their families or creating frictions and divisions within the families, which is a major deterrent. Family is a very important safety net in Palestine, especially as women often return to their family or origin in the case of divorce or widowhood, and brothers are expected to be women's life-long protectors. Losing this contact may have very serious consequences for women and is why many women are reluctant to claim their rights.

23. Discussions with key informants and stakeholders conducted within the SIA revealed key issues that hinder women from claiming their inheritance rights, even if these are documents in the Inheritance Distribution Certificate. The most important of these are: "fear of family boycott"; lack of awareness of rights; ignorance of the laws and procedures related to inheritance partition; lack of financial resources for complaining in a court, and social criticism of a woman who would embarrass her husband or brothers.

24. While renunciation of inheritance rights is, at times, the result of a decision made freely by women on the basis of social and economic considerations, often women are forced to renounce their inheritance or are made to believe by family members – in good or bad faith – that they are not entitled to it. Ignorance of statutory and Islamic laws combined with the deliberate violation of women's land and property rights by taking advantage of gender-discriminatory and widespread social practices badly negatively affect women in Palestine as in other Muslim countries. As noted earlier, often social norms are such that women face the risk of being cut off from their families if they claim their land rights, which is a major deterrent to them doing so, as well as a major cause of personal and social friction and division. Women claiming their rights can be judged as being greedy, selfish, putting the husbands in a bad light, or insulting them for not being able to provide for them. Families are not keen to "split the family land" by "giving it away" to the women's "new family", which is the family of her husband. Women refer to justice to secure their inheritance rights only in a few extreme cases to avoid disrupting family relationships on which they often heavily depend and facing disapproval from society.

25. However, women are increasingly interested in claiming their inheritance rights. Different groups working on the women's inheritance issue have emerged; they are challenging traditional gender dynamics and creating a conducive environment. In 2003, the Ministry of Women's Affairs (MoWA) was established to facilitate gender mainstreaming in different national sectors. MoWA's mission is to "ensure a legal and policy framework for achieving gender equality by mainstreaming gender and empowering women as essential partners in the building of a democratic state". Civil society in Palestine is vibrant and strong, and there are numerous non-governmental

organizations with interventions on women's rights and well-being. Progress was made with regard to women's rights, particularly through sharia courts.

26. In 2011, three administrative orders were passed by the Chief Justice of the Sharia Court to reduce the vulnerability of women. The orders aimed to ensure that women have access to accurate information in inheritance cases. In particular, action was taken to reduce the number of women renouncing their land rights. The decree of 15/5/2011 defines the preconditions required for inheritance renunciation (*Takharuj or Tanazul*): (1) Detailed inventory of the movable and immovable belongings of the deceased, signed by all the heirs present in Palestine, and authenticated by the local authority; (2) Report established by three experts to evaluate the belongings to be excluded from inheritance under *takharuj* procedure; (3) Publish the *takharuj* decision in a newspaper for at least a week, under the supervision of the sharia court; and (4) The final *takharuj* decision should not be registered until four months after the death.

27. The importance of the 15/5/2011 decree is that it imposes transparency of the inheritance process, in terms of inventory, valuation and definition of every heir's right, and under the control of official bodies, thus breaking the secrecy, hence the potential intimidation, prevailing inside a large number of families. Civil society organizations are currently lobbying the Palestinian Authority to establish an inheritance department within the Justice Ministry. A few land mediators are active in the West Bank to provide guidance and suggest solutions for land conflicts, including about the difficulties linked to inheritance. A few women are among these mediators.

28. Civil society has also been active in fighting inheritance denial, including through conducting: (1) capacity development of local community based organizations to lead campaigns on women's property rights issues; (2) study circles and training events for community based organizations, journalists and lawyers; (3) legal aid through a network of community-based organizations (CBOs), lawyers and journalists for women whose inheritance is endangered; (4) community and media campaigns on women's right to inheritance; and (5) awareness raising through documentary movies and drama re-enactments. A number of documents have been produced in Arabic: a guide to inheritance concepts and procedures, another to ways and means of organizing training sessions, a video with women's testimonies, and video with an explanatory cartoon. Civil society organization are also working to promote gender equitable legislation, particularly concerning six key issues: marriage age, common wealth, polygamy, divorce, custody and equal legal status (for example as witnesses in marital disputes); all of which quite important for ensuring inclusive land settlement and registration processes. Nonetheless, as discussed below, women's awareness of their inheritance rights remains a key constraint to inclusive land settlement and registration processes in Palestine.

29. **Rights of Use and Customary Norms:** Although formally registered ownership is generally perceived as the best and safest tenure option, including for women, the majority of women in Palestine access land and housing through what is sometimes defined as "secondary rights", mostly rights of use to other peoples' properties. Women often gain rights of use to land, housing and property through their relationship with family members, mostly male relatives - fathers, husbands, brothers and children. Such "secondary rights" do not necessarily offer less protection from eviction, as long as the underlying social relationships are solid.

30. Discussions with women suggest that many of them do not feel insecure in such arrangements, especially in times of social peace and stability. As in most other parts of the world, children, girls, young women and unmarried women live in the house and on the land owned by the "head of the family", which can be considered in many cases a very

secure type of secondary right. Parents of landowners often enjoy equally relatively secure access to land and housing. The strength to which such options protect women rights, however, heavily depends on several factors: the quality of relationships with the relatives, stability in family composition and power balance within families, changing needs and priorities, preferences of the family members, economic pressure, stability of the society, and many others. Women with a good level of education and who have access to an independent income are generally better able to enforce their secondary rights to land and property, two of the key reasons for this being their ability to voice their interests within the family and access to formal or informal justice systems.

31. The access to tenure security through secondary rights, however, also poses risks to be mitigated, when possible. One of the most frequent risks identified in the discussions with women is that women are seen as laborers – even free laborers - on the land and property they live and work on, rather than having fuller rights. Another common risk for women is divorce or separation from the household they depend on. They could find themselves destitute and often unable even to recover their investments – in cash or kind – made over the years in the land and property where they were living and working due to the applicable inheritance laws. Women living within communities or households that suffer from social conflicts are particularly vulnerable, even more so if they access land and housing through non-formalized user rights.

3. The Land Settlement and Registration Process: Key Weaknesses and Social Implications

32. Much of the negative social consequences and risks identified in the SIA are rooted in the institutional framework, settlement and registration implementation procedures in place, and in weaknesses in the institutional capacities of institutions involved; and much less in the legal framework. These are discussed in the following paragraphs.

3.1. Awareness Raising and Procedural Education

33. The Land and Water Settlement Law (No. 40 of 1952) includes two provisions articles 5 and 6 on issues related to awareness raising and education in the communities targeted for new registration activities. Article 5 requires LWSC to announce –through what is referred to as Settlement Order- its intent to undertake land settlement and registration activities in Official Gazette once it has taken a decision in this regard. Article 6 stipulates that a public announcement (referred to as Settlement Announcement) should be made in the communities once the date for starting the settlement and registration process is decided, leaving to LWSC to decide on the best way to do this. This flexibility seems justifiable as determining the appropriate ways to inform targeted settlement area residents needs to be context specific.

34. The Unified Procedures Manual offers additional details and fills some important gaps in the Law, where it stipulates that LWSC should undertake community awareness and preliminary data collection on tenure holders in collaboration with community-based organizations and community volunteers after the initial decision is published in the Official Gazette and prior to commencement of settlement activities. The Manual stipulates that least two public meetings should be organized for this purpose Once the Settlement Announcement is displayed and activities start, the Manual stipulates that LWSC should intensify these public awareness activities, particularly through working with local volunteers and CBOs. The Manual further stipulates that LWSC should share the Settlement Announcements with the Ministry of Foreign Affairs and Expatriates (MoFAE) requesting that it shares these announcements with all Palestinian embassies,

consulates and representative offices for announcement to Palestinian nationals living abroad. This announcement is intended to mitigate against the risk of exclusion of expatriates and any foreign nationals with land ownership in Palestine from the process.

35. Findings emerging from field visits and discussions with stakeholders suggest that the legal and procedural stipulations regarding the publication of Settlement Orders and Announcements were generally adhered for all sites visited, but less so for other stipulations. In particular, despite efforts by LWS to enforce procedures in local settlement offices, there was no evidence that the preparatory awareness raising and socialization activities have been implemented ahead of the settlement and registration activities, or that the collaboration with civil society and local volunteers to raise awareness and organization of public meetings as stipulated in the Manual. For example, In Al-Bireh, two public meetings were organized solely by in the Municipality, but no more than 40 people attended these meetings. The Municipality posted written and disseminated verbal announcements in different parts of the city (including through mosques and public announcement boards), though the Settlement Order was confined to a small neighbourhood in the city, In collaboration with the LWSC settlement office, it also printed and widely circulated a brochure on the settlement and registration process, and reached out to Chicago-based Abna' Al-Bireh Association to announce the start of the process to Palestinian in the United States and Latin America. In all other communities visited, however, public awareness was largely limited to the display of the Settlement Announcement in public places (mainly Municipality buildings and mosques) and organization of one or two public meetings to announce the beginning of settlement and registration works. In all communities visited, it was reported that attendance in public meetings was largely confined to small groups of men, and that these meetings and announcements did not help much in providing legal education.

36. The narrow scope of public awareness activities and their gender blindness, renders them generally ineffective -from the perspective of all stakeholder met, particularly women- in, both, raising knowledge about the settlement and registration process, and, more importantly, educating stakeholders on their tenure rights and how to secure them in the process of settlement and registration. The latter is particularly consequential from a social safeguards' perspective, especially when considering that the overwhelming majority of citizens interviewed –both, men and women, educated or otherwise- openly reported having very limited knowledge or understanding of the legal framework or text related to land settlement and registration. Examples captured in the SIA of how this lack of awareness had consequences for both tenure security of stakeholders include, inter alia:

- citizens who were unaware that they were requested to be present when their land was being surveyed had their land borders wrongly demarcated, and did not realize this until after the Table of Rights was finalized. At this point, the period during which they could file an objection had legally lapsed, and they had no legal recourse. In practical terms, this meant that they have lost part of their tenure to their neighbours.

- citizens who had their lands registered, but only after they had realized that their initial decision not to lay claim on the land they own to avoid paying for its surveying, could have led their land to be registered as state land.

- citizens –both, men and women, who had lost the opportunity to benefit from the expedited and simpler procedures to partition their apartments or lands to get them registered individually in their individual names because they did not know that this was possible during the settlement process. This is particularly consequential for

individuals whose joint property is in essence controlled and used by one or a few of proprietors, as these proprietors would have a vested interest in keeping the land undivided to maintain their control over it.

37. The systematic and detailed awareness of the settlement procedures, rights and safeguards granted by law to individuals to claim their rights is a very important procedural step before the settlement is initiated. Given the lack of legal culture in society, especially on land settlement issues, many individuals find that their rights to claim or object are lost because they do not know or understand legal procedures.

3.2. Community Engagement and Local Committees

38. The only reference to community engagement in the systematic land settlement and registration is found in the Unified Procedures Manual. The Manual stipulates that a local committee should be formed in partnership with the respective LGU in each target community to facilitate the work of LWSC in the community. While the Manual does not include provisions to specify the responsibilities of local committees, it is commonly understood within LWSC that local committees are there to:

- provide local knowledge,
- assist in informally resolving boundary related disputes to circumvent social conflicts and litigation, facilitate LWSC's and private surveyors' access to land owners to expedite cadastral works, and
- be present during the installation of boundary markers for individual land parcels. The aim of the latter is to reduce mistakes, misunderstandings or disputes during surveying.

The Manual does not include any requirements in relation to the membership of local committees, except for a suggestion that membership be drawn from well-respected individuals with the community, and ensuring representation of all clans in this committee. Neither the Land and Water Settlement Law nor the Manual envisage any role for the LGUs beyond that of securing office space, formation of local committees, and facilitating awareness raising activities.

39. The SIA found substantial variations within the visited communities in the way local committees get formed and the role they and LGUs play in the process of land settlement and registration. In 3 out of the 7 communities visited, a local committee was not formed, and LGUs either appointed a coordinator from it staff or contracted a coordinator to facilitate the work of surveyors and the LWSC. These coordinators played no role in informal dispute resolution, and, according to Settlement Commissioners, lacked historic knowledge of people-to-land relationships. Their role in assisting LWSC in validating tenure claims has been very limited as a result. In the 4 communities where committees were formed, membership of these committees was exclusively comprised of men, and ranged from 3-9 members. Only two of these committees were involved in settling boundary disputes during the settlement process, and both were perceived by residents interviewed as being impartial and having intimate knowledge of land-to-people relations.

40. Similarly, the SIA found substantial variation in the role of LGUs in systematic land registration activities beyond securing office space for the LWSC. In 2 out of the 7 communities visited, LGUs were behind the demarcation of roads and determining road widths in areas outside approved structural plans, an authority the Land and Water Settlement Law confers to Settlement Commissioners to ensure impartiality and objectivity, and safeguard against possible special interests within LGUs.

3.3. Cadastral Surveying, Supervision and Verification

41. The approach to cadastral surveying supervision and verification varies considerably from one community under systematic land settlement and registration to another, with clearly no unified approach in place. As already discussed, LGUs are responsible for contracting surveyors to undertake cadastral surveying works in the plots targeted for settlement and registration, while LWSC is legally responsible for supervising and validating survey work and demarcation of roads. Cadastral surveying hence involves the identification, demarcation, measuring and mapping of new or changed legal parcel boundaries and this may include the process of re-establishing of lost boundaries and sometimes resolving disputes over boundaries or other interests in real property. The product of such surveys is a survey sketch. This sketch is a prerequisite for the preparation of the Table of Claims, on which basis both the List and Table of Claims get prepared by LWSC.

