

Governance Challenges in Land Deed Registration Service and Way Forward

Executive Summary

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1. Introduction

1.1 Background of the Research

According to the article 42 (1) of Bangladesh Constitution, every citizen has the right to acquire, hold, transfer or otherwise dispose of property. Registration of deed is a very important process for securing these rights. The purposes of registration of any deed are to ensure the final legal validation of that deed, to provide information on the transfer of property, to give security of the ownership of deed and to help prove the existence of the deed, in case it is lost or damaged.

In 1864, the registration process of deed was introduced in Indian sub-continent and according to the Registration Act 1908, registration of deed was made mandatory for the transfer of any property irrespective of its values. According to section 17 of the Registration Act 1908, the deeds which are mandatory for registration are: sale deed, deed of gift, mortgage deed, partition deed, deed of exchange, power of attorney, will etc. If a deed is not registered, for which registration is legally mandatory, the transaction by means of that deed is not proved.

Registration department is one of the oldest public institutions in this sub-continent. The records of transfer of property and registration related documents are stored under the jurisdiction of this institution. The Directorate of Registration started functioning as a Directorate in 2018, which was formerly a department under the Ministry of Law, Justice and Parliamentary affairs. Under the supervision of the Directorate 497 Sub-Registrar Offices and 61 District Registrar Offices are operating throughout the country. Government collects a significant amount of revenue through this Directorate every year. In the fiscal 2017-18, the total number of deeds registered under the Registration Directorate was 3,672,428 and the total revenue earned through this process was BDT 12432,99,72,731 or BDT 124.33 billion.

To make the deed registration process easy and to increase citizens' facilities in regard to deed registration various initiatives have been taken. These include the amendment of the Registration Act 1908, the formulation of the Registration Manual 2014, the Registration Rules 2014, and the Power of Attorney Rules 2015, the revision of the Lowest Market Value Rules 2010. Furthermore, to make the language easy for deeds, specific format for deed writing and the option to compose in computer have been introduced. Some more initiatives include introducing option to deposit registration fees through pay order, setting Citizen's Charter in the premises of sub-registrar offices and installing CC camera to ensure safety of record rooms. Moreover, the training initiatives for the officers have been carried out to build their professional capacity.

In spite of having these reforms and positive initiatives there are various limitations and deficits in governance in land deed registration services which have been reflected in some research reports and media reporting. Land registration service has been identified as one of the most corrupt sectors consecutively in various rounds of Household Surveys on Corruption Experience conducted by TIB during 1997 to 2017. According to the last report of 2017 Household Survey, 42.5% households became victims of corruption while receiving service from sub-registrar offices and among them 28.3% households had to pay bribe on an average of BDT 11,852. Apart from this, a picture of corruption in land deed registration activities has been reflected in other researches of TIB, which include the study entitled Land Management and Services: Governance Challenges and Way forward (2015) and Baseline Survey on Land Services (2015-2017).

1.2 Rationale of the Research

Firstly, to ensure a corruption-free and people-friendly land registration service, it is important to identify the governance deficit in registration related institutions and address them. Secondly, the corruption scenario in land registration service has been partly demystified through some researches,

which necessitates a land registration specific in-depth research to identify the governance challenges. Thirdly, “land” is a priority sector of TIB’s activities. TIB has been commissioning various researches and advocacy programmes focusing on good governance by which it tends to explore ways to overcome the governance challenges of land sector for many years. Under this context and as a part of its continuous effort, this research has been conducted to find out the reasons behind the lack of good governance in land registration related offices.

1.3 Purpose of the Research

The objective of this research is to identify governance challenges in the land deed registration service and to propose recommendations to overcome those challenges. The specific objectives of this research are:

- a) To identify institutional and legal limitations related to land deed registration;
- b) To identify the types, causes and impacts of corruption in the land deed registration activities; and
- c) To propose recommendations to overcome the governance challenges existing in the land deed registration service.

