



# SOCIAL PROTECTION THROUGH LEGISLATED RIGHTS

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A 10-Year Retrospective



INDUS ACTION

## ABOUT THE ORGANISATIONS

### About Probex

Probex has been offering consulting services in the areas of research as well as monitoring and evaluation (M&E) since 2010. These services include developing M&E frameworks, conducting third-party evaluations, and building evaluation capacity and culture. They possess quantitative and qualitative research capabilities and are particularly skilled at the latter. Their clients include EkStep Foundation, for whom they interviewed 152 fathers in 3 phases, and Rohini Nilekani Philanthropies, for whom the sample size exceeded 160 across 6 qualitative studies, as well as a synthesis report.

### About Indus Action

Indus Action strives to improve the delivery of welfare rights for families with an income of less than Rs. 10,000 (\$135) per month across 20 States in India. 890 million citizens continue to remain below the poverty line due to a lack of sustainable access to welfare rights such as education, health, and livelihood security.

They solve the problem of access by mobilising communities to claim their welfare entitlements and build capacity and technology tools for governments to improve last-mile delivery of welfare rights. Indus Action advocates for process and policy-level changes based on research and on-ground efforts with communities. Since 2013, they have supported ~7,94,170 individuals access over INR 750 crores worth of welfare across education, livelihood and maternity entitlements.

Their goal is to propel one million+ families below the poverty line on an irreversible path out of poverty by 2025. Indus Action aims to do this by providing access to a portfolio of rights that builds their resilience against poverty and helps them exercise their civic skills. They define success as when (1) a family has newly accessed and successfully received at least three legislated rights; (2) at least one child in the family has benefited from access to free education through the Right to Education Act; (3) at least two other members of the family have received access to entitlements through direct benefit transfer for young mothers, pensions for elderly members, access to affordable quality healthcare/insurance, and social security.

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## REFLECTIONS: *A Note from the CEO*

“What’s the farthest place that you would like to go to if you had a blank cheque?”

10 years ago, little did I know that this question would significantly change my life. As I tried to codify the ‘capacity to aspire’ of students who received Right to Education (RTE) scholarships, the majority of responses of 6th graders who couldn’t name a place outside their district shook me up. I had already been in the education sector for 4 years, spending two years as an educator in a low-income private school and the rest understanding the cutting edge evidence on social mobility.

Indus Action was born in that crucible moment. I decided that my active citizenship role was to be inside the ring of policy implementation, not just offer the ringside view of an objective evaluator. And it didn’t take long for me to fail in the ring. My first 100 days. My first year. My first 1000 days were laced with significant crashes I had made from my own leadership or active citizenship expectations.

During one of those vulnerable times in year 1, when I contemplated quitting, I met Padma Shri Sister Cyril. Having profiled Loreto Sealdah’s Rainbow School, Kolkata, as one of the Bright Spots in implementing RTE Section 12(1)(c), we secured her commitment to keynote a report launch. That she committed to flying, with her challenges with mobility, meant the world to my team and me. And I still remember every little moment of how she showed up during the day. One amongst us without any air, a child amongst children and a wise educator for every adult and parent in the room. As I dropped her off at the airport, I squeezed in time to ask what gave her the courage to bear the cross of her leadership role as a radically progressive Principal. She smiled and showed her pendant, “The greatest souls on this earth had to carry this gift for their leadership”.

As the world lost her radiant smile and infectious optimism this year, this 10-year retrospective report is a humble tribute to inclusive educators and leaders like her. If I can write this reflection, having survived social entrepreneurship for a decade, it is because all of us at Indus Action could stand on their shoulders. The really broad ones that built our public systems to be more just & inclusive since 1947.

We commissioned this exercise with Probex to look into the rearview mirror after the first decade of efforts across 60+ RTE scholarship campaigns and 20+ campaign pilots in livelihood, maternity and portfolio (PoWER) entitlements. We were clear that we needed to document both our bright spots and our failure diaries. While we have much to show on how we unlocked welfare entitlements & rights for 794k citizens, we also share areas where we haven’t had our desired impact. I hope the latter is helpful to other leaders and organisations to build strategic clarity on pathways to avoid.

Finally, as a recipient of the Shamnad Basheer Prize 2022 in the lead-up to our first decade, this report, in honour of his legacy, is also a sincere attempt to reinforce our lifelong commitment to intellectual integrity and the public good commons. We will strive harder to unlock justice outcomes for millions of vulnerable families in India in the coming decade and create public goods and infrastructure to move every Indian irreversibly out of poverty.

I hope, along with you, we go far and long in the next decade.

**Tarun Cherukuri**  
Co-founder and CEO



## ACKNOWLEDGEMENTS

### From Probex

First and foremost, we would like to thank Tarun Cherukuri and Archana Kannan for conceptualising this retrospective and for envisioning its potential benefit to Indus Action, its direct stakeholders and the larger CSO ecosystem. We hope that the findings of this study are relevant not only to Indus Action but also to its government and CSO partners who generously shared their time, experience and insights with us. We also hope that the approach employed for this retrospective provides ideas and inspiration to other CSOs nearing an important milestone in their growth.

The support of Indus Action, and Archana Kannan and Madhuri Dhariwal in particular, was integral to the execution of this retrospective. Their positive attitude and humour helped to create a smooth and enjoyable working relationship and were much appreciated. We would especially like to thank Madhuri Dhariwal for her responsiveness to our numerous requests for data and clarifications, her consistent willingness to help despite all her other commitments, and her incredible persistence, in ensuring that the information available to us was as comprehensive as possible.

In addition to the specific individuals named above, we are indebted to the entire Indus Action team for their candid reflections on the organisation's work over the last 10 years, their feedback on the draft report, their participation in the Theory of Change workshops and focus groups, and their coordination and scheduling of the interviews. We are also grateful to the communications team for the report design. Without the contribution of all these individuals, this study would not have come to fruition.

### From Indus Action

We are grateful to Devyani Srinivasan and Bhakti Damle from Probex Consulting, who ensured a balance of rigour and understanding, working to ensure the timely completion of this evaluation. We also thank Puja Bajad and John Meyase, who helped write this report. Without their sharp focus, we would not have been able to pull out insights we believe will be useful to all in the ecosystem.

We would also like to express our heartfelt gratitude to the various governmental and non-governmental stakeholders (whom we cannot name due to confidentiality reasons), who have given their valuable time and shared their experiences of working with Indus Action over the past decade. Your feedback, both positive and critical, will help us grow and improve.

To our wonderful IA Ambassadors for their time and ongoing support: Firdaus Fatima, Gayatree Dey, Hemanth Pothula, Kritika Sangani, Mayurdhar Devolla, Neha Jagani, Shijoy Verghese, we stand on your shoulders.

To the Indus Action team, for putting together documents, scheduling interviews, and reflecting on the past ten years together, and especially for keeping vulnerable citizens at the heart of what we do; upwards and onwards!

Gratitude to Riddhi Sonetta for designing the report in record-breaking time and Shammi Talwar for the printing.



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# ABBREVIATIONS USED

<b>ANM</b>	Auxiliary Nurse Midwife
<b>ASHA</b>	Accredited Social Health Activist
<b>BoCW</b>	Building and Other Construction Workers
<b>BPL</b>	Below Poverty Line
<b>CBO</b>	Community Based Organisation
<b>CSO</b>	Civil Society Organisation
<b>DBOCWB</b>	Delhi Building and Other Construction Workers Board
<b>DCPCR</b>	Delhi Commission for Protection of Child Rights
<b>DG</b>	Disadvantaged Group
<b>EWS</b>	Economically Weaker Section
<b>GRC</b>	Gender Resource Center
<b>HCD</b>	Human-Centred Design
<b>J-PAL</b>	The Abdul Latif Jameel Poverty Action Lab
<b>MLAs</b>	Members of the Legislative Assembly
<b>MPs</b>	Members of Parliament
<b>NCC-CL</b>	National Campaign Committee for Central Legislation on Construction Labour
<b>NCPCR</b>	National Commission for Protection of Child Rights
<b>PEN</b>	Partner Entrepreneur Network
<b>PMMVY</b>	Pradhan Mantri Matru Vandana Yojana
<b>PMU</b>	Project Management Unit
<b>RTE Act</b>	The Right to Free and Compulsory Education Act
<b>SCPCR</b>	State Commission for the Protection of Child Rights
<b>SIFPSA</b>	State Innovations in Family Planning Services Agency
<b>SRS</b>	Systems Requirement Specifications
<b>ToC</b>	Theory of Change

# EXECUTIVE SUMMARY

## CONTEXT

Indus Action is a policy implementation organisation that enables sustainable access to welfare rights for vulnerable families<sup>1</sup>. By 2030, they aim to enable sustainable access to legislated rights for over 2.5 million vulnerable families. Key indicators that the organisation currently measures are the number of citizens it supports in accessing welfare benefits and the corresponding financial value of the welfare that the citizens receive. This study was commissioned for the 10th anniversary of Indus Action in August 2023. It intends to share the learnings from key interventions implemented alongside government stakeholders and citizens to offer the ecosystem a transparent view of the progress and areas where efforts may have failed. By doing so, it hopes to enrich the dialogue in the ecosystem on how best to deliver welfare benefits by improving the citizen experience in accessing welfare rights and developing a synthesis of systemic lessons learnt.

Indus Action has worked on securing access for families to the Right to Education, Livelihood, and Food Security through legislated welfare entitlements. They began with the Right to Education Act in 2013-14 and expanded their work to include livelihoods and food security in 2020-21. Despite its comparative nascent, Indus Action's work on livelihoods and food security was included in the scope of this study, as it illustrates the rationale and process behind their ongoing evolution into an organisation focused on multiple legislations - Portfolio of Welfare Entitlements (PoWER). Through the PoWER strategy Indus Action aims to facilitate the effective consolidation of welfare benefits by piloting programs to simplify and increase access to entitlements for vulnerable families.

## METHODOLOGY

This study drew on three sources of data: Indus Action's internal reflections, secondary data, and primary research. As used in this report, the term "secondary data" refers to publicly available information and proprietary sources. "primary data" refers to key informant interviews conducted with external stakeholders. The objectives of this study were,

- to assess Indus Action's contribution to systemic change through its effort in education, food security and livelihoods domains, and
- to use a combination of evidence and reflection towards documenting Indus Action's learnings in its endeavour to create systemic change.

1. Indus Action defines vulnerable families as those subsisting on an income of less than Rs. 10,000 (\$135) per month, and through its programming attempts, to provide pathways for unrestricted access to their welfare entitlements towards ensuring quality education, robust health, and secure livelihoods, amongst others.



For the purpose of this retrospective report, the programming streams are mapped as three domains corresponding to the Right to Education, Right to Livelihoods and Right to Food Security.

## KEY FINDINGS

The results from primary and secondary data analysis have emerged in the form of key findings in Section 4. This section outlines the findings from the independent evaluation of the three domains. The findings show the impact at the systems level, policy and processes across all three domains and specifically for the relevant citizen groups Indus Action serves. It further outlines the possible way to approach things when the intended outcome does not materialise.

### Right to Education

Section 12(1)(c) of the Right of Children to Free and Compulsory Education Act mandates all private, unaided, non-minority, recognised schools to reserve at least 25% of the seats in their entry classes for children from weaker sections and disadvantaged groups in the neighbourhood. Indus Action's work within the RTE Section 12(1)(c) domain can be understood in four phases. These phases aren't mutually exclusive and have overlapping timelines.

While Indus Action began its intervention in 2013, focusing on the demand side and citizen-led efforts, by 2015-16, the organisation realised that as individuals working on the ground, there were only so many families they could work with to support their children's admissions and more importantly, the administrative hurdles in accessing a legislated right had to be addressed. Therefore, they chose to work with education departments in the Union Territory of Delhi and several other states such as Chhattisgarh, Uttarakhand.

The primary impact that Indus Action aims to achieve through its Right to Education domain is an increase in the number of children accessing their rights under Section 12(1)(c).

**Indus Action postulates that policy and process interventions are required to increase the number of students admitted under the provision.**

To enable this, the following factors contribute significantly:

- strengthening online processes,
- removing barriers to registration and application,
- robust tracking,
- grievance redressal and
- approval of reimbursements.

Therefore, Indus Action encourages governments to develop and/or strengthen online processes and provides them with an MIS design and implementation support. Its other main process interventions are:

- creating outreach strategies,

**A key takeaway from government stakeholder conversations was the importance of the online MIS in increasing transparency and improving targeting.**

Another learning is that as Indus Action grows to partner across states, there is an increased need to communicate the value proposition of the organisation's engagement across multiple levels of the state machinery.

The results were mixed across the five states where baseline data was available.

**Three out of the five states where Indus Action reported that they were involved in setting up and managing the education MIS, as well as in awareness creation, grievance redressal, and building the capacity of government officials (Chhattisgarh, Odisha, Uttarakhand), showed a substantial increase in the number of admissions.**

**Chhattisgarh - ~22,000 (2017) to 40,216 (2018), Odisha - 4,786 (2021) to 12,105 (2022), Uttarakhand - 5,037(2020) to 10,098 (2021).**

Two states (Madhya Pradesh and Tamil Nadu) showed a decline (varying from slight to substantial) in admissions across the three years of data studied.

### **Right to Livelihood**

Through its work under the Building and other Construction Workers Act 1996, Indus Action aims to increase the receipt of welfare by labourers while reducing process friction and administrative burden. Using the grievance redressal work, the team builds recommendations that lead to process redesign, sometimes involving technology and policy changes.

Triangulation of data from three sources revealed that Indus Action's work on the right to livelihood did not have the same focus in Chhattisgarh and Delhi (the two geographies examined for this evaluation). While in Chhattisgarh, the focus was on Indus Action's role as a knowledge partner, in Delhi, the focus was on Indus Action's role as a technology partner. While different roles were expected of Indus Action in Chhattisgarh and Delhi, in both geographies, government officials validated that these roles had been (and/or continued to be) fulfilled.

In Chhattisgarh, in addition to redesigning BoCW welfare programs, Indus Action (through the Labour Department's Project Management Unit) began working on process interventions in 2022-23. Therefore, by comparing what the Chhattisgarh government achieved before and during 2022-23, it was



easier to trace the contribution of Indus Action to successful claims through system change than in Delhi.

**In Chhattisgarh, the government increased successful claims from 77,130 to 1,15,412 between 2020-21 and 2021-22, which is approximately 1.5 times.**

In 2022-23, the combined effort of the government and CSOs increased the number of successful claims to 2,56,779, an increase of approximately 2.2 times. This data demonstrates clear improvement when there is alignment between the Labour Department, Indus Action's interventions, CSOs and unions towards a common goal.