42. The accuracy in the cadastral survey activity, including the corresponding preparation of the Table of Claims, is a prerequisite to the successful demarcation of boundaries, and completion of settlement and registration activities, both of which are critical for tenure security. This is widely acknowledged by LWSC, and the Unified Procedures Manual includes several safeguards for these purposes. In practice, however, some of these safeguards have not been systematically applied or fully instituted in the work of LWSC in the communities visited, with some negative consequences for tenure security. The table below summarizes the SIA findings in this regard.

Table 1. Safeguards to ensure accuracy and impartiality of cadastral surveying, examples of limited application and real and perceived consequences

Safeguards Set in the Manual	**Examples of Limited application**	**Examples of Negative Consequences (real and perceived) of Limited Application of Safeguard**
Settlement Commissioner or designated LWSC staff to be present during Cadastral Surveying to ensure accuracy and log tenure claims for surveyed parcels Local Committee members to be present during the survey work to validate tenure claims and provide local knowledge. Beneficiaries to be notified ahead of the date and time survey team's visit to ensure accurate demarcation and measurement.	- Private surveyors in 3 out of 7 communities visited worked alone, or without the presence of either the local committee or LWSC - Cases where surveyors visits were either not appropriately coordinated or did not take place on the data and time specified were reported as a regular occurrence in 3 out of 7 communities surveyed.	- Boundary demarcation and area measurement mistakes. - roads used customarily not demarcated dues to lack of due diligence by Surveyors and LWSC, leading LWSC to propose alternative roads which were objected upon. - identification of existing structures that did not exist in reality.
Survey sketches to be prepared by the contracted surveyor and transferred electronically to LWSC on daily basis for verification and archiving purposes.	- In 5 out of 7 communities visited sketches were not transferred to LWSC on a daily basis.	- No evidence of material negative consequences could be identified by the assessment. However, stakeholders met felt that this could potentially open the door for corruption, fraud and side-dealing, where private surveyors could be bribed to alter survey sketches.

For better accuracy, recommendation to require the use of Total Stations in surveying densely populated areas.	- While Total Stations were used in the 2 communities visited where plots surveyed were densely populated, Total Stations were not identified as an explicit requirement in survey tender documents.	- No evidence of material negative consequences could be identified by the assessment.
Surveying activities to be conducted only during the work days and hours of LWSC to enable LWSC to supervise the cadastral surveying activities.	- In 4 out of the 7 communities visited, surveyors had reportedly worked independently on Fridays and Saturdays, against the request of the LWSC.	- No evidence of material negative consequences could be identified by the assessment. However, this has the potential of exacerbating all previously mentioned consequences.
The process of land registration supported by the LWSC requires as a first step subdivision of land based on inheritance where applicable, and through this process LWSC is working to ensure women's inheritance property rights.	In all communities visited, LWSC prepares the Table of Claims on the basis of documented tenure claims of tenure holders. Legacy Restriction Certificates are often a primary document in the registration. However, the SIA found several instances where LWSC does not systematically endeavour to sub-divide collectively-owned land into individually registered parcels, and many tenure holders are not aware that they could request such sub-division. In nearly all sites visited, tenure claims for collectively-owned land is logged with LWSC by one of tenure holders on behalf of the other owners, and settlement officers usually do not investigate whether the other owners wish to sub-divide the land.	- Tenure holders who control and are the primary users and beneficiaries of collectively owned land have an incentive to keep this land undivided and preserve the status quo. The SIA team heard several examples of how these tenure holders use the process for their advantage by marginalizing the other holders from any engagement in the settlement and registration process, so that they do not request the land to be sub-divided in process, thereby restricting registration benefits to land the other land owners.

43. While all LWSC staff recognize the importance of the preceding safeguards and make efforts to enshrine them, there are many institutional -and some legal/governance- weaknesses that limit LWSC field offices' capacity to ensure their systematic application in practice. Foremost among these is the issue of Settlement Commissioners status, recruitment and capacity as this not only affects the results of cadastral surveying, but the overall success and sustainability of systematic land settlement and registration activities.

44. The legal authorities conferred to Settlement Commissioners are quite extensive, and the ways in which they are discharged have huge legal, social and economic consequences at many levels. Accordingly, many stakeholders met, including judges and senior government officials, viewed Settlement Commissioners as equal –if not higher- in rank than the most senior government officials. Yet, most Settlement Commissioners are not even civil servants, but contracted employees. While they are hired in accordance with the PA's standard recruitment procedures, they are typically young lawyers or engineers with relatively limited experience and competencies in several of the fields required for effectively discharging their responsibilities, even by their own admission. They are Opportunities they have for professional development and experience sharing within LWSC are little-to-none.

45. Other important weaknesses include the following:

- Insufficient institutional resources in decentralized LWSC offices, particularly human resources and transport. This renders some of these offices dependent on LGUs for transport (which is not always available) on the one hand, and unable to accompany and provide quality control over survey work as expected. Many LWSC staff met in the field complained about the workload they have, reporting that they often find themselves having to discharge responsibilities of vacant posts, for which they sometimes lack the technical capacity. Indeed, this seems to be a limitation that affects most LWSC offices, but particularly those with less than five staff. Of the seven LWSC field offices visited by the assessment team, more than half reported experiencing human resource capacity constraints.

- Variable capacity and relevant experience among contracted private surveyors. The selection of private surveyors is undertaken independently by LGUs in accordance with the Public Procurement Law No. 8 of year 2014, which stipulates that contract should be awarded to the bidder that meets the standard technical requirements and offers the lowest price. While this procurement process is in line with international best practice, it does not always result in the selection of the most qualified surveyors. According to most stakeholders interviewed, this is largely due to the lack of specificity in required experience and capacity on the one hand, and limited weight given to this capacity in the tender preparation and evaluation processes. A few interlocutors suggested that addressing this issue requires both administrative and legal improvements. These involve not only improving the selection process to give more attention and weight to experience and capacity to undertake cadastral surveying, but also strengthening the legal framework by enacting a law for accrediting surveyors who could perform cadastral services in the name of state and provide a certain security.

- Emphasis on speed and quick quantitative results. There is consensus among nearly all stakeholders met that demand for rapid implementation of settlement and registration is high, particularly within government. The extent to which this compromises the principal objectives of the settlement and registration process and accuracy and reliability of survey records is potentially a critical issue that has faced LWSC in past years, and may lead to an erosion of confidence in the system.

46. It is important to note here that while the cost of surveying is borne by settlement and registration beneficiaries, the responsibility for determining surveying costs and the way they are collected are the sole responsibility of the local authorities in the settlement areas. The being said, surveying costs were deemed to be appropriate and not prohibitive by all beneficiaries met, including those seemingly poor. This despite the fact that it varies substantially from one community to one community to another (from US$ 28-US$220), depending on the nature of lands to be surveyed. The sentiment expressed by beneficiaries strongly suggests that the benefits of registration outweigh the monetary cost involved, but this should be understood in context: surveying is not conditional on any advance payment of surveying costs by the beneficiaries, which practically means that LGUs are providing unconditional, short-term financing to beneficiaries to cover the cost of surveying and registration.

47. Once their land is surveyed and formally registered, beneficiaries have little incentive to pay the surveying costs, which is increasing the financial burden on LGUs. In an attempt to help LGUs recover the survey costs, the PLA is not handing registration certificates to beneficiaries unless they present a clearance letter from the relevant LGUs. This, however, is providing a disincentive for many beneficiaries to collect their certificates

from the PLA. As one beneficiary explained: "as long as my land boundaries are clearly marked and the certificate of registration is issued, I have no [immediate] need for collecting the certificate". It is worth noting here that some of the large land tenure holders exploit gaps in the legal framework to avoid paying the full survey costs, where they refrain from laying claim on their land to invoke its registration in the name of the Treasury. They then manage overturn this registration by filing an objection through the settlement courts, paying only the court fee which is a fraction of the actual surveying costs.

3.4. Demarcation of Roads and Land Acquisition in the Settlement and Registration Process

48. The Land and Water Settlement Law is silent on issues of acquisition of land by the State or by the State on behalf of absent tenure holders, which some legal professionals believe is done on purpose as other laws deal with this subject. Hence, land deductions that take place within the framework of the systematic land registration process are not considered land acquisitions, and the legal framework grants LWSC the authority to force the state to compensate the tenure holder when these deductions cause material damage to the land, including in terms of its useability and economic value.

49. Article 9 of The Land and Water Settlement Law is the primary legal basis for changing land boundaries for the establishment of right of way/access in the course of systematic land registration. This article gives the Head of LWSC or his designee –in the case, the Settlement Commissioner- exclusive discretionary authority issue final decisions to:

i. Redraw any or all serpentine land boundaries under settlement to improve the land's viability and use, as long as any resulting loss in area gets offset through exchange with land with the same value or through financial compensation. It is worth noting here that neither the basis for valuing financial compensation nor the eligibility criteria for compensation have been clarified, leaving this matter entirely to the discretion of the Settlement Officers.
ii. Alter land boundaries of land under settlement to establish road access to these lands and/or connect them to existing road networks or planned in structural plans. Under this provision, the Law gives discretionary authority to the Head of LWSC or his designee to decide on the value of compensation necessary to offset any negative impact of such alteration, where compensation can be financial or non-financial (concessions in relation to zoning regulations, discounts and waivers on building permit fees, and land of equal value).
iii. In case that an access road would only serve a single parcel, to designate a right of passage to these parcels, instead of altering and redrawing the boundaries of land(s) through which this road passes. The Law stipulates that the direction and width of his right of passage should be clearly documented on cadastral maps, while ensuring that this does not change the area of the affected land.
iv. Revoke right of access established in lieu of the previous decision by removing it from registration maps, if the reasons for its establishment are no longer valid.

50. The Unified Procedures Manual reconfirms provision (i) above by restating it verbatim. It partly reconfirms provision (ii) above, as it omits reference to compensation for area lost as a result of border changes to establish the right of way[4]. It makes no reference, however, to provisions (iii) and (iv). The Manual elaborates on the legal provisions it

[4] The omission of the reference to compensation in the Procedures Manual does not cancel the right to compensation as per the law. The SIA, however, could not ascertain the existence of claims for compensation in the Courts.

reconfirms through a number of stipulations of its own, which are intended to safeguard against creating social conflict on the one hand, minimize negative impact on freehold and tenure, preserve customary rights of passage, and take into consideration current and future urban and rural development needs. In addition to underscoring the need for ensuring equity and fairness in demarcating roads, these stipulations are summarized below:

- Existing roads and roads demarcated in approved structural plans should be drawn on as is without change as these roads are already legally approved and final.
- Newly demarcated roads falling outside approved structural plans should not be less than six meters in width to ensure future urban expansion and other development needs.
- All attempts should be made to ensure that newly demarcated roads follow routes used customarily, including through engaging the local community in identifying these routes and referring to incomplete Jordanian settlement records.
- All newly demarcated roads should not be drawn on maps before a through physical examination, *in-situ*.

51. It is important to note here that the issue of land deductions for establishment of roads and other public purposes is mainly governed by the Temporary Planning of Cities and Villages Law No. 79 of 1966. This law stipulates that local master plans become final after a two-month period designated for public viewing and objections by anyone who may be negatively affected by them. The High Planning Council, of its own volition, has the final decision with respect to the modification of plans after the objections are filed. Hence, any road-related land deductions that come about through the systematic land settlement and registration within approved structural plans are in practice deductions that have been legally established and already approved. In other words, they will have been done prior to the systematic registration process. Accordingly, any objections relating to these deductions will most likely be dismissed in Settlement Courts.

52. Moreover, it is worth noting that the Article 31 of the Temporary Planning of Cities and Villages Law No. 79 of 1966 limits deduction for road establishment or any other public purpose to no more than 30 per cent of any given parcel. It further states that any land owner whose land parcel area gets reduced as a result of this reshaping by more than this 30 per cent is entitled for compensation (monetary or in land of equal value) from the local authority.

53. Discussions with stakeholders and field observations on land acquisition, land settlement practices in relation to land demarcation and opening of new roads, and stakeholders' perspectives on these matters revealed the following:

    - It is a common practice for LWSC Settlement Commissioners to invoke their legal authority redraw land boundaries to establish roads that grant the access to all parcels of land falling outside structural plans. In undertaking settlement work outside structural plans, the common practice for LWSC is to limit any deduction to any parcel for establishing right of way to no more than 25 percent of its total area. In essence, this means that all tenure holders will lose part of their land for the establishment of these roads in process, but this is generally acceptable to them given that these roads are there to benefit them and, for many, become a community asset. Administrative LWSC data shows that some 44,000 dunums or roughly 7% of lands settled in 2019-2020 have been demarcated as roads. The data further shows that, on average, around 75 per cent of land titles involve some reduction in the "claimed areas" by citizens, and this percentage is expected to remain the same in future titling.

- While Settlement Commissioners are legally authorized to determine compensation for losses associated with roads they establish, they hardly exercise their discretionary authorities in this regard. This largely because they either feel unauthorized to do so, or want to avoid setting a precedent in this regard. Some Commissioners interviewed reported that they were not fully aware of the discretionary authority they have in this regard, highlighting that reference to compensation does not exist in the manual. Some Commissioners met seemed to also the lack legal background needed to exercise their legal authorities with the degree of confidence needed. Citizens met were also unaware of that are legally entitled for compensation.

