

Rajiv Awas Yojana (RAY)

Guidelines for Social Audit

2013 - 2022



***Ministry of Housing & Urban Poverty Alleviation
Government of India***

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Preface

Rajiv Awas Yojana (RAY) envisages a "Slum Free India" with inclusive and equitable cities in which every citizen has access to basic civic and social services and decent shelter.

In pursuance of this vision of "Slum Free India", Rajiv Awas Yojana (RAY) was launched in June 2011 in two phases; the preparatory phase for a period of two years which ended in June 2013 and implementation phase. Central Government has approved the implementation phase for the period of 2013-2022.

RAY envisages a two-step implementation strategy i.e. preparation of Slum Free City Plan of Action (SFCPOA) and preparation of projects for selected slums.

RAY Scheme Guidelines issued by the Ministry broadly describe the Scope, Coverage, Reforms, Implementation Approach, and Central Assistance, Administrative and Implementation structure and Monitoring mechanisms under RAY.

However, to assist States/ULBs to implement RAY, the following operational guidelines have been prepared by the Ministry:

1. Guidelines for Reforms
2. Guidelines for GIS, MIS and GIS-MIS Integration
3. Guidelines for preparation of Slum-free City Plan of Action
4. Guidelines for Community Participation
5. Guidelines for preparation of Detailed Project Reports
6. Guidelines for Project Management
7. Guidelines for Social Audit
8. Guidelines for Capacity Building
9. Quality Assurance Manual

The above mentioned guidelines are uploaded on the Ministry's website at www.mhupa.gov.in.

Operational guidelines provide a general reference framework for implementation under RAY. Feedback and suggestions are welcome and may be posted at Ministry through RAY Vaarta (www.mhupa-ray.gov.in), an interactive website which serves as a common platform for discussions and dissemination of information.

Abbreviations

CBO	Community Based Organisation
CSMC	Central Sanctioning and Monitoring Committee
CSO	Civil Society Organisation
DPR	Detailed Project Report
DUs	Dwelling Units
FGD	Focused Group Discussion
GoI	Government of India
IPoMS	Integrated Poverty Monitoring System
MoHUPA	Ministry of Housing and Urban Poverty Alleviation
NGO	Non Government Organisation
RAY	Rajiv Awas Yojana
SAC	Social Audit Committee
SFCPoA	Slum Free City Plan of Action
SLNA	State Level Nodal Agency
ULB	Urban Local Body
UTs	Union Territories

Guidelines for Social Audit

1. Introduction

- 1.1. The Guidelines on Social Audit aim to describe the relevance of social audit in Rajiv Awas Yojana (RAY) and operational mechanisms required for the conduct of social audit.
- 1.2. Social Audit is a participatory assessment of the performance of a programme or a scheme. It is founded on the principles of transparency and participation wherein people affected by any scheme having direct stake in the process, are engaged. Social Audit helps to identify the deficiencies in a programme and also provides an opportunity for timely corrections. Social audit is an important social accountability tool.

2. Need and Objectives of Social Audit under RAY

- 2.1. Community voice and consensual decision-making is one of the key elements of this Ministry's strategy. In order to evaluate the performance of housing and urban poverty alleviation programmes, Ministry places importance of institutionalizing the monitoring and evaluation mechanisms, including social audits. It is therefore important to initiate a formal process and mechanism to review progress of the scheme and projects undertaken in slums from the point of view of the community. Under RAY, slum dwellers' associations and federations are encouraged as community based institutions to facilitate and strengthen community participation leading to participatory planning and decision making at the community level. Therefore, institutionalizing the social audit process facilitates in capturing social benefits of the scheme from the community's perspective.

2.2. The key objectives of Social Audit are:

- a. To promote equity, transparency and accountability;
- b. To provide voice to the people directly affected by the scheme/project;

- c. To receive timely feedback on the implementation of projects for revisiting the course of action.

