INDUS ACTION: SOCIAL PROTECTION THROUGH LEGISLATED RIGHTS
A 10-YEAR RETROSPECTIVE
ABOUT THE ORGANIZATIONS

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 consist of developing M&E frameworks, conducting third-party evaluations, and building evaluation capacity and culture. While we possess both quantitative and qualitative research capabilities, we are particularly skilled at the latter. Our clients include EkStep Foundation, for whom we interviewed 152 fathers in 3 phases, and Rohini Nilekani Philanthropies, for whom our 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 like 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 also advocates for process and policy-level changes based on their research and on-ground work with communities. They have supported ~842,000 individuals access over INR 550 crores worth of welfare in the past decade across the domains of education, livelihood and maternity entitlements.

Their goal is to place one million+ families currently below the poverty line on an irreversible path out of poverty by 2025. They aim 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.

Citation:

Indus Action: 10 year retrospective, Devyani Srinivasan and Bhakti Damle, August 2023
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 of those 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, we secured her commitment to keynote the report launch. That she committed to fly, with her challenges with mobility, meant the world to me and my team. 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 am able to 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 maternity, livelihood and portfolio (PoWER) entitlements. We were clear that we need to document both our bright spots and our failure diaries. While we have much to show on how we unlocked welfare entitlements & rights for 892k citizens, we share back the process tracing of our failures. 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 to 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 in the service of moving every Indian irreversibly out of poverty.

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

CONTEXT

Indus Action is a policy implementation organisation that enables sustainable access to welfare rights for vulnerable families. 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 vulnerable 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. This report intends to share the learnings from key interventions implemented alongside government stakeholders and citizens. The essence is to offer to the ecosystem a transparent view into the progress and areas where efforts may have failed. By doing so, the hope is to enrich the dialogue in the ecosystem on how best to deliver welfare benefits by improving the citizen experience and reducing the administrative burden of the government.

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 nascency, 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 rather than just one.
METHODOLOGY

Probex Consulting followed a rigorous reflection process and drew on primary and secondary data for this retrospective study. Primary data was collected through key informant interviews and Indus Action team reflections. The triangulation of these 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.

The objectives of this retrospective study were as follows:
• Co-design a rigorous reflection process with Indus Action, and ensure that it is well-documented
• Use a combination of evidence and reflection to identify Indus Action’s successes and failures in creating systemic change, and the reasons for both, and communicate them transparently through a narrative report
• Evaluate Indus Action’s contribution to systemic change through its work on education, food security and livelihoods

As a first step in this effort, theories of change were articulated for three of the key interventions that Indus Action has sustained over the past decade. These were Right to Education, Right to Livelihood and Food Security. The three theories of change were refined through online workshops facilitated by the Probex team with participation from all relevant internal team members in the organization. These workshops were a space of critical examination of Indus Action’s vision of enabling sustainable access to legislated rights.

This study drew on three sources of data: primary research, Indus Action’s internal reflections, and secondary data already available with the organisation.

Two key limitations were identified as the report’s first draft was drawn up. Firstly, the sample was biased towards partners and government officials who worked at the state level, whereas several of Indus Action’s interventions happen at a block or district level. Secondly, the sample was biased towards high-performing partners and government officials with a positive experience with Indus Action. More interviews were conducted at a district level to address the first limitation. The second limitation was addressed to some extent by gathering reflections from Indus Action on their successes and challenges. These limitations persist and are reflected in the findings below of the three key workstreams.

KEY FINDINGS

This section outlines the learnings from the independent evaluation of the three workstreams. The theories of change referenced here can be found within the report in the pages marked alongside. The learnings explain both the choices made by Indus Action, the impact as experienced by the
government stakeholders and/or citizens and a possible way to approach things differently where the intended outcome did 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, recognized 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 time durations. These four were identified as distinct aspects of Indus Action’s strategy and expansion:

- Phase I: Working directly with parents (2.1.3)
- Phase II: Working primarily with state governments (2.1.4)
- Phase III: Scaling with the Partner Entrepreneur Network (2.1.5)
- Phase IV: Achieving breakthroughs and safeguarding against setbacks (2.1.6)

The Theory of Change can be accessed on Page 22 of the report.

While Indus Action began as an intervention focusing on the demand side, and citizen-led efforts, by 2015-16 the organization realized 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 supply-side friction in accessing a legislated right needed to be addressed. Therefore, they chose to work with education departments across states through the implementation of the Management Information System (MIS) modules.

Across the 8 MoUs studied and relevant stakeholders interviewed, Indus Action’s key contributions were seen in the areas of registration, grievance redressal and capacity building. A key takeaway from government stakeholder conversations was the importance of the online MIS in increased transparency and improved targeting. A challenge was identified with no state-level official having top-of-mind recall on the grievance redressal operations done by the Indus Action team. It could be argued that the block and district-level officials were more aware of the workings of the process, however, as Indus Action grows to partner across states, there is a need to communicate the value proposition of the organisation’s engagement across levels of the state machinery.

Results of children’s outcomes are mixed across the five states where baseline data is available. Three out of the five, where Indus Action has worked most closely with the state, (Chhattisgarh, Odisha, Uttarakhand) showed a substantial increase in the number of applications and therefore admissions. Two states (Tamil Nadu and MP) showed a decline and stagnation in the number of admissions across the three years of data studied. Pre-pandemic (2017-2019), the retention data stood at 88% and in 2021, it rose significantly to 94%. While this is the data point for one year, the need for a longitudinal study on retention and the impact on long-term outcomes for children is strongly felt.
**Right to Livelihood**

Through its work under the Building and Construction Workers Act 1996, Indus Action aims to increase the receipt of welfare by labourers, while reducing process friction and administrative burden. The Theory of Change can be accessed on Page 30 of the report. Using the grievance redressal work, the team builds recommendations that lend to process redesign, sometimes involving technology and policy changes.

In interviews with government officials, it was noted that Indus Action was seen as a knowledge partner and particularly in Chhattisgarh, the team has been able to intervene to inform policy change to benefit construction workers. In the work done on the BoCW website in Delhi, while it is too soon to see impact at an outcome-level, the improved design 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.

Understanding impact through number of workers registered is challenging. Between 2020-21 and 2021-22, Chhattisgarh government saw a 1.5x jump in the number of claims made by workers. While the period between 2021-23 overall shows an increase in registration of construction workers as well as claims made, it overlaps with the GoI efforts called “Mission Mode Project”, which called upon BoCW boards to register workers and support welfare access. Therefore it is difficult to parse out impact for the several CSOs, government bodies and Indus Action teams across states. However, it is illustrative of possible benefits to workers when the government, civil society and unions come together with a shared goal.

**Right to Food**

The work on this right focuses on two key areas of impact - firstly, all vulnerable women are able to access the three installments under the Pradhan Mantri Matru Vandana Yojana (PMMVY), and citizens use the instalments to supplement nutrition and income loss due to pregnancy and/or childbirth. The Theory of Change for Indus Action’s work on can be accessed on Page 36 of the report. For this to reach its full potential, it also needs the expansion of the coverage of women under the welfare scheme and an increased budget allocation at the Government of India level.

The work on securing the Food Security right was piloted in Uttar Pradesh. Indus Action’s capacity-building and interventions to create awareness in urban locations were validated through the interviews. Alongside setting up grievance redressal mechanisms, there were also capacity building measures and program monitoring.

There are no publicly accessible records of the unique number of women who received the direct benefit in three individual tranches, making it difficult to ascertain the impact within the given intervention period. Also, the amount of money the state releases is shown as a bulk amount, thus making it difficult to bifurcate and track the individual tranches. Therefore, while the number of
applicants and those who received some benefit shows an increase, given that the number of partial claimants was significantly higher (almost 18 times) than the applicants, it could be inferred that either the data is incorrect or claims are being approved after a delay of one or more years.

LEARNING ACROSS THE THREE RIGHTS

While the findings speak to the possible impact of Indus Action’s work across the three key workstreams, it is also important to note the learning from the process to live into the intent of this document. The below are compiled from the reflections of Indus Action team members.