54. All citizens interviewed in the communities visited by the assessment team perceive the benefits of having clearly delineated and formally documented roads leading to their parcels outweigh the resulting losses of land. For most, these perceived benefits manifest in increased value and saleability of land, and lower investment risks. Several citizens highlighted that road demarcation by LWSC bolsters their tenure security as it establishes clear and permanent boundaries for their lands. A few citizens noted that having lands marked on cadastral maps creates an incentive for them to demand their local authorities to open and pave the demarcated roads and improve infrastructure and other municipal services in the newly registered plots.

55. However, and despite their concurrence with benefits highlighted in the preceding paragraphs, a handful of citizens expressed serious discontent with the way their land has been redrawn to facilitate access to other parcels. Most of these citizens reported that they had lost larger proportion of their land than what would have been possible had the newly delineated road routes followed those that had been customarily used for years. While some of these citizens had filed objections, others were unable to because they did not realize the problem until the statutory limitation period for objections (30 days) had lapsed. It appears that these citizens had either not been aware that the Table of Rights and associated maps had been displayed for them to review, or had seen these but were unable to understand the maps.

56. The lack of comprehensive data on the typology of objections filed with Settlement Courts makes it impossible to ascertain the scale or nature of road-related disputes. Also, the lack of proper and consistent documentation of formal dispute-resolution activities undertaken by LWSC during the implementation of land settlement activities, did not enable the assessment to shed light in this regard. Nevertheless, qualitative evidence gathered through field visits and interviews with Settlement Judges strongly suggest that road-related objections constitute at least one third of all settlement related objections. However, anecdotal evidence strongly suggests that most road related objections relate to:

- new road routes, particularly when these routes are different than well-known routes that have been customarily used for many years;
- comparative size of parcel area lost to that of adjacent parcels, where objectors feel that the newly demarcated road took up more of their land than their neighbors; and

- linked to the previous point, width of roads, where land owners feel that the width of road should either be larger[5] or smaller[6] than that demarcated.

57. In connection with the previous point, road-related disputes and objections seem to be lowest in communities visited in the southern West Bank (Tarqumya and Hindaza). Here, LWSC relied heavily on LGUs for advice and technical inputs in relation to road delineation and demarcation, and this seems to have significantly helped in reducing road-related objections, but not necessarily other types of disputes and objections. In contrast, road-related objections seemed to disproportionately high in communities where road delineation and demarcation was delegated by LWSC to surveyors (Salfeet, for example). These drastically different approaches offer important insights to any discussion of how community engagement in the entire land settlement and registration process is necessary for the successful completion and sustainability of process.

3.5. Institutional Arrangement

58. The LWSC/PLA are currently in the process of hiring a Social Safeguards Specialist (SSS). The SSS shall be responsible for the overall management of the SMP; she/he shall coordinate and oversee compliance to its implementation, as well collect and consolidate the necessary information for reporting on its implementation; including reports on the performance of the GRM from the Control and Complaints Unit.
59. LWSC will have overall responsibility for owning and implementing the SMP in line with the suggested timeline. LWSC responsibility includes the day-to-day implementation of social mitigation measures, following up and monitoring actions. The role of the LWSC relevant departments (GRM Unit, SLR Department, Gender Unit and Media & Public Relation Department) will focus on ensuring that the project is implemented smoothly taking all necessary measures and implementing the SMP recommendations.
60. The LWSC GRM Unit will be responsible for coordinating day-to-day functioning and implementation of the GRM related to the SLR in the targeted areas. The GRM will report to the Social Safeguard on a regular basis, and document grievances and complaints providing quarterly and annual reports in responding to complaints and suggesting feasible measures and mitigations as detailed in the SMP.
61. The GRM Unit will also be responsible of raising awareness about the GRM and publish the Records of Claims as they get prepared to increase the transparency of the settlement process, thereby increasing the utility of the GRM and other dispute-resolution mechanism. The GRM unit will use the Communication Plan proposed activities, especially those related to GRM dissemination.

3.6 Capacity building requirements for Implementation of SMP

[5] Some land owners object to narrow road widths even though these cause them to lose a smaller area of their land because they feel that wider roads leading to their parcels drive the value of their land upwards. Typically, these are owners of large parcels of land.

[6] Those who object to the suggested width of demarcated roads are typically owners of small parcels or owners of primarily agricultural lands. While they do not object to the principle of having part of their land allocated to roads, they find the width of suggested roads to be excessive for the current and foreseen future use of their land and the area in its vicinity. We found these objections mostly in agricultural communities where roads that are six meters in width or less suffice the access needs of farmers.

Capacity Development

62. The Implementation agencies (PLA and LWSC) have no in-house social risk management specialists, therefore RERP will fill this capacity gap through the social safeguard specialist-SSS who will be responsible for overall monitoring the implementation of the SMP and support the two agencies" relevant team to play key role in implementing the SMP.

63. In accordance with tasks of the SMP, there is specific technical assistance that will be provided by SSS as part of the RERP PIU. The specialists will assist in all aspects of the implementation of SMP, internal monitoring and evaluation, including providing training to the Gender Units at the two agencies and other relevant government agencies.

64. RERP will provide training and capacity building, such as gender mainstreaming and awareness training. The SSS will work with the PIU and the two agencies to apply the SMP and other instruments as required throughout the project. The SSS and the RERP team will contribute to the development of annual work plans, and ensure activities such as consultation, site visits and review of bid documents to ensure gender mainstreaming measures are included.

Training

65. The RERP's SSS and the gender units at the two agencies are responsible for training the PIU and staff involved in the project on their social roles and responsibilities. Training will cover matters such as:
    - Training the PIU on the requirements for preparing gender mainstreaming and social clauses in ToRs.
    - Training all those involved in the GM including SEA/SH, GBV and code of conduct
    - Consultation and engagement training, awareness raising and support.

66. Specialist resources will be engaged to deliver training on various topics, such as those proposed in the Gender Action Plan- GAP[7]:
    - Developing a strategy that integrates gender equality in the work of LWSC & PLA, including: policies, measures, internal bylaws, regulations, updating operational manual, procedures for hiring staff, training of human resources, planning, implementation and monitoring, gender sensitive and responsive budget.
    - Developing a gender training plan and training materials, curricula for different management levels at both LWSC and PLA.
    - Developing gender sensitive indicators and institutionalize them in the work of the LWSC and PLA including the development of data collection, storage, and analysis tools.
    - Setting criteria and carefully selecting local committee members (ensure representation of women) with special focus on the ability to promote equality and educate the local community and the importance of removing discriminatory practices. Gender training for Local committee members.

[7] More related Capacity Building and Training Activities are listed in the GAP and the Communication Plan.

3.6. Grievance Redress and Dispute Resolution Mechanisms (including Project-level GRM)

67. It is often said that "a law is as good as its implementation" and that "rights mean little if they cannot be claimed and enforced"; access to justice and dispute resolution mechanisms are crucial to satisfy both these points in the context of systematic land settlement and registration. There are a number of options available to people in Palestine to settle grievances and disputes arising from systematic land settlement and registration process, and these include both formal and informal mechanisms. Formal mechanisms are: (1) the Grievance Redress Mechanisms (GRM) at LWSC, which ais part of the PA central GRM managed by the Government Secretariat (GS); (2) formal dispute resolution and reconciliation mechanisms set forth in the Land and Water Settlement Law; and (3) the court system, through the Settlement Courts. Informal mechanisms include traditional mediation by clan and religious leaders, but these are not being leveraged by LWSC, and for good reasons. We discuss each in the following paragraphs,

3.6.1. LWSC's GRM

68. Both the LWSC and PLA have separate grievance redress systems, but both are connected to the central electronic system of grievances which is controlled and managed by the Complaints Unit at the GS. At LWSC, the system is designed to enable citizens to file grievances through several mechanisms, including: electronically through the said central mechanism, LWSC's social media pages, and designated e-mail addressed and fax numbers; and in person at one of LWSC's three District Offices in the north, middle, and south of the West Bank. Citizens can also file grievances with the office of the LWSC Chairman and at the General Administration of Settlement Department at LWSC headquarters, though complaints filed here get transferred to the Control and Complaints Unit for processing and follow-up. The system currently does not enable citizens to file complaints or grievances at local offices.

69. A procedures manual has been put in place to govern the way complaints are logged and handled, and this manual applies to the World Bank Project. Once submitted, grievances get administratively reviewed -and as necessary followed up- for completion and logged in a central complaints log, which includes the following data, as relevant: the block identity number, the parcel identity number, the area of the parcel, the location of the parcel (within the Geopolitical Boundaries of A, B or C), name of the LGU and governorate, and the nature of the complaint (staff related or land related). Once logged, complaints are typically investigated by staff of LWSC's Control and Complaints Unit within a period of 10 days, and this investigation takes place on site in the subject community. In all cases reviewed by the assessment team, investigations were conducted and closed within a period of 30 days of the date on which they were logged, and complainants notified of the result of the invitation. The GRM manual identifies the triggers for closure of complaints as follows:

- withdrawal of the complaint by the complainant through a written request;
- resolution of the complaint amicably during the investigation; and/or
- investigation proves that complaint is malicious in nature.

70. LWSC has recruited two staff in each of its District Offices to investigate complaints, including a surveyor and a legal staff. In 2019, LWSC received a total of 160 grievances, of which 24 were rejected on grounds of anonymity of complainant (11), lack of supporting evidence and details (3), and repetition (10). Of the accepted grievances (136), 90 were submitted by hand, 13 by e-mail, 18 by fax, 4 through LWSC's social media

page, and 35 through the central complaints system maintained by the GS. PLA received less than 30 complaints in the same year.

71. Discussions with government stakeholders –including the GS- suggest that the complaints have been dealt with efficiently, with 131 grievances resolved of a total of 142 investigated in 2019. However, there is a consensus among stakeholders that the number of grievances filed through the GRM is low in comparison to the number of objections filed in the court system. Two key reasons seem to be culprit here. Firstly, the existence of the GRM as a complaints and dispute resolution mechanism is not well-known to residents in settlement areas. Secondly, the GRM offers little chance for resolving disputes and addressing settlement-related grievances once the Table of Rights is displayed. Indeed, only a couple of citizens met during field visits knew about the GRM, and both chose not to use it to address their surveying-related grievances because these grievances could only be resolved through the court system once the Table of Rights is displayed. As a matter of fact, this points to the importance of current LWSC plans to display the tenure claims for all parcels under settlement on a rolling basis as they get logged to improve the transparency of the settlement process on the one hand, and to improve the responsiveness of the GRM as a dispute-resolution mechanism on the other hand. As is, the GRM, including the Project-level GRM- seems to be mostly used by citizens for one reason, that is: to get a report from LWSC to bolster the objections they have already filed in court system.

3.5.2. Formal Dispute Resolution within the framework of the Settlement and Registration Process

72. The Land and Water Settlement Law grants authority to the Head of the LWSC or his designee (again, the Settlement Commissioner) to offer reconciliation between parties with competing claims over land tenure. Should this offer be accepted and reconciliation agreement is reached, the Law stipulates that this shall be documented in an formal reconciliation agreement to include all details related rights and how these shall be instituted, thereby providing the basis for the final settlement and registration. Nearly all stakeholders interviewed in the seven sites visited reported preferring such dispute resolution mechanism over any other dispute resolution mechanism.

73. While several Settlement Commissioners met during the course of this SIA reported having successfully mediated reconciliations, many have not as they feel that they do not have sufficient training to undertake mediation for many difficult disputes they witness. In general, however, the assessment found a good degree of reticence among Settlement Commissioners to engage in mediation efforts and this because of lack of incentives, lack of training (legal among those with an engineering background, and engineering and surveying among those with legal backgrounds), and heavy workload.

3.5.3. Settlement Courts

74. The Settlement Law stipulates that any tenure holder residing in Palestine can file an objection with Settlement Courts through the Local Settlement Office within a period of 30 days from the date of displaying the Table of Rights corresponding with their objection. Tenure holders residing outside Palestine can file an objection directly to the Settlement Court for a period of up to five years after the display of the Table of Rights in accordance with Article 15 of the Settlement Law. Any objection filed after this statutory period of limitations gets dismissed in Court. Filing an objection requires the payment of a Court fee amounting to 1 per cent of the value of the claimed tenure/ownership right based on the valuation of LWSC of the land, with a minimum fee of JD50 and a maximum cap of JD 500. The full payment of the Court fee is a

prerequisite for the objection to be heard, and any objection for which the fee is not paid by the date of the first hearing gets dismissed on procedural grounds. Theoretically, dismissed objections can be refiled as long as this is done within the limitation period, but in practice this is not possible because hearings are often scheduled months after the objection is filed.

75. The need to strengthen tenure security is evident from the large number of land related disputes in courts. According to data from LWSC, 29,233 cases involving land disputes had been established in the courts since the establishment of LWSC until October 2020, putting a strain on the personnel and financial resources of these courts. Of the total cases filed, only 5,159 (17.6 per cent) had been adjudicated in 2020, while 24,074 cases remain in adjudication. Objections filed with Settlement Courts continue to mount every day.

76. The majority of unsettled land dispute cases are situated in a small number of jurisdictions. More than 30 percent of cases originate in the Ramallah jurisdiction. Altogether, Ramallah and three other jurisdictions – Hebron (25.6 per cent), Bethlehem (14.6 per cent) and Nablus (8.1 per cent) – account for 79 per cent of all current land dispute cases. Land-related court cases are more common in areas with generally higher levels of registration. This suggests that land-related disputes involving unregistered land are more likely to be addressed outside of the court system.