1.4 Scope of the Research

In Bangladesh most of the deed registrations are land related. In this research only land related registration service has been included. The land registration activities done by the Sub-Registrar Offices and District Registrar Offices under the jurisdiction of the Directorate of Registration have been included in the scope of this study.

1.5 Research Methodology

This is a qualitative research. Data collection and analysis were carried out by using some qualitative methods. Data were collected from both primary and secondary sources. A total of 16 District Registrar Offices were selected from eight divisions (two from each division) at the first stage of selecting study locations and institutions for data collection. Here the highest and lowest number of registrations conducted in a year under the jurisdiction of a District Registrar Office were considered. At the second stage, a total of 41 Sub-Registrar Offices were selected from these 16 districts. In this selection 32 Sub-Registrar Offices i.e. two Sub-Registrar Offices from each selected district were selected considering the highest and lowest number of registrations conducted in a year. The other nine Offices were selected considering the importance of location and variation of areas (for example, border areas, river erosion prone areas, etc.).

Data were collected by using a set of checklists prepared by following a few indicators of good governance. The indicators include capacity, transparency, accountability and integrity. Key Informant Interviews (KIIs) and observation methods were used for data collection. The KIIs were conducted with the staff of Directorate of Registration and selected District Registrar Offices and Sub-Registrar Offices and other concerned stakeholders such as Record Keepers, Deed Writers, *Nakalnabish* (copiers), lawyers, service recipients, AC Land, Union Land Assistants, Surveyors, officials of Anti-Corruption Commission (ACC), real estate and bank officials, NGO activists, journalists, experts and so on. The data collection, analysis and report writing were accomplished during July 2018 to August 2019.

2. Research Findings

2.1 Legal Limitations and Challenges of Implementation of Laws: There is a gap in the implementation of processes and obligations set in the laws to verify the title of the land. For example, sometimes the updated record of rights is not available in the Sub-Registrar Offices. As a result, it becomes difficult for the Sub-Registrars to verify the documents whether they are legal or illegal, which leads to risks of forgery. On the other hand, the directives relating to the appointment or enlistment of *Nakalnabish* are not codified in the law. Apart from this, it has been stated in the rule 42 of the Registration Rules 2014 that the registration officials are not responsible for checking validity of any deed submitted to them and if the deed is submitted by following all rules and if they are satisfied with that, they will be bound to complete the registration without considering any potential risk. With this provision there might be a risk for other party. Besides, the registration fees are determined by specific market price of property which is regulated by the Lowest Market Price Determination of Property

Rules 2010. In some cases, specific market price of property is not compatible with the actual market value or price of the property. In some cases, the price set in the Rules appears higher than the actual market value or price of the property where the buyers have to pay excess registration fees and face financial loss. On the other hand, in some cases the actual price of property is higher than the specific market price set as per the Rules. In such cases, buyers do not mention the actual price of the property and follow the specific market price set as per the Rules. Thus, they can pay less registration fees than the actual ones. Thus, in such cases government gets deprived of earning actual revenue.

2.2 Infrastructural Limitations: Many infrastructural limitations were found in the land registration offices selected under this study. Most of the Sub-Registrar Offices (27 offices out of 41) were seen operating in very old buildings. Many old structures of the buildings became damp and infested by termite. Many parts of these buildings were found broken and cracked, plaster and water were falling from roof and which required rigorous maintenance. Besides, in many cases insufficient rooms were found, especially for the extra *Mohrar* or *Nakalnabish*. Sometimes, it was found that 20-25 people were working in a single room. They were even working in veranda and under the stairs of the building. Moreover, in most of the cases, the record rooms at the Sub-Registrar Offices and District Registrar Offices were found to be not in a good condition. The rooms were found damp and thus, it appeared that the important documents remaining in such conditions are at risk of damage.