### Right to Food Security

Indus Action aims to achieve three outcomes through its Right to Food Security domain. First, citizens receive all instalments of the PMMVY benefit on time, and it costs them less to do so. Second, citizens use the instalments to supplement nutrition and income loss due to pregnancy and/or childbirth. The third intended outcome is that coverage of the PMMVY is expanded, and more births are included, based on Indus Action's recommendations for increasing the allocated government budget.

The efforts on securing this right was piloted by Indus Action in Uttar Pradesh in 2020, where the focus was on process rather than policy. Indus Action targeted four PMMVY processes through its interventions: awareness creation, grievance redressal, the application process and program monitoring. The specific interventions mentioned in the interviews were the development of a program dashboard and helpline and providing application assistance through Community Champions.

A comparison of the data from September 2020 and December 2021 indicates the extent to which approvals of claim increased between the 7th and 20th month of Indus Action's engagement.

**The number of “partially successful claimants” who received either 1 or 2 of the 3 PMMVY instalments increased by 4,64,643 between September 2020 and December 2021.**

However, the decrease in the number of applications in the same period and the timeliness of approvals are concerning.

## KEY LESSONS ACROSS THE THREE DOMAINS



### On Indus Action's strategic priorities:

- Action research has been key to Indus Action's success in making policy and process recommendations to increase inclusion and improve citizen experience and continues to be relevant despite the organisation's increasing focus on building state capacity and technology.
- To enhance inclusivity, it is crucial to verify that the beneficiaries of RTE Section 12(1)(c) would not have had the financial or social means to afford private education in the first place. To improve this targeting of the most disadvantaged, both engaging CBOs and revisiting Indus Action's community engagement strategy are worth considering.



### On government engagement:

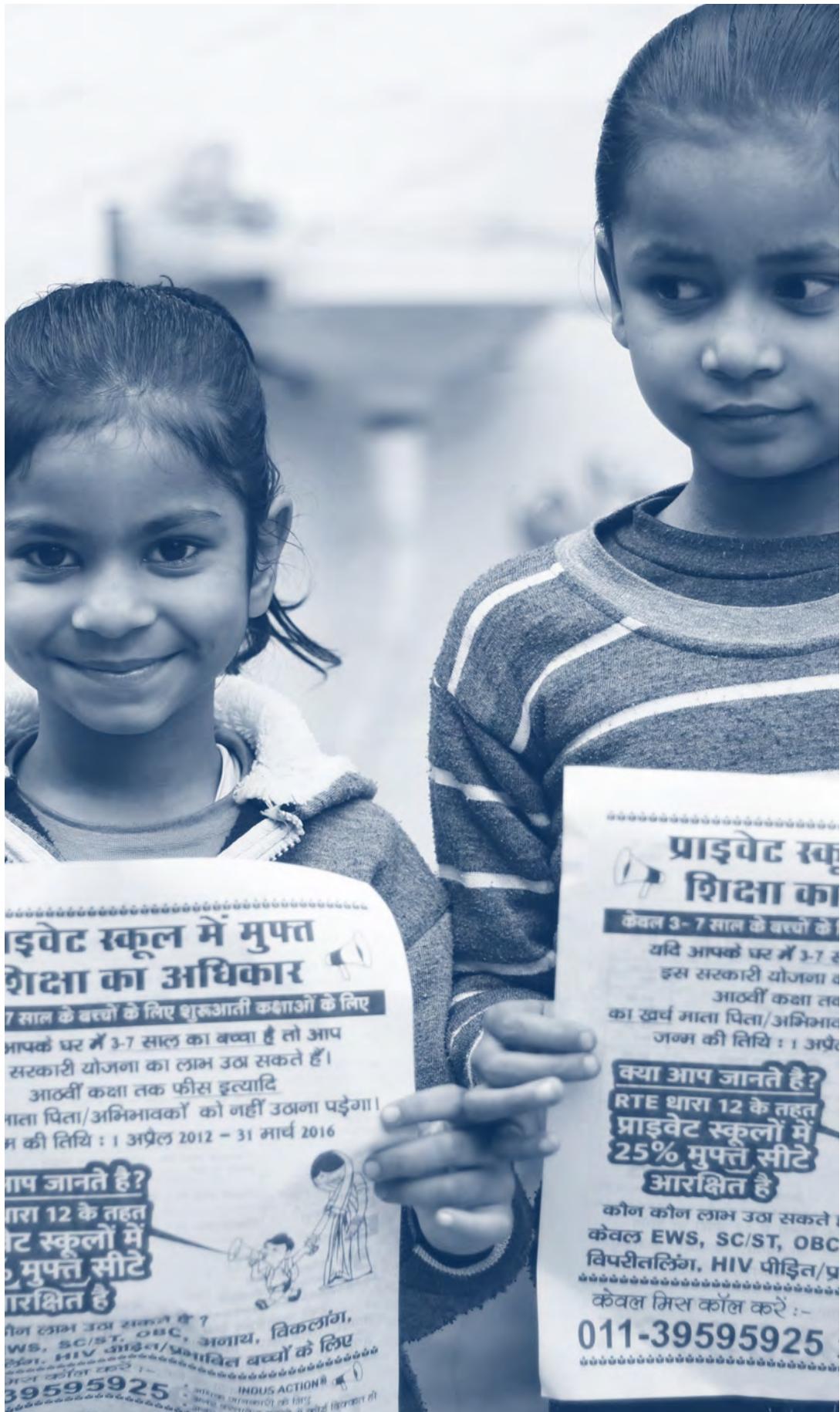
- Surfacing best implementation practices from states (e.g. through the Bright Spots Reports) / districts has been an effective strategy. This approach leverages comparative performance analysis, where regions are motivated to improve by observing and learning from their peers' successful policies and practices. Specific to PMMVY, this strategy is more effective when rankings are communicated frequently, and the state government shoulders the responsibility for doing so.
- Identifying and collaborating with champions within the administration and political representatives is critical to successful partnerships across the board.
- Embedding a team member as a part of the PMU on the government's side is a helpful way to build a sense of investment and help transfer knowledge to build capacity within the system. At the same time, for sustainability, the government must also ensure sufficient human resources.



### On ecosystem engagement:

- Supporting partner entrepreneur organisations to carry forward Indus Action's effort requires room for adaptation to each organisation's context.
- Policy change, as well as furthering Indus Action's implementation efforts, require "allies" within the ecosystem who are closely associated with the government and work collaboratively with Indus Action.

# 1. INTRODUCTION



## 1.1 PURPOSE, SCOPE AND USE

Indus Action is a policy implementation organisation that works towards reducing the entrenched challenge of poverty and systemic barriers that restrict large sections of the Indian population to access their welfare entitlements. Its target for 2030 is to enable sustainable access to legislated rights for more than 2.5 million vulnerable families.

**Key indicators that the organisation currently measures are the number of citizens it supports in accessing welfare benefits and the financial value of the welfare that the citizens receive.**

This retrospective study was commissioned for its tenth anniversary in August 2023 to reflect on Indus Action's journey and trace back its learnings thus far.

Probex undertook a rigorous reflection process and drew on both primary and secondary data for this study. Primary data was collected through key informant interviews and reflections from the Indus Action team. The triangulation of primary interviews with a wide range of secondary sources contributed to the credibility of the evaluation. Using a combination of evidence and reflection, Indus Action sought to identify its successes and failures in creating systemic change and the underlying reasons for both.

**Indus Action has worked on securing access for vulnerable families to the right to education, livelihood and food security through legislated welfare benefits.**

They began with the Right to Education Act in 2013-14 and expanded their work to include livelihoods and food security in 2020-21. Despite its comparative nascent, Indus Action's work on livelihoods and food security was included in the scope of this study, as it illustrates the rationale and process behind their ongoing evolution into an organisation focused on multiple legislations.

The objectives of this retrospective study were as follows:

- to assess Indus Action's contribution to systemic change through its work on education, food security and livelihoods domains, and
- to use a combination of evidence and reflection towards documenting Indus Action's learnings in its endeavour to create systemic change.

For the purpose of this retrospective report, the programming streams are mapped as three domains corresponding to the Right to Education, Right to Livelihoods and Right to Food Security.

This report is divided into seven sections, beginning with an Introduction, which lays out the report's purpose and scope and the methodology undertaken to conduct an independent assessment to inform findings in Section 3. The second section begins by laying out the context for each domain through the specific legislated Acts. The Theories of Change for each domain are presented in Section 2 to elaborate on Indus Action's approach to overcoming challenges experienced in implementing these Acts for each domain. The section further lays out the key implementation trajectories within the education domain to reflect Indus Action's decade-long work.

Section 3 describes the findings of this study in relation to the three domains of programming; the findings are informed by the extensive primary and secondary research conducted for this study, along with reflections from the Indus Action team. The findings discuss the implementation routes identified within the ToCs and attempts to answer the research questions above by assessing system and process level impact for various stakeholders/citizen groups. This section further informs the learnings and reflections in Section 4. Additionally, Section 4 lays out engagement strategies for relevant stakeholders for each domain, followed by Section 5, which delves into future impact, opportunities and risks based on the learnings in the previous section.

Section 6 concludes this report and is structured to respond to the three central questions below:

1. For which rights and/or interventions were Indus Action's contributions to systemic change validated?
2. For which rights and/or interventions were Indus Action's contributions to systemic change either not validated or was evidence missing?
3. What opportunities for, and risks to, achieving future impact emerged from this study?

Section 7 uses the opportunities for and the risks involved in achieving future impact identified as starting points for arriving at a set of recommendations for Indus Action's future programming. Appendix 1 describes Indus Action's evolution to an organisation focused on multiple legislations rather than just one and the way forward. For readers who would like to read more about Indus Action's work, there is a reading list in Appendix 2. Appendix 3 contains a glossary of monitoring and evaluation terms used in this report. Appendix 4 provides more information on Indus Action's education MIS. Appendix 5 details the process undertaken to develop the three ToCs.



## 1.2 METHODS AND DATA COLLECTION

Towards the objective of this report, ToCs of the three domains were refined in consultation with the core teams from Indus Action (ref. Annexure 5).

Particular attention was paid to ensuring alignment between Indus Action's vision of enabling sustainable access to legislated rights and its approach.

This study drew on three sources of data: Indus Action's internal reflections, secondary data, and primary research. As used in this report, the term "secondary data" refers both to publicly available information and proprietary sources. "Primary data" refers to key informant interviews with external stakeholders (see Table I).

**Table I: Interview Composition**

Indus Action Domain	No. of People Interviewed	
	Government	Partners
Right to Education	8	5
Right to Livelihood	3	4
Right to Food Security	2	0

As is evident from Table I, the interviews were not equally distributed between the 3 Indus Action domains. This is not a limitation, as key informants (see Appendix 3 for a definition of this term) are considered proxies for an organisation or group. Specifically, the uneven distribution of interviews with partners reflects their relative importance to the 3 domains.

Partners have been viewed by Indus Action as key to scaling the Right to Education efforts, especially from 2017 onwards. In contrast, to date, Indus Action has not worked with any partners for the Right to Food Security efforts. In the Right to Livelihood efforts, Indus Action has worked with partners at both the state and field levels.

However, it is possible that the choice of key informants biased the report's findings, which is discussed in the next section. Mitigation measures included ensuring that Indus Action was not present for the interviews and focused the questions on the work of the government or partner rather than Indus Action. Sample interview guides are available [here](#).



### 1.2.1 Limitations

A key limitation identified during the initial data collection process reflected a biased sample towards partners and government officials who worked at the state level. The focus on state-level data collection was intentional at the onset to evaluate Indus Action's policy design interventions. However, focusing on the state level alone resulted in an insufficient understanding of policy implementation, and therefore, it was decided to conduct 3 additional interviews with government officials at the district and block levels and 2 with field partners. The findings of these interviews have been incorporated into this version of the report.

The second limitation was that, as witnessed in other evaluations,

**Stakeholders who are dissatisfied with an intervention and/or did not benefit from it are often difficult to interview, and as a result, their views were not available for this study.**

This included states where Indus Action attempted to work or advocated for changes, but was not successful in forging government partnerships. To mitigate the risk of bias due to this limitation, reflections on successes and challenges were gathered from the Indus Action team. These were validated by documents available with Indus Action.

## 2. A DECADE OF ENHANCING SOCIAL PROTECTION THROUGH LEGISLATED RIGHTS



Indus Action has worked towards securing access for vulnerable families through legislated welfare benefits, across three key domains, i.e. Right to Education, Right to Food Security and Right to Livelihoods. This section lays out Indus Action's approach towards overcoming implementation challenges in relation to the respective Acts.

## 2.1 THE RIGHT TO EDUCATION DOMAIN

### 2.1.1 Context Background

**The Right of Children to Free and Compulsory Education Act, commonly known as the RTE Act, was enacted in 2009 and came into force in 2010.**

Among the provisions of The RTE Act<sup>2</sup>, Indus Action has chosen to focus on implementing Section 12(1)(c). Section 12(1)(c) emerged as a response to the need for inclusivity and equal access to quality education<sup>3</sup>. The National Commission for Protection of Child Rights states that “the said section is rooted in the belief that the values of equality, social justice, and democracy can be achieved only through the provision of inclusive elementary education to all.<sup>4</sup>”

Section 12(1)(c) of the RTE Act<sup>5</sup> mandates all private, unaided, non-minority, recognised schools to reserve at least 25% of the seats in their entry classes for children from weaker sections and disadvantaged groups in the neighbourhood. The state government then reimburses these schools for providing free and compulsory education to the students.

The implementation of Section 12(1)(c) across the country has encountered several obstacles. According to a report by the Right to Education Forum, only 15 out of 36 states and Union Territories sought funds from the Union Government to implement the policy by 2016-17<sup>6</sup>. There has also been a lack of a grievance redressal system, and parents often choose schools that start at the preschool stage rather than class I<sup>7</sup>, among other issues.

**Despite extensive efforts to raise awareness about this provision, surveys conducted by J-PAL (The Abdul Latif Jameel Poverty Action Lab) in Delhi, a state known for its legal and social activism, show that only 3% of families were aware of this particular section in 2010<sup>8</sup>.**

2. “*The Right of Children to Free and Compulsory Education Act, 2009*”, August 27, 2009.

3. Indus Action, Bright Spots 2019

4. Indus Action, *Retention Survey 2021*, (n.p.), 3,

5. “Right to Education Act”

6. Indus Action, Bright Spots 2019, 6

7. Ibid

8. Indus Action and Central Square Foundation, *Project Eklavya Campaign 1.0 Report*

Additionally, there has been significant resistance within society towards integrating students from different backgrounds in classrooms.<sup>9</sup>

### 2.1.2 Education as an equaliser, the Indus Action approach

The impact that Indus Action aims to achieve through its Right to Education domain is increasing the number of students admitted under Section 12(1)(c). Indus Action also attempts to ensure retention of the students admitted under the act within the same schools until grade 8. In the last 10 years of Indus Action, the primary focus has been enhancing the number of children gaining admission under the Act.