Table 2. Land Related Dispute Cases Filed, Adjudicated, and Resolved as of October 2020

Governorate	Land Disputes Filed in Settlement Courts (until 24 Sept. 2020)		Total Number of Cases Adjudicated		Total Number of Land Cases in Courts (as of 24 September 2020)	
	Number	%	Number	%	Number	%
Ramallah	8,252	28.2%	856	16.6%	7,396	30.7%
Jerusalem	949	3.2%	112	2.2%	837	3.5%
Bethlehem	4,938	16.9%	1,419	27.5%	3,519	14.6%
Hebron	7,570	25.9%	1,407	27.3%	6,163	25.6%
Qalqilya	618	2.1%	76	1.5%	542	2.3%
Tulkarem	769	2.6%	72	1.4%	697	2.9%
Jenin	1,252	4.3%	88	1.7%	1,164	4.8%
Nablus	2,368	8.1%	425	8.2%	1,943	8.1%
Salfit	2,498	8.5%	704	13.6%	1,794	7.5%
Tubas	19	0.1%	-	0.0%	19	0.1%
Total	**29,233**	**100.0 %**	**5,159**	**100.0%**	**24,074**	**100.0 %**

77. The typology of cases cannot be discerned from available data, but it is believed that most cases are related to mistakes in both surveying, and mistakes in the logging Tables of Rights. A large proportion of cases are also likely related to the extensive use of Irrevocable Powers of Attorney (IPA) in lieu of multiple registered transactions. Other disputes are related to inheritance cases, especially where land has not been subdivided for generations. The failure to subdivide plots results in a large number of legal heirs for a single plot of land, and reaching a unanimous decision on transactions affecting the

land becomes quite intricate. Other conflicts are related to boundary disputes, especially in rural areas.

78. Defending land rights can be prohibitively expensive, especially when considering that litigants nearly always hire lawyers to represent them. Lawyer fees are very high, and sometimes based on arrangements where lawyers are granted tenure hold by the claimant in return their services. The poor are particularly disenfranchised by the financial costs of litigation, and those who find themselves having to defend their tenure rights in separate, small parcels find the cost of resorting to court no less prohibitive.

79. At present, the court system is slow and inefficient, with many claimants having to wait for many years before their cases are adjudicated. At the time of writing this report, cases logged with Ramallah Settlement Court in March 2020 had not yet even been scheduled for a first hearing session. The LWSC is planning to circumvent the inefficiency of the Court system by displaying the Table of Claims for lands under settlement as claims get made, as this would increase the likelihood of dispute resolution outside the court system, thereby reducing litigation. The assessment identified a number of challenges that are causing these inefficiencies; many of these are rooted in the lack of adequate governance and internally management structures in the Settlement Courts because the Supreme Judicial Council does not acknowledge Settlement Courts as civil courts. These challenges are presented in Table 3 below.

Table 3. Challenges facing Settlement Courts and causing inefficiencies

Aspect	**Evidence**	**Consequences**
Very low number of Settlement Judges in proportion to objections filed	12 Settlement judges have been appointed across the West Bank.	- Significant delays in scheduling of cases. - Long waiting times between sessions for individual cases. - Excessive workload on existing judges and record takers.
Weak physical and human resources within the structure of Settlement Courts', particularly Registries and Summons Officers.	Judges interviewed complained about registries not being properly equipped or staffed. Similar complaints were voiced regarding summons officers.	- Case files not properly stored, protected or archived, thereby risk being lost, tampered with, or damaged. - Electronic case management system (Al-Mizan) not up-to-date and contains errors. - Summons not delivered on time or not delivered altogether, forcing judges to postpone hearing repeatedly.
Objections filed by claimants through LWSC local offices are sometimes administratively incomplete	Judges noted receiving incomplete and sometimes ill-worded objections. Key information, such as complainant address and contact details- are missing. Sometime even names of defendants is different than that in the Table of Rights.	- If names of defendants is different than that in the Table of Rights, objections get dismissed on material grounds. Claimant cannot appeal. Right to defend tenure is lost due to the statute of limitations.

	Assessment team corroborated these examples through an examination of a sample of objections.	- Summons not delivered on time or not delivered altogether, forcing judges to postpone hearing repeatedly.
Some legal texts are subject to different interpretations by Settlement Judges. Lack of opportunities for collective learning and experience exchange among Settlement Judges.	For example, Article 16 of the Land and Water Settlement Law stipulates material mistakes in the Final Table of Rights resulting from human error could be corrected based on a ruling from the Settlement Judge. Some judges reported dismissing requests to correct material mistakes in the Table of Rights before it is finalized, while others reported that they would accept it.	Inconsistent application of the Law undermines confidence in the judiciary.
Some legal provisions add unnecessary burden on the judiciary, and sometimes contribute to conflict	The PA places restrictions on the right of access to land registration files (only heirs are entitled to this right). If a third party needs to know about these files, a decision from the court is needed. Open access to registration files increases transparency and reduces the problems associated with land disputes.	- Unnecessary burden on the judiciary, with consequences for overall efficiency of the court system.

3.5.4. Informal Dispute Resolution Mechanisms

80. Aside from the formal system, which includes the formal dispute resolution mechanism and settlement courts discussed above, land settlement-related dispute resolution may be undertaken by kinship networks, religious leaders, and, most frequently, mediation committees. Women, in common with many men, often see the judicial process as excessively slow and ineffective, and that is why they prefer to resolve their disputes outside the court system. Some also face challenges in accessing formal justice processes –such as physical distance from justice service providers, a low level of awareness of their rights or procedural options, and high costs, both in terms of legal transactional costs and expenditures for travel, food and accommodations to engage in a formal judicial process. Women often face additional barriers such as restrictions on their physical mobility, less access to information than men, and social and cultural issues such as the stigma of raising a dispute publicly or engaging in a public process, which prevent them from seeking redress for grievances.

81. Informal dispute resolution mechanisms are rarely the first place any disputants will go to resolve their land-related disputes as these mechanisms are perceived to be ill-suited for addressing disputes of a private nature. For both women and men, the first point of seeking relief is far more likely to be family members and kinship networks. Most commonly, disputants arrive at mediation by non-family members only after all other informal dispute resolution mechanisms have failed. Mediators commonly articulate that their overall goal in mediation is to settle disputes. In line with the interest-based mediation method, mediators are aware (and often verbally repeat) that they are not

judges, that the mediation committees do not function like a court of law; and those mediators have no power to make decisions for disputants.

82. However, field research commonly demonstrated that mediators aim to get disputes to a settlement of some kind, regardless of the nature of the dispute that they are dealing with, and that settlements are considered successes, and a service to the community by mediators. The push for settlements can lead to complicated and often negative results from the perspective of equality for women. This rests on a range of issues interpreted as 'culturally appropriate mechanisms' for pushing for a settlement and culturally appropriate outcomes.

83. Power relations pervade the mediation process. While broader political and social processes set the limits of those relations, the mediator plays a crucial role in how the process unfolds. Since mediation is about negotiation and agreement between parties, the mediator has the power to frame agreements in certain ways. The mediators' primary task is to manage the power relationship of the disputants and that in unequal power relationships the mediator may attempt to balance power. To strike the balance, the mediators provide the necessary power underpinnings to the weaker negotiator-information, advice, friendship -or reduces those of the stronger.

84. Yet, problematically, according to disputants met by the assessment team, mediators often act with strong moral authority on a number of issues. To some extent this is expected of them, since they commonly hold positions of respect through their age and community service. Yet the power balance maintained by the mediators in this way may ultimately maintain a social ordering that reflects their own beliefs about what is appropriate, with clear consequences for gender relations. This is exacerbated when mediators push for a settlement which is tied to unequal perspectives on women's rights and position in society. Importantly, this issue of power imbalance is far from exclusive to the different kinds of women who bring disputes; others, both male and female, will come to mediation in a fundamentally unequal position, by virtue of class and gender.

Who Benefits? And Who Could Potentially Lose or be Excluded from Systematic Land Settlement and Registration?

85. The overwhelming body of evidence generated from stakeholder interviews and field visits suggests that LWSC's objectives of securing land tenure for land holders and improving land governance are largely being met. The evidence confirms the theory that land settlement and provision of land titles increases tenure security and investment in Palestine, and often results in positive social impacts for women in particular. In all seven communities visited, there was substantially more support for land settlement and registration than opposition. The key and most frequently cited benefits noted by both men women in this regard and women: (1) confirmation of ownership rights; (2) resolving disputes over competing ownership rights and boundaries; (3) increasing land value; and (4) encouraging private investment. In nearly all interviews, and with the exception of interviews with men and women who had filed objections against LWSC documented ownership claims, land registration was seen as according individuals the rights associated with full, private ownership—namely the power to sell, lease, and transfer rights by inheritance. This process ensures that customary users capture at least some of the increasing value of land.

86. Discussions with stakeholders, including those already presented in previous sections of this report, suggest that the principle direct beneficiaries from systematic land settlement and registration in Palestine are those citizens and institutions whose tenure claims during the settlement process either go uncontested, or manage to resolve ownership

dispute amicably during the settlement and registration process. They are thus able to formally secure their tenure and enjoy the benefits of formal property ownership listed in the preceding paragraph. Indirect beneficiaries include real-estate developers who benefit from identifying areas suitable for housing development, and local authorities who benefit from increased revenues and improved capacity for local administration, and residents in nearby communities whose registered land has appreciated in value as a result of the systematic settlement and registration activities in the neighboring communities.

87. Typically, the profile of the direct beneficiaries is likely to include one or more of the following characteristics:

- their land has been surveyed or registered prior to 1967, as this enables them to easily prove their land ownership claims based on the incomplete cadastre and surveying records;
- they reside in communities with approved structural plans and whose land has been already clearly demarcated in these plans;
- their lands are at risk of encroachment by squatters or whose lands have been used by squatters for less than 10 and 15 years, respectively[8];
- They have been squatters on state-owned land for more than 15 years and on private land for more than 10[9];
- live or own apartments and condominiums that have not been formally registered in their names, as they benefit from the expedited and simpler registration processes;
- women and children heirs of deceased land and property owners, whose tenure rights were established through a Certificate of Legacy only in response to requirements of to the systematic land settlement and registration process, or whose inheritance shares in property/land tenure has been established and registered in their names through formal registration certificates; and
- Palestinian expatriates who have been unable to travel to Palestine to formally register and secure their tenure, and would have otherwise either lost their property to squatters, or sold it at much lower price than it was worth because they were unaware of its market value.

88. This notwithstanding, and based on stakeholder discussions and a review of objections filed by claimants in land settlement courts, findings suggest that a number of stakeholders stand to lose from systematic land settlement and registration. Others stand the risk of exclusion from systematic land settlement activities. Profiling these stakeholders according to distinct socio-economic and demographic groups is not

[8] Registration offers some extra protection, especially in relation to people whose land has been used or trespassed by others by what is known as squatter's rights or adverse possession. It is much easier to establish squatter's rights over unregistered land. The squatter can apply to be recognized as the owner if they have openly and continuously occupied private land as if it was their own for at least 10 years without any attempts by the rightful owner to remove them. They can do the same for state-owned land if they have been occupying and using it for more than 15 years. However, with registered land squatter's rights have effectively been extinguished.

[9] Squatters have no entitlements to ownership or use rights on registered land. Within the course of systematic land settlement and registration, squatters have the right as any other claimant to claim ownership and/or use rights. The Law grants them ownership of the land they have squatted in cases where they demonstrate its use over a period of 15 years for public lands, and 10 years for private lands. Where they have used the land for less than this duration, the law grants them compensation from the owners of any investment they have made in the land in conjunction with its use.

possible given the paucity of data that enables such analysis in Al-Mizan system on the one hand, and the substantial variation in opinions of stakeholders met in this regard on the other hand. However, based on field interview results, some broad characteristics for each of these groups can be identified. These are depicted in Table 4 below.

89. The preceding benefits notwithstanding, a number of stakeholders may be exposed to economic and social risks as a result of systematic land settlement and registration. Others may be excluded from the benefits of systematic land settlement and registration. We discuss these risks and their mitigation measures in Table 4 below. Given that a number of the proposed mitigation measures fall outside the remit of the Project, Table 4 includes project-specific mitigation measures in line with the Bank's requirements. **The SMP in chapter eight of this report provides more details on these measures, the project's contribution to their implementation,** and the responsibilities for their monitoring and reporting.