2.3 Deficiencies of Logistics: Huge deficiencies of necessary logistics (furniture, printer, forms, various registers, index, kerosene and naphthalene for record room, transport etc.) in the researched District and Sub-Registrar Offices were also reported. Such picture was found in 32 Sub-Registrar Offices out of 41. There were found insufficient chairs, tables, *Almirah* to carry out the official work. In some cases, the existing furniture were found to be old and in bad condition. Due to the insufficient number of *Almirah* important documents and volume books were found to be kept in open spaces. According to the officials, due to insufficient chairs the extra *Mohrars/Nakalnabish* have to bring their own chair and table. Apart from this, the insufficiency of “Volume Book” was reported from most of the Sub-Registrar Offices. Such picture was reported from 18 Sub-Registrar Offices out of 41. Due to this shortage, sometimes, extra *Mohrars/Nakalnabish* could not copy the deeds timely and service recipients had to wait for a long time to get their deeds. Besides, the payment to extra *Mohrar/Nakalnabish* depends on their deed writing. If there is a shortage of volume book, they cannot write and thus they do not get the scope to earn at that time.

2.4 Budget Constraints: The entire registration service was found to be administered with insufficient budget. There is no system and practice to assess and place financial demand to the ministry from the local level offices. The budget provided from the ministry was found to be insufficient to meet the necessity of Sub-Registrar Offices. Sometimes, it was delayed to send the budget to local offices on time. In such cases, payment of house rent and electricity bill remained pending. Moreover, it was reported that the allowances such as transport allowance for conducting commission, allowances for extra *Mohrar/Nakalnabish* are not sufficient in accordance with present market price.

2.5 Gaps in Initiating Digitisation in Land Registration Service: Land registration service has not yet been digitised. There is no database for this service. As a result, there is an obstacle to search and validate the documents and necessary information in a short time. For this reason, forged deeds cannot be identified easily. Hence, the service recipients face harassments in getting original deeds and certified copies.

2.6 Shortage of Human Resources: Sub-Registrar Offices of the country have shortages of human resource. It was found that there is a shortage of Sub-Registrars in many offices. Among the 41 offices visited during data collection, 22 offices did not have full-time Sub-Registrars. In this situation a Sub-Registrar was found to be deployed with extra charge of more than one offices (sometimes three offices at a time). Due to the extra pressure apart from administering their own offices, in most cases the additional responsibilities were found to be unattainable and difficult, which hinders smooth functioning of the registration process. This situation results in a situation that the service recipients face delay and harassment. Besides, human resources were found to be disproportionately deployed in

regards to increasing number of land deed registration. The number of permanent staff of a Sub-Registrar Office is five and it is very difficult now-a-days to administer the registration work with this size of human resources. In a Sub-Registrar Office, there were extra *Mohrar/Nakalnabish*, *Umedar* working on temporary basis. Due to the shortage of staff, sometimes extra *Mohrar/Nakalnabish* are deployed in some important tasks (like indexing, searching etc.) by which the temporary workers get access to many important documents, which is very risky for the security of registration documents.

2.7 Inadequate Training: There are opportunities of training at national and international level for the District Registrars and Sub-Registrars. However, it was alleged that there is discrimination in getting training opportunities and all are not awarded with equal opportunity in this regard. On the contrary, there is no scope of formal training for the staff especially the Assistants, *Mohorars*, and extra *Mohrars/Nakalnabish*.

2.8 Deficiency in Transparency: Deficiencies were found in transparency and openness of information in land deed registration services. According to laws and regulations some circulars such as list of registration fees, time table of deed submission, daily circular of completed deeds, directives of withdrawal of power of attorney, time of search and submission of certified copy, citizen charter etc. must be shown in public places. However, in many cases all these circulars were found to be not shown in the offices visited for this research. Citizen charters were found in 31 Sub-Registrar Offices out of 41. In a few cases the citizen charters were found to be not visible to the service recipients, in some cases not updated, and in some cases the texts were small and hazy. Moreover, no information desk and direction sign were found in any offices. Besides, the contact details (name and contact address) of Designated Information Officer were not found in the court premises. Apart from this, the information delivery was found to be slower as the documents and information are stored manually and there is no use of modern technology. Alongside, the websites of the registration directorate were found to be not updated and some important information were not available in the website. Moreover, the Directorate of Registration does not publish any consolidated annual report – the current practice is that their activities are included in the annual report prepared by their reporting ministry.