On government engagement:
• The importance of identifying and collaborating with champions within the administration and the political representatives was seen as a key component of successful partnerships across board
• Embedding a team member as a part of the PMU on the government’s side is a helpful way to both build a sense of investment but also help transfer knowledge to build the capacity within the system
• While team members can be added as a part of the project unit, adding of human resources from the government’s side to sustain efforts beyond Indus Action’s stipulated tenure is key in sustainability of efforts

On citizen engagement:
• Some of Indus Action’s key pivots have emerged from high-touch campaigns and community-engagement efforts on RTE
• Insights on improving construction workers’ citizen experience to access welfare came about from sustained community engagement and action research
• While understanding citizen journeys supports generation of insights, the current level of access to benefits even within the vulnerable is led by the privileged amongst those. There is a need to examine what citizen engagement would look like in the next chapter for Indus Action with increased focus on technology and also efforts to reach the most vulnerable in each context

On ecosystem engagement:
• Supporting partner entrepreneur organisations to carry forward the work done through playbooks requires room for adaptation to one’s organisation’s context
• Uptake on policy changes and furthering the implementation work would need “allies” within the ecosystem who were closely associated with the government and worked collaboratively with Indus Action
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ABBREVIATIONS USED

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

FROM PROBEX

First and foremost, we would like to thank Tarun Cherukuri and Archana Kannan Iyer 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 shared so generously their time, experience and insights with us. We also hope that the approach that was employed for this retrospective provides ideas and inspiration to other CSOs that are nearing an important milestone in their growth.

The support of Indus Action, and Archana Kannan Iyer and Madhuri Dhariwal in particular, was integral to the execution of this retrospective. Their positive attitude and humor helped to create a smooth and enjoyable working relationship, and was 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 for the incredible persistence with which she ensured 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 extremely grateful to Devyani Srinivasan and Bhakti Damle from Probex Consulting, who ensured a balance of rigour and understanding, working to ensure timely completion of this evaluation. We would also like to express our heartfelt gratitude to the various stakeholders, both governmental and non-governmental, (whom we cannot name due to confidentiality reasons), who have given their valuable time and share their experiences of working with Indus Action over the past decade. Your feedback, both positive and critical, will definitely help us grow and improve.

To the wonderful IA Ambassadors for their time and ongoing support: Gayatree Dey, Hemanth Pothula, Kritika Sangani, Mayurdhar Devolla, Firdaus Fatima, 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.
1. INTRODUCTION

1.1 PURPOSE, SCOPE AND USE

Indus Action is a policy implementation organisation that enables sustainable access to welfare rights for vulnerable families. Its target for 2030 is to enable sustainable access to legislated rights for 2.5 million+ vulnerable families. Key indicators that the organization currently measures are the number of vulnerable citizens it supports in accessing welfare benefits and the financial value of the welfare that the citizens receive. This study was commissioned in preparation for its 10th anniversary in August 2023.

Probex followed a rigorous reflection process, and drew on both primary and secondary data for this retrospective. Primary data was collected through key informant interviews and reflections from the Indus Action team. The triangulation of these 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.

To date, Indus Action has worked on securing access for vulnerable families to the right to an education, a 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 nascency, 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 rather than just one.
The objectives of this retrospective study were as follows:

01. Evaluate Indus Action’s contribution to systemic change, through its work on education, food security and livelihoods.

02. Co-design a rigorous reflection process with Indus Action, and ensure that it is well-documented.

03. Use a combination of evidence and reflection to identify Indus Action’s successes and failures in creating systemic change, and the reasons for both, and communicate them transparently through a narrative report.

This report is divided into four sections. The first section describes the evaluation methods used and their limitations. Section 2 (Indus Action and the Context) begins with the Right to Education (2.1), describing the specific provision of the Act the organization chose to work on and their Theory of Change. Similar sub-sections on the Right to Livelihood (2.2), and Right to Food Security (2.3), follow.

Section 3 describes the findings of this study. Again, it begins with the Right to Education (3.1), testing Indus Action’s Theory of Change and identifying the lessons learnt from its interventions. Similar sub-sections on the Right to Livelihood (3.2), and Right to Food Security (3.3), follow.

Section 4 describes the conclusions of this study. Section 4.1 is structured as responses to 3 central questions. These questions are:

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 4.2 uses the opportunities for, and risks to, achieving future impact identified as starting points for arriving at a set of recommendations for Indus Action. Appendix 1 further 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.
1.2 METHODS AND DATA COLLECTION

The three Theories of Change were refined through online workshops with core teams from Indus Action. Particular attention was paid to ensuring alignment between Indus Action’s vision of enabling sustainable access to legislated rights, and its Theories of Change. In addition, a key objective of the workshops was to clearly articulate the systemic changes required in a range of stakeholders to achieve Indus Action’s vision. An input, activity/intervention, output, outcome and impact format was used for all three Theories of Change.

The three sources of data that this study drew on were Indus Action’s internal reflections, secondary data already available with the organization, and primary research. As used in this report, the term, “secondary data” refers both to information that is publicly available (for example from the Indus Action YouTube channel and website), and to proprietary sources. “Primary research” refers to key informant interviews conducted with external stakeholders (see Table I for further clarification). The interview composition is also elaborated on in Table I.

Table I: Interview Composition

<table>
<thead>
<tr>
<th>Indus Action Workstream</th>
<th>No. of People Interviewed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Government</td>
</tr>
<tr>
<td>Right to Education</td>
<td>8</td>
</tr>
<tr>
<td>Right to Livelihood</td>
<td>3</td>
</tr>
<tr>
<td>Right to Food Security*</td>
<td>3</td>
</tr>
</tbody>
</table>

*Of the 3 individuals, 2 had also been interviewed for another evaluation and therefore the number of respondents is 3 but the number of interviews is 5.

As is evident from Table I, the interviews were not equally distributed between the 3 Indus Action workstreams. This is not an issue per se, as key informants (see Appendix 3 for a definition of this term) are, in a sense, proxies for an organization or group. Specifically, the uneven distribution of interviews with partners reflects their relative importance to the 3 workstreams. Partners have been viewed by Indus Action as key to scaling the Right to Education workstream, especially from 2017 on. In contrast, to date, Indus Action has not worked with any partners on the food security workstream. On the livelihood workstream, Indus Action has worked with partners at both the state and field levels.

However, it is possible that the findings of the report were biased by the choice of key informants, and this is discussed in section 1.3. Mitigation measures included ensuring that Indus Action was not present for the interviews, and focusing the interview questions on the work of the government or partner, rather than Indus Action. Sample interview guides are available here.
1.3 LIMITATIONS

There were two key limitations to this study that were identified when writing the first draft of this report. The first limitation was that the sample was biased towards partners and government officials who worked at the state level. This initial focus on the state level was intentional and was part of the study design.

To evaluate Indus Action’s policy design interventions, the focus on the state level was necessary to a certain degree. 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. Several measures were implemented to mitigate the risk of bias due to this limitation. Two of these measures were described in section 1.2. In addition, to the extent possible, this gap was filled by gathering reflections from Indus Action on not only their successes but also their challenges.
2. INDUS ACTION AND THE CONTEXT

2.1 THE RIGHT TO EDUCATION

2.1.1 The Right of Children to Free and Compulsory Education Act

The government’s commitment to compulsory education for children under 14 was first established in the 1968 National Education Policy. Over the years, significant legal milestones included shifting education to the Concurrent List (1976), Supreme Court cases recognising education as a right (1992, 1993), and proposed constitutional amendments to make education a fundamental right (1997). The Constitution was eventually amended in 2002 to mandate free and compulsory education for children aged 6-14 in Article 21A.

The Right to Free and Compulsory Education Act, commonly known as the RTE Act, was enacted in 2009 and came into force in 2010 to give effect to this right. Among the provisions of The RTE Act, Indus Action has chosen to focus on the implementation of Section 12(1)(c). Section 12(1)(c) emerged as a response to the need for inclusivity and equal access to quality education.

2 Indus Action, Bright Spots 2019, 2-3
3 Indus Action, Bright Spots 2019, 3
5 Indus Action, Bright Spots 2019
The National Commission for the Protection of Child Rights (NCPCR) 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.”

The idea of inclusive schooling is also consistent with Constitutional values and ideals, especially with the ideals of fraternity, social justice and equality of opportunity. Admission of 25% of children from socially and economically disadvantaged sections in the neighbourhood is not merely to provide avenues of quality education to poor and disadvantaged children. The larger objective is to provide a common place where children sit, eat and live together for at least eight years of their lives, cutting through distinctions of caste, class and gender in order to minimise such divisions in our society. The other objective is that the ‘75% of children’ who come from better-endowed families enrich their learning via interactions with children from families who have not had similar opportunities but are rich in knowledge systems allied to trade, craft, farming and other services and that the pedagogic enrichment of the ‘75% children’ is provided by such intermingling.

Section 12(1)(c) of the RTE 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. The state government then reimburses these schools for providing free and compulsory education to these students. Private minority schools are exempted from this provision because it would otherwise violate the rights of minorities to establish private schools under Article 30.