3. Broad Areas to be covered under Social Audit

- 3.1. Social audits can be conducted concurrently at various stages of its implementation. It must have a clear focus, with clear and effective methods for data collection and verification based on the detailed checklist and formats prepared.
- 3.2. Each State/UT should identify judicious mix of projects at pre construction, construction and post construction stages for social audit. The social audit is most effective and beneficial at the construction stage as the feedback received at this stage will help identify timely corrective measures. If social audit is conducted at post construction stage, the issues related to design faults and other structural deficiencies may remain unaddressed. Learnings from social audit are useful insights to be incorporated during implementation of other projects also. States/UTs are expected to make efforts to use such learnings by sharing and circulating the guiding and remedial actions to all concerned for other projects being implemented. These are also important feedback for the Ministry which may be utilized for future decision making.
- 3.3. The social audit formats and checklists will be designed by the facilitating agencies (para 5.3) in such a manner that they match with the stage of project implementation namely, pre construction, construction and post construction stages, when the social audit is proposed to be conducted. It is necessary to audit the process and outcomes of all the key aspects undertaken or completed at the time of audit. For example, if social audit is conducted at construction stage, it will be necessary to examine the processes of decision making and decisions taken at pre-construction stage like selection of beneficiaries, site for construction, place of infrastructure etc.
- 3.4. Social audit at preconstruction stage should focus on (i) engagement of community during planning stage in collection of data and its ratification (ii) preparation of list of beneficiaries and its ratification (iii) creation and strengthening of community

organizations on site decision making by community on models, designs and layout plans and (iv) others as may be deemed necessary.

3.5. During construction stage, in addition to focus on areas at preconstruction stage, social audit should include— (i) number of dwelling units constructed are as approved in the DPR (ii) community/social infrastructure and basic infrastructure are as approved in the DPR (iii) there is no change in the project location (iv) quality of materials and fittings used for construction are as per specifications approved in DPR (v) adherence to design specifications are as approved in DPR and (vi) other as may be deemed necessary.

3.6. Social audit at post construction stage should also include (i) visible functionality of the entire infrastructure created under the project like- electricity points, water supply connection points, toilets, etc. including their last mile connectivity (ii) adherence to terms of allotment as specified in allotment letter, deeds and agreements (iii) access to infrastructure created (iv) impact on livelihood linkages and (v) any other as may be deemed necessary.

4. Central Assistance and Release of Funds

4.1. States/UTs should prepare an annual plan to conduct social audits for 5-10% of the sanctioned/approved projects as on the date of preparation of the annual plan (Indicative format at **Annexure 1**). In subsequent years, it should be ensured that projects which have already been taken up for social audit are not repeated to avoid duplication.

4.2. States/UTs should select and maintain a panel of agencies (facilitating) for undertaking Social Audits by following a transparent empanelment process for use by the implementing agencies, Urban Local Bodies (ULBs).

4.3. Central funds will be released in two equal installments to the States. First installment will be released on receipt of the annual plan and its approval by the CSMC. The final installment will be released on receipt of utilization of at least 70% of earlier central release and submission of project wise report of social audits (Indicative format at **Annexure 2**).

4.4. The norms for central financial support for conducting Social Audit will be as approved by CSMC and will be communicated to the States/UTs.

5. Stakeholders and their key roles for conducting Social Audit

5.1. MoHUPA RAY Mission Directorate

- Examine the annual plan sent by the States/UTs and obtain approval of CSMC.
- Release of central assistance.
- Issue advisory and guidelines from time to time.
- Monitor the progress of Social Audit as per annual plan submitted by the State/UT.
- Direct the States/UTs to carry out Social Audit of project(s) other than those included in the annual plan.

5.2. State Level Nodal Agency of RAY

- Identify projects for Social Audit and develop an annual plan for approval of the Ministry.
- Select and appoint facilitating agency or agencies for handholding the Social Audit committees (SAC) for conducting social audit through an open and transparent process. Suggested qualifying criterion for selection of facilitating agencies is placed at Annexure 3. Suggested ToR for facilitating agencies is placed at Annexure 4.
- Provide administrative and technical support to the facilitating agencies. Social Development Experts in the State Level Technical Cell is expected to provide technical support and supervision to the social audit process as a nodal person.
- Facilitate meetings of facilitating agencies with the ULBs and CBOs and monitor the progress of social audits.
- Participate, if needed, in the public meeting in slums where the social audit is conducted. Support cities in taking actions on the issues raised through the process

of social audit.

- Submit progress reports as prescribed from time to time to the RAY Mission Directorate at MoHUPA and upload Social Audit Summary Reports (project wise) in IPoMS (web based monitoring system).