Table 4. Social and Economic Risks and Groups Likely to be Affected

Risk	Profile of Vulnerable Groups	General Mitigation Measures	Project-Specific Mitigation Measures
Economic losses as a result of legal disputes over settlement decisions.	Any one or group of tenure holders who file objections to claim competing land tenure or ownership rights than those displayed in the Table of Rights, or are subject to litigation in settlement courts as their land may be temporarily seized, and they would have to endure long waiting times and financial losses in lieu of litigation. Particularly vulnerable within this group are the poor who cannot afford to pay court fees and as a result may get their objections returned without adjudication, and those who own more than one parcel of land and find themselves having to file objections on more than one of them.	- Strengthening dispute resolution mechanisms within the framework of systematic land settlement and registration, including through strengthening local committees' role in dispute resolution, utilizing local dispute resolution mechanisms, and enhancing LWSC's staff capacities in dispute resolution. - Strengthening the GRM, including through capacity development of LWSC Complaints Unit. - Advocating the Supreme Judicial Council to amend regulations to enable poor litigants and litigants with several objections to pay court fees in instalments congruent with their economic capacities. Until such amendment is done, the Project will not fund the registration of land under litigation or dispute.	1) In all project targeted communities, and in close cooperation with the relevant LGUs: a. Form local dispute resolution committees to support LWSC in resolving disputes that emerge during the course of settlement activities. This committee should draw on both male and female residents of the targeted communities who have a reputation for integrity. b. Train members of local dispute resolution committees on land-related dispute resolution, drawing on experience gained by LWSC and mediators in this regard. c. Install complaints boxes in LWSC Local Offices and design

Risk	Profile of Vulnerable Groups	General Mitigation Measures	Project-Specific Mitigation Measures
			and implement an awareness raising campaign about the existence and use of these boxes. Visit LWSC offices on a weekly basis to collect grievances. d. Design and implement media campaigns to raise public awareness about the GRM. e. Publish the Records of Claims as they get prepared to increase the transparency of the settlement process, thereby increasing the utility of the GRM and other dispute-resolution mechanism. In the meantime, bolster the human resource capacity of the Control and Complaints Unit to efficiently handle the likely increase in grievances. 2. Under the project no land under litigation or dispute shall be eligible for funding for its registration until disputes are amicably resolved.
Economic losses as a result of information asymmetry	Property owners who may fall prey to opportunistic real-estate investors whose business model is built on purchasing unregistered land in communities that are planned to be targeted by systematic land settlement, thereby lose the benefit of	- Develop a three-year, rolling timetable for all planned settlement orders, to include the communities and plots planned for settlement and registration, and dates on which Settlement Orders and Settlement Announcements are expected to be issued. Widely disseminate this	3. Develop a timetable showing all communities that will be targeted by the project throughout its lifetime, and widely disseminate this timetable and revise it on an annual basis.

Risk	Profile of Vulnerable Groups	General Mitigation Measures	Project-Specific Mitigation Measures
	selling their land at higher value once their land is registered.	timetable and revise it on an annual basis.	
Loss of formal tenure rights due to lack of information and legal education	Tenure holders who get coerced into renouncing their tenure rights by their male family members, or who are led to believe that this renunciation is only a formality to expedite settlement and registration processes and has no implications on their rights, particularly women and youth.	- Conduct awareness raising workshops on the settlement process and implications of renunciation of rights in each targeted community. - Publish and make widely available educational materials on tenure rights, ensuring its accessibility to all stakeholder groups in the targeted communities. - Partner with community-based organizations and leverage their existing capacities to raise awareness on immovable property ownership rights, land settlement and registration. - When documenting claims on the basis of renunciation documents, ensure communicating with those who have renounced their rights to validate that they have indeed agreed to renounce their ownership and understand that their decision is final.	4. In all communities targeted by the project: a. Conduct at least 2 awareness raising workshops on the settlement process and implications of renunciation of rights in each targeted community. b. Publish and make widely available educational materials on tenure rights, ensuring its accessibility to all stakeholder groups in the targeted communities. c Identify community-based organizations with existing capacities to raise awareness on immovable property ownership rights, land settlement and registration, and partner with them to leverage their capacity to raise public awareness (particularly among women) on issues of land rights, settlement amomg heirs (takhruj), and land registration and settlement procedures. d.When documenting claims

Risk	Profile of Vulnerable Groups	General Mitigation Measures	Project-Specific Mitigation Measures
			on the basis of renunciation documents, ensure communicating with those who have renounced their rights to validate that they have indeed agreed to renounce their ownership and understand that their decision in this regard is final.
	Farmers and squatters who are unaware of their rights to claim tenure over trees they have cultivated in or structures they have built on others' property.	- Publish and make widely available educational materials on tenure rights, ensuring its accessibility to all stakeholder groups.	5. Design and print educational materials specific to squatter's rights, explained in footnote number 8, in the process of systematic land settlement and registration process, and disseminate this widely in all targeted communities once the Settlement Announcement is published.
Inability of tenure holders to defend ownership rights as a result of rejection of objections in settlement courts due to administrative formality and forms of objections filed	Any citizen filing an objection personally or through a lawyer within the legal period (30 days) but failing to comply with required formalities and administrative requirements. Once their objections get rejected in court on the basis of formality and the 30-day objection period has passed, objections will not be accepted by the Settlement Court.	In each Settlement Office, and to minimize the possibility of rejection by the court of filed objections on the basis of form or due to being incomplete, put in place a mechanism to ensure that objections get filed using standardized forms and completion checklists to ensure administrative completion and compliance of objections with required form.	6. In all local Settlement Offices in communities targeted by the project, a. ensure that standardized objection forms are widely available to the public for free. b. design and print educational materials on administrative compliance of objections, to include a checklist.
Potential land boundary disputes	Since most land parcels have only informal boundaries, it is	- In the partnership agreement with LGUs, and to minimize surveying errors,	7. In all communities targeted by the project:

Risk	Profile of Vulnerable Groups	General Mitigation Measures	Project-Specific Mitigation Measures
during individual parcel delineation.	expected that there would be boundary disputes during the formal delineation of boundaries under the Project. Cases of such conflicts have been noted in the SIA and is one of the many reasons for litigation and delays or stalled processing of individual titles.	include specific technical requirements that should be included in tender documents for the qualification and evaluation of private sector surveyors to ensure that surveyors with the requisite technical capacities and experience in cadastral land surveying get contracted. - Ensure that LWSC surveyors accompany private sector surveyors at all times throughout the boundary demarcation process. - Communicate clear schedules for boundary demarcation with land owners and adhere to these schedules, and request that land owners be present during the demarcation process. - Engage local committees in the demarcation process, and using their knowledge of boundaries as a key input in the demarcation process, particularly for lands with absentee owners. - Strengthen dispute resolution mechanisms within the framework of systematic land settlement and registration, including through strengthening local committees' role in dispute resolution, utilizing local dispute resolution mechanisms, and enhancing LWSC's staff capacities in dispute resolution. - Strengthening the GRM as a dispute resolution mechanism, including through capacity development of LWSC Complaints Unit.	a. Ensure that LWSC surveyors accompany private sector surveyors at all times throughout the boundary demarcation process. b. Communicate clear schedules for boundary demarcation with land owners and adhere to these schedules, and request that land owners be present during the demarcation process. c. Engage local committees in the demarcation process, and using their knowledge of boundaries as a key input in the demarcation process, particularly for lands with absentee owners.

Risk	Profile of Vulnerable Groups	General Mitigation Measures	Project-Specific Mitigation Measures
Conflict over contested inheritance of parcels	Heirs of a deceased land owner of an unregistered land. Many of the land parcels whose owners have died are now occupied by their heirs. However, sometimes the ownership of the parcel by the occupying heir(s) is contested by the other heirs. This could create conflict that was not previously on the surface. Women heirs may be coerced to renounce their inheritance rights as a result, or be given compensation well below their legal entitlement in the process. It is likely that Project may inadvertently weigh in on the side of the current occupant, without having solid basis to do so. .	- Vet ownership claims before recording them with the members of the local committees. - Vet authenticity of any inheritance documents with the Ministry of Awqaf and Religious Affairs. - Strengthen dispute resolution mechanisms within the framework of systematic land settlement and registration, including through strengthening local committees' role in dispute resolution, utilizing local dispute resolution mechanisms, and enhancing LWSC's staff capacities in dispute resolution. - Strengthening the GRM as a dispute resolution mechanism, including through capacity development of LWSC Complaints Unit.	
Exclusion from the benefits of land settlement and registration	Tenure holders whose who names get omitted from the Table of Claims due to forged signatures or documents that do not get noticed or properly investigated by Settlement Commissioners, particularly women.	- Vet ownership claims before recording them with the members of the local committees. - Vet authenticity of any signed documents with the relevant authorities.	8. Revise procedures so that vetting of signatures and official stamps on supporting documents to filed claims are vetted for authenticity by local committees and relevant authorities.
	Women who have invested with their families in the purchase of property but are unaware of their ability to claim tenure over this property, or unaware of the settlement and registration process altogether. This is particularly true for	- Design, print and make widely available, including through the internet and social media, standard educational materials on land settlement and registration. - Produce short educational films to spread awareness about settlement procedures and requirements, and	9. Design, print and make widely available, including through the internet and social media, standard educational materials on land settlement and registration in all communities targeted by the project.

Risk	Profile of Vulnerable Groups	General Mitigation Measures	Project-Specific Mitigation Measures
	women who have co-purchased property in settlement areas outside their own community or in the same community away from their place of residence.	widely disseminate them through local media outlets, and websites and social media of PLA, LWSC, and partner LGUs. - Leverage the existing capacity of national NGOs local CBOs with ongoing programmes focusing on legal and rights education to implement legal education workshops on land settlement and registration, particularly for women and elderly. - Improve the accessibility of the Table of Rights and corresponding cadastral survey maps: firstly, by widely announcing their display (including through text messaging technologies); and secondly, by making printed copies thereof available to local CBOs and LGUs in targeted sites to display. Electronic copies could also be made available for wider circulation, including through the websites and social media pages of PLA, LWSC, MoFAE and partner LGUs. - Once the Tables of Rights are displayed, dedicate sufficient time and staff resources to answer technical questions that right holders may have on these tables, as well as offer legal advice. - Put in place a mechanism to follow-up closely with MoFAE to ensure that Settlement Orders and Instructions get disseminated and published as requested.	10. Produce short educational films to spread awareness about settlement procedures and requirements, and widely disseminate them through local media outlets, and websites and social media of PLA, LWSC, and partner LGUs. 11. In all communities targeted by the project, map and leverage the existing capacity of national NGOs local CBOs with ongoing programmes focusing on legal and rights education to implement legal education workshops on land settlement and registration, particularly for women and elderly. 12. Improve the accessibility of the Table of Rights and corresponding cadastral survey maps in all communities targeted by the project: firstly, by widely announcing their display (including through text messaging technologies); and secondly, by making printed copies thereof available to local CBOs and LGUs in targeted sites to display. Electronic copies could also be made available for wider circulation, including through the websites and social media pages of PLA,

Risk	Profile of Vulnerable Groups	General Mitigation Measures	Project-Specific Mitigation Measures
			LWSC, MoFAE and partner LGUs. 13. Once the Tables of Rights are displayed, dedicate sufficient time and staff resources to answer technical questions that right holders may have on these tables, as well as offer legal advice. 14 Put in place a mechanism to follow-up closely with MoFAE to ensure that Settlement Orders and Instructions get disseminated and published as requested for all communities and plots targeted by the project.
	Tenure holders whose lack of awareness of the opportunity to divide land or property they collectively own with others within the course of the settlement and registration process renders them unable to reclaim usufruct rights and exercise agency in relation to their land.	- Same as above. - For all ownership claims submitted collectively, require that all claimants sign the claim documents, and at least one third of them to be present during the submission of the claim and suggest to them to sub-divide the land they claim into distinct parcels that could be registered in their individual names in proportion to their ownership in the original parcel. Offer assistance when needed.	NB: previous measures apply here. In addition: 15. For all ownership claims submitted collectively in all project targeted communities, require that all claimants sign the claim documents, and at least one third of them to be present during the submission of the claim and suggest to them to sub-divide the land they claim into distinct parcels that could be registered in their individual names in proportion to their ownership in the original parcel. Offer assistance when needed.

4. Applicable Safeguards and Policies

90. This project was not prepared under the Environmental and Social Framework but safeguards policies and at the time of project preparation none of the safeguard's policies was triggered. But to ensure social issues were addressed it was agreed that SMP to be prepared and disclosed. The TOR of the SIA that is bases for the SMP was reviewed and cleared by the Bank.

91. Table 5 below provides a summary of these safeguards and their applicability, identifies gaps (where they exist) between these safeguards and relevant Palestinian laws and policies, and explains how gaps are bridged by the SMP.