State Governments have the autonomy to determine the specific quota and eligibility criteria for the Economically Weaker Section (EWS) and Disadvantaged Group (DG) admissions in private unaided schools within their jurisdiction. The Union Government provides a general framework for the states to follow, ensuring that the provisions of Section 12(1)(c) are upheld across the country. One of the responsibilities of the Union Government is to ensure the monitoring of the RTE Act, along with the NCPCR and its state-level counterpart, the State Commission for the Protection of Child Rights (SCPCR). The NCPCR examines and reviews the safeguards for child rights provided by or under this law and recommends measures for their effective implementation. The SCPCRs are responsible for monitoring the implementation of the Act in their respective states, examining and addressing any complaints or violations of the Act, and recommending measures for the effective implementation of the Act.

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

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6 Indus Action, Retention Survey 2021, 3.
9 “Right to Education Act”
10 Indus Action, Bright Spots 2019, 4
11 “Right to Education Act”
12 Ibid
13 National Commission for Protection of Child Rights, Section 12(l)(c)/SOP, 2020-21
14 Ibid
15 Ibid
sought funds from the Union Government for implementation of the policy by 2016-17\textsuperscript{16}. There has also been a lack of a grievance redressal system, and parents often choose schools that start at the pre-school stage rather than class I\textsuperscript{17}. Despite extensive efforts to raise awareness about this provision, surveys conducted by J-PAL (The Abdul Latif Jameel Poverty Action Lab) in Delhi alone, a state known for its legal and social activism, show that only 3\% of families were aware of this particular section in 2010\textsuperscript{18}. Additionally, there has been significant resistance within society towards the integration of students from different backgrounds in classrooms\textsuperscript{19}.

2.1.2 Indus Action’s Right to Education Theory of Change

The impact that Indus Action aims to achieve through its Right to Education workstream is that there is an increased number of students admitted in schools under Section 12(1)(c). Indus Action also intends for these students to be retained until the 8th standard in the same schools.

However, Indus Action focuses on admission more than on retention.

To increase the number of students admitted, Indus Action postulates that policy and process interventions are required. A key assumption of this Theory of Change 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 MIS design\textsuperscript{20} and implementation support to them. 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. For schools, the process begins with making seats available and registering on to the MIS. Once parents of eligible students apply for these seats, state governments allot students to schools and address grievances on time, assisted by ground partners.

Finally, Indus Action’s primary and secondary research, as well as consultations with ground partners and other stakeholders, are important interventions that lead to both policy and process
design recommendations. These recommendations are made to schools, state governments and the Union Government. For state governments, this includes recommendations on how to increase 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, this will lead to the impact of students being retained.

As mentioned in section 2.1.1 of this report, one of the responsibilities of the Union Government is to ensure the monitoring of the RTE Act, along with the NCPCR and SCPCRs. Adopting Indus Action’s recommendations will enable the Union Government to streamline the reimbursement process and bring visibility and transparency through improved monitoring of the RTE Act. States will reimburse schools on time once the Union Government streamlines the reimbursement process.
Indus Action’s Right to Education
THEORY OF CHANGE

**Inputs**

- Human, financial + tech resources
- Publicly available data on implementation of Section 12(1)(c)
- Govt. partnerships
- Ground partners

**Activities**

- Create outreach strategies (including IEC material) for the govt. + ground partners
- Provide design + implementation support to either set up or enhance existing MIS
- Operate the helpline

**Outputs**

- Conduct capacity building workshops on technology, policy + processes for all stakeholders
- Conduct primary and secondary research, build relationships through stakeholder consultations, and design collaterals

**Outcomes**

- Outreach strategies are implemented
- Parents of eligible students apply + follow through with the admissions process
- State govs.:
  - Publish + implement rules for Section 12(1)(c)
  - Allocate budgets
  - Adopt the MIS
  - Direct schools to comply
  - Run the process + allot students to schools
  - Address grievances on time
  - Reimburse schools on time
  - Act on recommendations to increase retention
- Ground partners assist with grievance redressal

**Impacts**

- 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)
The key assumptions of this Theory of Change are:

- The intervention targets economically weaker/disadvantaged (EWS/DG) households, thereby upholding the true spirit of Section 12(l)(c).

- Manual processes are a key impediment to administrative effectiveness. By developing and/or strengthening online processes, barriers to registration, application, tracking, grievance redressal and reimbursement shall be removed.

- Parents and guardians will be able to access the online application process, as several channels are available for the same.

- Because Indus Action’s recommendations are legally and technically feasible, as well as based on field/ground experience, the government is willing to adopt them.

As part of developing this Theory of Change, four phases in Indus Action’s work on Section 12(l)(c) were identified. Each of these four phases was also the thematic basis for a focus group which enabled internal reflection on the successes, limitations and lessons learned in that phase. The phases overlap and are not mutually exclusive. These phases are listed below, with more detailed descriptions in the sections of the report in parentheses:

**PHASE I:** Working directly with parents (2.1.3)

**PHASE II:** Working primarily with state governments (2.1.4)

**PHASE III:** Scaling with the Partner Entrepreneur Network (2.1.5)

**PHASE IV:** Achieving breakthroughs and safeguarding against setbacks (2.1.6)

To accommodate all four phases within a single Theory of Change was challenging. (For example in Phase I, implementing strategies to reach parents would have been an output, but in Phase II it was an outcome of building government capacity.) Therefore, it was decided that the Theory of Change would focus primarily on Indus Action’s work with state governments. While in the list above, this is the second phase of Indus Action’s work, it continues to this day. Nevertheless, it is acknowledged that some of Indus Action’s efforts, such as to scale with the Partner Entrepreneur Network and safeguard against setbacks, are not reflected in the Theory of Change and therefore are described separately.
2.1.3 Phase I: 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*\(^2\) and other community-based organizations. Pamphlets were distributed that contained the number of Indus Action’s missed call helpline, as well as information on where to apply and the documentation needed. Through 100-day campaigns every year, Indus Action iteratively tested technology, process and policy solutions to improve conversion through the stages of awareness, identification, documentation, application, admission and retention.

Despite Indus Action’s ideological leaning towards the demand side, and citizen-led efforts, by 2015-16 the organization realised that as individuals working on the ground, there were only so many parents they could reach out to, so many application forms they could fill and so many grievances they could resolve. 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.

\(^2\) Government-run childcare centres that provide a range of services, including pre-school non-formal education.
2.1.4 Phase II: Working primarily with state governments

Indus Action's work with the Delhi Government’s Education Department began with supporting them with grievance redressal systems, and with running the lottery online. (The lottery 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 Raipur district in Chhattisgarh. In Raipur, the Education MIS was piloted with 3 modules.

At this time, Indus Action was actively scouting for states. The partnership with the Chhattisgarh Education Department 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, both through Indus Action's team and the Partner Entrepreneur Network (described in section 2.1.5). This wave of expansion was followed by a wave of contraction in 2020-21, but then expansion again in 2021-22 (see section 2.1.6).

2.1.5 Phase III: Scaling with the Partner Entrepreneur Network

In 2016-17 Indus Action expanded to Uttar Pradesh with Saaras Impact Foundation, and in 2017-18 the Partner Entrepreneur Network (PEN) was created. The intention behind PEN was for Indus Action to scale through Partner Entrepreneurs (rather than their own team), to reach 1 million+ Section 12(1)(c) admissions before 2020. Partner Entrepreneurs were provided seed capital, knowledge and technology to achieve their targets.

Of the first 7 Partner Entrepreneurs, only 3 continue to work on Section 12(1)(c) as on date. Therefore, Indus Action decided to supplement PEN with its teams. Nevertheless, 3 new partnerships were started through PEN in 2022-23, and it continues to be one of the strategies pursued by Indus Action to scale.

2.1.6 Phase IV: Achieving breakthroughs and safeguarding against setbacks

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 4 (Andhra Pradesh, Bihar, Jharkhand and Odisha) have now signed MoUs with Indus Action. In 2 of these states, Indus Action is pursuing a double-pronged strategy, and is supporting Partner Entrepreneurs as well.

However, there is a risk that these states (and others) will reverse their decision by emulating Karnataka’s “Rule 4”. “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 judgement from the Supreme Court23, sustained pressure is required to safeguard against such setbacks in other states.
2.2 THE RIGHT TO LIVELIHOOD

2.2.1 The Building and Other Construction Workers Act (BoCW)

The Building and Other Construction Workers (BoCW) Act was enacted in 1996. 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.” 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 of social security benefits.

Agarwala cites these two Acts as examples of how informal construction workers organized at the national level to force the central government to enact new legislation successfully. More specifically, as described by Godavarth, several unions of workers in the construction sector and allied occupations came together as the National Campaign Committee for Central Legislation on Construction Labour (NCC-CL) and sent to the Lok Sabha a draft law for regulating such workers. Subsequently, construction workers successfully used judicial pressure to force all state governments to enact the Boards at the local levels.

