



# Policy Brief

## BRIDGING GAP BETWEEN POLICY INCLUSION AND PROCEDURAL EXCLUSION OF KHAWAJA SIRAS APPLICANTS FROM BISP

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### INTRODUCTION

Listening to the voices of margins and incorporating Khawaja Siras into the formal network of social protection to mitigate their miseries is widely appreciated. Their eligibility to get financial assistance from Benazir Kafalat Program aims at pulling them out from the trap of chronic poverty. A policy decision by BISP board to further relax Poverty Means Test (PMT) requirements for Khawaja Siras keeping in view of their economic precarity instilled a ray of hope among community members who have been living on edges as social outcasts for centuries. This policy designed in good faith and intent did not yield desired results on account of bureaucratic procedural loopholes as the evidence from field uncovered. Field data from different study sites indicates that a significant number of Khawaja Siras don't have predictable access to financial assistance despite eligibility.

Khawaja Sira applicants across different districts and tehsils face delayed enrollments, interrupted payments and go through prolonged verification processes. Factors often linked to this outcome like lack of applicant compliance is not the reason behind it. Rather, routinized administrative procedures vis-à-vis identity verification, biometric identification and inter-agency coordination are the core issues responsible for the insignificant number of Khawaja Sira beneficiaries. The same system which is effectively working for binary categories of gender treats third gender people differently as they are not aligned with underlying administrative assumptions on account of their different living arrangements, mobility patterns and documentation history.

The procedural exclusion from cash assistance causes more than situational inconvenience. It compromises their ability to bear food insecurity, inflationary shocks, healthcare utilization and housing continuity. Repeated uncertainty also wears down confidence in public institutions, causes grievances and generates procedurally preventable administrative burden for BISP offices.

This policy brief uncovers the reasons behind Khawaja Sira exclusion. Their exclusion is not attributed to their lack of awareness or compliance with the procedures rather it is the result of inter-departments coordination challenge and system design. Relying on evidence from fieldwork, it institutes that exclusion is produced through existing procedures as an intended consequence suggests measures to bridge up this gap between policy inclusion and procedural exclusion. This



# Policy Brief

policy brief is well grounded in field data and is designed in a way to align policy with administrative practices. The core aim is to make predictable and uninterrupted access to financial assistance for eligible candidates. This will enhance the integrity of the program without putting extra burden on the allocated resources.

## METHODOLOGY

This policy brief is guided by qualitative fieldwork conducted across Rawalpindi, Lahore, Federal capital Islamabad and Sargodha districts to uncover the problems faced by Khawaja Siras who were eligible for financial assistance under Benazir Kafalat Program. Khawaja Siras' interaction with BISP registration, verification and grievance systems in practice were operationally focused during data collection process. Data sources used for this research undertaking are structured interaction with applicants, purposeful engagement with institutional stakeholders, transgender activists and community based civil society organizations and review of administration patterns in relation to registration, payment continuity and timeframe verification.

Pattern identification rather than individual narratives were the focus of methodology. Data was compiled across different sites to find out consistently observed procedural obstacles; common points of delay and consistent rationale offered for payment suspension. The principle of confidentiality is given utmost care, and no name of applicants, activists, or officials is used in this brief to avoid institutional visibility.

To assess whether observed challenges manifested localized lapses or system configuration challenges, administrative information was triangulated across different locations. The review focused on identifying discrepancies between listed beneficiaries and actual disbursement, the timeline and frequency of verification delays and effectiveness of grievance redressal mechanisms.

Narrative and thematic techniques were used for data analysis. Narrative analysis was employed to comprehend how Khawaja Siras unfolded their lived experiences over time specifically in relation to their access to social protection networks, encounters with institutions and income instability. This facilitated the study to document sequence of events and recurring experiences as expressed by the respondents in their own words. Then application of thematic analysis resulted in identification of common patterns across interviews, focus group discussions and institutional responses. Data coding were done manually and these were developed through repeated readings and comparison of transcripts. This combined approach not only preserved individual experiences but also helped for systematic comparison of different categories of respondents across different locations.



# Policy Brief

## FINDINGS

### ***Gap between eligibility and Actual Receipt of BISP Assistance***

Across all study sites, there was a consistent gap between formal eligibility recognition of Khawaja Siras and actual receipt of financial assistance from BISP under its flagship program Benazir Kafalat Program. Most often, recorded eligibility in the administrative systems did not guarantee receipt of financial support and those who received initial disbursement faced long delays. Reliable translation of financial assistance for listed beneficiaries is not consistently achieved.