Table 5. Applicable Safeguards

Applicable WB Safeguards and their requirements	**Relevant Palestinian Laws and Regulations**	**Gaps and how they will be bridged**
OP 4.01 - Environmental Assessment	The Palestinian Environmental Law (PEL) No. 7 of 1999. The Palestinian Environmental Assessment Policy (PEAP), approved by decree No: 27-23/4/2000.	No gaps exist. OP 4.01 has been triggered for this project. The Project will only involve soft activities, including land registration; therefore, project activities are not expected to cause any significant, direct, or indirect environmental or social impacts. For the same reasons, the Project is not covered by the PEL or PEAP.
OP 4.12 Involuntary Resettlement	Constitutional provisions that private property shall be respected and shall not be expropriated. Acquisition Law No. (2) for the year (1953), according to which the state can appropriate private land based on a court decision for the purposes of public benefit (defined as for building schools, hospitals, economic infrastructure, public buildings, and other public benefit uses) in exchange for a fair compensation for all the land acquisitioned. Land and Water Settlement Law No. 40 of 1952, which	Some gaps exist, and these will be addressed through procedural process improvements, strengthening of communication and socialization activities to enhance legal and procedural awareness, and enhancement of grievance redress and dispute resolution mechanisms. Some details are presented below, and the full list of mitigation measures are included in the SMP table at the end of this document. The project will not involve any resettlement activities, voluntary or involuntary. It will also not include any acquisition by the state of private land. The project will not support the titling of property in the name of the State

Applicable WB Safeguards and their requirements	Relevant Palestinian Laws and Regulations	Gaps and how they will be bridged
	gives Settlement Commissioners the authority to issue decisions to compensate land owners for losses associated with redrawing of the boundaries or reshaping their lands in conjunction with settlement works, if this affects the viability of the land or depreciates its value in any way. Planning of Cities and Villages Law No. 79 of 1966, which gives local authorities the right to deduct within the framework of preparing outline and structural plans no more than 30 per cent of the land purposes of establishment of roads and/or public facilities without compensation. In the event that more than this percentage is deducted, owners are entitled for full compensation of the deduction from the local authority.	that would result in evictions. The project will support the registration of property in Areas A and B that do not require the acquisition by the State of land to establish rights of way/access. Some LGUs do land adjustments based on existing laws that may include either or both of the following situations: (i) parcel reshaping to make parcels more usable; and (ii) establishing right of way and access which may include acquisition of a portion of the parcel by the State." As there might be land owners who may be affected by the Project parcel redrawing or reshaping activities for the establishment of roads outside already approved structural plans, (which devalues their land, makes it unviable for investment, or implies that they lose trees that they have cultivated), measures will be introduced through the implementation of the SMP to ensure that Settlement Commissioners issue decisions to compensate these land owners in line with OP 4.12. We understand the approach under the project is not to finance such parcel redrawing/reshaping, rather than applying OP4.12 and providing compensation. The SMP also includes several measures to ensure that social safeguards in the Land and Water Settlement Law and Unified Procedures Manual are systematically upheld, including through capacity building measures. Moreover, the SMP includes specific measures to ensure that settlement process is implemented in an inclusive manner, including of women, elderly, and persons with disabilities. It includes several measures and social safeguards to ensure community engagement in the settlement process –including in dispute resolution- and information disclosure.
Stakeholder Engagement and Information Disclosure	Land and Water Settlement Law No. 40 of 1952.	The Land and Water Settlement Law No. 40 of 1952 and Unified Procedures Manual will both apply. Both include several measures and social safeguards

Applicable WB Safeguards and their requirements	Relevant Palestinian Laws and Regulations	Gaps and how they will be bridged
	Unified Procedures Manual for Land and Water Settlement and Registration.	to ensure community engagement in the settlement process –including in dispute resolution- and information disclosure. Within the framework of designing and implementing the project, as well as during the preparation of the SIA, consultations were organized to inform the communities of their rights under the project and to disseminate information and facilitate public disclosure. These consultations will continue during the project implementation, and the SMP outlies how these consultations will take place.

5. Public Consultations and Grievance Redress Mechanism

4. The following sections will discuss the stakeholders' identification, engagement and consultation, including the main concerns that were raised during the different consultation activities. The sections also discuss the proposed grievance redress mechanism.

5.1. Public Consultations

92. As part of the SIA and the SMP, many activities were carried out to ensure the adequate engagement of a wide spectrum of stakeholders in identifying social risks associated with land settlement and registration activities. In addition to meetings with the PLA, LWSC, Cabinet Secretariat, settlement judges, lawyers, and real estate developers, field visits were organized in eight communities where systematic settlement activities have been completed (4) and underway (4). The selection of these communities was based on a two-step, stratified 'purposive sampling' (also referred to as 'judgment sampling') approach. Within this broad approach, the key objective was to sample as many governorates as possible, and, within the selected governorates, communities that offer 'maximum variation' in terms of geography, socio-economic conditions, land tenure contexts, and experience with systematic land registration on the basis of the following criteria:

- communities exhibiting unusually high rates of disputes over property rights during the settlement process;
- communities exhibiting comparatively low rates of land ownership by women. because of socially constructed social norms; and
- communities where land related disputes have been relatively low and land ownership is near parity between men and women.

93. The selected communities for field visits were Al-Biereh and Betunya (Ramallah Governorate), Bidya and Salfeet (Salfeet Governorate); Arabouneh (Jenin Governorate);

Nablus City (Nablus Governorate); Hindaza (Bethlehem Governorate); and Tarqumya (Hebron Governorate).

94. During the community visits, consultations were organized with the following stakeholders: local authorities, Settlement Commissioners, land surveyors, and male and female citizens, and men and women with competing claims over land ownership. Over 120 people connected with the land settlement and registration activities were interviewed. A qualitative appreciative inquiry and inductive approach was used for this purpose, where stakeholders' views on measures that could be taken by the project to mitigate social risks were systematically collected.

95. In assessing the legal and institutional framework of systemic land settlement and registration for purposes of the SMP, the focus was primarily on investigating aspects related to land acquisition by the state for the establishment of right of way in settled/to be settled land, and the efficacy of grievance mechanisms in resolving disputes arising from this. Citizens' views in this regard provided key inputs to the analysis and the risk mitigation measures identified in the SMP. Central to this analysis was the degree to which legal provisions are sensitivity to inclusion and enshrining individual property rights (including inheritance rights for women, children, and disabled and how these are enshrined through the systematic land registration process).

96. The assessment of existing grievances and grievance redress mechanisms from a user perspective was a central component of the SMP preparation process. In-depth interviews were conducted with some 20 users of the GRM, as well as with PLA, LWSC, local authorities, and the Cabinet Secretariat (which is centrally responsible for the GRM) to identify its weaknesses and ways to improve it. The SMP includes several activities that involve opening up opportunities for local stakeholders to suggest ways to improve the GRM, including through the installation of complaints and suggestion boxes in all LWSC local offices.

5.2. Project-Level Grievance Redress Mechanism

97. The grievances related to the Project activities are limited to complaints from the targeted communities during the different phases of the land settlement and registration. A grievance redress or complaints handling mechanism will be in place to ensure that the population affected by the Project have the access to a viable system to air grievances and to seek resolution with no intimidation or coerciveness. The grievance system is also important for LWSC to ensure they are accountable to complaints and that these complaints are handled transparently and efficiently.

98. A grievance redress mechanism has already been proposed for this Project. This GRM was reviewed by the consultants who undertook the SIA and adjusted to suit the specific needs of the stakeholders. The proposed GRM follows clear and smooth administrative procedures, in order to provide sufficient time and effort, and to optimize the complaints from the reception to completion or closure. The following is a description of the Grievance Redress Mechanism (GRM) that will be used.

99. **Definitions:**

- Complaint: is an expression of written or verbal dissatisfaction by the complainant to LWSC expressing his or her dissatisfaction with the way settlement activities are being undertaken, or any harm resulting to him/her or the public as a result.

- Complainant: An person or entity who has suffered negative social or economic impact or has incurred harm in conjunction with the implementation of land and water settlement activities in the community where he/she has land or water tenure.
- Complaints Officer: A staff member of LWSC' Control and Complaints Unit.

100. The GRM is designed to enable citizens to file grievances through several mechanisms, including: electronically through a centre-of-government complaints mechanism to which LWSC is connected, LWSC's social media pages, and designated e-mail addressed and fax numbers; a complaints hotline; and in person at one of LWSC's three District Offices in the north, middle, and south of the West Bank. Citizens can also file grievances with the office of the LWSC Chairman and at the General Administration of Settlement Department at LWSC headquarters, though complaints filed here get transferred to the Control and Complaints Unit for processing and follow-up. The system currently does not enable citizens to file complaints or grievances at local offices, but this is planned for 2021 through availing complaints boxes in all LWSC local offices. A procedures manual has been put in place to govern the way complaints are logged and handled.

101. All grievances, irrespective of the mechanism through which they were filed, will be logged and given a reference number by LWSC Complaints Unit for follow-up and tracking. If the complainant chooses to submit the complaint electronically via the LWSC's webpage, the government's central complaints system, or through LWSC's social media page, the computerized system will transfer the complaint electronically to a designated staff member of LWSC Complaints Unit. In case the complaint is submitted through hotline or fax, the complaint officer will receive and register the complaint using a standard form, which he/she then transfers to the competent staff at the Complaints Unit for entry into the system and further processing. Once entered, Grievances are given a reference or a ticket number, and complainants receive this number through a phone call or text, which they can use to follow-up on their grievance by phone. Electronically submitted complaints automatically get a computer-generated reference number once they submit their grievance. In all cases, a competent staff at the Complaints Unit verifies that the complaint is administratively complete, and where needed reaches out to the complainant to fill any missing information and supporting documents. The complaints electronic log includes the following data, as relevant: the block identity number, the parcel identity number, the area of the parcel, the location of the parcel (within the Geopolitical Boundaries of A, B or C), name of the LGU and governorate, and the nature of the complaint (staff related or land related).

102. Once administratively complete, the grievance will first be brought to the attention of the Head of Control and Complaints Unit at LWSC, who reviews it and assigns one of the Unit's six Complaints Officers to study and investigate it within ten days –usually, through a field visit and meeting with the complainant and relevant stakeholders. During this period, the Complaints Officer will try to redress the complaint in an amicable manner, whenever possible, through engaging directly with relevant stakeholders, and will issue a report with the result of his/her investigation. This report typically includes a summary of the compliant, the investigation findings and conclusions, a suggested response for the complainant and –as necessary- recommendations for follow-up investigation. This report gets submitted to the Head of the Control and Complaints Unit, who, after review, either approves it signalling authorization for the suggested response letter to be sent, or sends it back to the concerned Officer for clarification or follow-up.

103. In instances where the Complaints Officer feels that he/she needs assistance in investigating or redressing the complaint, he/she may request the Head of the Control and Complaints Unit to form a Grievance Redress Committee (GRC) to support in

redressing the Complaint. In such cases, the GRC will have representatives from the Control and Complaints Unit, the concerned Local LWSC Office, the Local Dispute Resolution Committee, and, as necessary, LWSC's Legal Department and/or General Administration of Settlement Department. The GRC will be formed within a week of being requested and will have a maximum of four weeks to investigate and redress the complaint. Records will be kept of all grievances received including contact details of complainant, date the complaint was received, nature of grievance, agreed corrective actions and the date these were submitted, and final outcome. Complaints will be considered closed on in one of the following cases:

- withdrawal of the complaint by the complainant through a written request;
- resolution of the complaint amicably during the investigation; and/or
- investigation proves that complaint is malicious in nature.

104. The proposed GRM does not impede access to the country's judicial or administrative remedies. The project affected population has the right to refer the grievances to appropriate courts of law at any stage of the process. The Project will ensure that the project affected population has the right to approach court of law anytime during the process of grievance redress activities.

6. Social Management Plan

105. As previously noted in section 1.2 of this report, the SMP is a combination of the proposed mitigation measures for the anticipated social impacts and the monitoring plan, which is designed to:

- ensure that the prediction for the impacts is accurate;
- assure that the mitigation measures recommended in this report are implemented fully and in accordance to the World Bank's requirements stipulated in this report ;
- Ensure community engagement in the settlement process –including in dispute resolution- and information disclosure. and
- facilitate the monitoring of the SMP, including through identifying how activities will be monitored and how often, and who is responsible for monitoring.

106. Based on the SIA findings summarized previously in chapters three and four of this report, The SMP is designed to address the weaknesses in the land settlement and registration process and institutional architecture which have a bearing on social risks. The rationale for doing so instead of structuring the plan around risks is because the social impacts of the land settlement and registration process are largely driven by a confluence of legal and institutional factors, and not easily attributable to a single activity in the process. Nonetheless, mitigation measures are closely aligned with the social risks identified previously in chapter six. Social mitigation and monitoring actions are presented in a matrix format. The matrix includes an identification of the issues, mitigation measures, and responsibility for executing the mitigation measures and monitoring actions.

107. While the SMP sets out the responsibilities for the implementation of the various mitigation measures, the responsibility for the overall management of the SMP is with the LWSC/PLA and the Social Safeguard Specialist engaged by them" to clarify the institutional responsibility, who shall coordinate and oversee compliance to its implementation, as well collect and consolidate the necessary information for reporting on its implementation; including reports on the performance of the GRM from the Control and Complaints Unit. Compliance monitoring will be conducted using the specific measures relevant to, and prescribed for the activities. The monitoring will also

assess the general social performance. Monitoring reports should be prepared on quarterly basis and contain information with regard to social compliance as well as any emerging needs for improving the SMP. Project Monitoring Reports to The World Bank should include a chapter dedicated to the progress in implementation of the SMP and its results.

108. The cost of mitigation measures and monitoring activities identified in the plan are limited to those costs that the Project will need to cover. All other costs will be covered by LWSC from its own budget.

109. It is important to note that it is evident that each community targeted by the Project will likely have its own peculiar social issues which can only be ascertained during Project implementation. These issues will have to be assessed and addressed at the ground level on a per community basis. Thus, for each community, there is a need to conduct social screening, rapid and participatory rural assessment mainly focused on land tenure issues and gender dynamics of the settlement area, covering such issues as, land classification status, actual terrain, water resources, community relations, and vulnerable households. Such screening and assessment would help identify if and when additional safeguards are needed to mitigate social risks, and would thus help in fine-tuning the SMP to the special social circumstances of different settlement areas. Financial resources should be allocated for this purpose.