Despite these efforts, in 2019, only 35 million construction workers were registered (i.e. had a labour card or certificate) 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 union territories to register all the left-out workers. As Deshingkar argues, this action was prompted by the lockdown imposed by the Indian government at the start of the Covid-19 pandemic and the international attention that the spectacle of migrants walking hundreds of miles home in the initial weeks, when no trains or buses were running, attracted. A majority of construction workers are seasonal migrants.

Delhi is one of the most important destinations for migrants, and the capital region’s construction sector employs many migrant workers. In November 2021, Delhi launched the Shramik Mitra Yojana, to ensure that the welfare programs reach construction workers in the capital. The term, “Shramik Mitra”, was coined by Aajeevika Bureau, a non-profit organization that provides services and solutions to seasonal migrants and their households.

31 Deshingkar, “Normalising Human Suffering”, 137.
33 ANI, Delhi - ‘Shramik Mitra’ scheme, November 9, 2021,
2.2.2 Indus Action’s BoCW ToC

The impact that Indus Action aims to achieve through its Right to Livelihood workstream is an increase in receipt of welfare for labour, and reduction in process friction and administrative burden. To achieve this impact, Indus Action intervenes in both policies and processes. Indus Action relies on two data sources to redesign policies and the application processes, which, once redesigned, are recommended 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 application processes. The first data source for the recommendations is the helpline, which Indus Action runs in collaboration with the government. However, the main function of the helpline is to redress grievances. Proof of concept data also informs the recommendations.

Indus Action’s process interventions also include providing 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 to 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.

The time taken for both processes will decrease. If the application process is easier and more citizens are aware of it, it is expected that applications, initially for labour cards/certificates and then for welfare claims, will increase. At the same time, IA’s action research will lead to inclusion errors being reduced.

Finally, Indus Action expects in the future to make recommendations to the government on revising the processes for cess collection and increasing the amount. Adopting these recommendations should lead annual 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 important for the government to build the capacity of their cadre.

34 Shramik Mitras are known as Shram Mitras in Chhattisgarh and Jharkhand, but all play similar roles.
“*The Incomplete Project of E-Shram, India’s Database of Unorganised Workers – Article 14,*” n.d.
35 Rajiv Khandelwal, Executive Director, text message, May 7, 2023.
Indus Action’s Right to Livelihood

THEORY OF CHANGE

**Inputs**
- Human, financial + tech resources
- Public data on beneficiaries
- Govt. partnerships
- Partners

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

**Outcomes**
- Govt. makes the application process easier
- Shram Mitras, govt. + 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
- Consistency in processes followed by frontline staff
- Inclusion errors reduced
- Recommendations on cess adopted + annual collection increases
- To sustain the schemes + IA’s interventions, govt. allocates resources and builds the capacity of their own cadre

**Outputs**
- Helpline run in collaboration with the govt.
- Helpline and proof of concept data used to redesign policies + application processes, and these are recommended to the BoCW Board and Labour Departments
- Shram Mitras, govt. + ground partners equipped to create awareness and conduct camps
- Labour website created and/or redesigned to make it more accessible
- Knowledge products created + disseminated
- Recommendations made to govt. to revise processes for cess collection and increase the amount

**Impact**
- More citizens who apply for welfare are able to claim it, and it takes less time and money, thereby reducing process friction and administrative burden
The key assumptions of this Theory of Change are:

- Indus Action can secure government partnerships because the work is on schemes for which there is democratic demand, and identify personally motivated bureaucrats and politicians to work with.

- Currently all eligible construction workers are not applying for and claiming welfare because they are not aware of the process, it is cumbersome, and/or the transaction costs are high.

- An increase in applications demonstrates the demand for welfare and increases pressure to deliver it.

- The website enables efficiency, transparency, and the tracking of interactions between states and citizens to increase accountability. Alongside the website, the helpline enables personalised grievance redressal.

The first three assumptions require explanation, so they are not viewed as contradicting each other. The first refers to democratic demands from stakeholders such as the NCC-CL described in the previous section (2.2.1). While the NCC-CL represents workers, this does not mean that all workers are aware of the process of applying for BoCW welfare programs.

This Theory of Change draws from Indus Action's experience in both Chhattisgarh and Delhi, which are the two geographies in which it has worked on the implementation of the BoCW Act since 2020-21. During the Theory of Change workshop, it was discussed that there had been substantial differences in the interventions in Delhi and Chhattisgarh. While these differences are not reflected in the Theory of Change, they are discussed in section 3.2 of this report.
2.3 THE RIGHT TO FOOD SECURITY

2.3.1 The National Food Security Act

The National Food Security Act was enacted in 2013. Clause 4 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\textsuperscript{36}. Women are eligible to receive Rs. 6,000 through a combination of 2 welfare programmes, the Pradhan Mantri Matru Vandana Yojana (PMMVY) and Janani Suraksha Yojana\textsuperscript{37}.

The Rs. 5,000 provided under the PMMVY has been subdivided into 3 instalments that incentivise specific health-seeking behaviours. The first instalment incentivises pregnancy registration within the first 5 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 partially compensate for wage loss\textsuperscript{38}.

As calculated in 2022, PMMVY’s entitlement of Rs. 5,000 provided over one year amounts to one month’s wage loss\textsuperscript{39, 40}. 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 Food Security Theory of Change combines the objectives of the National Food Security Act and PMMVY, envisioning that citizens will use the benefit to supplement both 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 PMMVY ToC

This Theory of Change is based on Indus Action’s interventions to implement the PMMVY in Uttar Pradesh. However, some details that are specific to Uttar Pradesh have been omitted. (see the paragraph below for further explanation) As a result, if Indus Action chooses to expand its interventions to implement the PMMVY to other states, this Theory of Change will remain relevant.

In Uttar Pradesh, the institutional arrangements to implement the PMMVY are complex, and these complexities, in particular have been omitted from the Theory of Change. For example, while it was Indus Action’s Partner Entrepreneur, Saaras Impact Foundation, that originally signed an MoU with the State Innovations in Family Planning Services Agency (SIFPSA) in February 2020 to support


\textsuperscript{38} Ibid.

\textsuperscript{39} Amar Patnaik, “State schemes can cast a lifeline to this welfare plan,” The Hindu, January 3, 2022

\textsuperscript{40} As per the 2023-24 wage rates, less than a month would be compensated for.
the implementation of the PMMVY, their involvement in the partnership did not continue. Similarly, SIFPSA is a joint venture of the Government of India and the Government of Uttar Pradesh (blurring the lines between centre and state) and was registered in 1993 as an independent society. However, these complexities have been ignored for the report to be consistent with the Theory of Change.

Indus Action aims to achieve two impacts through its Right to Food Security workstream. First, citizens receive all instalments of the PMMVY benefit on time, and it costs them less to do so. The second is that 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 memos Indus Action writes to the Government of India, recommending policy and process redesigns. It is these recommendations that are expected to lead to an easier application process and, ultimately, to increased coverage of births through an increase in the budget allocated.

A critical process intervention is raising awareness about the registration and application processes. The 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. However, Indus Action believes that it is important to raise awareness among both citizens and community health workers. This increased awareness is expected to ensure that eligible citizens are identified, and their applications are submitted and verified promptly.

The helpline, set up by Indus Action, is another important process intervention. The helpline allows 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 that citizens are aware of this avenue for grievance redressal.

Indus Action's work also extends to providing supportive supervision to block and district officials. 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 correct applications and reduce the number of applications in correction queues.

Finally, for citizens to receive all instalments of the PMMVY benefit, they must receive ante-natal check-ups and immunise their children on time. Institutional delivery is a mandatory condition to receive the Janani Suraksha Yojana benefit. Therefore these are also intended outcomes of this workstream, even though behaviour change communication on maternal and newborn health has not been included in this Theory of Change.
Indus Action’s PMMVY THEORY OF CHANGE

Inputs
Human, financial + tech resources
- Set up the helpline
- Train ASHAs, ANMs + data entry operators at Awareness Melas
- Publicize the helpline through Awareness Melas, campaigns, meetings + collateral
- Update citizen data on the PMMVY dashboard and share it with block, district + state level officials

Activities
- Update senior officials on monthly progress
- Troubleshoot with officials where targets are not met
- Research policy change implementation in different states
- Write GoI memos

Outcomes
With the assistance of
- 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

Outputs
- Increased awareness about registration and application processes among citizens, data entry operators, ANMs + ASHAs
- Citizens are aware of the helpline as a means of grievance redressal
- The helpline is handed over to the govt.
- Block + district officials receive supportive supervision
- Applications with errors are flagged + shared with the govt.