To increase the number of admitted students, Indus Action postulates that policy and process interventions are required in tandem. A key assumption of this approach is that by developing and/or strengthening online processes, barriers to registration, application, tracking, grievance redressal and reimbursement will be removed. Therefore, Indus Action encourages governments to develop and/or strengthen online processes and provides them the MIS design<sup>10</sup> and implementation support. Its other main process interventions are creating outreach strategies, conducting capacity-building workshops and operating a grievance redressal helpline. As a result of these interventions, the government, ground partners and schools can execute their responsibilities effectively in implementing Section 12(1)(c).

For state governments, these responsibilities begin with publishing and implementing the Section 12(1)(c) rules, allocating budgets and adopting the MIS. The process begins with making seats available and registering for the MIS for schools. Once parents of eligible students apply for these seats, state governments allot students to schools and address grievances on time, assisted by ground partners.

**Indus Action's research and consultations with ground partners and other stakeholders are important interventions that lead to policy and process design recommendations to inform the institutional response.**

These recommendations are made to state governments and school systems. For state governments, this includes recommendations on increasing retention of students entering through Section 12(1)(c). If state governments adopt these recommendations and schools become more inclusive of Section 12(1)(c) students, the impact is expected to result in more children being admitted and retained. A diagrammatic version of Indus Action's approach to engaging with RTE is below.

9. Aditya Singh, "Revisiting the RTE: Evaluating the Quality and Equality of Education in India" International Journal of Social Science and Economic Research, no. 4 (February, 2019): 1516.

10. The term MIS is used broadly in a variety of contexts, which includes referring to a type of computer software that is used to store, organise and analyse information. Design is one stage in the application development life cycle, a process for planning, creating, testing and deploying an information system.



- Human, financial and technology resources
- Publicly available data on implementation of Section 12(1)(c)
- Partnerships with governmental and non-governmental organisations

## INPUTS

## ACTIVITIES

## OUTPUTS

## OUTCOMES

## IMPACT

- Increased number of students enrolled in schools under Section 12(1)(c)
- Students are retained until the 8th standard in the same schools under Section 12(1)(c)

# THEORY OF CHANGE

- Create outreach strategies (including IEC material) for the government and ground partners
- Conduct capacity building workshops on technology, policy and processes for all stakeholders
- Provide design and implementation support to either set up or enhance existing MIS
- Operate the helpline
- Conduct primary and secondary research, build relationships through stakeholder consultations, and design collaterals

- Outreach strategies for the government and ground partners are delivered
- The government, ground partners and schools are able to execute their responsibilities in implementing Section 12(1)(c)
- MIS is created in collaboration with the government
- Grievances are received and escalated through the helpline
- Knowledge products are created and disseminated
- In collaboration with ground partners, policy and process design recommendations are given to schools, state governments and the union government

- Outreach strategies are implemented
- Parents of eligible students apply and follow through with the admissions process
- State governments:
  - Publish and implement rules for Section 12(1)(c)
  - Allocate budgets
  - Adopt the MIS
  - Direct schools to comply
  - Run the process and allot students to schools
  - Address grievances on time
  - Reimburse schools on time
  - Act on recommendations to increase retention
- Ground partners assist with grievance redressal
- Schools:
  - Make seats available
  - Become more inclusive
- The union government:
  - Brings visibility and transparency to the process
  - Streamlines the reimbursement process



## 2.1.3 Key Programming Contours

Across its 10-year programming landscape within the education domain, Indus Action expanded its impact from working directly with parents to enable school admission under Section 12(1)(c) to working with state governments. Indus Action formed its Partner Entrepreneur Network in 2017-18 to ensure the gradual scalability of its implementation model, leading to an enhanced focus on system-level impact and integration through institutional strengthening. Below is a snapshot of the key contours within the Indus Action's programming landscape through working with citizen groups, leveraging partnerships and strengthening public delivery systems.

### Working directly with parents

From 2013-16, Indus Action was focused on working with the parents of eligible students to enable school admissions for their children under Section 12(1)(c). To target parents of eligible students, awareness was created through door-to-door campaigns, as well as through *anganwadis*<sup>11</sup> and community-based organisations. Pamphlets were distributed that contained the number of Indus Action's missed call helpline, as well as information on where to apply and the relevant documentation needed.

**Through 100-day campaigns every year, Indus Action iteratively tested technology, process and policy solutions to improve conversion through awareness, identification, documentation, application, admission, and retention.**

By 2015-16, Indus Action recognised that its citizen-led approach had limitations. Although they were dedicated to working on the ground, they realised that their reach to parents, capacity to fill out application forms, and ability to resolve grievances were constrained by the scale of their efforts. These limitations highlighted the need to engage actively with government systems. Therefore, along with continuing to support parents directly, Indus Action started working with the Delhi Government's Education Department in September 2015.

### Working primarily with state governments

Indus Action's work with the Delhi Government's Education Department began by supporting them with grievance redressal systems and running the online lottery system (the online lottery system matches applicants to schools based on seat availability and preference criteria). In 2016-17, the move to primarily support education departments continued and extended to the Raipur district of Chhattisgarh. In Raipur, the Education MIS was piloted with three modules.

At this time, Indus Action was actively seeking partnerships with state departments. The partnership with the Chhattisgarh Education Department

11. Government-run childcare centres that provide various services, including pre-school non-formal education.

expanded to the entire state in 2017-18, and an MoU was signed with the Uttarakhand government in the same year. A wave of expansion followed through Indus Action's team and the Partner Entrepreneur Network.

### **Scaling with the Partner Entrepreneur Network**

In 2016-17, Indus Action expanded its operations to Uttar Pradesh in collaboration with Saaras Impact Foundation. By 2017-18, the organisation established a broader network of partners, moving beyond the initial concept of the Partner Entrepreneur Network (PEN). The primary objective of this expanded partnership network was to scale Indus Action's impact, aiming to facilitate over 1 million admissions under Section 12(1)(c) before 2020. These partnerships provided seed capital, knowledge, and technology to help the partner entrepreneurs achieve their targets.

Out of the first seven partners, only three (Tapasya, Saaras, Bhumi) continue to focus on Section 12(1)(c) initiatives. However, the partnership network remained dynamic and grew further in 2022-23, with the induction of three new collaborations (Rupayan, Project Saathi, Association for PARIVARTAN of Nation). Engaging with a diverse range of partners continues to be a strategic method for Indus Action to extend its influence and reach more beneficiaries, as well as ensuring growth of the ecosystem.

### **Scaling through system integration**

**In the last few years, states and UTs that were reluctant to implement Section 12(1)(c) earlier have faced pressure from the judiciary, civil society and/or the media to do so.**

Indus Action has been focusing on securing breakthroughs in these states, and four states (Andhra Pradesh, Bihar, Jharkhand and Odisha) have now signed MoUs with Indus Action. In two of these states, Indus Action is pursuing a double-pronged strategy and supporting Partner Entrepreneurs<sup>12</sup>.

However, there is a risk that these states (and others) will reverse their decision by emulating Karnataka's "Rule 4" route. "Rule 4" refers to Karnataka's amendment to Section 12(1)(c) which extends admissions to private schools only for students who have no government schools in their vicinity. While the case (Special Leave Petition) awaits judgment from the Supreme Court<sup>13</sup>, sustained pressure is required to safeguard against such setbacks in other states.

## **2.2 THE RIGHT TO LIVELIHOODS DOMAIN**

### **2.2.1 Context**

The Building and other Construction Workers (BoCW) Act was enacted in 1996.

12. Indus Action, Bright Spots 2023

13. Indus Action, Bright Spots 2019, pp. 99

It describes itself as “an Act to regulate the employment and conditions of service of building and other construction workers and to provide for their safety, health and welfare<sup>14</sup>”. The Act mandates that every State government shall constitute a Workers’ Welfare Board, and to augment the resources of these Boards, the Building and other Construction Workers Welfare Cess Act (BoCW Cess Act) was also enacted in 1996.

**The BoCW Cess Act mandates creating a State-level fund by levying and collecting a cess on the cost of construction incurred by employers, which is to be managed by the Boards and utilised to ensure that workers can avail social security benefits<sup>15</sup>.**

Despite these efforts, in 2019, only 35 million construction workers were registered (i.e. had a labour card or certificate)<sup>16</sup> out of an estimated 54 million. (Workers must renew their registrations annually and link their bank accounts to their Aadhaar cards to avail of welfare measures.) It was only in 2020 that the Ministry of Labour and Employment directed all states and UTs to register all the left-out workers<sup>17</sup>.

Delhi is one of the most important destinations for migrants<sup>18</sup>, and the capital region’s construction sector employs many migrant workers<sup>19</sup>. In November 2021, Delhi launched the Shramik Mitra Yojana to ensure the welfare programs reach construction workers in the capital<sup>20 21</sup>.

The term “Shramik Mitra”<sup>22</sup> was coined by Aajeevika Bureau, a non-profit organisation that provides services and solutions to seasonal migrants and their households<sup>23</sup>.

## 2.2.2 Indus Action's systems approach to streamlining welfare for workers

The impact that Indus Action aims to achieve through its Right to Livelihood domain is improved access to welfare rights for labourers and enhanced

14. “Building and Other Construction Workers Act, 1996,” August 19, 1996.

15. “Building and Other Construction Workers Welfare Cess Act, 1996”, August 19, 1996.

16. Ajit Jha, “Vulnerability of Construction Workers During COVID-19: Tracking Welfare Responses and Challenges”, *The Indian Journal of Labour Economics* 64, no. 4 (November 1, 2021): 1057.

17. Jha, “Welfare Responses and Challenges”, 1063.

18. Deshingkar, “Normalising Human Suffering”, 137.

19. Jha, “Welfare Responses and Challenges”, 1049.

20. ANI, Delhi - ‘Shramik Mitra’ scheme, November 9, 2021,

21. Shramik Mitras are known as Shram Mitras in Chhattisgarh and Jharkhand, but all play similar roles. Centre for Policy Research & UNICEF India, Improving Social Protection Portability for Migration-affected Children: Spotlight on Chhattisgarh (New Delhi: UNICEF, 2021), 6.

“The Incomplete Project of E-Shram, India’s Database of Unorganised Workers – Article 14,” n.d.

22. “The Delhi Shramik Mitra Yojana will see the state government reach out to construction workers and inform them about various welfare programmes within the state. As part of the scheme, the Shramik Mitras are appointed to reach out to workers registered by the Construction Board at the ward level. The Shramik Mitras are expected to help workers in applying and availing the benefits of relevant government schemes.”

23. Rajiv Khandelwal, Executive Director, text message, May 7, 2023.

procedural efficiency. To achieve this impact, Indus Action intervenes in both policies and processes and has worked with the Chhattisgarh and Delhi Government's Labour Departments for the same. Indus Action relies on grievance and research data to redesign policies and the application processes, which forms the basis for recommendations to the BoCW Boards and Labour Departments.



As part of its proof of concept, Indus Action conducts registration and claims camps and accompanies citizens to district offices to understand the application processes. The first data source for the recommendations is the helpline, which Indus Action runs in collaboration with the government. The main function of the helpline is to redress grievances, data from which inform the basis for further systemic guidance. The emerging evidence and analysis contribute to the recommendations.

Indus Action's process interventions also include providing technology, policy and technology design and project management support to the government and building their capacities, along with those of ground partners and Shram/Shramik Mitras. As a result of the capacity building, the government, ground partners, and Shram/Shramik Mitras are expected to make citizens more aware of application processes and conduct registration and claims camps. At the same time, the government is expected to make the application process easier. An accessible labour department website (through Indus Action's technology intervention) is one pathway to making the application process easier.

If the application process is streamlined and more citizens are aware of it, it is expected that applications, initially for labour cards/certificates and then for welfare claims, will increase.

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### **Indus Action's action research further attempts to reduce inclusion errors by investigating and sustainably addressing blockers identified through grievance redressal and field insights.**

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Finally, Indus Action expects to make future recommendations to the government on revising the processes for cess collection and increasing the amount of cess collected. Adopting these recommendations should lead annual cess collection to increase and these resources to be allocated to sustaining the delivery of welfare benefits. To sustain the delivery of welfare benefits, it is also crucial for the government to build the capacity of their cadre (example: the Shram/Shramik Mitras, Labour Inspectors).

A diagrammatic version of Indus Action's approach to engaging with BoCW is below.



- Human, financial and technology resources
- Public data on beneficiaries
- Government partnerships
- Partnerships with governmental and non-governmental organisations

## INPUTS

## ACTIVITIES

## OUTPUTS

## OUTCOMES

## IMPACT

- More citizens who apply for welfare are able to claim it, money than the status quo

# THEORY OF CHANGE

- Design training content, SOPs and manuals for calling team, Shram Mitras, ground partners and government
- Build capacities of the government and ground partners
- Create collateral for registrations and claims camps
- Conduct registrations and claims camps, and accompany citizens to district offices.
- Track registrations and claims
- Manage records and analyze helpline data
- Conduct action research
- Provide technology, design and project management support to the government

- Helpline run in collaboration with the government
- Helpline and proof of concept data used to redesign policies and application processes and recommendations stemming from the data given to the BoCW Board and Labour Commissioners.
- Shram Mitras, government and ground partners equipped to create awareness and conduct camps
- Labour website created and/or redesigned to make it more accessible
- Knowledge products created and disseminated
- Recommendations made to government to revise processes for cess collection and increase the amount

- Government makes the application process easier
- Shram Mitras, government and ground partners create awareness and conduct camps
- Citizens are more aware of application processes
- More citizens apply for labour cards / certificates and welfare, and it takes less time
- More citizens receive labour cards / certificates
- Citizens are able to file grievances either on their own or with assistance, and it takes less time than before
- Grievances are redressed
- There is consistency in processes followed by frontline staff
- Inclusion errors are reduced
- Recommendations on process are adopted and annual collection increases
- To sustain the schemes and IA's interventions, government allocates resources and builds the capacity of their own cadre

## 2.3 THE RIGHT TO FOOD SECURITY DOMAIN

### 2.3.1 Context

The National Food Security Act was enacted in 2013. Clause 4 of the Act states that every pregnant woman and lactating mother shall be entitled to free, nutritious meals through her local Anganwadi and a maternity benefit of not less than Rs. 6,000<sup>24</sup>. Women can receive the benefits through a combination of two welfare programmes, the Pradhan Mantri Matru Vandana Yojana and Janani Suraksha Yojana<sup>25</sup>.

The Rs. 5,000 provided under the PMMVY has been subdivided into three instalments that incentivise specific health-seeking behaviours. The first instalment incentivises pregnancy registration within the first five months at an Anganwadi or other approved health facility. The second instalment incentivises ante-natal check-ups. The third instalment incentivises the registration of the child's birth and its first cycle of vaccinations. Along with improving health-seeking behaviours, the other objective of the PMMVY is to compensate for wage loss partially.