2.9 Gaps in Accountability: There is a deficiency in making regular and effective inspection and monitoring of the District Registrar and Sub-Registrar Offices by the Divisional Inspectors and District Registrars respectively. Some offices were found to be remaining out of inspection for a long time. Apart from this, there was a shortage of regular inspection of record rooms. There is a provision of taking permission of inspection from the Inspector General of Registration (IGR), which creates administrative complications and hinders the inspection process. Besides, as the conducts and activities of Districts Registrars, Sub-Registrar, other staff, *Nakalnabish* and deed writers are not monitored properly, the risk of corruption and irregularities is likely to increase. According to law, if a deed writer takes additional money from the service recipients, the license of that deed writer will be cancelled. However, in practice, there is a gap in taking measures in stopping this malpractice. On the other hand, as the deed writers are local citizens, they have political connection along with strong back up from Deed Writers Associations, it is difficult to take action against them. In most cases, the accountability mechanism does not work properly as some collusions work among the registration related stakeholders in making financial corruption through land deed registration. Locally, collusion takes place among a portion of the officials of Sub-Registrar Offices, *Nakalnabish* and Deed Writers. They also maintain contact and collusion with the District Registrar Offices and even the Registration Directorate.

Complaint box was found in 24 Sub-Registrar Offices out of 41. The number of complains was also low in the offices having complain box in place. Basically, there was no awareness campaign on complaint mechanism to encourage the service recipients to lodge complains. Moreover, no register was found to be maintained for recording the complaints properly. Sub-Registrar Offices took part in public hearings organised by the ACC. Sometimes instant solutions were made through this mechanism, but in most of the cases effective solutions were not given later on. Besides, public hearings were not conducted by following proper methods (giving prior announcement, specifying venue, third party involvement etc.).

Furthermore, coordination gap among the concerned ministries and departments regarding land registration is visible. Land management and registration process is a concern of three ministries – the Ministry of Land, Ministry of Law, Justice and Parliamentary Affairs and Ministry of Public Administration. There is a provision of conducting mutation and updating Record of Rights (RoR) by the AC (Land) Office immediately after the land registration. However, some gaps were found in this process. It was found that Record of Rights (RoR) are not updated on regular basis. Moreover, there is a provision to provide RoR regularly to the Sub-Registrar Offices, which is also not followed properly. As a result, Sub-Registrars face challenges in verifying the documents for registration as they sometimes do not get the updated RoR from the AC Land Office. On the way around, it was also alleged that the land transfer notice is not served properly and regularly from the Sub-Registrar Offices.

2.10 Irregularities and Corruption in the Land Deed Registration Services

2.10.1 Bribery in Land Deed Registration Services: Unauthorised money is collected from the service recipients in various ways. In most cases, getting services from the Sub-Registrar Offices without bribing is unimaginable. For deed registration, service recipients come in contact with various stakeholders especially the officials or individuals directly and indirectly involved in the registration process, and they have to bribe to these officials and individuals. Most of the service recipients have no idea about the 'fees' of the Deed Writers and most of them collect higher fees than the actual rate from the service recipients. Under various excuses service recipients are forced to pay unauthorised money. Most of the cases, the amount of money depends on some criteria such as area (economically significant area or the areas having high land value), category of Sub-Registrar Office (small or large), financial ability of service recipients and their relationships (relative or familiar) with Deed Writers, and type of registration. Depending on the type of registration and value of the land, service recipients have to pay one to three percent more of the registration fees. In addition to the registration fees of each deed, the Deed Writers are alleged to collect unauthorised money ranging from 500 to 5000 BDT from the service recipients in the name of *Dalil Lekhok Samity* (Deed Writers' Association).