Impact
- Citizens are able to track their application status through the helpline
- The govt. continues to run the helpline and redress grievances on time
- Data is used for monitoring by the govt. 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
- Govt. makes the application process easier, based on our recommendations
The key assumptions of this Theory of Change are:

- Pregnant women and lactating mothers already know how to supplement nutrition, and to do so only require direct access to the PMMVY benefit through their accounts.

- Through troubleshooting, stakeholders who need refresher training are identified. Through refresher training, all ASHAs, ANMs and data entry operators can execute their responsibilities.

Based on the first assumption, in this Theory of Change, there is only an indirect relationship between receiving the PMMVY benefit and supplementing nutrition. This link is tenuous. To establish a stronger link between the PMMVY benefit and supplementing nutrition, Indus Action had proposed to SIFPSA that they use various communication channels to promote health-seeking behaviour, including spending money on nutritious food for the mother and child. While behaviour change communication was ultimately excluded from the MoU, it is worth exploring whether it can be included in Indus Action’s future work on the PMMVY, so that its link to nutrition becomes less tenuous.
3. FINDINGS

3.1 THE RIGHT TO EDUCATION

3.1.1. System Changes Through Policy Interventions

To improve implementation of Section 12(1)(c), Indus Action envisions in its Theory of Change that it will make policy recommendations to state governments and the Union Government in collaboration with ground partners. This study could not validate whether Indus Action had made any policy recommendations to the Union Government. However, to validate Indus Action’s role in making policy recommendations to states, 8 of their MoUs with state governments were analysed. This analysis yielded an understanding of which interventions were expected of Indus Action by state governments and whether making policy recommendations was one of them. Further information is provided in Table II.

Table II: MoUs with Education Departments in 8 States

<table>
<thead>
<tr>
<th>No.</th>
<th>State</th>
<th>MoU Year</th>
<th>Policy Change</th>
<th>Awareness Creation</th>
<th>Application Centres</th>
<th>MIS</th>
<th>Helpline</th>
<th>Capacity Building</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>UK</td>
<td>2017-18</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>2</td>
<td>MH</td>
<td>2017-18</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>3</td>
<td>CG</td>
<td>2017-18</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>4</td>
<td>JH</td>
<td>2018-19</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>5</td>
<td>OR</td>
<td>2018-19</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>6</td>
<td>HR</td>
<td>2021-22</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>7</td>
<td>AP</td>
<td>2022-23</td>
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<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>8</td>
<td>BR</td>
<td>2022-23</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
</tbody>
</table>

As evident from Table II, all of the 8 MoUs analysed recognised a role for Indus Action in policy change. For example, some MoUs said that “Indus Action will also propose data-driven policy change recommendations to the department”. In other MoUs, Indus Action committed to supporting the department with “centralised notifications with universal admission criteria”.

UK, CG, OR and HR are in italics in Table II because, in those states, officials were also interviewed for this study. However, it was only in OR (Odisha) that state officials 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. This policy was Notification 629.
The MoU that was signed with the Department of School and Mass Education, Government of Odisha in March 2019 had a validity of 3 years. An MoU dated the 1st of April, 2023, that was drafted by Indus Action for the Government of Odisha (but had not been signed at the time of writing) was also reviewed for this study. This MoU differs from the others reviewed for this study in that it proposes that the Government of Odisha compensates Indus Action for their services financially. Here again, it is noteworthy that a policy and research advisor is one of the human resources that Indus Action has included (and budgeted for) in the MoU. This MoU has the potential to ensure a greater role for Indus Action in policy-making in Odisha and the sustainability of their interventions. In other states, the sustainability of Indus Action’s interventions will be tested over the next few years, as Indus Action exited Gujarat, Maharashtra and Rajasthan in 2020, Uttar Pradesh in 2021, and Delhi in 2022 (to name a few).

### 3.1.2. System Changes Through Process Interventions

To date, Indus Action has targeted interventions into 8 processes to improve Section 12(1)(c) implementation. The first of these processes is awareness creation, in which (as stated in Indus Action’s Theory of Change), the organization intervenes by creating outreach strategies for the government and ground partners and building their capacities to deliver them. Each of the remaining 7 processes corresponds to a module in Indus Action’s Education MIS. These processes/modules are school registration; student registration and application; allotment/allocation of applicants to schools (through an online lottery); admission confirmation/admission; student tracking; fee reimbursement; and grievance redressal.
The number of MIS modules adopted varies from state to state. However, the 2 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 have been received on these helplines since the 2014-15 academic year.

That state governments see a role for Indus Action in awareness creation, developing an online MIS and operating a helpline is also evident from Table II. Other process interventions expected of Indus Action mentioned in the MoUs are setting up application centres and capacity building. All 8 MoUs recognise a role for Indus Action in capacity building. For example, the MoU with the education department in Uttarakhand says that Indus Action will conduct training/workshops/conferences on Section 12(l)(c) “for all private schools, government officials and other important stakeholders”. One observation from Table II is that there has been a high degree of consistency in Indus Action’s interventions across states and over time.

Among these process interventions, the one mentioned most often in the interviews with state officials was the online MIS. This intervention was mentioned by all 6 officials interviewed (from 4 states and Delhi). The role of Indus Action in developing the online MIS was also validated in all 4 states (Uttarakhand, Haryana, Odisha and Chhattisgarh) and Delhi.

That government officials highly valued the online MIS was evident from the frequency with which it was mentioned during the interviews, as well as from what respondents said it had resulted in. Statements from 3 respondents indicate that the earlier manual lottery system was perceived as encouraging corruption, and it is possible that it did. One respondent said that the online MIS had increased transparency and improved the targeting of eligible students. Another respondent said that beneficiaries now had greater trust in the system than earlier.
Aside from greater transparency, 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 that one respondent described was that it saved a lot of time and made monitoring easier.

In contrast to the changes brought about by the online MIS, only one respondent cited awareness creation as a process in which there had been a change due to Indus Action. This respondent said the state had no strategy for implementing Section 12(1)(c) before Indus Action’s intervention. However, they now conduct monthly drives to ensure the appropriate students are selected. Similarly, only three respondents said that Indus Action had a role in capacity building. In addition, it was specifically technical capacities that were mentioned, indicating that state officials primarily derived value from adopting Indus Action’s education MIS and learning how to maintain it.

None of the state officials interviewed validated Indus Action’s intervention in the grievance redressal process through helplines. It is possible that this is 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. Of these, one said that Indus Action operated the helpline, and the other that he operated it but had received training from Indus Action. Interestingly, these officials described the helpline both as a means of awareness creation and grievance redressal, saying that it is used by parents to gather information on Section 12(1)(c) and ask any questions that they have.

Given that only two officials at deputy and district levels were asked about the helpline (compared to 5 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, but 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 tell 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.

While there were differences in the responses of state and deputy or district level officials in the same state, there were also differences between states. Interviews with officials in Odisha and Delhi stood out because they validated multiple contributions by Indus Action. For example, the state official from Odisha described Indus Action’s contributions through policy-making, awareness creation and the online MIS.

The interview with the official in Delhi was also notable because of his emphasis on Indus Action’s
The interview with the official in Delhi was also notable because of his 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 organization 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 Report\textsuperscript{42}.

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\textsuperscript{44}, the government subsequently adopted.

The Delhi official also mentioned that another study 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.

\textsuperscript{42} Indus and Central Square Foundation, Eklavya Campaign Report
\textsuperscript{44} Ibid., 48
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 Uttarakhand, Haryana and Chhattisgarh 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 status of the implementation of Section 12(l)(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 an unique emphasis on knowledge creation and dissemination, or that the specific respondent in Delhi remembered and/or valued Indus Action’s role as a knowledge partner more than the officials interviewed in Uttarakhand, Haryana and Chhattisgarh.

When asked about any other support Indus Action had provided in implementing Section 12(l)(c), the official in Delhi also mentioned the organisation’s focus on special needs children. 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(l)(c) seats to be allotted to students with special needs in 2015-16, and for the criteria on which to admit them to be made fairer. By 2019-20, students with special needs had started to be allotted seats in Delhi.

A final source of data that was used to validate the reports from Indus Action on their policy and process interventions was a letter of recommendation from Nila Mohanan, who was 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.

The letter validates that through Project Eklavya, nearly 1,00,000 families were reached. Most importantly, the letter acknowledges the recommendations that, based on insights from the campaign, Indus Action presented to the government to improve the admissions process. The translation of such insights into systemic changes is discussed further in section 3.1.4.