5.3. Facilitating Agencies

- Study the approved detailed project reports (DPRs), identify projects for social audit.
- Prepare formats/checklists for data collection using indicative parameters in Para 3.4 to 3.6 above.
- Interactions and meetings with ULBs to draw out a calendar of activities for social audit in identified project.
- Facilitate formation of Social Audit Committees (SAC) in the community with the support from the ULBs.
- Build capacities of SAC to create awareness amongst the community on project identified for social audit by organising community meetings.
- Collect the data required for conducting as identified earlier with the support of SAC and undertake data verification with the community.
- Support SAC in organising on site public meetings.
- Prepare social audit report, share the same with community, incorporate community views/suggestions finalise the report and submit to ULB and SLNA.
- Carry out any other work as may be necessary for successful conduct of social audit.

5.4. Urban Local Bodies

The role of ULBs in successful conduct of social audit is important as they are not only the fulcrum of the entire process but also the consumer of the findings of social audit. Key roles of ULBs include:

- Involve all the stakeholders in the social audit process, mainly community and elected representatives of the slums selected for social audit.
- Formation of slum wise Social Audit Committee (SAC).
- Share with facilitating agency all information relating to the identified project, including its DPR.
- Provide feedback, suggestions and approval to the checklist and formats prepared for data collection by the facilitating agencies.
- Participate in the public meeting for sharing of social audit findings and to address issues raised.
- Prepare the minutes of the public meeting with the follow up action points.

Social Development Expert in the RAY Technical Cell at ULB will be the anchor and is expected to play an important role in preparation and conduct of social audits, including dissemination of findings.

5.5. Social Audit Committee (SAC)

SAC is expected to be a representative committee having representation from all the economic and social groups, especially women and marginalised. SAC will lead the process of social audit under the guidance of the facilitating agency and the ULB. Slum dwellers association, other CBOs involved in conducting surveys and micro planning during preparation of SFCPoA and DPR may play the role of SAC. Social Audit may appoint a chairperson from its members. Key roles of SAC are:

- Support facilitating agency in data collection and its verification.
- Support facilitating agency in analysis of data and preparation of minutes of the public meeting.
- Organise public meeting with the support from the facilitating agency and ULBs.
- Liaise with the ULBs on issues raised during the public meeting for appropriate remedial actions.

- Undertake follow up of the issues at the community level.

6. Key Activities in Social Audit

Each social audit process may take 2-3 months to complete. The key activities to be undertaken in a social audit process are mentioned below. Some of the activities can be undertaken simultaneously while some may be sequential.

6.1. Relationship Building: ULBs should lead the process of building up relationship with all the stakeholders including facilitating agencies and other stakeholders involved in the process of social audit. This will help in defining and agreeing exact roles for each stakeholder and in detailing plan along with calendar of activities for conduct of social audit including timelines for completion of each activity.

6.2. Developing checklist and identification of required information: The facilitating agencies should study the DPR to understand the project identified for social audit and to develop relevant formats/checklists to collect data/information depending upon the stage and scope of the assignment in consultation with SLNA/ULB a suggested list of documents from which relevant data can be taken is provided at **Annexure 5**.

6.3. Building a Conducive Environment for Social Audit: Building a favorable environment for stakeholder participation, especially the slum community is most essential. Prior intimation to the slum dwellers about the social audit should be given through meetings and focus group discussions by the ULBs and the facilitating agency.

6.4. Forming the Social Audit Committee (SAC): ULBs with the assistance of the facilitating agency should form a representative social audit committee in the community as explained in Para 5.5 above. Existing slum dwellers association or any such other representative group can play the role of SAC, for the purpose of this scheme.

6.5. Training of SAC members: Training for SAC members should focus more on activities which are required to be taken up in the field. Based on the project to be audited, it should include familiarization of SAC members:

- Project and its components under the approved DPR
- Documents and records for information collection
- Understanding on the checklist or format for data collection
- Understanding the process of data collection
- Data analysis and discussions after field visits
- Developing short reports, display charts for public meeting and presentation of data in the public meeting.

6.6. Analyzing the Information: The most crucial activity under social audit is gathering relevant information under the specific checklist or formats developed for each project selected for social audit and its verification. The collected information should be analyzed and then compiled in a manner that it is easy to read and discuss in the public meeting.