**As calculated in 2022, PMMVY's entitlement of Rs. 5,000 provided over one year amounts to one month's wage loss<sup>26 27</sup>.**

**The limited extent to which the PMMVY could compensate for wage loss was one of the reasons that Indus Action chose to evolve into an organisation focused on multiple legislations.**

Another concern with the design of the PMMVY is that although its 2017 Guidelines state that it is in accordance with the National Food Security Act, the objectives of the former do not include food security. Indus Action's Theory of Change on Food Security combines the objectives of the National Food Security Act and PMMVY, envisioning that citizens will use the benefit to supplement nutrition and income loss. However, the route to supplement nutrition through the PMMVY in its current form is indirect (see section 2.3.2 for further discussion).

### 2.3.2 Indus Action's approach to enhancing policy and process to supplement nutrition and income loss for pregnant women and lactating mothers.

24. "The National Food Security Act, 2013," September 10, 2013.

25. Government of India Ministry of Women and Child Development, "Pradhan Mantri Matru Vandana Yojana (PMMVY) Scheme Implementation Guidelines" (New Delhi: Ministry of Women and Child Development, 2017).

26. Amar Patnaik, "State schemes can cast a lifeline to this welfare plan," The Hindu, January 3, 2022

27. As per the 2023-24 wage rates, less than a month would be compensated for.



Indus Action aims to achieve three outcomes through its Right to Food Security domain. First, citizens receive all instalments of the PMMVY benefit on time and at a reduced cost. Second, citizens use the instalments to supplement nutrition and income loss due to pregnancy and/or childbirth. The third intended impact is that coverage of the PMMVY is expanded, and more births are included, based on Indus Action's recommendations for increasing the allocated government budget.

To achieve these impacts, both process and policy interventions are required. On the policy front, Indus Action conducts research into policy change implementation in different states. This research and the insights gathered from its process interventions inform the recommendations made to the Government of India on policy and process redesign. These recommendations are expected to lead to an easier application process and, ultimately, to enhanced coverage of births through an increased budget allocation.

A critical process intervention is raising awareness about the registration and application processes. In setting up PMMVY, the anticipation was that women will apply for the benefit with the assistance of community health workers (e.g. ASHAs and ANMs) rather than on their own. However, Indus Action believes raising awareness among citizens and community health workers is important.

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**This increased awareness is expected to ensure that eligible citizens are identified by community workers, and their applications are correctly submitted and verified promptly.**

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The helpline, set up by Indus Action, is another important process intervention. The helpline supports citizens to track their application status and serves as a means of grievance redressal. Over time, the helpline is expected to be handed over to the government, ensuring its continued operation and timely grievance redressal. Publicising the helpline through awareness *melas*, campaigns, meetings, and collateral is another crucial activity, ensuring citizens are aware of this avenue for grievance redressal.

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**Indus Action's work also extends to providing supportive supervision to block and district officials.**

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This is done alongside updating citizen data on the PMMVY dashboard and sharing this information with block, district, and state-level officials. Regular updates on monthly progress are provided to senior officials, and troubleshooting is carried out where targets are not met. The data collected in this process is used for monitoring at all government levels, which helps to correct pending/incorrect applications correct applications and reduce the number of applications in correction queues.

Finally, for citizens to receive all instalments of the PMMVY benefit, they must go for ante-natal check-ups and immunise their children on time. Institutional delivery is a mandatory condition to receive the Janani Suraksha Yojana benefit.



Indus Action's approach to enhancing policy and praxis to supplement nutrition and income loss for pregnant women and lactating mothers is below.



- Human, financial and tech resources

## INPUTS

## ACTIVITIES

## OUTPUT

## OUTCOMES

## IMPACT

- Citizens receive all instalments of the PMMVY benefit on time, and it costs them less to do so
- Citizens use the instalments to supplement nutrition and income loss
- Based on our recommendations, more births are covered through an increase in the budget allocated

# THEORY OF CHANGE

- Set up the helpline
- Train ASHAs, ANMs and data entry operators at Awareness Melas
- Publicize the helpline through Awareness Melas, campaigns, meetings and collateral
- Update citizen data on the PMMVY dashboard and share it with block, district and state level officials
- Update senior officials on monthly progress
- Troubleshoot with officials where targets are not met
- Research policy change implementation in different states
- Write policy and process change memos addressed to Government of India

- Increased awareness about registration and application processes among citizens, data entry operators, ANMs and ASHAs
- Citizens are aware of the helpline as a means of grievance redressal
- The helpline is handed over to the government
- Block and district officials receive supportive supervision
- Applications with errors are flagged and shared with the government
- Recommendations are made to the GoI on policy and process redesign

- With the assistance of ASHAs, data entry operators and ANMs, eligible citizens are identified, and their applications are made and verified on time
- Citizens are able to track their application status through the helpline
- The government continues to run the helpline and redress grievances on time
- Data is used for monitoring by the government at all levels
- Applications are corrected, reducing the number of applications in correction queues
- Citizens receive ante-natal check-ups on time
- Citizens give birth in institutions
- Citizens have their children immunized on time
- Government makes the application process easier, based on our recommendations

## 3. KEY FINDINGS



## 3.1 SYSTEM CHANGE THROUGH POLICY INTERVENTION

### 3.1.1 The Right to Education

- **Policy Recommendation:**

**To improve the implementation of Section 12(1)(c), Indus Action envisions in its approach to make policy recommendations to state governments and the Union Government in collaboration with ground partners.**

An analysis of the MoUs between Indus Action and the Education Department of eight states (Uttarakhand, Maharashtra, Chhattisgarh, Jharkhand, Odisha, Haryana, Andhra Pradesh and Bihar) indicates Indus Action's role and expected interventions in making policy recommendations in all these States. The interview with state officials of Odisha cited a policy change that was made to improve the implementation of Section 12(1)(c) and that Indus Action was involved in drafting it. There was, however, no evident validation of Indus Action's intervention in policy change from the interviews of officials conducted in the other three states - Uttarakhand, Chhattisgarh and Haryana.

**Table II: MoUs with Education Departments in 8 States**

#	State	MoU Year	Policy Change	Awareness Creation	Application Centres	MIS	Helpline	Capacity Building
1	Uttarakhand	2017-18	Y	Y	Y	Y	Y	Y
2	Maharashtra	2017-18	Y	Y	Y	Y	Y	Y
3	Chhattisgarh	2017-18	Y	Y	Y	Y	Y	Y
4	Jharkhand	2018-19	Y	Y	Y	Y	Y	Y
5	Odisha	2018-19	Y	Y	Y	Y	Y	Y
6	Haryana	2021-22	Y	Y	Y	Y	Y	Y
7	Andhra Pradesh	2022-23	Y	Y	Y	Y	Y	Y
8	Bihar	2022-23	Y	Y	Y	Y	Y	Y



### 3.1.2 The Right to Livelihood

Indus Action's involvement in the Right to Livelihood domain has been in the states of Chhattisgarh and Delhi. The MoU with the Labour Department of Chhattisgarh signed in October 2021 listed out six responsibilities of Indus Action, out of which four refer to Indus Action's role either as a knowledge partner or in redesigning welfare schemes. In Delhi, the MoU with the Chairman of BoCW Board with Indus Action in 2020 and subsequently 2023, does not recognise a role for the organisation in policy interventions.

- **Redesigning Welfare Schemes / Programs**

In Chhattisgarh, interviews with a partner who was part of the Labour Department's Project Management Unit (PMU) and a government official validated that Indus Action has played a role in redesigning welfare programs in the state. The partner stated that Indus Action had joined the PMU before the signing of the MoU, which was created to provide technical support to the Commissionerate in designing policies.

This study found several instances of Indus Action's intervention in policies relevant to construction workers through its role as a knowledge partner to the state's Labour Department, mostly redesigning welfare programs and benefits.

- Through the PMU, Indus Action was involved in the proposal for an increased amount for the family pension program and a redesigned scholarship program that would increase the amount based on the child's vulnerability. Both proposals, however, could not get approval from the political leadership.
- A free coaching program for children of construction workers who wanted to appear for competitive exams was introduced in Chhattisgarh.

**The interviews also highlighted Indus Action's involvement in redesigning the BoCW and Unorganized Worker's maternity benefits. The redesigning involved defining a clear objective based on wage compensation which got approved.**

However, instead of the recommended 50% of the minimum wage as compensation towards maternity benefits, a fixed amount calculated based on the current minimum wage was finally approved.

### 3.1.3 The Right to Food Security

Indus Action's involvement in this domain has only been in Uttar Pradesh. PMMVY, being a centrally sponsored scheme, gives limited opportunities for policy intervention, and the focus for Indus Action has been on process rather than policy.

**The primary research from the interviews also showed no evidence of Indus Action's interventions leading to policy changes.**

## 3.2 SYSTEM CHANGE THROUGH PROCESS INTERVENTION

### 3.2.1 The Right to Education

Indus Action has targeted interventions into eight processes to improve Section 12(1)(c) implementation. The first of these processes is awareness creation, in which the organisation intervenes by creating outreach strategies for the government and ground partners and building their capacities to deliver them. Each of the remaining seven processes corresponds to a module in Indus Action's Education MIS. These processes/modules are school registrations, student registration and applications, allotment/allocation of applicants to schools (through an online lottery), admission confirmation/admissions, student tracking, fee reimbursements, and grievance redressal.

- **Outreach**

Indus Action has a stated role in awareness creation in the states it is involved in, as mentioned in all the eight MoUs analysed for the study (Table II). Of the interviews, only one respondent cited awareness creation as a process in which there had been a change due to Indus Action's intervention. This respondent said the state had no strategy for implementing Section 12(1)(c) before Indus Action's intervention. Following the intervention, they conduct monthly drives to select the appropriate students.

- **Capacity Building**

All eight MoUs analysed in this study recognised a role for Indus Action in capacity building (Table II). However, only three respondents said that Indus Action had a role in capacity building. In addition, technical capacities were specifically mentioned, indicating that state officials primarily derived value from adopting Indus Action's education MIS and learning how to maintain it.

- **Data-Driven Governance (MIS)**

A visible and key intervention by Indus Action in improving the implementation of Section 12(1)(c) is the development of Indus Action's Education MIS. This intervention had the maximum recall value in the interviews with the state officials. The role of Indus Action in developing the online MIS was also validated from the interviews of officials from Chhattisgarh, Delhi, Haryana, Odisha, and Uttarakhand.



The interviews indicated a generally positive acceptance and impact of the online MIS. Statements from three respondents indicate that the earlier manual lottery system was perceived to be encouraging corruption.

**One respondent stated that the online MIS had increased transparency and improved the targeting of eligible students, while another mentioned a greater trust in the system than earlier.**

The online MIS was also described as bringing about an increase in applications. More specifically, in Odisha, it was mentioned that in one year, applications had doubled from approximately 5,000 to 10,000. Another benefit of the online MIS one respondent described was that it saved time and made monitoring easier.

- **Grievance Redressal**

The two processes in which Indus Action intervenes in almost all states through its helpline are registration/application and grievance redressal. Based on Indus Action's data,

**695,470 unique missed calls were received on these helplines since the 2014-15 academic year.**

None of the state officials interviewed validated Indus Action's intervention in the grievance redressal process through helplines. This may, however, be because district, block and deputy-level officials are more aware of the magnitude of Indus Action's work on grievance redressal than state officials. While only two other officials (deputy and district levels) were asked about the helpline, this hypothesis was validated to a certain extent. One mentioned that Indus Action operated the helpline, while the other mentioned that he operated it but had received training from Indus Action. Interestingly, these officials described the helpline as a means of awareness creation as well as grievance redressal, saying that parents use it to gather information on Section 12(1)(c) and/or to ask any questions they may have.

Given that only two deputy and district-level officials were asked about the helpline (compared to five at the state / UT level), an attempt was made to triangulate these findings with automated call logs and other sources. Indus Action's records show that their first helpline was operational and was receiving missed calls, at least from 2014-15. Still, no automated call logs or other data sources were available from this period. However, invoices from Exotel, a call tracking solution that Indus Action uses, were reviewed for the

period from January to December 2018, February to October 2019, December 2019 to November 2020, July 2021 to January 2022 and July 2022 to March 2023. While these invoices provide evidence of Indus Action's operation of the helpline(s) almost continuously between January 2018 and March 2023, it is not possible to infer from them which states the missed calls originated from and whether they were about Section 12(1)(c), the BoCW benefits and/or the PMMVY.

• **Knowledge Partner**

The interview with the official in Delhi was notable because of their emphasis on Indus Action's role as a knowledge partner. Like the other officials interviewed, this respondent recognised Indus Action's contribution through the online MIS. However, this respondent linked the online MIS to Indus Action's knowledge products, saying that the organisation documented the flaws in the earlier (manual) system, gave the government a solution, and deputed a team in Delhi to support its implementation. The knowledge product that the official was referring to in this example was the Project Eklavya Campaign 1.0<sup>28</sup> Report.

**Project Eklavya was Indus Action's first campaign in Delhi to break the social, psychological and technical barriers that impede the implementation of the bold provisions under Section 12(1)(c).**

During this campaign, a challenge was that many parents believed that the existing lottery system encouraged corruption. Therefore, in the campaign report, Indus Action recommended a centralised online lottery system for Delhi<sup>29</sup>, which the government adopted.

The Delhi official also mentioned that another study<sup>30</sup> by Indus Action found that the resources of the DCPCR were being spread too thinly. This led to the DCPCR narrowing its focus to non-compliant schools and sharpening its monitoring. As a result, violations were curbed in 140 schools.

The responses of the Delhi officials were unique in their emphasis on Indus Action's role as a knowledge partner. In comparison, the responses from the officials in Chhattisgarh, Haryana, and Uttarakhand indicate that they perceived Indus Action primarily as a technology partner. While a 2017 work order from DCPCR was reviewed for this study, it was only possible to validate that they had commissioned Indus Action to assess the implementation status of Section 12(1)(c) and not the specifics of the studies mentioned by the official interviewed. It is possible that the partnership with the Delhi government did have a unique emphasis on knowledge creation and dissemination or that the

28. Indus Action and Central Square Foundation, Eklavya Campaign Report.

29. Ibid

30. Ibid,30.

specific respondent in Delhi remembered and/or valued Indus Action's role as a knowledge partner more than the officials interviewed in Chhattisgarh, Haryana, and Uttarakhand.

When asked about any other support Indus Action had provided in implementing Section 12(1)(c), the official in Delhi also mentioned the organisation's focus on children with special needs. This focus is not elaborated on in the interview. However, as reported by Indus Action, they began highlighting the need for 3% of Section 12(1)(c) seats to be allotted to students with special needs in 2015-16 and to make their admission criteria fairer. By 2019-20, students with special needs were allotted seats in Delhi.