110. A cleared version of this SMP will be disclosed on the PLA and LWSC websites.

Table 3. Social Management Plan

No.	Issue	Mitigation Measure	Responsibility	Timing of implementation within the SLR process	Time estimation for implementation	Reporting Frequency
1	Awareness raising, outreach and legal advice	Develop and institute an awareness raising and outreach strategy for land and water settlement activities, to include the minimum standards and clear guidelines for community engagement and outreach	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations.	Start immediately and complete by end of August 2021	2 months	Quarterly
		Undertake numerous public meetings in the communities targeted by settlement to announce and explain the settlement process	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations.	Start immediately within all communities currently under SLR, and ongoing for all new targeted communities	1 month after issuance of Settlement Order, and 1 month after issuance of Settlement Announcement in all targeted communities.	Quarterly
		Design, print and make widely available, including through the internet and social media, standard educational materials on land settlement and registration. These materials should answer the following questions: What is land settlement and registration? Why is it important? What are the costs of land settlement and registration? How to claim tenure within the context of land settlement and registration? How to ensure that your tenure claims are documented? What are important dates to be mindful of? What grievance redress mechanisms exist? What are Settlement Courts and when best to resort to them?	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations and Legal Department.	Start immediately and complete by end of 2021 for first batch of material. Develop new materials in 2022.	6 months. Disseminate continuously.	Quarterly
		Produce short educational films to spread awareness about settlement procedures and requirements, and widely disseminate them through local media outlets, and websites and social media of PLA, LWSC, and partner LGUs.	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations and Legal Department.	Start immediately and complete by end of 2021 first batch of films. Develop new films in 2022.	1 month for each film. Disseminate continuously.	Quarterly
		Leverage the existing capacity of national NGOs local CBOs with ongoing programmes focusing on legal and rights education to implement legal education workshops on land settlement and registration, particularly for women and elderly.	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations and Legal Department	Start immediately. This is an ongoing measure.	Ongoing	Quarterly
		Improve the accessibility of the Table of Rights and corresponding cadastral survey maps: firstly, by widely announcing their display (including through text messaging technologies); and secondly, by making printed copies thereof available to local CBOs and LGUs in targeted sites to display. Electronic copies could also be made available	General Administration of Settlement Department	Start immediately for all plots currently targeted by SLR and for all communities and plots targeted going forward.	Ongoing.	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Timing of implementation within the SLR process	Time estimation for implementation	Reporting Frequency
		for wider circulation, including through the websites and social media pages of PLA, LWSC, MoFAE and partner LGUs.				
		Once the Tables of Rights are displayed, dedicate sufficient time and staff resources to answer technical questions that right holders may have on these tables, as well as offer legal advice.	General Administration of Settlement Department	Start immediately for all plots currently targeted by SLR and for all communities and plots targeted going forward.	Ongoing.	Quarterly
		Follow-up more closely with MoFAE to ensure that Settlement Orders and Instructions get disseminated and published as requested.	General Administration of Media and Public and International Relations	Start immediately for all plots currently targeted by SLR and for all communities and plots targeted going forward.	Ongoing.	Quarterly
2	Capacity of Local LWSC Offices	1. Institute a standard/unified organizational structure for Local Settlement Offices to include at least seven employees (Settlement Commissioner, 2 surveyors, 2 lawyers, 1 social safeguards specialist, and 2 administrative staff); and reconstitute all LWSC offices accordingly.	General Administration of Settlement Department, with support from the General Administration of Administrative and Financial Affairs	Start in March 2021 and complete by June 2021.	1.5 months	Quarterly
		2. Allocate the necessary resources for each LWSC local office to have access to means of transportation for the entire duration of the settlement and registration activities, and particularly during cadastral surveying works.	General Administration of Settlement Department, with support from the General Administration of Administrative and Financial Affairs	Start once new organizational structure is approved, and aim to complete for all currently open Local Settlement Offices by October 2021.	6 months	Quarterly
		3. Leverage existing capacity within and outside LWSC, to design and institute a Training of Trainers Programme for Settlement Officers within LWSC; and cascade this training to retrain all current and newly appointed Settlement Officers.	General Administration of Settlement Department, with support from the General Administration of Administrative and Financial Affairs	Start immediately and complete training for first cohort of trainees by August 2021. Develop a training schedule by 1 September 2021.	2 months for development of training package. 1 month for training of first cohort of trainers. 1 month for each cohort of trainees thereafter.	Quarterly
3	Minimizing surveying errors, road related disputes, and ownership disputes	4. Amend the Unified Procedures Manual to make it a requirement for Settlement Commissioners to, firstly, formally ask LGUs to propose the demarcation of roads on the survey maps, and, secondly, to require the Settlement Commissioner to approve these proposals only after verifying them in-situ through a physical examination and consultation with affected land owners.	General Administration of Settlement Department.	Start immediately and complete by 30 May 2021.	2 months.	Monthly until Manual is revised and approved by chairman.
		Re-confirm the authority granted by law to the Settlement Commissioners to issue final decisions to compensate tenure holders whose lands become unviable after being reshaped to accommodate access	General Administration of Settlement Department, with support from Legal Department.	Begin immediately and complete by 1 April 2021.	1 month	Monthly until Instructions/Regulations are issued by chairman.

No.	Issue	Mitigation Measure	Responsibility	Timing of implementation within the SLR process	Time estimation for implementation	Reporting Frequency
		roads, or those who lose more than 30 per cent of their land as a result.				
		5. For all ownership claims submitted collectively, require that all claimants sign the claim documents, and at least one third of them to be present during the submission of the claim and suggest to them to sub-divide the land they claim into distinct parcels that could be registered in their individual names in proportion to their ownership in the original parcel. Offer assistance when needed.	LWSC Settlement Commissioners	Issue instructions immediately, and no later than 15 March 2021.	1 week.	Quarterly
		Vet ownership claims before recording them with the members of the local committees.	LWSC Settlement Commissioners	Issue instructions immediately, and no later than 15 March 2021. Ensure ongoing adherence.	1 week.	Quarterly
		6. Vet authenticity of any signed documents with the relevant authorities.	LWSC Settlement Commissioners	Issue instructions immediately, and no later than 15 March 2021. Ensure ongoing adherence.	1 week.	Quarterly
		7. Vet accuracy of survey maps prepared by private surveyors through physical examination of all demarcated plots and roads	LWSC Settlement Commissioners	Issue instructions immediately, and no later than 15 March 2021. Ensure ongoing adherence.	1 week.	Quarterly
		8. Put in place technical guidance for LGUs to consider when tendering and evaluating tenders for cadastral surveying works.	General Administration of Settlement Department, with support from Legal Department.	Complete by 30 April 2021.	1 month	Quarterly
4	Dispute resolution within the framework of systematic land settlement and registration	9. In all communities under land settlement and in close cooperation with the relevant LGUs, form local dispute resolution committees to support LWSC in resolving disputes that emerge during the course of settlement activities. This committee should draw on both male and female members of the community who have a reputation for integrity.	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations	Start immediately for all plots currently targeted by SLR and for all communities and plots targeted going forward.	Ongoing.	Quarterly
		10. Install complaints boxes in all LWSC Local Offices and raise awareness about these. Visit LWSC offices on a weekly basis to collect grievances	The Control and Complaints Unit	Begin immediately and complete for all local Settlement Offices by 30 June 2022	4 months	Monthly

No.	Issue	Mitigation Measure	Responsibility	Timing of implementation within the SLR process	Time estimation for implementation	Reporting Frequency
		11. Raise awareness about the GRM and publish the Records of Claims as they get prepared to increase the transparency of the settlement process, thereby increasing the utility of the GRM and other dispute-resolution mechanism. In the meantime, bolster the human resource capacity of the Control and Complaints Unit to efficiently handle the likely increase in grievances.	The Control and Complaints Unit, with support from the General Administration of Settlement Department.	Start immediately for all plots currently targeted by SLR and for all communities and plots targeted going forward.	Ongoing.	Monthly
5	Settlement Courts	Where needed, either move Settlement Courts to suitable office buildings, or physically rehabilitate these Courts. At minimum, this should ensure that Settlement Courts have two rooms that could serve as court rooms, and that the Registries get housed in the same building as these courts.	Legal Department, with support from the General Administration of Administrative and Financial Affairs	Formulate a plan immediately and complete by 31 January 2021.	12 months	Quarterly
		For each Settlement Court, and depending on the geographic breadth covered under the jurisdiction of these courts, hire an adequate number of summons officers to ensure that subpoenas and notifications get served in a timely manner.	Legal Department, with support from the General Administration of Administrative and Financial Affairs	Begin hiring process immediately and complete by 30 October 2021.	7 months.	Quarterly
		In each Settlement Office, and to minimize the possibility of rejection by the court of filed objections on the basis of form or due to being incomplete, put in place a mechanism to ensure that objections get filed using standardized forms and completion checklists to ensure administrative completion and compliance of objections with required form.	Land Settlement Commissioners, with support of administrative staff in Local Settlement Offices	Issue instructions immediately and no later than 30 March 2021.	1 week.	Quarterly

7. **Monitoring Plan**

111. Compliance monitoring will be conducted using the specific measures relevant to, and prescribed for the activities. The monitoring will also assess the general social performance. Monitoring reports shall be prepared on quarterly basis, and shall present analysis of the Project's social compliance as well as emerging needs for improving the SMP. Project Monitoring Reports to the World Bank shall include a chapter dedicated to the progress in implementation of the SMP and its results, guided by the SMP monitoring framework.

112. The cost of mitigation measures and monitoring activities identified in the plan are limited to those costs that the Project will need to cover. All other costs will be covered by LWSC from its own budget.

113. The Social Safeguard Specialist (SSS) will be responsible for overall monitoring the implementation of the SMP including the identified mitigation measures and providing regular reports on the progress and challenges in implementation.

114. The SSS will establish, maintain, and update a database of activities. The database will include for each activity:

- Type of activity
- Timeline
- Implementation report
- Cross references to the Grievance Mechanism's log of complaints.

115. The SSS will also prepare:

- Quarterly reports summarizing monitoring results, to be included in the Project's Quarterly Reports to the World Bank
- Reports that aggregate and analyze monitoring results ahead of regular World Bank implementation support missions
- An annual evaluation of all social monitoring results, which will be submitted to the World Bank as part of overall project implementation reporting

Table 4: Monitoring and Evaluation Plan

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
1	Awareness raising, outreach and legal advice	Develop and institute an awareness raising and outreach strategy for land and water settlement activities, to include the minimum standards and clear guidelines for community engagement and outreach	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations.	Progress in development of the awareness raising strategy (ToR under preparation, tendered, awarded, under development, completed, approved by LWSC Chairman, and disseminated).	Media and Public Relations Department	Ongoing until completion of strategy	General Administration of Settlement Department	Quarterly
		Undertake numerous public meetings in the communities targeted by settlement to announce and explain the settlement process	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations.	Number and date of public meetings held in each targeted community Number of participants by gender and age attending public meetings.	Attendance records	Ongoing	General Administration of Settlement Department	Quarterly
		Design, print and make widely available, including through the internet and social media, standard educational materials on land settlement and registration. These materials should answer the following questions: What is land settlement and registration? Why is	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations and Legal Department.	Number and type of educational materials printed	Procurement and administrative records.	Monthly	General Administration of Media and Public and International Relations	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
		it important? What are the costs of land settlement and registration? How to claim tenure within the context of land settlement and registration? How to ensure that your tenure claims are documented? What are important dates to be mindful of? What grievance redress mechanisms exist? What are Settlement Courts and when best to resort to them?						
		Produce short educational films to spread awareness about settlement procedures and requirements, and widely disseminate them through local media outlets, and websites and social media of PLA, LWSC, and partner LGUs.	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations and Legal Department.	Number of educational films produced. Number and type of media outlets and channels used to disseminate films produced	Procurement and administrative records.	Monthly	General Administration of Media and Public and International Relations	Quarterly
		Leverage the existing capacity of national NGOs local CBOs with ongoing programmes focusing on legal and rights education to implement legal education workshops on land settlement and registration,	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations and	Number of MoUs signed with local CBOs and NGOs for purposes of delivery of legal education, awareness and advice.	MoUs. Partners' reports or	Ongoing	General Administration of Settlement Department	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
		particularly for women and elderly.	Legal Department	Number and type of legal education activities conducted by partner CBOs Number of beneficiaries by age and gender reached, according to type of legal education and advisory activity	attendance records they make available to LWSC Partners' reports or attendance records they make available to LWSC			
		Improve the accessibility of the Table of Rights and corresponding cadastral survey maps: firstly, by widely announcing their display (including through text messaging technologies); and secondly, by making printed copies thereof available to local CBOs and LGUs in targeted sites to display. Electronic copies could also be made available for wider circulation, including through the websites and social media pages of PLA, LWSC, MoFAE and partner LGUs.	General Administration of Settlement Department	Description and number of outlets and places through which each Table of Rights and corresponding maps have been displayed.	Monthly reports by Local Settlement Offices	Ongoing	General Administration of Settlement Department	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
		Once the Tables of Rights are displayed, dedicate sufficient time and staff resources to answer technical questions that right holders may have on these tables, as well as offer legal advice.	General Administration of Settlement Department	Number of visitors to Local Settlement Offices who come to ask questions about the Table of Rights and associated maps, by age and gender	Monthly reports by Local Settlement Offices	Ongoing	General Administration of Settlement Department	Quarterly
		Follow-up more closely with MoFAE to ensure that Settlement Orders and Instructions get disseminated and published as requested.	General Administration of Media and Public and International Relations	Proportion of Settlement Orders and Settlement Announcements issued that get announced on MoFAE's website and social media pages.	Monitoring tracker of MoFAE website and social media pages.	Ongoing	General Administration of Media and Public and International Relations	Quarterly
2	Capacity of Local LWSC Offices	Institute a standard/unified organizational structure for Local Settlement Offices to include at least seven employees (Settlement Commissioner, 2 surveyors, 2 lawyers, 1 social safeguards specialist, and 2 administrative staff); and reconstitute all LWSC offices accordingly.	General Administration of Settlement Department, with support from the General Administration of Administrative and Financial Affairs	Number and proportion of Local Settlement Offices fully staffed according to the revised organizational structure.	Staffing tables	Monthly	General Administration of Settlement Department	Quarterly
		Allocate the necessary resources for each LWSC local office to have access to means	General Administration of Settlement Department, with	Number and proportion of Local Settlement	Administrative Records	Monthly	General Administration of Settlement Department	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
		of transportation for the entire duration of the settlement and registration activities, and particularly during cadastral surveying works.	support from the General Administration of Administrative and Financial Affairs	Offices with designated modes of transport				
		Leverage existing capacity within and outside LWSC, to design and institute a Training of Trainers Programme for Settlement Officers within LWSC; and cascade this training to retrain all current and newly appointed Settlement Officers.	General Administration of Settlement Department, with support from the General Administration of Administrative and Financial Affairs	Progress in development of the training programme (ToR) under preparation, tendered, awarded, under development, completed, approved by LWSC Chairman, and rolled). Number and proportion of LWSC Settlement Commissioners (by gender) trained.	Administrative records Training reports.	Ongoing as of 2021, until finalization of training materials and approval by Chairman. Ongoing.	General Administration of Settlement Department	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
3	Minimizing surveying errors, road related disputes, and ownership disputes	Amend the Unified Procedures Manual to make it a requirement for Settlement Commissioners to, firstly, formally ask LGUs to propose the demarcation of roads on the survey maps, and, secondly, to require the Settlement Commissioner to approve these proposals only after verifying them in-situ through a physical examination and consultation with affected landowners.	General Administration of Settlement Department.	Unified Procedures Manual revised as per mitigation measure.	Revised Procedures Manual	Ongoing until Manual gets revised and approved by chairman.	Social Safeguards Specialist	Monthly until Manual is revised and approved by chairman.
		Re-confirm the authority granted by law to the Settlement Commissioners to issue final decisions to compensate tenure holders whose lands become unviable after being reshaped to accommodate access roads, or those who lose more than 30 per cent of their land as a result.	General Administration of Settlement Department, with support from Legal Department.	Chairman's issuance of instructions or regulations to reconfirm corresponding authority.	Chairman's Instructions or Regulations.	Ongoing until Instructions/Regulations are issued by chairman.	Social Safeguards Officer	Monthly until Instructions/Regulations are issued by chairman.