6.7. Communicating about the Public Meeting: SAC and facilitating agencies should give prior intimation to the community about the public meeting for larger participation. Information about the meeting may also be displayed in places accessible to slum dwellers. Date for the public meeting should be fixed in consultation with the elected representatives and ULB officials so as to facilitate their presence. A public meeting for social audit is a special meeting for a specific purpose and therefore no other matters should be discussed. Public meetings should be conducted at the project site to ensure accessibility to progress of physical works, works related defects/concerns could be easily attended, women can participate in greater numbers, the loss of wages is minimized and officials present in the meeting can undertake quick assessment of the status or work under way/completed.

6.8. Organizing the Public Meeting and sharing of social audit findings: Key findings of the audit should be discussed in the public meeting and the concerned ULB officials should be present for providing clarifications, if any. Important issues should be written on charts for display. The information on these charts should be focused and written lucidly in local language. Public display of relevant information on charts encourages the participants to ask questions and clarify their doubts and

concerns. A suggestion box should also be kept for people who do not wish to speak out but are willing to raise issues and give suggestions. The concerned ULB officials should adequately respond to resolve on the spot queries and issues raised by the community. It is only where it is not possible to suitably address the concerns on the spot for want of information, ULB should fix a timeline by which the reply will be provided. This time frame should be communicated to the community.

6.9. Preparing summary of findings: With public hearing and detailed discussion in it brings the process of social audit to closure barring follow up actions necessary for remedial action. Summary report of Social Audit with the finding of the public hearing should be prepared by the facilitating agency in 10 days and should be submitted to SLNA and concerned ULB. An indicative format for preparing the summarized report is annexed at Annexure 2. Based on the issues raised by the community, follow up actions should be listed and made part of the summary report. There may be instances where families are adversely affected due to project design or deviation in it. In such cases, full details of the affected family should be should be annexed with the summary report. These summary reports should be uploaded by the States/UTs in IPoMS. In addition to a summary report, a detailed report of Social audit highlighting key processes should also be prepared by the facilitating agencies and submitted to SLNA through ULB. An indicative format for preparing detailed report is placed at **Annexure 6.**

Annexure 1: Indicative Format for Preparation of Annual Plan for Social Audit

- 1. Annual Action Plan for the year -----**
- 2. Number of projects approved as on (DATE) under RAY in the States/UTs:**
- 3. Total number of projects identified for Social Audit:**
- 4. About the Identified Projects for Social Audit (Project wise)**
 - 4.1. Name of the Project
 - 4.2. Types – In situ up gradation, redevelopment or relocation
 - 4.3. Location (Name of the Slum, City and the State/UT)
 - 4.4. Date of the sanction of the project
 - 4.5. Start date of the construction on site
 - 4.6. Total Project Cost
 - 4.7. Total Central Share approved
- 5. Broad Activity plan including expected Time frame for social audit:**
- 6. Required funds for Social Audit of the identified projects:**

Annexure 2: Indicative Format for Summary Report of Social Audit

1. Details of the project/projects for which Social audit was conducted

- i. Name of the Project
- ii. Types – In situ up gradation, redevelopment or relocation etc.
- iii. Location (Name of the Slum, City and the State/UT)
- iv. Date of sanction of the project
- v. Start date of the construction on site
- vi. Total Project Cost
- vii. Total Central Share approved

2. Duration of the Social Audit (including Public Meeting):

3. Key activities undertaken with the dates/months :

4. Key issues found during data analysis and public meeting:

5. Feedback and Responses in Public Meeting:

a. Key Issues addressed during Public Meeting

b. Key Issues requiring redressal post Public Meeting with timeline and stakeholders involved

Issues	Action Required	By whom	By when

6. Annexure :

- a. List of Participants in the Public Meeting (segregated- Elected Representatives, ULB officials)**
- b. Checklist and format used for data collection and data sheets**
- c. Minutes of the public meeting**
- d. List of families affected adversely**
- e. List of SAC members (specifying Name, Gender etc.)**
- f. Any other as deemed necessary**

Annexure 3: Suggested Criterion for Selection of Facilitating Agencies

1. The agency should be registered under the Indian Societies Registration Act/ Indian Trust Act/ Indian Religious and Charitable Act as a non-profit institution or the company under the Companies Act or under relevant State Acts for at least three years;
2. Agency is not blacklisted or placed under funding restriction by any Ministry or Department of the Government of India (GoI) or CAPART or by any State Government or its agency;
3. The executive officers/members should not have affiliation to political parties.
4. Desirable qualifications of the agency:
 - a. Experience of engaging with CBOs
 - b. Skills related to community mobilization and use of participatory approaches
 - c. Experience on social accountability tools and methodologies
 - d. Experience of working on urban poverty and housing issues
 - e. Experience to work with a variety of stakeholders including the Government
 - f. Suitable human resources in the field of social development having experience of usage of social accountability tools including social audit.