A final data source used to validate the reports from Indus Action on their policy and process interventions was a letter of recommendation from Nila Mohanan, the Mission Director of Mission Convergence, during the Project Eklavya campaign. The letter confirms that Indus Action was given access to 10 Mission Convergence Gender Resource Centers (GRCs) in South Delhi for the campaign. In each of the 10 Centers, GRC staff and volunteers were trained by Indus Action to be the face of the campaign<sup>31</sup>.

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### The letter validates that through Project Eklavya, nearly 1,00,000 families were reached.

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Most importantly, the letter acknowledges the recommendations that, based on insights from the campaign, Indus Action presented to the government improvements in the admissions process.



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<sup>31</sup> Nila Mohanan, I.A.S., District Magistrate, reference letter, February 28, 2014.

### 3.2.2 Livelihood

Indus Action has targeted interventions into three process improvements towards implementing the BoCW Act. These processes are awareness creation, the process from applications to approvals, and grievance redressal. This evaluation found Delhi offered greater evidence of Indus Action's intervention in these processes than Chhattisgarh.

- **Awareness Creation/Outreach**

To create awareness among construction workers of the BoCW Board's welfare programs and to redress grievances in Delhi,

**Indus Action's interventions have consisted of their proof of concept, building the capacities of ground partners to conduct awareness camps, and running a helpline in collaboration with the government.**

Both the ground partners interviewed described camps as one way to reach out to workers, and mentioned the involvement of Indus Action during the process. However, one of the partners said that the camps were ineffective due to coordination issues between CSOs and the government, and other channels (for example, pamphlet distribution) had been more effective instead.

- **Application Process**

Indus Action also used the helpline to make IVR calls to workers to inform them about camps where they would be assisted to correct application errors. These were referred to as "amendment camps". Indus Action's IVR calls to registered construction workers about amendment camps were also mentioned in the MoU and validated through primary and secondary research<sup>32</sup>.

While it is too early to measure the results of Indus Action's intervention in the process from the application to the approval stages, its potential is far-reaching. In the second quarter of 2023, a dedicated online portal<sup>33</sup> was launched for construction workers applying for the Delhi BoCW Board's welfare programs. The responsibilities of Indus Action for this online portal were described in their MoU with the Delhi BoCW Board as follows:

**Clause 1.1.** Indus Action will contribute to the new website design by sharing its welfare claim eligibility predictive engine to ensure a more targeted outreach of welfare benefits to eligible construction workers.

32. Arun Kumar Jha, Secretary (Board), letter, July 7, 2021.

33. "Delhi Building and Other Construction Workers Welfare Board," accessed July 15, 2023.



**Clause 1.2** Study, design, and support the BoCW website development process and the board's technical team by providing project management support and sharing wireframes of [the] integrated welfare delivery tracking system.

**Clause 1.3** Study and design, through Human-Centred Design (HCD), based methods, scalable solutions that can be incorporated into the existing welfare delivery flow, and the digital interface of DBOCWWB portals to ensure the citizen experience of accessing benefits is most efficient in terms of time and money spent by eligible construction workers.

The last sentence above closely resembles the impact statement in Indus Action's ToC: "more citizens (construction workers) who apply for welfare can claim it, and it takes less time and money". Towards achieving this impact,

**Indus Action undertook a "form rationalisation" activity to remove repetition in the registration, renewals and claims forms. This potentially reduces application time by approximately 20-25 minutes and almost eliminates travel and documentation-related costs that a worker undertakes when visiting district offices for applications. At present, these costs are a minimum of Rs. 500 per visit.**

Another major challenge that surfaced in the process of welfare delivery is the government's struggle in identifying the eligible pool for matching provisions due to lack of consolidated information. This challenge is further amplified by the citizens lack of awareness of all schemes and their eligibility for the same. The Eligibility Engine, built by the Indus Action and IDInsight team, is being developed to address eligibility when given a set of citizens and their characteristics and eligibility without complete information.

This engine also has far-reaching potential. It aims to predict, which welfare programs workers are eligible for, based on events such as marriage, pregnancy, and school admission that they report on the portal.

**The engine's potential is far reaching because it shifts the onus from the citizen to the government to determine eligibility of construction workers and their families for programs.**

A similar idea had been considered by the former Labour Commissioner in Chhattisgarh but has not been implemented there as yet.

The primary research was validated through one respondent's feedback, "Indus Action played a critical role" in developing the website. This respondent described Indus Action's role as designing the website and explaining the Board's requirements to the vendor (E-NET Spider) in technical terms. These requirements were decided on through a study in which Indus Action, the Board, the National Informatics Centre (NIC) and E-NET Spider were all involved. This study resulted in a Systems Requirement Specifications (SRS) document (system architecture framework representative of the needs and demands of a system through technological integration). As is evident from Indus Action's version of the SRS, it contains the wireframes central to defining the application process and the abbreviated (rationalised) forms.

Another respondent described Indus Action's contribution to the website as making it user-friendly by increasing the number of languages it could access (earlier, it was only in English, but now it can also be accessed in Hindi, Punjabi and Urdu). However, neither of the respondents mentioned Indus Action's welfare claim eligibility predictive engine.

#### • **Grievance Redressal**

Some challenges faced in implementing the BoCW Act per the respondents were that the administration is not worker-friendly, cannot respond to many workers, and is unwilling to "go the extra mile" for them. Therefore, CSOs (Indus Action, Jan Sahas and Mobile Crches) were mentioned as agencies bridging an important gap in awareness creation and grievance redressal. It was also stated that earlier, there was no grievance redressal system in place, and workers need to be able to access a 24-hour helpline when the Labour Department office only functions from 9 am to 5 pm. The monthly reports that Indus Action submits to the Labour Department based on the helpline data were mentioned, which state how many people contacted the helpline and categorise their grievances. The primary research indicates that Indus Action was able to deliver what the Board expected, which was the following (paraphrased from the MoU):

- Stage-wise grievance recording and communication to the concerned district office
- Grievance record management
- Grievance data analysis and pattern identification
- Monthly reports
- Dashboard on the website with the updated status of the grievance and the quality of address by the Delhi Labour Commission

#### • **General Process Overview**

As stated at the onset, there is stronger evidence for Indus Action's process interventions in Delhi than in Chhattisgarh. This assessment is based on the fact that in Chhattisgarh, Indus Action could not intervene in the process from the application stage to the approval stage in a similar manner as in Delhi.

While the primary research indicates that the PMU created an app in Chhattisgarh, it was for worker registration alone and did not extend to the subsequent processes.

According to Indus Action's reflections, one reason they could not use technology to improve the process from application to approval in Chhattisgarh was a difference in priorities at the time, between the Labour Department and Indus Action. Therefore, an observation of this study was that to compensate, Indus Action redoubled its efforts to create awareness and redress grievances instead. Similar to the intervention in Delhi, in Chhattisgarh, Indus Action registered workers, applied for welfare programs on their behalf, and set up a helpline to provide information about BoCW welfare programs and redress grievances.

### However, because in Chhattisgarh, the helpline is also being used to reach out to migrants who returned during the lockdown.

it is equipped to function as a “supply-side push,” giving information on welfare programs to workers who otherwise would not have known about them.

In Chhattisgarh, the PMU also proposed a Labour Resource Centre (LRC) in every state block to provide the same services as the helpline, but in person. While this proposal has yet to materialise, the Chhattisgarh Labour Department and Indus Action pursued another route to register construction workers who were not aware of the existence of the app or the helpline. This route was the Shram Mitra Yojana.

The Shram Mitra Yojana was launched before the COVID-19 pandemic and has undergone several minor changes. In 2018, it stipulated that Shram Mitras would be financially incentivised to submit applications for labour cards and welfare programs on behalf of workers, up to an amount not exceeding Rs.2,500 each<sup>34</sup>. In 2021, it was decided that the Shram Coordinators responsible for motivating, supervising and guiding the Shram Mitras would also be eligible for a financial incentive (which they were not earlier)<sup>35</sup>.

By January 2023, 269 Shram Mitras and Shram Coordinators had been nominated, and a letter was sent from the BoCW Board to the districts (copying Indus Action), stating that these individuals require training about their responsibilities and proposing training dates and venues<sup>36</sup>. No evidence is available on the implementation or outcomes of the training till May 2023. Nevertheless, the nomination of 269 Shram Mitras and the allocation of funds to incentivise them and the Shram Coordinators indicates greater receptivity by the BoCW Board to supply-side pushes.

34. Chhattisgarh Government. Building and Other Construction Workers Board. (Notification). Padum Singh Elma. Raipur, April 20, 2018.

35. Chhattisgarh Government. Labour Department. (Notification). Renuka Srivastav. Raipur, February 27, 2021.

36. Savita Mishra, Secretary, Building and Other Construction Workers Board, letter, January 3, 2023.



Only 10 Shramik Mitras had been nominated against a planned #800 in Delhi. Although the primary research indicated that the Shramik Mitras create awareness and assist with grievance redressal, it was also acknowledged that with only 10 Shramik Mitras, application submissions on behalf of workers are a tall task. As stated by one respondent, not all administrative and political leaders perceive the appointment of Shramik Mitras and ground partners as equally important, and therefore, a risk that this evaluation identified is that these roles are not insured against leadership changes.



In both Chhattisgarh and Delhi, it is too early to tell whether most of the interventions of Indus Action will lead to sustainable system changes. In Chhattisgarh, it has only been a few months since the instruction to train Shram Mitras was issued, and the helpline was set up. In Delhi, the website has just been launched. However, the primary and secondary research indicates that while Indus Action will hand over the helpline to the Delhi BoCW Board, the vendor will maintain the website for the next five years. No information was available on how the Chhattisgarh Labour Department plans to sustain the interventions of Indus Action and the PMU.

### 3.2.3 Food Security

The focus of Indus Action in Uttar Pradesh has been on process rather than policy, and it has targeted four PMMVY processes through its interventions. These processes are awareness creation, grievance redressal, the application process and program monitoring.

- **Awareness Creation, Training and Application**

PMMVY anticipates that women will apply for the benefit with the assistance of community health workers (e.g. ASHAs and ANMs) rather than on their own. Once women apply for PMMVY, they can call the helpline independently. Indus Action intended that women use the helpline to track their applications and file grievances.

Awareness Melas was, therefore, an important activity planned by Indus Action that would enable both community health workers to be trained on registration and application processes and publicise the helpline. Other activities to publicise the helpline were campaigns and meetings. The proposal by Saaras Impact Foundation in September 2019 also validates that awareness creation and capacity building of community health workers were two of the areas in which they (along with Indus Action) offered support to State Innovations in Family Planning Services Agency (SIFPSA) in implementing PMMVY.

This support was accepted by SIFPSA, as is evident from their MoU with Saaras Impact Foundation. This MoU states that one of the areas in which Saaras Impact Foundation and Indus Action will provide support is in conducting effective IEC campaigns, especially in urban locations. It also states that

Saaras Impact Foundation and Indus Action will build capacities at the community, district, and block levels.

Both Indus Action's capacity-building and interventions to create awareness in urban locations were validated through the interviews. In three of the five interviews with government health officials, a specific question was asked on whether they had received training to understand the dashboard and helpline operations. Two officials said that they had not received training but that Indus Action had trained others.

The primary research also revealed why the MoU with SIFPSA specified that Indus Action was expected to focus on urban locations. It was explained that the urban data was not sufficiently disaggregated to answer questions about the number of applicants and their respective locations. In addition, there was only one District Operator for urban locations.

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**Indus Action's role was described as helping answer questions on the urban data by applying filters to the portal and contributing to an increase in the number of applications from urban areas (from 50 to 100).**

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Although it was validated that Indus Action had a substantial role to play in awareness creation, none of the specific activities to create awareness listed in the ToC was mentioned by respondents.

Another activity mentioned in the ToC but not validated through the interviews, was Indus Action's training of community health workers. Instead, it was mentioned that Indus Action had identified eligible women and assisted with their applications through community champions. These champions would visit the District Women's Hospital, identify eligible women, and assist them in submitting applications.

**• Grievance Redressal**

The MoU with SIFPSA also said that Indus Action would develop a functional helpline but did not describe it specifically as a means of grievance redressal. The two respondents interviewed for this evaluation validated Indus Action's role in developing and/or operating the helpline. It was stated that it had been very effective in providing information on PMMVY and redressing grievances.

**• Program Monitoring**

The last of the four processes for which Indus Action has designed an intervention is program monitoring. This intervention is a program dashboard. During a webinar held on the 28th of January, 2021, Rajesh Bangia, Deputy

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General Manager (Projects) at SIFPSA, stated that Indus Action had helped them develop this dashboard<sup>37</sup>. One of the two district officials interviewed for this evaluation supported this statement.

**The dashboard was described as having made program monitoring easy, for example, by enabling comparison of the achievements of each district.**

These interview responses were also validated by accessing the dashboard online. Bar charts and tables that show the best and worst performing areas are visible to the public and were last updated on the 26th of March, 2023<sup>38</sup>.

- **Concluding Remarks:**

**Regardless of whether Indus Action's contribution to the helpline and dashboard is acknowledged or not, it is positive to see that the government has taken ownership of both interventions.**

It is too early to determine whether the sustainability of the interventions is ensured, as it will depend on consistent effort over time to keep the dashboard updated and in use and the helpline operational. Specific to the helpline, the primary research revealed that since the merger with the National Health Mission helpline, there have already been some complaints about the quality of grievance redressal. However, given that signing long-duration, non-financial MoUs with state governments is not sustainable either, the withdrawal of Indus Action from PMMVY implementation in Uttar Pradesh is an important test case for whether a relatively short-duration engagement can lead to lasting improvements in welfare programs.

## 3.3 RESULTS FOR CITIZEN GROUPS

### 3.3.1 Results for Children

Indus Action's systemic interventions are expected to increase the number of students admitted to schools under Section 12(1)(c). To validate whether this result has been achieved, baseline data on student admission before systemic intervention by Indus Action is important but is only available for select states. Table I contains admissions data for these states before and during Indus Action's intervention. It also contains the number of students admitted in three

37. Indus Action, "Expanding the Scope of Maternity Benefits: PMMVY 2.0," YouTube video, YouTube.

38. PMMVY State Team, PMMVY Dashboard 2.0.U.P., March 26, 2023

other states where Indus Action has intervened but where baseline data is unavailable or unclear. These three states were chosen because admissions data were at least available for the first two years of Indus Action's intervention. The first, second and third years of Indus Action's intervention correspond to Years 1, 2 and 3 in the table.