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
		For all ownership claims submitted collectively, require that all claimants sign the claim documents, and at least one third of them to be present during the submission of the claim and suggest to them to sub-divide the land they claim into distinct parcels that could be registered in their individual names in proportion to their ownership in the original parcel. Offer assistance when needed.	LWSC Settlement Commissioners	Number and proportion of collectively owned land or real estate under settlement that get divided into parcels and registered to sole individual owners, by gender.	Local Settlement Offices' reports	Ongoing	General Administration of Settlement Department	Quarterly
		Vet ownership claims before recording them with the members of the local committees.	LWSC Settlement Commissioners	Number and proportion of claims duly signed by local committees.	Claims Tables	Ongoing	General Administration of Settlement Department	Quarterly
		Vet authenticity of any signed documents with the relevant authorities.	LWSC Settlement Commissioners	Number of disputes and objections claiming unauthentic documents.	GRM reports, Al-Mizan/List of Objections	Ongoing	General Administration of Settlement Department	Quarterly
		Vet accuracy of survey maps prepared by private surveyors through physical examination of all demarcated plots and roads	LWSC Settlement Commissioners	Number of verification visits to surveyed parcels.	Local Settlement Offices' reports	Ongoing	General Administration of Settlement Department	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
		Put in place technical guidance for LGUs to consider when tendering and evaluating tenders for cadastral surveying works.	General Administration of Settlement Department, with support from Legal Department.	Technical guidance note prepared and integrated in an annex in all partnership agreements with LGUs beyond 2020.	MoUs/Partnership agreements with LGUs	Ongoing	General Administration of Settlement Department	Quarterly
4	Dispute resolution within the framework of systematic land settlement and registration	In all communities under land settlement and in close cooperation with the relevant LGUs, form local dispute resolution committees to support LWSC in resolving disputes that emerge during the course of settlement activities. This committee should draw on both male and female members of the community who have a reputation for integrity.	General Administration of Settlement Department, with support from the General Administration of Media and Public and International Relations	Proportion of Communities targeted with active local dispute resolution committees. Number of members in local dispute resolution committees, by locality age and gender.	Local Settlement Offices' reports	Ongoing	General Administration of Settlement Department	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
		Install complaints boxes in all LWSC Local Offices and raise awareness about these. Visit LWSC offices on a weekly basis to collect grievances	The Control and Complaints Unit	Proportion of LWSC Local Offices with a complaints box. Number of grievances filed through complaints boxes, and proportion of these addressed.	The Control and Complaints Unit	Ongoing	The Control and Complaints Unit	Monthly
		Raise awareness about the GRM and publish the Records of Claims as they get prepared to increase the transparency of the settlement process, thereby increasing the utility of the GRM and other dispute-resolution mechanism. In the meantime, bolster the human resource capacity of the Control and Complaints Unit to efficiently handle the likely increase in grievances.	The Control and Complaints Unit, with support from the General Administration of Settlement Department.	Number of Grievances filed and addressed by the GRM. Proportion of grievances redressed within 30 days of their receipt.	The Control and Complaints Unit	Ongoing	The Control and Complaints Unit	Monthly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
5	Settlement Courts	Where needed, either move Settlement Courts to suitable office buildings, or physically rehabilitate these Courts. At minimum, this should ensure that Settlement Courts have two rooms that could serve as court rooms, and that the Registries get housed in the same building as these courts.	Legal Department, with support from the General Administration of Administrative and Financial Affairs	Number and proportion of Settlement Courts that have two rooms that could serve as court rooms and a registry within same building	LWSC Administrative data	Quarterly	Social Safeguards Specialist	Quarterly
		For each Settlement Court, and depending on the geographic breadth covered under the jurisdiction of these courts, hire an adequate number of summons officers to ensure that subpoenas and notifications get served in a timely manner.	Legal Department, with support from the General Administration of Administrative and Financial Affairs	Number and average numbers of Summons Officers in settlement courts	Legal Department administrative records	Quarterly	Social Safeguards Specialist	Quarterly

No.	Issue	Mitigation Measure	Responsibility	Progress Indicator	Source of Data	Monitoring Frequency	Monitoring Responsibility	Reporting Frequency
		In each Settlement Office, and to minimize the possibility of rejection by the court of filed objections on the basis of form or due to being incomplete, put in place a mechanism to ensure that objections get filed using standardized forms and completion checklists to ensure administrative completion and compliance of objections with required form.	Land Settlement Commissioners, with support of administrative staff in Local Settlement Offices	Proportion of objections returned being incomplete or on the basis of form.	Mizan	Ongoing	Legal Department	Quarterly

SMP Implementation cost estimate

No.	Issue	Mitigation Measure	Cost (for the Project)	Responsibility	Source of Financing	Timeline											
						1	2	3	4	5	6	7	8	9	10	11	12
1	Awareness raising, outreach and legal advice	Develop and institute an awareness raising and outreach strategy for land and water settlement activities, to include the minimum standards and clear guidelines for community engagement and outreach	$15,000	LWSC	LWSC												
		Undertake numerous public meetings in the communities targeted by settlement to announce and explain the settlement process and dissemination and disclosure of the SMP to all stakeholders.	$20,000	LWSC and Regional LWSC offices	LWSC, WB Public Awareness Campaign and GAP, LWSC and other partners												
		Design, print and make widely available, including through the internet and social media, standard educational materials on land settlement and registration. These materials should answer the following questions: What is land settlement and registration? Why is it important? What are the costs of land settlement and registration? How to claim tenure within the context of land settlement and registration? How to ensure that your tenure claims are documented? What are important dates to be mindful of? What grievance redress mechanisms exist? What are Settlement Courts and when best to resort to them? inheritance awareness.	$100,000	Awareness Campaign, WB, LWSC and other partners	WB the Public Awareness Campaign and GAP, LWSC DLI and other partners												

		Produce short educational films to spread awareness about settlement procedures and requirements, and widely disseminate them through local media outlets, and websites and social media of PLA, LWSC, and partner LGUs.		LWSC	WB the Public Awareness Campaign and GAP, LWSC and other partners													
		Leverage the existing capacity of national NGOs local CBOs with ongoing programs focusing on legal and rights education to implement legal education workshops on land settlement and registration, particularly for women and elderly.	$15,000	LWSC Regional Offices, NGO and CBOs	WB Training Program, Legal Category and the GAP implantation DLI2													
		Improve the accessibility of the Table of Rights and corresponding cadastral survey maps: firstly, by widely announcing their display (including through text messaging technologies); and secondly, by making printed copies thereof available to local CBOs and LGUs in targeted sites to display. Electronic copies could also be made available for wider circulation, including through the websites and social media pages of PLA, LWSC, MoFAE and partner LGUs.	$50,000	LWSC Regional Offices	LWSC,DLI1													
		Once the Tables of Rights are displayed, dedicate sufficient time and staff resources to answer technical questions that right holders may have on these tables, as well as offer legal advice.	$15,000	LWSC Regional Offices	LWSC,DLI1													
		Follow-up more closely with MoFAE to ensure that Settlement Orders and	-	LWSC Regional Offices & MoFAE	LWSC													

		Instructions get disseminated and published as requested.																
2	Capacity of Local LWSC Offices	Institute a standard/unified organizational structure for Local Settlement Offices to include at least seven employees (Settlement Commissioner, 2 surveyors, 2 lawyers, 1 social safeguards specialist, and 2 administrative staff); and reconstitute all LWSC offices accordingly.	$100,000	LWSC	LWSC & WB DLI1													
		Allocate the necessary resources for each LWSC local office to have access to means of transportation for the entire duration of the settlement and registration activities, and particularly during cadastral surveying works.	$20,000	LWSC	LWSC & WB DLI1													
		Developing a gender training plan and training materials, curricula for different management levels at both LWSC and PLA.	-	LWSC Gender Unit	Cost reflected in the Gender Action Plan													
		Developing gender sensitive indicators and institutionalize them in the work of the LWSC and PLA including the development of data collection, storage, and analysis tools.	-	LWSC Gender Unit supported by an external consultant LWSC& PLA	Cost reflected in the Gender Action Plan													
		Setting criteria and carefully selecting local committee members (ensure representation of women) with special focus on the ability to promote equality and educate the local community and the importance of removing discriminatory practices. Gender training for Local committee members (1day * x training sessions)	-	Will be implemented by the Gender Unit Focal Person at the LWSC	Cost reflected in the Gender Action Plan													

		Leverage existing capacity within and outside LWSC, to design and institute a Training of Trainers Program for Settlement Officers within LWSC; and cascade this training to retrain all current and newly appointed Settlement Officers.	$20,000	LWSC	WB Through RERP DLI1 and the Training Program													
3	Minimizing surveying errors, road related disputes, and ownership disputes	Re-confirm the authority granted by law to the Settlement Commissioners to issue final decisions to compensate tenure holders whose lands become unviable after being reshaped to accommodate access roads, or those who lose more than 30 per cent of their land as a result.	-	LWSC & Regional LWSC Offices	LWSC													
		For all ownership claims submitted collectively, require that all claimants sign the claim documents, and at least one third of them to be present during the submission of the claim and suggest to them to sub-divide the land they claim into distinct parcels that could be registered in their individual names in proportion to their ownership in the original parcel. Offer assistance when needed.	-	LWSC & Regional LWSC Offices	LWSC													
		Vet ownership claims before recording them with the members of the local committees.	-	LWSC & Regional LWSC Offices	LWSC													
		Vet authenticity of any signed documents with the relevant authorities.	-	LWSC & Regional LWSC Offices	LWSC													
		Vet accuracy of survey maps prepared by private surveyors through physical examination	$50,000	LWSC & Regional LWSC Offices	WB Through RERP DLI1													

		of all demarcated plots and roads															
4	Dispute resolution within the framework of systematic land settlement and registration	In all communities under land settlement and in close cooperation with the relevant LGUs, form local dispute resolution committees to support LWSC in resolving disputes that emerge during the course of settlement activities. This committee should draw on both male and female members of the community who have a reputation for integrity.	-	LWSC & Regional LWSC Offices and LGUs	Members of committee are volunteers. Accommodation and refreshment are covered by the LGUs												
		Install complaints boxes in all LWSC Local Offices and raise awareness about these. Visit LWSC offices on a weekly basis to collect grievances	$15,000	LWSC & Regional LWSC Offices and LGUs	LWSC & LGUs												
5	Settlement Courts	Where needed, either move Settlement Courts to suitable office buildings, or physically rehabilitate these Courts. At minimum, this should ensure that Settlement Courts have two rooms that could serve as court rooms, and that the Registries get housed in the same building as these courts.	-	LWSC & Regional LWSC Offices and LGUs	LWSC in coordination with partners												
		For each Settlement Court, and depending on the geographic breadth covered under the jurisdiction of these courts, hire an adequate number of summons officers to ensure that subpoenas and notifications get served in a timely manner.	-	LWSC & Regional LWSC Offices and LGUs	LWSC												
		In each Settlement Office, and to minimize the possibility of rejection by the court of filed objections on the basis of form or due to being incomplete, put in place a mechanism to ensure that objections get filed using	-	LWSC & Regional LWSC Offices and LGUs	LWSC												

		standardized forms and completion checklists to ensure administrative completion and compliance of objections with required form.																
Total			**$455,000**															