It was also alleged during data collection that the Deed Writers collect extra money from the service recipients in the excuse of meeting 'office expenses' of Sub-Registrar Office and in some cases this bribe amount is fixed. For each land deed registration bribe money is given to the relevant officials of Sub-Registrar Office ranging from one thousand to five lakh BDT. In most cases, it was alleged that a significant number Sub-Registrars, Assistants, *Moharars*, *Nakalanabish*, Deed Writers are involved in this unauthorised transaction of money. Every day the collected bribe money is distributed among the officers and employees of Sub-Registrar Office according to their position. This money distribution is made by following a few rules. For example, it was alleged that 10 to 50 percent of this money is kept for the Sub-Registrars and a certain percentage of the money is distributed among other officials. It was further alleged that a portion of bribe money is allocated for the District Registrar Office and even for the Registration Directorate. Field data suggest that without bribe money it is very difficult to collect a duplicate deed copy. It requires additional unauthorised payment beyond the prescribed fees which ranges between one thousand to seven thousand BDT.

2.10.2 Fraudulence in Land Registration Process: In many cases, the real value of land is not mentioned in the deeds at the time of registration, which is deliberately made to reduce the registration fees. For this reason, government loses revenue. This is made in cases where the actual value of land is higher than the fixed market value. This means that the fixed market price is specified in this case; not the actual price. Again in some cases, the document is registered by showing the value above the average mauza rate, which is done for getting higher bank loan by the means of property mortgage. In addition, the value of the land varies by types of land. In some cases, the actual class of land is not mentioned in the deed, which is also deliberately done to reduce the registration fees. Moreover, the registration type

is also changed to reduce the registration fees. This is to mention that the rate of registration fee on property value is higher in Bangladesh than that of other countries in the subcontinent. This rate is 5.1% in Sri Lanka, 7.2% in India and 10.2% in Bangladesh. On the other hand, in some cases one's land is registered for another person by means of preparing fake documents. This is done through presenting various fake documents (National Identity Card, Record of Rights, *Dakhila* etc.) during the registration.

2.10.3 Negligence of Duty: In some cases, all important information related to deed registration is not properly verified during the registration. For example, sometimes the deed is registered without verifying proper details of property distribution among the inheritors. It was found in some cases that the Sub-Registrar and other employees in the Sub-Registrar Office do not maintain office hour and thus the office work is delayed. Due to the delay many service recipients have to return home without completion of deed registration related works. It was alleged that in many cases, various types of illegal transactions around land deed registration and the distribution of bribe money among the officials are perpetrated after the office hour.

2.10.4 Illegal Influence in Deed Registration Process: Various types of political influence and other types of pressures take place in the Sub-Registrar Offices. The influences are made to the Sub-Registrars either to force to do or not to complete any certain deed. Apart from this, recommendations from local people's representatives i.e. political influence work in the recruitment of *Nakalnabish* and providing license to the Deed Writers. As a result, the *Nakalnabish*, employees, and Deed Writers feel empowered and in many cases they show reluctance to follow properly the rules and regulations in the registration process.

2.10.5 Delay in Getting Registration Related Documents: Usually it takes a long time to complete a deed registration. After the registration of a deed it takes a long time to get the original documents. Sometimes it takes approximately three to four years to get the original deed copies. Shortage of human resources and volume books and slow pace of work of *Nakalnabish* are the main reasons for this delay. Likewise, if a service recipient applies for an urgent duplicate deed copy, it will take fifteen days instead of the stipulated seven days.