**Table III: Indus Action's Contribution to Section 12(1)(c) Admissions**

State	Baseline Data	Year 1	Year 2	Year 3
Chhattisgarh	23,000	40,254	48,200	52,674
Madhya Pradesh	NA	1,61,372	1,55,700	NA
Odisha	985	4,543	10,031	NA
Tamil Nadu	1,36,968	76,917	70,801	56,166
Uttarakhand	NA	2,405	4,868	10,000

The cells highlighted green in Table III are those with an increase in admissions compared to the previous year. Uttarakhand saw the number of students admitted doubling during Indus Action's intervention each year. In Odisha, student admissions increased almost five times in the first year and doubled in the next.

From the data in Table III alone, it is impossible to conclude that Indus Action's intervention resulted in increased admissions. However, in all three states, Indus Action reported that they were involved in setting up and managing the education MIS, as well as in awareness creation, grievance redressal, and building the capacity of government officials. That Indus Action's intervention made a substantial contribution was also validated in the interview with the official in Odisha, who credited the organisation with the increase from approximately 5,000 to 10,000 students (Years 2 to 3).

At the same time, of these five states, there were two in which admissions declined during the years of Indus Action's intervention (cells highlighted in yellow). Again, the decline in admissions is not directly attributable to Indus Action. While it is important to question whether any of Indus Action's interventions inadvertently contributed to a decline in admissions (for example, by preventing people without internet access from applying), in neither Madhya Pradesh nor Tamil Nadu, was it Indus Action that initiated online processes. In Madhya Pradesh, Indus Action reported that an education MIS existed before their intervention. In Tamil Nadu, the government had already created an online application using Google Forms before the intervention of Indus Action through its Partner Entrepreneur. Interviewing officials in these states could have yielded further insights. Them not being included in the sample was a shortcoming of this study.



Another plausible explanation for the decline in admissions is that schools were making fewer seats available, but at least in Tamil Nadu, this was not the case. While there was a slight decline in the number of seats available in the same period, it did not mirror the sharp drop in admissions. The role of schools is nevertheless important, not only during the admissions process but also in influencing student retention, which Indus Action seeks to achieve.

Private schools can positively influence retention by ensuring a non-discriminatory environment for Section 12(1)(c) students and supporting them academically if required. Towards this end,

### **Indus Action provides training to schools and makes recommendations to them so that they become more inclusive.**

However, Indus Action places greater emphasis on admissions than retention and therefore, does not hold itself accountable for the latter (for example, by setting targets). Nevertheless, it has conducted a retention survey periodically, beginning in 2017, in which samples of students were surveyed to assess whether they were still in their respective schools.

From 2017-19<sup>39</sup>, Indus Action found that the retention rate was stable at 88%<sup>40</sup>. However, in 2021, the retention rate was found to have increased to 94% on average<sup>41</sup>. Given that by 2021, the COVID-19 pandemic had forced many students from the most vulnerable backgrounds to drop out of school, this increase is surprising. Further, in a following report published in 2022, the retention rate had increased to 95.5%<sup>42</sup>.

Sharper research is required to determine how retention rates changed during the pandemic and, most importantly, why. The 2017-19 retention surveys demonstrate that a substantial majority of Section 12(1)(c) students were retained in their respective schools during this period, but there is a caveat here as well. While, according to Indus Action, the surveys measure retention over one year, the 2017 report does not state when the students who are the subject of the survey were admitted, and in the 2018 and 2019 reports, students who were admitted in different years were included in the sample.

In 2019, 41% of the students surveyed had been allotted a Section 12(1)(c) seat in 2018. No disaggregated retention rates were available for students who had been allotted a seat earlier. In the 2018 survey, data from only one question answered by 3,268 of the 5,924 parents was disaggregated when their child was allotted the Section 12(1)(c) seat.

39. Indus Action, Retention survey of students studying under RTE Section 12(1)(c) For Academic Year 2017 and 2019.

40. Indus Action, Retention survey of students studying under RTE Section 12(1)(c) For Academic Year 2018.

41. Indus Action, Retention survey of students studying under RTE Section 12(1)(c) For Academic Year 2017.

42. Ibid. 44.

Nevertheless, based on the information available, the surveys indicate that the retention rate is approximately 88% over one year. While this is positive, retention over one year is only an interim indicator of Indus Action's impact. Given that Indus Action's intended impact is that students are retained until the 8th standard in the same schools,

**It is important to attempt to measure whether longer-term retention rates are as high as 88%.**

Although it is possible that students Indus Action admitted before 2017-18 will be difficult to trace, it is worthwhile to attempt to do so.

### 3.3.2 Results for Livelihood

While the 2021-22 and 2022-23 data (Table IV) indicate substantial improvements in implementing the BoCW Act in Chhattisgarh and Delhi, there is a risk that these gains will not be sustained. This is because, in July 2020, the Ministry of Labour and Employment requested the Chief Secretaries of all the states and union territories to implement a “Mission Mode Project” to register construction workers and ensure that eligible people access the BoCW welfare programs without delay. Therefore, the data from 2021-22 and 2022-23 may reflect a short-term effort by BoCW Boards to register construction workers and ensure their access to BoCW welfare programs, which may not sustain without continued pressure from the Ministry.

**Table IV: Access to BoCW Welfare Programs from 2020-2023<sup>43</sup>**

State / UT	Number of Successful Claims		
	2020-21	2021-22	2022-23
Delhi	712	1,662	18,132
Chhattisgarh	77,310	1,15,412	2,56,779

Nevertheless, the 2021-22 and 2022-23 data demonstrate what is possible when there is both pressure from the Ministry and intervention from Indus Action, other CSOs and unions. Table IV compares the number of successful claims (i.e. workers who received money from BoCW welfare programs) in 2020-21, 2021-22 and 2022-23.

43. Data from Chhattisgarh and Delhi Labour Departments respectively



**The 2022-23 data for both Chhattisgarh and Delhi represents the combined effect of pressure from the Ministry, action by the state/Union Territory government, and the intervention of CSOs and unions.**

While the role of unions was not a focus of this evaluation, it was mentioned by two of the respondents interviewed in Delhi. Interestingly, one of them said that the bulk of email complaints are received from unions (more than 100 construction worker unions are registered with the Labour Department, and they send complaints on behalf of their members). While this response indicates that unions played a positive role, another respondent stated that unions also arrange for labour cards for individuals who are not eligible. Although not mentioned explicitly by the respondent, the comment again highlights the need for an accurate eligibility engine to ensure that only those eligible for labour cards receive them.

In Chhattisgarh, the contribution of Indus Action to successful claims through system change is easier to trace than in Delhi for two reasons. Firstly, because welfare programs were applied manually in Delhi until recently, only the number of successful claims is available for 2020-21, not application data. Secondly, since in Chhattisgarh the PMU did not begin working on process interventions until 2022-23, it is easier to separate what the government was able to achieve before and following Indus Action's intervention. In particular, the applications and successful claims in 2020-21 and 2021-22 are important, as they demonstrate the extent to which the Chhattisgarh government was able to implement the "Mission Mode Project" on its own (without the intervention of CSOs).

As is evident from Table IV, in Chhattisgarh, the government increased successful claims from 77,310 to 1,15,412 between 2020-21 and 2021-22, which is approximately 1.5 times. In 2022-23, the combined effort of the government and CSOs increased the number of successful claims to 2,56,779, an increase of approximately 2.2 times. This is a considerable achievement in its own right. Unfortunately, it was impossible to measure whether more citizens who apply for welfare, claim it, in line with the impact articulated in the BoCW ToC. The BoCW Board has an application backlog, and approvals exceeded applications in all three years.

### 3.3.3 Results for Pregnant Women and Lactating Mothers

An attempt was made to compare data on applications and benefits received before and after Indus Action's intervention. However, it was not possible to establish a baseline, as the earliest data was only available from September

2020, when the MoU with SIFSPA had already been signed. Nevertheless, a comparison of the data available from September 2020 and December 2021 indicates the extent to which Indus Action increased applications and approvals between the 7th and 20th month of their engagement.

**Table V: PMMVY Application and Approvals in Uttar Pradesh<sup>44</sup>**

Month of Indus Action Engagement	Applicants	(Partially) Successful Claimants
7 (September 2020)	1,80,321	31,70,413
20 (December 2021)	2,44,084	45,61,593

Given that the PMMVY benefit consists of 3 instalments, “partially successful claimants”, have received either 1 or 2 instalments. The number of “partially successful claimants” increased by 13,91,180 between September 2020 and December 2021.

Similarly, the number of applications increased by 63,763 between September 2020 and December 2021. While these numbers are substantial, the number of applications is lower than the number of “partially successful claimants”, which points to an issue with the timeliness of the approvals.

The data for PMMVY is entered by the Anganwadi worker at the ground level and digitised by the Block Operator, which takes the data to a central CAS platform. While Indus Action was working on this in 2021, they realised that while they could know the number of women who have received the absolute amount, there are no publicly accessible records of the unique number of women who received the DBT in (the three) individual tranches. Thus, calculating that unique number for a month or year is challenging. The amount of money released is also shown as a bulk amount, thus making it difficult to bifurcate and track the individual tranches. The CAS platform is centrally managed, with limited access to reports and data. It can be inferred that if the number of partially successful claimants is 17-18 times the number who applied in a given year, then either the data is incorrect or claims are being approved after a delay of one or more years.

44. Data from PMMVY back-end database obtained during MoU with SIFSPA

## 4. DISCUSSION AND LEARNINGS



This section synthesises the key challenges and successes experienced across Indus Action's operations domains, leading to learnings across the three domains. It draws on the team's reflections, primary interviews and secondary research and attempts to respond to the following two questions across the education, livelihoods and food security domains.

**Q1. What was successful about Indus Action's choice of interventions? What were the key challenges faced?**

**Q2. What was successful about the stakeholder engagement strategy? What were the key challenges faced?**

Given the operational modalities discussed in Section 2 and a longer engagement journey within the Education domain, the responses to the above questions were further segregated around government, partner and community engagement strategies.

## 4.1 DISCUSSIONS AND LEARNINGS - EDUCATION DOMAIN

### Success and Challenges

Indus Action's choice of interventions was successful because they could balance their research and consulting roles, using the former to enrich the latter. In Delhi, Indus Action was able to translate insights from their helpline data into systemic changes in the implementation of Section 12(1)(c).

Further examples are available from implementing Section 12(1)(c) in Gujarat and Tamil Nadu.



**In Gujarat, when Indus Action was working with parents, they found that parents from other states could not use their Voter ID cards as address proof, nor were their rental agreements accepted. Indus Action immediately took this issue to the government, which resulted in rental agreements being accepted as proof of address from the next admission cycle onwards.**

In Tamil Nadu, a field survey conducted by Indus Action highlighted the risk of corruption in the offline lottery system. Indus Action communicated this concern to the Principal Secretary directly because of their prior relationship. However, an online lottery system has not yet been implemented in Tamil Nadu.

Among Indus Action's choice of interventions, the Education MIS was still among the most valued by the Tamil Nadu government<sup>45</sup>, as in other states (see section 3.1.2). As described by Indus Action, the strengths of the MIS were that it provided governments with an end-to-end solution for managing the implementation of Section 12(1)(c) and could be easily adopted in different contexts. At the same time, a state like Tamil Nadu could use it only for student registration and applications, as it was modular.

In contrast, while this study presumed that state officials would describe and value policy changes made to improve the implementation of Section 12(1)(c) in their interviews, the findings were that this was rarely the case. The only exception from the interviews was from Odisha, although Indus Action's experience indicates that Andhra Pradesh is also an exception with the Amma Vodi welfare program, discussed below.

Taken together, the overall findings and the exceptions indicate that while it is worthwhile to work in some states on policy reform, there is merit in supplementing these efforts with similar interventions with the Union Government (a double-pronged approach), as the latter may have greater authority to make policy changes.

In Andhra Pradesh, the government's Amma Vodi welfare program directly transfers Rs. 15,000 per year to women with BPL ration cards with school-going children. While the Andhra Pradesh government's interest in merging Amma Vodi with Section 12(1)(c) was acknowledged in the 2021 Bright Spots Report<sup>46</sup>, Indus Action also cited its contribution to this merger as one example of how they have been able to successfully adapt their engagement with each state to its context. Govt Order Ms. No. 24 contains evidence of this merger, stating that parents will reimburse schools at the end of the year from the amount received under Amma Vodi (given that the costs mentioned in G.O. Ms. No. 24 range from Rs. 5,100 to Rs. 8,000 per year<sup>47</sup>, the amount received through Amma Vodi is expected to be sufficient).

**Indus Action's choice of interventions is closely linked to its ability to engage with the government.**

45. R. Sudalaikannan, I.A.S., State Project Director, Samagra Shiksha, reference letter.

46. Indus Action, *The Bright Spots Report 2021: Status of Inclusion through the Lens of RTE Section 12(1)(c)*, n.p.

47. Government of Andhra Pradesh, Order No. 24 (Vijayawada: Printing & Stationery, 2023), 12.

Without government engagement, neither Indus Action's policy nor technology interventions would have been possible. The government engagement strategy of Indus Action's Right to Education domain is discussed in the subsequent paragraphs.

## Government Engagement Strategy

Indus Action has been partnering with governments from 2015, beginning in Delhi. In 2017, Indus Action began its expansion into other states. One factor facilitating this expansion was that the Ministry of Human Resource Development organised workshops nationwide to match curated Civil Society Organisations (CSOs) to state governments. Entry into states was also enabled by judicial pressures that Principal Secretaries faced to implement Section 12(1)(c).

**Reflections from Indus Action indicate that engaging political representatives and champions within the administration was also important to partner with state governments.**

A few ways in which political representatives were engaged are as follows:

- In Uttarakhand, analysis of the helpline data found that grievances from parents were clustered in certain geographies. Parents from these geographies were referred to their elected representatives and existing, official routes of grievance redressal, such as the Chief Minister's helpline.
- Parliamentary questions were sent to several MPs and MLAs (Members of Parliament and Members of the Legislative Assembly). The Bright Spots Report 2019 provided a medium to disseminate these responses to the public. (For example, see pages 27-28 for data on notifications and admissions gathered from parliamentary responses)<sup>48</sup>.

Finally, successful partnerships with state governments resulted from the ability to engage with the administration. The reflections from Indus Action emphasised that it was particularly important to engage senior officials at the Principal Secretary or Director level. In states such as Chhattisgarh and Uttarakhand, these champions within the government were key contributors to the success of the partnerships.

Not being able to find a champion within the State or finding someone in the government who actively opposed the implementation of Section 12(1)(c) were

48. Indus Action, Bright Spots Report 2019, 27-28.

some of the challenges reported by Indus Action. In addition, it was mentioned that finding a single champion within the government is not always sufficient, and where possible, it is worthwhile to engage instead with the whole department, from the Principal Secretary to the execution officer-in-charge. A similar realisation was arrived at on the risks of depending on a single champion through Indus Action's reflections on their Right To Livelihood domain.