Annexure 4: Terms of Reference for Facilitating Agencies

1. Brief Description of Task

The purpose of this Terms of Reference (ToR) is to support States/UTs and Cities to undertake social audit under Rajiv Awas Yojana (RAY). To enable the process of social audit in the field, MoHUPA has prepared and circulated Social Audit Guidelines. This assignment focuses on undertaking social audit in identified project sites under RAY.

2. Background

2.1. Community voice and consensual decision-making is one of the key elements of MoHUPA's strategy. In order to evaluate the performance of housing and urban poverty alleviation programmes, Ministry places importance of institutionalising the monitoring and evaluation mechanisms, including social audits.

2.2. Considering community participation is essential feature of RAY, it is important to initiate a formal process and mechanism to review the progress of the scheme and projects undertaken in the slums from the point of view of the community. Under RAY, slum dwellers associations and federations are encouraged as community based institutions to facilitate and strengthen community participation leading to participatory planning and decision making at the community level. Therefore, institutionalizing the social audit process facilitates in capturing social benefits of the scheme from the community's perspective.

2.3. The key objectives of Social Audit are:

2.3.1. To promote equity, transparency and accountability;

2.3.2. To provide voice to the people directly affected by the scheme/project;

2.3.3. To receive timely feedback on the implementation of projects for revisiting the course of action.

3. Description of Task

This task is primarily to facilitate social audits by engaging communities in RAY and take the process of social audit to a logical conclusion. The key responsibilities of the facilitating agency are as follows:

3.1. **Relationship Building:** Facilitating agency, with the support from ULB, would have meetings with all the stakeholders involved in social audit of selected slums.

This step should result in facilitating agency coming up with a detailed plan to conduct social audit with possible date of completion of each activity.

3.2. Developing checklist for the social audit: The facilitating agencies should study the DPR prepared and develop understanding of the project identified for social audit. Based on this, the facilitating agency would develop relevant formats or checklists to collect information necessary for social audit in consultation with ULB. An indicative list of important documents that may be required during the social audit is placed at Annexure 5 of the Guidelines on Social Audit issued by MoHUPA.

3.3. Building a Conducive Environment for Social Audit: Facilitate agencies will assist ULB in building a conducive environment for participation of the stakeholders, especially the slum community. Facilitating agency will have meetings with the slum dwellers in order to ensure the same.

3.4. Forming the Social Audit Committee (SAC): Facilitating agency will actively assist ULBs in forming a social audit committee in the community. The social audit committee should have adequate representation of women and marginalized groups within the community.

3.5. Training of SAC members: Facilitating agency will provide trainings for SAC members on the following:

- About the project and components of approved DPR
- Documents and records for information collection
- Understanding on the checklist or format
- Understanding on the process of data collection
- Data analysis and discussions after field visits
- Developing short reports, display charts for Public Meeting and presentation of data in the public meeting.

3.6. Analysing the Information: The facilitating agency with the support of SAC would collect data and analyse the same. Facilitating agency would facilitate SAC to compile the information in a manner that it is easy to read in the public

meeting. Facilitating agency should verify each piece of information gathered before presenting in the public meeting.

3.7. Communicating about the Public Meeting: Facilitating agencies, with the active involvement of SAC, would give prior intimation to the community about the public meeting so that maximum number of people are able to participate. They can display information with the support from SAC regarding the meeting in places which are accessible to slum dwellers. Facilitating agency should fix the date for the public meeting after consultation with the elected representatives and ULB officials as their presence is very important.

3.8. Organizing Public Meeting and sharing of social audit findings: Facilitating agency would assist SAC in organizing the public meeting. The facilitating agency would steer discussions and assist the social development expert from the ULB to document key issues raised and addressed during the public meeting.