2.11 Institutional Irregularities and Corruption in Land Deed Registration Service

2.11.1 Challenges in Recruitment, Transfer and Promotion of Staff and Copiers: It was alleged in the field that a huge illegal transaction of money takes place in the recruitment and promotion of Sub-Registrars and other employees. At present, Sub-Registrars are recruited through Public Service Commission (PSC), but the Sub-Registrars were employed through other processes before. For example, the government appointed 197 Sub-Registers in different Sub-Registrar Offices with the purpose of reinstating staff of the Mujibnagar Government. It is alleged that there were even appointments of staff who were under eighteen years old during the Liberation War of 1971. A many of staff joined the Sub-Registrar Offices in their late age and who did not have similar or formal job experience for many years. Some of them went to retirement after several years later. It was also found that these staff committed enormous level of corruption indiscriminately. Apart from this, five percent Office Assistants from the head office were promoted to Sub-Registrars. It was found that in some cases there were some persons among them who were having only HSC certificate, which was below the required qualification for the position of Sub-Registrar.

On the other hand, the transfer of Sub-Registrars to some particular places is alluring because the registration service is more corrupt and the transaction of unauthorised money is much higher in some particular places. It is alleged that the transaction of unauthorised money ranging from three lakh to 20

lakh BDT is made for each transfer for Sub-Registrars and the size of amount depends on places. This amount ranges up to 50 lakh BDT for the high cost land areas like Dhaka and its adjacent areas. Again, there are also allegations of bribery in the promotion from Sub-Registrar to District Registrar. In most cases, unauthorised payment is made for the enrolment of *Nakalnabish* as well as in the appointment of a *Nakalnabish* as permanent employee. 20,000 BDT to three lakh BDT is taken for the enrolment of a *Nakalnabish*. Again, though the appointment of *Nakalnabish* goes under the jurisdiction of the District Registrar, the decision and nomination from the Registration Directorate get priority. In the same way, unauthorised money transaction is made for the appointment of permanent *Mohorar* from the *Nakalnabish* and for the transfer and promotion of other employees of Sub-Registrar Offices. It is alleged that a transaction ranging from two lakh to eight lakh BDT is made for the appointment of *Mohorar*'s post and the transaction ranging from three lakh to 10 lakh BDT is made for the appointment of Assistant/Clerk post from the *Mohorar* position. Again, there are also allegations of illegal money transactions in the promotion of Head Clerk from the Assistant/Clerk.

2.11.2 Irregularities in Issuing Licenses to Deed Writers: There are also allegations of unauthorised financial transactions ranging from one lakh to three lakh and political influence in getting licenses for Deed Writers. It was alleged in the field that a certain portion of this money is distributed to the Deed Writers' Association, Sub-Registrar Offices, District Registrar Office and the Registration Directorate. Apart from this, it requires recommendations from local parliament member to issue a license. In addition to that, after obtaining the license, a Deed Writer has to pay unauthorised money ranging from two lakh to three lakh BDT for the enrolment of his/her name in the Deed Writers' Association. Moreover, a certain amount of 'fees' is required to renew the Deed Writer's license every year while they are also forced to pay extra money in this process.

3. Overall Observations

The level of bribery or transaction of unauthorised money in the Sub-Registrar Offices is extremely high. In most of the cases, a collusion among the service providers works in the transaction. In some cases, a portion of service recipients become part of the collusion. On the other hand, in most cases service recipients become the sufferers of irregularities and corruption that they experience in the Sub-Registrar Offices. They are also forced to bribe for even a normal service that they seek and even after submitting valid documents. A chain or pattern of corruption exists in the deed registration process. It is observed that the employees of Sub-Registrar Offices take illegal money from the Deed Writers who take the illegal money from the service recipients and each of them protect each other's interests and all of them get benefited from the unauthorised transaction of money. If the deed registration is made through an illegal process, then the amount of bribe money is several times higher than the actual rate. There is a lack of awareness among the service recipients about the registration fees and the due processes. As a result, they are easily victimised to corruption. On the other hand, there is a gap in existing accountability mechanism as all the concerned stakeholders are alleged to be benefitted from the unauthorised financial transaction taking place in the land deed registration process. The deficiencies of effective coordination among concerned ministries and departments have become the barriers to ensuring hassle-free land registration services. Moreover, some legal, procedural and institutional constraints and gaps in accountability and coordination are some other barriers to ensuring good governance in the land registration services.