3.1.3 The Results for Children

Indus Action’s systemic interventions are expected to result in an increased number of students admitted in schools under Section 12(l)(c). To validate whether this result has been achieved, baseline data on student admission prior to systemic intervention by Indus Action is important, but is only available for select states. Table III contains admissions data for these states before and during Indus Action’s intervention. It also contains the number of students admitted in 3 other states where Indus Action has intervened, but where baseline data is unavailable or unclear. These 3 states were chosen because admissions data was at least available for the first 2 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.

45 Ibid.
Table III: Indus Action’s Contribution to Section 12(1)(c) Admissions

<table>
<thead>
<tr>
<th>State</th>
<th>Baseline Data</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>CG</td>
<td>23,000</td>
<td>40,254</td>
<td>48,200</td>
<td>52,674</td>
</tr>
<tr>
<td>MP</td>
<td>NA</td>
<td>1,61,372</td>
<td>1,55,700</td>
<td>NA</td>
</tr>
<tr>
<td>OR</td>
<td>985</td>
<td>4,543</td>
<td>10,031</td>
<td>NA</td>
</tr>
<tr>
<td>TN</td>
<td>1,36,968</td>
<td>76,917</td>
<td>70,801</td>
<td>56,166</td>
</tr>
<tr>
<td>UK</td>
<td>NA</td>
<td>2,405</td>
<td>4,868</td>
<td>10,000</td>
</tr>
</tbody>
</table>

The cells highlighted green in Table III are those where there has been an increase in admissions compared to the previous year. Uttarakhand saw the number of students admitted doubling in each year of Indus Action’s intervention. In Odisha, student admissions increased by almost 5 times in the first year, and doubled in the next.

From the data in Table III alone, it is not possible to conclude that it was Indus Action’s intervention that resulted in increased admissions. However, in all 3 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 organization with the increase from approximately 5,000 to 10,000 students (Years 2 to 3).

At the same time, of these 5 states, there were 2 in which admissions declined during the years of Indus Action’s intervention (see the 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 already existed prior to 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. However, interviewing officials in these states could have yielded further insights, and a shortcoming of this study was that they were not included in the sample.

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 does provide training to schools and makes recommendations to them so that they become more inclusive. However, Indus Action focuses more 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\(^46\), in which students who Project Eklavya assisted were surveyed to assess whether they were still in their respective schools.

From 2017-19 (and possibly earlier), Indus Action found that the retention rate was stable at 88%\(^47\)\(^48\)\(^49\). However, in 2021 the retention rate was found to have increased to 94% on average\(^50\). This increase is surprising, given that by 2021 the COVID-19 pandemic had forced many students from the most vulnerable backgrounds to drop out of school, but was not discussed in the retention survey report.

Further research is required to determine how retention rates changed during the pandemic, and most importantly, why. The 2017-19 retention surveys do 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. This caveat is that while according to Indus Action the surveys measure retention over an one-year period, 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 (see the paragraph below for further information)\(^51\)\(^52\).

In 2019, 41% of the students surveyed had been allotted a Section 12(1)(c) seat in 2018\(^53\). There were no disaggregated retention rates available for students who had been allotted a seat earlier. In the 2018 survey data from only one question that was answered by 3268 of the 5924 parents was disaggregated by when their child was allotted the Section 12(1)(c) seat\(^54\)\(^55\).

Nevertheless, based on the information available, the surveys indicate that the retention rate is approximately 88% over a one year period. While this is positive, retention over one year is only an interim indicator of Indus Action’s impact. Given that Indus Action’s 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

\(^{47}\) Ibid.
\(^{51}\) Indus Action, Retention Survey 2018.
\(^{52}\) Indus Action, Retention Survey-2019.
\(^{53}\) Ibid.
\(^{54}\) Indus Action, Retention Survey 2018.
\(^{55}\) From this sample as well, 57% of students had been allotted the Section 12(1)(c) seat in the last year.
3.1.4 Success Factors and Lessons Learnt (Education)

This section discusses the successes and challenges of Indus Action’s work on education through implementing Section 12(1)(c), drawing from the team’s reflections, the interviews and the secondary research. Based on this discussion, 5 lessons are identified. More specifically, this section answers the following questions:

Q1. What was successful about Indus Action’s choice of interventions, and what was challenging?
Q2. What was successful about the government engagement strategy, and what was challenging?
Q3. What was successful about the partner engagement strategy, and what was challenging?
Q4. What was successful about the community engagement strategy, and what was challenging?

Successes and Challenges

Indus Action’s choice of interventions was successful because they could strike a balance between 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). (The helpline data was used for a similar purpose with the Delhi BoCW Board, referred to in section 3.2.4.)

Further examples are available from the implementation of 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 been implemented in Tamil Nadu yet.)

Yet, among Indus Action’s choice of interventions, the Education MIS was still one of the most valued by the Tamil Nadu government, 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 an exception as well (see the next paragraph). 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 it is possible that the latter has 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 who have 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, 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. G.O. 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, the amount received through Amma Vodi is expected to be sufficient.)

Indus Action’s choice of interventions is closely linked to their ability to engage with the government. 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 workstream is discussed in the subsequent paragraphs.

**Government Engagement Strategy**

Indus Action has been partnering with governments from 2016 on, beginning in Delhi. In 2017, Indus Action began its expansion into other states. One factor that facilitated this expansion was that the Ministry of Human Resource Development organised workshops across the country 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 were important to successfully partner with state governments as well. 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).

Finally, successful partnerships with state governments resulted from the ability to engage the administration. The reflections

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from Indus Action emphasised that it was particularly important to engage senior officials at the level of the Principal Secretary or Director. 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 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 workstream.

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

Indus Action works either through, or alongside, Partner Entrepreneurs. 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 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 partners who are more established having been more successful. Independent of the first, another factor has been a willingness among Partner Entrepreneurs to pursue both research and consulting roles, using the former to enrich the latter as Indus Action does. 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 3.1.1, 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, it was perceived as 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 organizational 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 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 is a combination of engaging with communities, state governments and Partner Entrepreneurs. While engaging with communities received less emphasis from 2016 on, it is of renewed relevance in the face of Karnataka’s Rule 4. What has been positive about Indus Action’s community engagement strategy to date, and what remains to be done, 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 to expand it from 1 to 11 districts in Delhi.61

Even before it partnered with the Delhi government, this early ambition for scale was achieved by Indus Action 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)62, is that students who apply for Section 12(1)(c) seats are those who are able...
to afford admission in those 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 in which there is a threat of Section 12(1)(c) being rolled back, it is possible that resistance by parents is weakened by the fact that they are able to 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 these 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 and women’s self-help groups. Creating this demand-side pressure is particularly important in large states.

From the successes and challenges discussed in this section, the following lessons have been drawn:

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 to communicate and engage with the Union Government, as well as 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 out 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 better 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).

3.2 THE RIGHT TO LIVELIHOOD

3.2.1 System Changes Through Policy Interventions

To improve the implementation of the BoCW Act, Indus Action envisions in its Theory of Change that it will use data to redesign relevant policies, and recommend them to the Boards and Labour Commissioners. In Chhattisgarh, that the Labour Department also expected this is reflected in the 6 responsibilities of Indus Action listed in the MoU signed in October 2021. Of the 6 responsibilities, 4 refer to Indus Action’s role either as a knowledge partner, or in redesigning welfare schemes (programs).

Interviews with both 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 Chhattisgarh not only since this MoU was signed, but also before that. The partner stated that Indus Action had joined the PMU by early 2021, which was created to provide technical support to the Commissionerate in designing policies. During that year, while Indus Action was specifically appreciated for its research and data analysis, there was close collaboration among the partners in the PMU, and “everyone worked on every project”.

It is important to note that unlike in Delhi, in Chhattisgarh Indus Action’s MoU was with the Labor Department and not specifically with the BoCW Board. Therefore, as long as there was an agreement between Indus Action and the Labor Department, any of the welfare programs of its 3 Boards were eligible to be redesigned. However, there was greater interest from the Commissioner (at least initially) in the BoCW Board, since it was easier to implement changes due to the availability of funds with this Board. As a result, the PMU focused on the welfare programs of the BoCW Board.
The two programs mentioned in both the interviews were the scholarship for children of construction workers and the family pension. By consolidating multiple smaller welfare programs, the PMU and Commissioner proposed to increase both the scholarship and family pension amounts. In addition, the PMU proposed a redesigned scholarship program that would increase the amount based on how vulnerable the child was, as their research had identified that girls and children from minority groups were at the greatest risk of dropping out. However, neither the redesigned scholarship nor the family pension was approved. According to one respondent, the political leadership wasn’t inclined toward “big bang reforms” such as those proposed, and therefore the redesigned programs were not approved.

Based on the analysis above, there is ample evidence that by acting as a knowledge partner to the Labour Department and redesigning its welfare programs, Indus Action has been able to intervene in policies relevant to construction workers.