3.9. Preparing summary of findings: Facilitating agency would summarise the discussions and prepare a summary report and submit within ten days to SLNA and ULBs. An indicative format for preparing the summarized report is annexed at Annexure 2 of the Guidelines on Social Audit issued by MoHUPA. In addition to a summary report which is the outcome of the public meeting, a detailed report of Social audit highlighting key processes should also be prepared by the facilitating agencies and submitted to SLNA through ULB. An indicative format for preparing detailed report is placed at Annexure 6 of the Guidelines on Social Audit issued by MoHUPA.

4. Deliverables: The social audit deliverables are suggested below:

- a) Developing a framework and methodology
- b) Developing a checklist and data collection tools and get the approval from ULB
- c) Undertaking Social Audit as per the tasks explained above
- d) Prepare a summary report of the public meeting
- e) Prepare a detailed report of Social Audit

5. Terms of Payment*

- a) Advance along with acceptance of the work – 25% of the total amount
- b) On completion of Public Meeting and submission of summary report: 25%
- c) On finalization of the final report: 50%

**May be decided by State/UTs and ULBs*

Annexure 5: Documents and Records for Information Collection

S.No	Record	Description	Available with
1.	Documents required for preparing DPR	Compiled information on slum survey, total station survey, infrastructure status report, layout etc. for the selected slum.	Urban Local Body
2.	Detailed Project Report (DPR)	<p>This document contains details of various components pertaining to the projects proposed by the Urban Local Bodies to be taken up under the RAY. This document contains important information pertaining to the project like:</p> <ol style="list-style-type: none"> 1. Profile of the project 2. Need for the project 3. Locations where works are to be implemented 4. Detailed specifications, of all the components under the project 5. An estimate of required infrastructure under each component 6. Requirement of building materials for each component 7. Timelines for completion of the works 8. Fund requirement 	Urban Local Body

S.No	Record	Description	Available with
3	Administrative Sanction Order from State Governments	This document is the administrative sanction given by the State Governments conveying the approval of the Government of India and providing for the execution of the projects by the Urban Local Body.	Urban Local Body
4	Administrative Sanction of the ULB	This document is a note file/order, which is an approval given by the concerned competent authority within the ULB for the execution of the project.	Urban Local Body
5	Technical Sanction of the ULB	This document is a note file/order, which contains the approval of the competent engineer to approve the work estimate. This document also gives key information on design, detailed estimate, item-wise costs, overall cost of the unit etc.	Urban Local Body
6	Agreement with Contract Agency	This document contains all the details of work to be undertaken by the contractor. This is key document that would give inputs for physical verification of the infrastructure. It also provides details of work, name of the contractor/agency in-charge etc.	Urban Local Body
7	Quality Control Report	This document contains details of quality assessment undertaken by the third party agency of the works executed in the ULB. This document provides periodical information on quality checks performed by the third party.	Urban Local Body

S.No	Record	Description	Available with
8.	Running Account Bills or Contract Certificates	This document contains details of the periodic release of money to the contractor based on the work done. This information is also available in the measurement book.	Urban Body Local
9.	Utilisation Certificate	This document contains the status of the funds already utilized by the ULB. This document also contains information as to how the fund was utilized and for what purpose. This can be useful to ascertain that the fund released utilized for the sanctioned component.	Urban Body Local

Annexure 6: Indicative Format for Final Detailed Report of Social Audit

1. Details of the project/projects for which Social audit was conducted

- 1.1.1. Name of the Project
- 1.1.2. Types – In situ up gradation, redevelopment or relocation
- 1.1.3. Location (Name of the Slum, City and the State/UT)
- 1.1.4. Date of the sanction of the project
- 1.1.5. Start date of the construction of project on site
- 1.1.6. Total Project Cost
- 1.1.7. Total Central Share approved

2. Key Activities undertaken (including Public Meeting) with the duration of Social Audit

3. Details of Social Audit Committee: Process of formation of SAC and the details of the members

4. Key issues found during data analysis and public meeting:

5. Feedback and Responses in Public Meeting

- a) Key Issues addressed during Public Meeting
- b) Key Issues requiring redressal post Public Meeting

6. Annexure: (List of Documents)

The list of document used for verification should be included as an Annexure.

- Checklist and format used for data collection
- Minutes of the public meeting
- List of SAC members (specifying Name, Gender etc.)
- Any other as deemed necessary