4. Recommendations

Regarding Legal, Procedural and Institutional Capacity

1. Necessary legal and procedural reforms relating to land registration and implementation of the laws must be ensured.

- After the land deed registration, the Land Transfer Notice should be sent to the Upazila Land Office properly and the record of rights should be updated regularly and provided regularly to the Sub-Registrar Offices.
- Instructions for the enrolment and recruitment of *Nakalnabish* should be included in the registration law.
- The market valuation system of the property should be adjusted with real value by reforming law.
- The registration fees must be reasonably accommodated (especially minimising), considering the current context and benefits of the service recipients.

2. Office of Assistant Commissioner-Land, Office of Settlement and Sub-Registrar office are engaged with the exchange process of ownership of land. A single ministerial monitoring and control is essential to increase the coordination among these institutions of the government for ensuring proper transfer of property and land deed registration considering the changing land management system of the country. For this, land registration activities and related institutions should be placed under the jurisdiction of land ministry.

3. Proper financial allocation, adequate infrastructure, logistics, human resources for all Sub-Registrar and District Registrar Offices should be ensured based on proper need assessments.

4. Appointment, transfer and promotion of employees of District Registrar and Sub-Registrar Offices and providing license to the Deed Writers should be transparent, corruption-free and free from political influence.

5. Training initiatives should be taken to improve skills of all staff of the District Registrar and Sub-Registrar Offices.

6. Services like deed registration, withdrawing duplicate deed documents and deed registration related other information should be provided through one-stop service.

Digitisation of Land Registration Service

7. Land registration services should be fully digitised to ensure corruption-free and pro-service recipient service

- The e-registration system should be introduced quickly and all necessary institutional and technical facilities should be ensured.
- A central database of updated Record of Rights (RoR) should be created, which should be integrated with the National Identity Database and the existing RoR information of each citizen should be displayed and the all-time access of the Sub-Registrars to this database should be ensured.

Ensure Transparency

8. In order to ensure the openness of information in the deed registration process, the notices and lists mentioned in the registration manual must be displayed in visible places of the Sub-Registrar Offices; the Citizen Charter displaying the name, contact number of the Designated Information Officers in the office premises should be updated.

9. Regular audit of District Registrar and Sub-Registrar Offices by the Registration Directorate and District Registrars respectively should be ensured; separate annual report on overall activities of Registration Directorate should be published and the website of Registration Directorate should be updated.

Ensure Accountability

10. The activities and behaviour of the officers, employees, *Nakalnabish* and Deed Writers of the District Registrars and Sub-Registrar Offices should be under regular and strict supervision, and to ensure their accountability, inspection of the offices should be increased, the information related to income and asset of the staff should be disclosed every year.
11. Regular audit should be conducted by the Office of the Comptroller and Auditor General in the Sub-Registrar Offices.
12. Effective filing of grievance and redress mechanism should be ensured in the District Registrar and Sub-Registrar Offices.
13. Proper public hearing and follow up actions should be ensured according to the concerns raised against the District Registrar and Sub-Registrar Offices.

Ensure Integrity Practices

14. District Registrar and Sub-Registrar Office employees, *Nakalnabish*, Deed Writers and relevant other stakeholders involved in irregularities and breaches of code of conduct related to deed registration process should be taken under immediate exemplary punishment.
15. For the implementation of the National Integrity Strategy (NIS), all Sub-Registrar Offices should form 'Ethics Committee', set focal points and provide training to the staff of all levels on the NIS.