At the time of writing, Indus Action partnered with state governments directly in Andhra Pradesh, Bihar, Chhattisgarh, and Uttarakhand. However, Indus Action works through or alongside Partner Entrepreneurs in other states. Where it has been successful, where it has not, and the reasons for both are discussed in the subsequent paragraphs.

## Partner Engagement Strategy

Given that the Partner Entrepreneur Network (PEN) was created soon after Indus Action had decided to work primarily with state governments, Indus Action expected that Partner Entrepreneurs would also do so. From this perspective, PEN has had limited success. Where it has been successful, one factor has been the stage of the organisation, with more established partners having been more successful. Independent of the first, another factor has been Partner Entrepreneurs' willingness to pursue research and consulting roles. Yet, it is possible that rather than the motivations of partners, it is instead a lack of alignment between Indus Action's expectations of PEN and the aspirations of the Partner Entrepreneurs themselves that is the issue, as the findings of this study indicate.

As mentioned in Section 2, there has been a high degree of consistency in Indus Action's interventions, both across states and over time. The interviews with Partner Entrepreneurs highlighted a perception that they were expected to engage with state governments to execute similar interventions and through doing so, achieve scale as defined by Indus Action's targets. Although the playbook developed by Indus Action for PEN states that it draws from the experiences of all the Partner Entrepreneurs<sup>49</sup>, it was perceived as the only representative of Indus Action's experience in Delhi.

When asked about the playbook, one Partner Entrepreneur said it was not very useful for other states and that, "Every state needs to have their playbook". Other responses from the Partner Entrepreneurs also indicated that they took pride in being able to adapt Indus Action's interventions to their context (whether organisational or geographic) and innovate rather than in executing a standardised program with fidelity. Although not stated explicitly, that Partner Entrepreneurs desired more opportunities to co-create the

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49. Indus Action, *Entrepreneur Playbook*, n.p. 1.

partnership with Indus Action was implied from the interviews.

In 2018, an evaluation was conducted of PEN, which found that Partner Entrepreneurs perceived the model as being too restrictive, both in its scope and the role that Indus Action expected of them. This role was articulated as that of an employee whose actions would be determined by the employer (Indus Action) rather than the Partner Entrepreneurs themselves. Both the findings of this study and the 2018 evaluation support the conclusion that Partner Entrepreneurs desired more freedom than PEN was designed to give them.

This evaluation found evidence that Indus Action has begun to experiment with working with Partner Entrepreneurs on the implementation of multiple policies, addressing their concern that the focus on Section 12(1)(c) alone was too restrictive. This expansion of the scope of PEN is also aligned with Indus Action's evolution to an organisation focused on multiple legislations. While this evaluation did not find a similar change by Indus Action in response to the desire expressed by Partner Entrepreneurs for more freedom, this finding is not conclusive as it is based on a small sample size.

## Community Engagement Strategy

Indus Action's current strategy combines engaging with communities, state governments and Partner Entrepreneurs. What has been positive about Indus Action's community engagement strategy and what can be the path ahead, is discussed below.

In the 2014-15 admission cycle, Indus Action executed the high-touch Project Eklavya campaign. High-touch community engagement strategies are usually associated with limited scale. However, immediately after the campaign was completed, Indus Action expressed an interest in expanding it from 1 to 11 districts in Delhi<sup>50</sup>.

Even before it partnered with the Delhi government, Indus Action achieved this early ambition for scale to a certain extent. Given that between 2014-15 and 2016-17, Indus Action had limited influence over the government's approval process, it is more appropriate to look at data on applications instead. Direct applications by Indus Action increased steadily, from 856 in 2014-15 to 18,501 in 2016-17. This consistent commitment to scale is worth highlighting as one of the success factors behind Indus Action's community engagement strategy.

At the same time, as Indus Action is aware, a finding that has emerged from research by J-PAL in Chhattisgarh and Damera's essays on school choice (with a focus on Karnataka)<sup>51</sup> is that students who apply for Section 12(1)(c) seats are

50. Mohanan, letter.

51. Vijay Kumar Damera, "[Essays on School Choice: Empirical Evidence from Implementation of India's National School Choice Policy](#)" (PhD thesis, University of Oxford, 2018)



those who can afford admission in designated schools even without winning the lottery. In all states where this is found to be the case, it is a concern because poorer students, whom the program was designed to benefit, are not benefiting. In addition, in states where there is a threat of Section 12(1)(c) being rolled back, resistance by parents may be weakened by the fact that they can afford seats in those schools anyway. Damera wrote his essays in 2018 (which was approximately a year before Karnataka's amendment to Rule 4), but

**Based on Indus Action's reflections, the mistargeting of Section 12(1)(c) is one of the reasons that there has been limited resistance to the amendment from parents.**

For both reasons, Indus Action must revisit its community engagement strategy to target the poorest of the poor better. In addition, to create demand-side pressure to implement Section 12(1)(c), it is also important for Indus Action to engage not only CSOs as it has been doing but also Community-Based Organisations (CBOs) such as trade unions, women's self-help groups, and youth associations/clubs.

Creating this demand-side pressure is particularly important in larger states.

## **Learnings:**

1. It is important to ensure that when an opportunity presents itself to engage in policy-making at the state level, Indus Action can leverage it. It is also important to continue communicating and engaging with the Union Government and consider how that communication can be strengthened. For example, the 2019 Bright Spots Report contains a wealth of information but requires a prominently placed section that separates and highlights the key findings for the Union Government and states, respectively.
2. Indus Action will benefit from codifying a go/no-go state selection rubric based on rigorous stakeholder analysis and current will for Section 12(1)(c) online implementation. The breakthrough attempts over the last 6 years in more than 10 states can help codify this rubric.
3. Identifying a champion within the state is valuable but not sufficient to engage with the government.
4. Where possible, it is worthwhile to engage with the whole department, from the Principal Secretary to the execution officer-in-charge.
5. It is necessary for Indus Action to revisit its community engagement strategy to target the poorest of the poor, as well as to engage CBOs who can create demand-side pressure on states to implement Section 12(1)(c).

## 4.2 DISCUSSION AND LEARNINGS - LIVELIHOODS DOMAIN

### Successes and Challenges

Indus Action through their field and community work consistently recorded and relayed the challenges construction workers faced to the BoCW Board and (in Delhi) to the website vendor. For example, the helpline's role in addressing grievances was discussed in Section 3.2.2. Similarly, the “application camp” was mentioned as another intervention that enabled policy implementation challenges to be diagnosed, resulting in the introduction of amendment services on the website.

**The experience in Chhattisgarh highlighted that along with balancing research and consulting roles, it was also important to balance the risk and impact levels of the interventions chosen.**

Policy interventions are potentially very impactful, but there is also a high risk that new or redesigned welfare programs will not be approved because the political leadership does not have the appetite for them. This was a challenge faced in Chhattisgarh when initially, the team expended substantial effort on redesigning policies, but most were not approved.

### Stakeholder Engagement Strategy

Two success factors behind Indus Action's stakeholder engagement strategy were identified. One success factor was that a team member was part of the PMU in Chhattisgarh throughout the year, maintaining a good relationship with the department. The other success factor was that in Chhattisgarh and Delhi, “allies” who were closely associated with the government and worked collaboratively with Indus Action to approve policy and/or process recommendations. In Chhattisgarh, these allies were the other partners in the PMU. In Delhi, the ally was a consultant to the Labour Department.

While these factors contributed to some successes in stakeholder engagement, a key challenge faced in both Chhattisgarh and Delhi has been ambiguity in the decision-making process. For example, in Delhi, senior bureaucrats have been unsure about whether the Government of the National Capital Territory or the Union Government has the authority to approve the disbursement of scholarships to children of construction workers. This has led to disbursements being stalled.



## Learnings:

1. Choosing interventions that balance risk and impact levels is important.
2. Embedding a team member in the department with which Indus Action is partnering with has been a useful strategy to improve government relationships.
3. Building relationships with decision-makers at all levels of the government is important.

## 4.3 DISCUSSIONS AND LEARNINGS - FOOD SECURITY DOMAIN

### Successes and Challenges

Indus Action's choice of interventions in their Right to Food Security domain (similar to the other two) was successful because they could balance their research and consulting roles. The helpline, in particular, was used to document grievances, informing Indus Action's policy and process recommendations. For example, data from Uttar Pradesh was used to make a recommendation to the Union Government that the husband's Aadhaar card should not be one of the documents required to apply. The Union Government accepted this recommendation as of 2023, but has not been implemented in Uttar Pradesh (or any other state) as yet.



The choice of interventions in the Right to Food Security domain was similar to the other two domains but was also determined by the specific needs expressed by SIFPSA, particularly for the dashboard. The rationale for the dashboard was provided in the minutes of a meeting held on the 12th of February, 2020, between SIFPSA, Saaras Impact Foundation and Indus Action. As described in these minutes, SIFPSA had been using software for tracking and monitoring PMMVY, but disbursing the maternity benefit to the beneficiary and the incentives to other stakeholders on time required a separate system. This system would pull data from the PMMVY portal.

The dashboard, therefore, served an important purpose since, if the maternity benefits were not received on time, it would not enable nutrition to be improved in-utero. At the same time, an additional intervention that was needed but missing was to determine whether other factors were also required for pregnant women and lactating mothers to improve their nutritional intake. On the supply side, it is plausible that the quantum of the benefit is insufficient and that it can only supplement free, nutritious meals provided by the local Anganwadi (as originally envisioned in The National Food Security Act).

**On the demand side, it is plausible that behavioural norms must change for women to both, exercise funds in their bank account and use them to buy nutritious food.**

Without such an intervention, the challenge for Indus Action has been that the relationship between PMMVY and food security has faded from institutional memory. This is evident in the previous version of the “UP – PMMVY” ToC, in which nutrition is not mentioned at all. While using the PMMVY benefit to supplement nutrition is mentioned in the version of the ToC created during this study, the assumption about how it will be achieved is tenuous.

## Stakeholder Engagement Strategy

Just as with the choice of interventions, the strategy used to engage PMMVY stakeholders drew from Indus Action’s experience. In particular, Indus Action’s Bright Spots Reports, published between 2018 and 2021, compared states on their implementation of Section 12(1)(c), with the implicit goal of encouraging healthy competition between them. A similar strategy was followed in Uttar Pradesh to encourage healthy competition among districts to improve implementation of PMMVY.

**In Uttar Pradesh, the equivalent to the comparisons in the Bright Spots reports were the data visualisations and tables available on the dashboard.**

It is inferred that a key factor that made this strategy successful in Uttar Pradesh was that the government owned it. This inference has been drawn based on the series of letters reviewed for this evaluation, in which the Executive Director of SIFPSA (also the Mission Director of the National Health Mission) sent the rankings to the districts. The letters reviewed were from February, March, April, July, September and December 2021, and January, February, April and May 2022<sup>52</sup>, indicating that districts received frequent reminders about how they compared to one another.

However, these letters also highlighted a key challenge encountered in Uttar Pradesh in implementing PMMVY, which was insufficient human resources. Despite multiple reminders and notifications being dispatched across the districts, as of May 2022<sup>53</sup>, across 21 districts, there remained 16 District Program Coordinator and 19 District Program Assistant vacancies that had not been filled. Vacancies in these positions (both contractual) are a potential

52. Aparna Upadhyay, Executive Director SIFPSA/Mission Director NHM, letters.

53. Ibid.

obstacle to effective monitoring of PMMVY. It is beyond the control of Indus Action if the government does not hire the contractual staff required to implement and monitor the program.

### Learnings:

1. Encouraging healthy competition between the districts to improve the implementation of PMMVY has been an effective strategy. Indus Action's experience indicates that this strategy is more effective when rankings are communicated frequently, and the state government shoulders the responsibility for doing so.

# 5. FUTURE IMPACT OPPORTUNITIES AND RISKS



Regardless of the limited extent of Indus Action's current interventions at the Union Government level, this evaluation identifies a key opportunity to achieve future impact. The Union Government is important in making financial resources available to implement both PMMVY and RTE Section 12(1)(c). Therefore, the Union Government is also the appropriate authority to make recommendations that have financial implications, such as covering more births through the PMMVY and extending Section 12(1)(c) to Class 12.

In addition, as is evident from the Union Government's guidelines for PMMVY, they exert control over the claims process, including the documents required. Therefore, one way

**For Indus Action to achieve its goal of making the application process easier would be to engage with the Union Government to reduce the number of documents required and forms to be filled out.**

In section 3.2.2, it was mentioned that the welfare claim eligibility predictive engine, which Indus Action developed with IDInsight, has far-reaching potential for its ability to predict which welfare programs workers are eligible for based on events such as marriage, pregnancy and school admission that they report on the portal. The second opportunity this evaluation identified to increase future impact was to eliminate the process of applying for benefits one at a time through an intervention such as the welfare claim eligibility predictive engine. While Indus Action is currently piloting this intervention in its Right to Livelihood domain, it applies equally to PMMVY. Given that women currently have to fill in three application forms at different points in time to receive a benefit that is equivalent to less than a month's wages, eliminating this burdensome process would contribute substantially to future impact.

**However, there is a risk that the political will to eliminate burdensome application processes will be low.**

As stated in an article in The Wire, while a Union Government budget of INR 8,000 crores is required to ensure the right to maternity benefits for all women as defined in the NFSA, only INR 2,500 crores has been allocated<sup>54</sup>. Therefore, eliminating application processes for PMMVY completely (and potentially enabling all eligible women to receive the benefit automatically), is unviable unless the Union Government substantially increases the current allocation. While there is merit in engaging with the Union Government to increase the

54. Vanita Leah Falco, K.C. Sachin, and Sabhil Nath Painkra, "How the centre can ensure women receive maternity benefits," The Wire, July 22, 2019

current allocation to be sufficient for all eligible women, this is a high-risk strategy.

A moderate-risk strategy that is also worth considering is to use an intervention such as the predictive engine to alert citizens of their eligibility for different welfare programs, but while still requiring them to apply. For the BoCW welfare programs and PMMVY, this moderate-risk strategy also has the potential for moderate impact and is, in other words, a compromise between the high-impact alternative and the status quo. Nevertheless, even to implement this strategy, political will is required at both the state and Union Government levels.

The lack of political will was a key risk to future impact identified by this evaluation. Given private school resistance to RTE Section 12(1)(c), its implementation has always been stymied by a lack of political will. However, this risk has been exacerbated because Karnataka's "Rule 4" has now set a precedent for state governments who want to substantially avoid implementing Section 12(1)(c).

Unfortunately, the current political will that exists to deliver welfare benefits to construction workers is also at risk. As described in section 2.2.1, Deshingkar argues that this political will was generated by the lockdown imposed by the Indian government at the start of the Covid-19 pandemic and the international attention attracted by the migrants walking hundreds of miles home in the initial weeks, when no trains or buses were running<sup>55</sup>. There is a risk that with reduced international attention to migrant issues in India, the political will to deliver welfare benefits to construction workers will also weaken.