Based on the analysis above, there is ample evidence that by acting as a knowledge partner to the Labour Department and redesigning its welfare programs, Indus Action has been able to intervene in policies relevant to construction workers. Through the PMU, Indus Action continues to work on redesigning BoCW welfare programs, most recently a free coaching program for children of workers who want to appear for competitive exams. Indus Action has had limited success in having these policy interventions result in system changes, although it has attempted to do so. The one exception is the maternity benefit.

The primary research validated that Indus Action had been involved in redesigning the BoCW and Unorganized Workers’ maternity benefits in Chhattisgarh. More specifically, redesigning the maternity benefit began with giving it a clearly defined objective, which was wage compensation. The PMU and Labour Department proposed that 50% of the minimum wage would have to be compensated. A key stipulation was that the compensation amount should not be fixed, but instead should be in accordance with the current minimum wage.

As stated by Indus Action, the maternity benefit was approved with the objective of wage compensation. However, the maternity benefit that was approved was a fixed amount, calculated based on the current minimum wage. Therefore, if the minimum wage is revised upwards, the maternity benefit will not automatically increase.

Unlike in Chhattisgarh, in Delhi, the BoCW Board’s MoU with Indus Action does not recognise a role for the organization in policy interventions. No evidence of Indus Action’s policy interventions in Delhi emerged from the primary research either. However, conversely, this evaluation found stronger evidence for Indus Action’s process interventions in Delhi than in Chhattisgarh.
3.2.2 System Changes Through Process Interventions

To date, Indus Action has targeted interventions into 3 processes to improve the implementation of the BoCW Act. As described in their Theory of Change, these processes are awareness creation, the process from applications to approvals, and grievance redressal. This evaluation found greater evidence of Indus Action's intervention in these processes in Delhi than in Chhattisgarh.

To both 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 in which they reach out to workers, and mentioned the involvement of Indus Action in them. However, one of the partners said that due to coordination issues between CSOs and the government, the camps were not very successful and other channels (for example pamphlet distribution) had been more effective instead.

Some of the challenges faced in implementing the BoCW Act were that (to paraphrase respondents), the administration is not worker-friendly, does not have the capacity to respond to a large volume of workers, and is not willing to, “go the extra mile” for them. Therefore, CSOs (Indus Action, Jan Sahas and Mobile Creches were mentioned) fill 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 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 categorises 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

Indus Action also used the helpline to make IVR calls to workers, to inform them about camps where they would be assisted to correct errors in their applications. 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 the primary and secondary research⁶³. The results of Indus Action's interventions into awareness creation and grievance redressal in Delhi are discussed in section 3.2.3.

⁶³ Arun Kumar Jha, Secretary (Board), letter, July 7, 2021
While it is too early to measure the results of Indus Action’s intervention into the process from application to approval, its potential is far-reaching. In the 2nd quarter of 2023, a dedicated online portal 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.

**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 Theory of Change, which is that “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.

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64 “Delhi Building and Other Construction Workers Welfare Board,” accessed July 15, 2023
Another major challenge identified in the process of welfare delivery is that the government is unable to figure out who is eligible for which provision, due to the lack of consolidated information, and the citizens also may not know about all schemes and their eligibility for the same. The Eligibility Engine, built by the Indus Action and IDinsights team, is being built to solve for this issue, addressing not only eligibility when given a set of citizens and their characteristics, but eligibility in the absence of complete information.

This engine also has far-reaching potential. Its purpose is 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 potential of the engine is far-reaching because it provides a “supply-side push”, shifting the onus from the citizen to the government to determine which programs construction workers and their families are eligible for. A similar idea had been considered by the former Labour Commissioner in Chhattisgarh but has not been implemented there as yet.

The primary research validated that, in the words of one respondent, “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 and E-NET Spider were all involved. This study resulted in a Systems Requirement Specifications (SRS) document, akin to a blueprint for a building. As is evident from Indus Action’s version of the SRS, it contains the wireframes which are central to defining the application process, as well as 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 be accessed in. (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.

In section 3.2.1 it was stated that 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 was not able to intervene in the process from application to approval 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 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 as well Indus Action registered workers and applied for welfare programs on their behalf, and set up a helpline to provide information about BoCW welfare programs and to 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 in every block of the state, to provide the same services as the helpline, but in-person. While this proposal has yet to materialise, at the same time, 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. In 2021 it was decided that the Shram Coordinators, who are responsible for motivating, supervising and guiding the Shram Mitras, would also be eligible for a financial incentive (which they were not earlier).

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. No evidence was available on the implementation or outcomes of the training to date. Nevertheless, the nomination of 269 Shram Mitras, and the allocation of funds to incentivise both them and the Shram Coordinators, indicates greater receptivity by the BoCW Board to supply-side pushes.

In Delhi, only 10 Shramik Mitras had been nominated against a planned 800. Although the primary research indicated that the Shramik Mitras create awareness and assist with grievance redressal, it was also acknowledged that with only 10, they cannot submit applications on behalf of workers. 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, for now, the primary and secondary research indicates that while Indus Action will hand over the helpline to the Delhi BoCW Board, the website will be maintained by the vendor for the next 5 years. No information was available on how the Chhattisgarh Labour Department plans to sustain the interventions of Indus Action and the PMU.

67 Savita Mishra, Secretary, Building and Other Construction Workers Board, letter, January 3, 2023.
68 ANI, Delhi govt launches 'Shramik Mitra' scheme, November 9, 2021.
3.2.3 The Results for Workers

While the 2021-22 and 2022-23 data indicate substantial improvements in the implementation of 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 had 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, it is possible that the data from 2021-22 and 2022-23 reflect a short-term effort by BoCW Boards to register construction workers and ensure their access to BoCW welfare programs, which will not be sustained without continued pressure from the Ministry.

Nevertheless, the 2021-22 and 2022-23 data demonstrate what is possible when there is both pressure from the Ministry, as well as 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. 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, the intervention of CSOs and the 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. (There are more than 100 construction worker unions that 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, his comment again highlights the need for an accurate eligibility engine, to ensure that it is only those individuals who are eligible for labour cards who 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 in Delhi, until recently, welfare programs were applied for manually, only the number of successful claims is available for 2020-21, not data on applications. 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 prior to 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).

Table IV: Access to BoCW Welfare Programs from 2020-2023

<table>
<thead>
<tr>
<th>State / UT</th>
<th>Number of Successful Claims</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2020-21</td>
</tr>
<tr>
<td>Delhi</td>
<td>712</td>
</tr>
<tr>
<td>Chhattisgarh</td>
<td>77,310</td>
</tr>
</tbody>
</table>

As is evident from Table IV, in Chhattisgarh the government was able to increase 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 was able to increase 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 not possible to also 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.
3.2.4 Success Factors and Lessons Learnt (Livelihoods)

This section discusses the successes and challenges of Indus Action’s work on livelihoods, drawing from the team’s reflections and the interviews. Based on this discussion, 3 lessons are identified. More specifically, this section answers the following questions:

Q1. What was successful about Indus Action’s choice of interventions? What was a key challenge that was faced?
Q2. What was successful about the stakeholder engagement strategy? What was a key challenge that was faced?

Successes and Challenges

Indus Action’s choice of interventions was successful because they could strike a balance between their research and consulting roles, using the former to enrich the latter. Through their field and community work, they consistently recorded and related the challenges that construction workers faced to the BoCW Board and (in Delhi) to the website vendor. For example, the role that the helpline played 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, which then resulted 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

An exploration of Q2 identified 2 success factors behind Indus Action’s stakeholder engagement strategy. One success factor was that a team member was part of the PMU in Chhattisgarh throughout the year, which maintained 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 it is the Government of the National Capital Territory or the Union Government that has the authority to approve the disbursement of scholarships to children of construction workers. This has led to disbursements being stalled.
Three lessons that have been learnt, based on both the successes and challenges are:

1. It is important to choose a set of interventions that balances risk and impact levels.
2. Embedding a team member in the department that Indus Action is partnering with has been a useful strategy to improve government relationships.
3. It is important to build relationships with decision-makers at all levels within the government.
3.3 THE RIGHT TO FOOD SECURITY

3.3.1 System Changes Through Process Interventions

In stark contrast to the scope that Indus Action had to design labour policies in Chhattisgarh, there were few opportunities to intervene in policy-making on the PMMVY in Uttar Pradesh. While data-informed policymaking was mentioned in the proposal to SIFPSA it was dropped from the MoU, and the only opportunity that the Theory of Change identifies to make policy recommendations is for the Government of India (as the PMMVY is a Centrally Sponsored Scheme). Nevertheless, three government officials in Uttar Pradesh were interviewed on whether the dashboard and helpline that Indus Action was tasked with developing had led to using evidence for either decision or policy making (asked about as two separate questions). However, their responses were mostly unrelated to the questions asked.