### ***Interrupted Assistance and Access lacking Continuity Safeguards***

Khawaja Sira applicants who received payments reported that assistance was short-lived. Many reported that they received one or two quarterly installments and then the payments were halted. Official reasons for suspension of payments varied across offices and time. It ranges from pending verification, expired surveys, biometric failures or unspecified technical issues. Uncertainty prevailing around interrupted payments and repeated follow-ups and absence of any consistent explanations gave the signal to many applicants that this system lacks continuity safeguards and having a fluid identity they adjusted and, in some cases, stopped applying again.

### ***Documentation and Verification Bottlenecks***

Central barrier in getting financial assistance from BISP for Khawaja Siras emerged from data was identity verification. Applicants with valid X-gender identity cards were told that their gender isn't updated in the backend database and hence rendering them ineligible for financial assistance. Without standardized guidance, some districts introduced additional documentation requirements causing further delay in case resolution.

Inconsistency in verification timelines was recorded. While some offices reported six months timeframe for verification completion while others mentioned verification processes completion takes 1.5 years. These timeline inconsistencies indicate coordination gaps between different departments rather than applicant-level shortcomings.

### ***Biometric Dependency and Limited Alternatives***

Certain applicants, particularly older adults and those engaged in manual labor were disproportionately affected by substantial reliance on biometric verification. Despite the existence of non-biometric mechanisms, their application was uneven and not systematically communicated. Mostly, biometric failure resulted in suspension of financial assistance rather than offering non-biometric verification mechanisms to applicants.

### ***Survey Design Limitations***

National Socioeconomic Registry (NSER) survey mechanisms assume stable household arrangements and binary gender classification. Many Khawaja Sira applicants live outside of traditional household units or in collective living arrangements. At regular intervals, expired



# Policy Brief

surveys excluded them from getting financial support as re-enumeration processes take time and were not readily accessible for participants.

## ***Grievance and Accountability Gaps***

Many applicants registered their grievances on different formal available channels and favorable decisions were made in their cases. Despite favorable decisions and directions, they were never given financial assistance. This misalignment between grievance resolution and program implementation eroded confidence accountability mechanisms and caused prolonged exclusion.

## ***Geographic Consistency***

Repeated and patterned occurrence across different districts indicates design constraints within existing systems rather than isolated administrative lapses. Exclusion patterns were similar despite different geographical settings, and it demands corrective measures.

## **KEY POLICY RECOMMENDATIONS**

### ***Introduction of Provisional Eligibility Status***

**Problem:** Despite eligibility recognition, prolonged verification delays cause extended exclusion

**Policy Action:** it is recommended to introduce time-bound eligibility status (e.g., nine months) for those applicants whose initial eligibility has been established but whose verification of credentials is pending. BISP and NADRA are responsible institutions to implement this policy action and implementation mechanism runs through Management Information system (MIS) which can flag their status for enabling temporary disbursement verification. The expected outcome of this policy action would be reduced waiting periods and continuity of financial support.

### ***Recognize Tahaffuz Centre Certification***

**Problem:** Documentation gaps results in delayed enrollment and verification completion.

**Policy Action:** Acceptance of certification from Tahaffuz Centres as temporary eligibility documentation in those cases where X-gender verification is pending. Responsible institutions for implementing this policy action are BISP and Tahaffuz Centres and Victim Support Officers posted at Tahaffuz Centres can verify and certify their X-gender status. Implementation mechanism runs through BISP MIS where this interim certification document can be integrated. The expected outcome of this policy action would be granting immediate access to pending formal verification cases.

### ***Mandatory Written Reasons for Denial or Suspension of Financial Assistance***

**Problem:** Verbal explanations create confusion and repeated follow-ups.

**Policy Action:** Standardized written notices should be issued for suspension or denial while recording reasons and specifying next logical steps. For this policy action, BISP District Offices



## Policy Brief

would be responsible institutions and implementation mechanisms operate through MIS which can generate automated notices. Though most of the Khawaja Siras may not be able to read written notices by themselves yet these standardized written recorded reasons serve an important administrative function of creating administrative clarity, enabling third party assistance and preventing exclusion through silence or shifting verbal explanations.

### *Integrate Ombudsperson Decision into MIS*

**Problem:** Favorable grievance rulings by Ombudsperson do not consistently restore payments.

**Policy Action:** Grievance outcomes should be directed linked to payment restoration in MIS. For this policy action, BISP MIS Wing is responsible institution. Verified rulings should trigger automated override in Management Information System as an implementation mechanism. The expected outcome of this policy action would strengthen accountability, trust and confidence of the applicants in the integrity of the system would be increased manifold.

### *Final Note*

All proposed evidence-based policy actions can be implemented within existing legal frameworks, administrative platforms and budgetary allocations. By correcting procedural exclusion, Benazir Income Support Program can enhance the integrity of the program while ensuring that eligibility recognition translates into stable access to financial assistance so that cases of episodic and intermittent financial relief can be mitigated.