As with the lack of political will, this evaluation identified another key risk that is equally relevant to all three domains. This is the risk of unintended outcomes. One such potential unintended outcome mentioned was that the conversion from a manual to an online application process prevents people without internet access from applying.

**It is also possible that, for welfare benefits delivered as cash transfers, the funds are not used as intended for multiple reasons.**

One possibility is that service providers use unscrupulous practices to siphon the cash (for example, government doctors/health facilities who ask for bribes). Another possibility is that due to cultural norms, the recipient of the cash transfer cannot control how it is used (this is particularly a risk for women). A third possibility is that the recipients themselves choose to use the cash for a purpose that is different from that intended by the program.

55. Riya Deshingkar, "Structural Violence and Normalising Human Suffering: Labour Migration During the COVID Pandemic in India", *Journal of South Asian Development* 17, no. 1 (February 8, 2022).

# 6. CONCLUSION



This evaluation found more similarities than differences between the three domains in Indus Action's choice of strategy and interventions. Common to all three domains was the strategy of simultaneously engaging with citizens and state governments. This strategy also shaped Indus Action's choice of interventions across the three domains. The most common process interventions were to improve citizen awareness of their rights, redress grievances (through a helpline), promote greater effectiveness and efficiency using technology solutions, and build capacities. However, one strategy unique to the Right to Education domain was its engagement of Partner Entrepreneurs. Another difference that was observed between states was the role of Indus Action in making policy recommendations being recognised.

Given the noted similarities, this concluding section is not organised by domains as the other sections have been. Instead, the conclusion seeks to answer a set of questions that draw on the data gathered on all 3 domains for this report.

**Q1. For which rights and/or interventions was Indus Action's contribution to systemic change validated?**

**Q2. For which rights and/or interventions was Indus Action's contribution to systemic change either not validated, or was evidence missing?**

**Q3. What opportunities for, and risks to, achieving future impact emerged from this study?**

## Validation and Evidence

The first step in answering this question was to compare the Theory of Change for each domain with any MoUs available as evidence of government engagement on that right, the results of which have been described in detail in the findings of this report. In summary, this comparison highlighted a high degree of consistency between the Theories of Change and the MoUs. The MoUs validated that governments acknowledged a potential role for Indus Action's process (and often policy) interventions and also pointed towards further replicating Indus Action's implementation models with other state agencies.

The next step was to validate whether, from the perspective of governments, these roles were fulfilled, and it was intended that the interviews with government officials would be used for this purpose. However, there was a high degree of variation in which the interviews validated interventions. This

was because of a difference in the focus of officials at different levels in the same state and between geographies.

For example, an analysis of the MoUs signed to work on the right to livelihood in Chhattisgarh and Delhi revealed that they did not have the same focus. While in Chhattisgarh, the focus was on Indus Action's role as a knowledge partner, in Delhi, the focus was on Indus Action's role as a technology partner. This shift in emphasis between Chhattisgarh and Delhi was also reflected in the interviews. Finally, these results were triangulated with a statement by Indus Action that there were substantial differences in the scope of their work on livelihoods in these two geographies. Based on all three sources of data, the evaluation was able to conclude that while different roles were expected of Indus Action in Chhattisgarh and Delhi, in both geographies, government officials validated that these roles had been fulfilled.

### **In the Right to Education domain, there were differences between geographies in the number of interventions validated, but also intra-state differences in which interventions were validated.**

In Chhattisgarh and Uttarakhand, officials interviewed at the district and deputy levels, respectively, validated Indus Action's helpline(s), and further evidence of this intervention was gathered by reviewing invoices from Exotel. However, in the same states, state-level officials did not validate the helpline but validated the online MIS, as did their counterparts in other states. These findings support the hypothesis that district, block and deputy-level officials are more aware of the magnitude of Indus Action's work on grievance redressal than state officials. This hypothesis also provides a possible reason that the two SIFPSA district officials interviewed validated the PMMVY helpline, although as no state officials were interviewed on it, the triangulation was inconclusive.

Aside from the online MIS and helpline, the other Section 12(1)(c) interventions that were less frequently validated (by state, district or deputy officials) were creating awareness among citizens, capacity building and application centres. Creating awareness (among citizens of their rights) was mentioned in the MoUs with Chhattisgarh, Haryana, Odisha, and Uttarakhand, but only in one state and in Delhi did the primary and secondary research validate this intervention. Capacity building was also mentioned in the MoUs with all these states but was only validated with officials in two. None of the respondents mentioned Indus Action's intervention through application centres, although they were included in the Chhattisgarh, Haryana, and Uttarakhand MoUs. Finally, Indus Action's interventions with the Union Government (on any of the three domains) were not validated, as no officials at this level were interviewed. No MoUs signed with the Union Government were made available for review by Indus Action.

## 7. RECOMMENDATIONS



This final section of the report contains four recommendations that are informed by the risks discussed above. The first two recommendations focus on increasing political will to implement the legislated rights discussed in this report. In addition, the second recommendation considers how to redesign the Partner Entrepreneur Network so that it both meets the needs of Indus Action and leverages the strengths of the Partner Entrepreneurs. The third and fourth recommendations focus on how to improve Indus Action's system for monitoring, evaluation and knowledge management, including evaluating unintended outcomes.

**1. Identify and work with trusted media partners to recognise states that have successfully improved access to legislated rights.**

**For states that have successfully improved access to legislated rights, recognition provides an impetus to continue their efforts.**

For states that have not implemented legislated rights, being exposed to "success stories" through the media contributes to an environment of healthy competition. The Better India is one example of a potential media partner (and its brand campaigns in particular).

**2. In addition to / instead of the existing model, leverage the local knowledge of Partner Entrepreneurs to identify and engage with key influencers in the state to generate political will for the implementation of legislated rights.**

**Both the interviews and Indus Action's reflections underscored that CBOs such as parents' associations and unions, have played an important role in creating demand-side pressure to implement legislated rights.**

In states that are reluctant to implement legislated rights, it is worth exploring whether a knowledgeable and committed Partner Entrepreneur can catalyse this demand-side pressure. A previous evaluation found that Indus Action's Partner Entrepreneurs are both capable and committed, and the current evaluation recommends that they should be considered for this role.

**3. Systematically document Indus Action's work for internal purposes (and not just external audiences) and improve knowledge management within the organisation.**

This evaluation found that most of the documentation by the organisation is

currently for external audiences (for example, government presentations, memos, and reports on the website), and therefore it is scattered across multiple sources and is difficult to consolidate. More systematic documentation of the organisation's work for internal purposes will benefit Indus Action in many ways, including in employee onboarding, communications and future evaluations (The Right to Livelihood work in Delhi is somewhat of an exception as it is already quite well documented). In addition, there is room for improvement in the current knowledge management system, as documents like contracts and MoUs are difficult to access because some files are missing and inconsistencies in the sharing permissions.

**4. Conduct mixed methods evaluations of the intended and unintended outcomes of Indus Action's work more frequently.**

Using mixed methods, it is recommended to evaluate Indus Action's work at least every 3-5 years. These evaluations could be conducted either internally or externally. Currently, while evaluations are conducted on an ad-hoc basis, more frequent and comprehensive evaluations will improve the organisation's ability to course correct and understand how best to measure the results of its interventions.



## APPENDIX 1: THE PoWER STRATEGY

### Context

Indus Action's target for 2030 is to enable sustainable access to legislated rights for 2.5 million+ vulnerable families. It plans to achieve this target partially through its existing domains. PMMVY and Section 12(1)(c) in particular, are important because they cater to 2 momentous life events: pregnancy and childbirth and entry into school, respectively.

At the same time, neither PMMVY nor Section 12(1)(c) on its own creates a robust social protection net that supports families to irreversibly move out of poverty. Therefore, Indus Action started to imagine a Portfolio of Welfare Entitlements (PoWER) strategy, of which the Right to Livelihood domain was the first pilot. Through PoWER, Indus Action has been facilitating the effective consolidation of welfare benefits by piloting programs to increase access to entitlements for vulnerable families. From these pilots they have understood where the inefficiencies lie and identified lessons that will result in better targeting, minimising inclusion and exclusion errors, greater efficiencies for the government, and increased social protection for families.

More specifically, the pilots underscored the need for accurate beneficiary registries so that beneficiaries could be automatically registered for welfare programs and their eligibility could be automatically validated (which would improve targeting). However, Indus Action also knew from experience that there would be data gaps even if these registries existed. The pilots also confirmed a need for an eligibility engine with a probabilistic model that fills data gaps and makes reasonable guesses about which programs a beneficiary is eligible for, which “off-the-shelf” engines could not do.

Nevertheless, it has taken time to arrive at these insights due to the diversity of the pilots and because they were spread across the team. Some of the lessons that have been learnt are that when innovating, there should be fewer pilots conducted in parallel and/or they should be better documented so that the knowledge gained from them is transferred to other pilots. Another lesson has been that rather than hiring technology expertise on an “as-needed” basis; it is important to plan and hire for these requirements in advance, the lack of which was particularly challenging in the BoCW pilots in Chhattisgarh and Delhi.

PoWER was not within the initial scope of this retrospective study. However, Indus Action's ongoing evolution into an organisation focused on multiple legislations rather than just one, which the report does mention, is closely linked to PoWER. In addition, the opportunities that were identified in section 4.1 (based on the evaluation of the Right to Livelihood domain) are also relevant to PoWER. This appendix was included to introduce readers to the PoWER strategy for these reasons.

### Objectives

Beyond the pilots, the objectives of PoWER are improving the consolidation of welfare benefits, coverage per benefit and coverage per beneficiary. Consolidation involves either merging welfare benefits within the same thematic areas (for example, scholarships, regardless of which department

they are provided by) or “de facto convergence”. “De facto convergence” refers both to concentrating the welfare budget in the top 10-15 programs and repackaging them as a portfolio scheme (Navaratnalu in Andhra Pradesh is an example of the former, and the Pradhan Mantri Gareeb Kalyana Yojana is an example of the latter).

Improving coverage per benefit involves either increasing the outlay of the welfare program or changing exclusionary criteria so that more beneficiaries are eligible. Improving coverage per beneficiary refers to ensuring that families have access to a portfolio of benefits. Indus Action aims to provide access to 3 benefits worth INR 12,000 per year. This target has been set based on a paper by Ghatak et al., which showed that receiving INR 1,000 per month was enough to push a family out of poverty.

## Operational Priorities

Through its work on Section 12(1)(c) and the PMMVY, Indus Action has gained a clear understanding of the process gaps and implementation challenges in delivering/accessing welfare benefits. Therefore, with PoWER it has chosen to focus more on governance and technology. However, community engagement continues to be central to its approach. Indus Action proposes a three-pronged strategy to the Union Government and states illustrated below.

Governance:

- **Analyse data** on schemes/beneficiaries to understand the effectiveness of scheme delivery and cost optimisation.
- **Conduct process audits for various line departments** to understand challenges from identification to the approval of claims, leading to recommendations to reduce the administrative burden on the citizen and state.
- **Use data** to inform policy-making.
- **Co-create policy** with citizens.

Technology:

- **Design inputs for an integrated service delivery system** to ensure **convergence** of social protection schemes.

Community engagement:

- **Mobilise community champions** to understand citizens' pain points.
- Work closely with a core team within the government to create training modules and train frontline workers.

## APPENDIX 2: FURTHER READING

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## APPENDIX 3: GLOSSARY OF MONITORING & EVALUATION TERMS

**Activities:** Actions taken or work performed through which inputs such as funds, technical assistance, and other types of resources are mobilised to produce specific outputs.

**Impacts:** Intended or achieved effects on identifiable population groups produced by a development intervention. Can be economic, sociocultural, institutional, environmental, technological, or other types.

**Inputs:** The financial, human, material, technological, and information resources used for the development intervention.

**Key Informant:** The person with whom an interview about a particular organisation, social program, problem, or interest group is conducted. In a sense, the key informant is a proxy for their associates at the organisation or group. Key informant interviews are in-depth interviews of a select (non random) group of experts who are most knowledgeable about the organisation or issue. They are often used as part of program evaluations and needs assessments, though they can also supplement survey findings, particularly for interpreting survey results. Key informants are not chosen because they are in any way representative of the general population that may be affected by whatever issue is being studied.

**Outcomes:** Effects of an intervention's outputs (outcomes come before impact). Project implementers do not have direct control over outcomes. Outcomes are what others do on their own, albeit influenced by the project's outputs.

**Outputs:** Include the products and services that result from completing activities within a development intervention. Project implementers have direct control over outputs.

**Theory of Change:** The Theory of Change originated as an evaluation tool that clarifies purposes, results and strategies. As such, it explains the pathways of change that lead to the long-term goals and the connections between activities, outputs and outcomes that occur at each step along the way.

## APPENDIX 4: THE EDUCATION MIS

The Education MIS, is a computer-based system, which helps to store and process data to make day-to-day working more efficient and information-driven for State Education Departments. The MIS proposed by Indus Action and built in different states, for Section 12(1)(c), contains different modules. Each of them serves a different purpose in the overall life cycle of the policy. The aim is to make the application, admission, and monitoring processes easier, less time-consuming, and more transparent, and to have an efficient platform for data collection.

- 1. School Registration:** This module helps bring all the schools onto the MIS platform. It shows the beneficiaries the seats and fee information of all schools in their neighbourhood.
- 2. Student Registration:** Parents/caregivers of eligible children apply for admission to listed schools based on neighbourhood criteria.
- 3. Lottery:** Online lottery is applicable for schools where the number of applications is more than the number of seats. The lottery algorithm decided by the state government matches student applications to school seats. The lottery can be done in a preferential order as well, giving preference to the more vulnerable groups among the disadvantaged.
- 4. Admission/Enrollment Process:** This module enables the nodal officers to review documents and approve the application for any further stage. It is also helpful for the private schools to declare whether the student is studying in school or has dropped out.
- 5. Reimbursement:** This module of the MIS, helps generate a report of reimbursement amounts for each school based on the number of children studying under RTE 12(1)(c) subject to the reimbursement rules of the state. It can also show the funds transferred from centre to state, state to district, and district to school.
- 6. Student Tracking:** This refers to the tracking of student information with respect to attendance and learning outcomes. It is helpful to understand the actual situation in schools, pertaining to the impact of the policy, and to also capture drop-outs in the system.
- 7. Grievance Redressal:** This module will create an efficient, ticket-based system to address the issues faced by different stakeholders in the implementation of the policy, which include the beneficiaries, schools, and government officials at different levels. It can also help link the complaints to the appellate authority for child rights mentioned in the RTE Act, namely, the SCPCR.



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