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. The subsequent paragraphs describe the process interventions planned by Indus Action and the extent to which the secondary and primary research validated them.
The 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 the PMMVY, they can call the helpline on their own. Indus Action intended that the helpline would be used by women both to track their applications and file grievances.

Awareness Melas were, therefore, an important activity planned by Indus Action that would enable both community health workers to be trained on registration and application processes and would publicise the helpline. Other activities to publicise the helpline that were mentioned in the Theory of Change 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 2 of the areas in which they (along with Indus Action) offered support to SIFPSA in implementing the 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 level and at the 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 any training to understand the dashboard and helpline operations. Two of the 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 be able to answer questions such as how many applicants there were and from which locations. In addition, there was only one District Operator for urban locations. Indus Action’s role was described as both helping to answer the questions on the urban data through applying filters to the portal and contributing to an increase in the number of applications from urban areas (from 50 to 100). 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.

Aside from creating awareness and building capacity, the MoU with SIFPSA also said that Indus
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 both validated Indus Action’s role in developing and/or operating the helpline. It was stated that it had been very effective, both in providing information on the PMMVY and in redressing grievances.

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 General Manager (Projects) at SIFPSA stated that Indus Action had helped them develop this dashboard. This statement was supported by one of the two district officials interviewed for this evaluation.

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

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.

### 3.3.2 The Results for Pregnant Women and Lactating Mothers

An attempt was made to compare data on applications, as well as 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 SIFPSA 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.
The right-hand column in Table V compares the number of “partially successful claimants” in September 2020 and December 2021. 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, due to which there is 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.

### 3.3.3 Success Factors and Lessons Learnt (Food Security)

This section discusses the successes and challenges of Indus Action’s work on food security through implementing the PMMVY, drawing from the team’s reflections and the secondary research. Based on this discussion, 2 lessons are identified. More specifically, this section answers the following questions:

Q1. What was successful about Indus Action’s choice of interventions, and what was challenging?
Q2. What was successful about the stakeholder engagement strategy, and what was challenging?
Successes and Challenges

Indus Action’s choice of interventions in their Right to Food Security workstream (as well as the other 2) was successful because they could strike a balance between their research and consulting roles, using the former to enrich the latter. The helpline, in particular, was used to document grievances, which then informed Indus Action’s policy and process recommendations. For example, data from Uttar Pradesh was used to make recommendations to the Union Government that the husband’s Aadhaar card should not be one of the documents required to apply. This recommendation was accepted by the Union Government but has not been implemented in Uttar Pradesh as yet.

The choice of interventions in the Right to Food Security workstream was similar to the other two workstreams 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 a software for tracking and monitoring the PMMVY, but disbursing both 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, as if the maternity benefit was 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 both for women to exercise control over the funds in their bank account and to use them to buy nutritious food for themselves.

In the absence of such an intervention, the challenge for Indus Action (as observed during this study) has been that the relationship between the 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.

57 R. Sudalaikannan, I.A.S., State Project Director, Samagra Shiksha, reference letter.
43 Ibid.
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\(^{71}\), 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 the PMMVY, which was insufficient human resources. Despite multiple reminders and notifications being dispatched across the districts, as of May 2022\(^{72}\), 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 obstacle to effective monitoring of the PMMVY.

### Stakeholder Engagement

Just as with the choice of interventions, the strategy used to engage PMMVY stakeholders drew from Indus Action’s past experience. In particular, Indus Action’s Bright Spots reports, published between 2018 and 2021, compare 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 the PMMVY.

In Uttar Pradesh, the equivalent to the comparisons in the Bright Spots reports was 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\(^{71}\), 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 the PMMVY, which was insufficient human resources. Despite multiple reminders and notifications being dispatched across the districts, as of May 2022\(^{72}\), 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 obstacle to effective monitoring of the PMMVY.

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71 Aparna Upadhyay, Executive Director SIFPSA/Mission Director NHM, letters.
72 Ibid.
Unfortunately, it is beyond the control of Indus Action if the government does not hire the contractual staff required to implement and monitor the program. However, based on the rest of the discussion above, the following two lessons have been identified:

1. **The Theory of Change** is an important tool for Indus Action to articulate not only how it intervenes in each workstream (the “means”), but why (the “ends”). At times, it is not possible to fully achieve the “ends” with the “means” available (the interventions that are feasible to implement). In these situations, it is preferable to acknowledge this divergence rather than modify the Theory of Change to only reflect the interventions that are feasible to implement at a particular moment in time. The former option is preferable because then the original “ends” are committed to institutional memory, and there is a greater probability that they are pursued when opportunities arise to do so.

2. **Encouraging healthy competition between the districts to improve the implementation of the 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.
4. CONCLUSION

4.1 CONCLUSION

This evaluation found more similarities than differences in Indus Action’s choice of strategy and interventions between the 3 workstreams. Common to all 3 workstreams was the strategy of engaging with citizens and state governments simultaneously. This strategy also shaped Indus Action’s choice of interventions across workstreams. 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 workstream was its engagement of Partner Entrepreneurs. Another difference that was observed, between states, was the role of Indus Action in making policy recommendations being recognized.

Given the similarities that have been noted, this concluding section is not organized by workstream 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 workstreams for this evaluation.

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 workstream 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.

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 interventions were validated through the interviews. This was both because of a difference in the focus of officials at different levels in the same state and because of differences 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 2 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 workstream, 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 2 SIFPSA district officials interviewed validated the PMMVY helpline, although as no state officials were interviewed on it, this conclusion is tentative.

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 Uttarakhand, Chhattisgarh, Odisha, and Haryana, 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 of 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 UK, CG and HR MoUs. Finally, Indus Action’s interventions with the Union Government (on any of the three workstreams) were not validated, as no officials at this level were interviewed. There were also no MoUs signed with the Union Government that were made available for review.
Future Impact: Opportunities and Risks

Regardless of the extent of Indus Action’s interventions at the Union Government level to date, this is a key opportunity identified by this evaluation to achieve future impact. The importance of intervening at the Union Government level is already recognized in two of the Theories of Change to achieve impacts for pregnant women and lactating mothers and for children through Section 12(1)(c).

The Union Government has an important role 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 to cover more births through the PMMVY and to extend Section 12(1)(c) to Class 12.

In addition, as is evident from the Union Government’s guidelines for the PMMVY, they exert control over the claims process, including the documents required. Therefore, one way for Indus Action to achieve its outcome 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. However, another way to reduce the burden that women currently face in accessing the PMMVY is to eliminate the application process altogether.

In section 3.2.1, 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 workstream, it is equally applicable to the 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 8,000 crore is required to ensure the right to maternity benefits for all women as defined in the NFSA, only 2,500 crore has been allocated. Therefore, eliminating application processes for the PMMVY completely (and potentially enabling all eligible women to receive the benefit automatically), is unviable unless the Union Government substantially increases the current allocation.

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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 the 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, some 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 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 political will that currently 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. It follows that 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.

Just as with the lack of political will, this evaluation identified another key risk that is equally relevant to all three workstreams. This is the risk of unintended outcomes. One such potential unintended outcome mentioned in section 3.1.3 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 that are delivered as cash transfers, the funds are not used as intended for multiple reasons. One possibility is that service providers engage in 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 is not able to control how it is used (this is particularly a risk for women). A third possibility is, of course, that the recipients themselves choose to use the cash for a purpose that is different from that intended by the program.

4.2 RECOMMENDATIONS

This final section of the report contains four recommendations that are informed by the two risks discussed above. The first two recommendations focus on how to increase 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, which includes the evaluation of unintended outcomes.
1. Identify and work with trusted media partners to recognize 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 own 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 which 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 for 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 because of inconsistencies in the sharing permissions.
4 **Conduct mixed methods evaluations of the intended and unintended outcomes of Indus Action’s work more frequently.**

It is recommended to evaluate Indus Action’s work at least every 3-5 years, using mixed methods. 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 not only improve the organisation’s ability to course correct and understand how best to measure the results of its interventions.
APPENDICES

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 workstreams. The 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 the 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 workstream 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 workstream) 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 (Navaratanalu in AP 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.

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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. This three-pronged strategy it currently proposes to the Union Government and states is 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


27. Indus Action and Chhattisgarh Shaasan, *छत्तीसगढ़ में शिक्षा का अधिकार 12(1)(c) के 10 साल\' [10 Years of 12(1)(c) of RTE in Chhattisgarh], n.p., 2021.
APPENDIX 3: GLOSSARY OF M&E 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 (nonrandom) 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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