
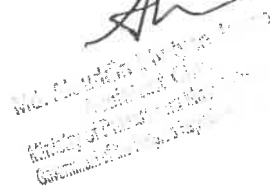


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# **The Social Management Framework (SMF)**

Fourth Primary Education Development Program (PEDP 4)

Directorate of Primary Education  
January 2019

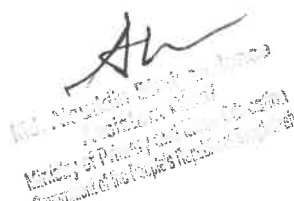
  


Ministry of Education and Sports  
Government of Ethiopia

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## ABBREVIATIONS AND ACRONYMS

ADB	Asian Development Bank
AusAID	Australian Agency for International Development
CBO	Community-Based Organization
CHT	Chittagong Hill Tracts
CIDA	Canadian International Development Agency
DPEO	District Primary Education Officer
DfID	Department for International Development
DLAC	District Land Allocation Committee
DPE	Directorate of Primary Education
DP	Development Partners
DPHE	Department of Public Health Engineering
EA	Executing Agency
EC	European Commission
EC	Entitlement Card
GOB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HCG	House Construction Grant
HTG	House Transfer Grant
IDA	International Development Association
JICA	Japan International Cooperation Agency
LGED	Local Government Engineering Department
LGI	Local Government Institutions
M&E	Monitoring and Evaluation
MOPME	Ministry of Primary and Mass Education
NGO	Non-Government Organization
OM F1	ADB's Operational Manual, Section F1
OP 4.10	Operational Policy 4.10 on Indigenous Peoples
OP 4.12	Operational Policy 4.12 on Involuntary Resettlement
PD	Project Director
PIU	Project Implementation Unit
PEDP I	First Primary Education Development Program
PEDP II	Second Primary Education Development Program
PEDP III	Third Primary Education Development Program
PEDP IV	Fourth Primary Education Development Program
RP	Resettlement Plan
SEC	Small Ethnic Communities
SECP	Small Ethnic Communities plan
SIDA	Swedish International Development Association
SMF	Social Management Framework
SPS	Safeguard Policy Statement 2009, ADB
SR2	ADB's Safeguard Requirements 2: Involuntary Resettlement
SR3	ADB's Safeguard Requirements 3: Indigenous Peoples
UEC	Upazila Education Committee
UEO	Upazila Education Officer
UNICEF	United Nations International Children's Education Fund
WB	World Bank

*Handwritten signature*  
 Mr. Anwar Hossain  
 Secretary, Ministry of Education  
 Government of Bangladesh

## Definition of Selected Terms

**Consultation Framework:** In view of their stakes and interests in the program, the framework is prepared to guide the program preparation team about who are to be discussed/ consulted about the overall program and its positive and negative social impact implications and to seek their inputs and feedback in the different stages of the project cycle.

**Small Ethnic Communities:** Small Ethnic Communities which are also identified as Indigenous Peoples in some document: Unless they are already recognized, the Small Ethnic Groups are identified in particular geographic areas based on these four characteristics: (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; (iii) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and (iv) an indigenous language, often different from the official language of the country or region.

**Participation/Consultation:** Defined as a continuous two-way communication process consisting of: "feed-forward" the information on the program's goals, objectives, scope and social impact implications to the program beneficiaries, and their "feed-back" on these issues (and more) to the policymakers and program designers. In addition to seeking feedback on program specific issues, participatory planning approach also serve the following objectives in all development programs: public relations, information dissemination and conflict resolution.

**Physical Cultural Property:** Includes monuments, structures, works of art, or sites of "outstanding universal value" from the historical, aesthetic, scientific, ethnological, or anthropological point of view, including unrecorded graveyards and burial sites, and unique natural environmental features like canyons, forests and waterfalls. Within this broader definition, cultural property is defined as sites and structures having archaeological, paleontological, historical, architectural, or religious significance, and natural sites with cultural values.

**Squatter:** Household or person occupying public lands without legal arrangements with the GoB or any of its concerned agencies is a squatter to the lands. Households/persons those displaced by riverbank erosion, cyclones or landlessness squat embankment /road slopes for residential, commercial and community purposes. In this project, many road squatters have their own land elsewhere for residing, but they built structure beside the road for mostly commercial purposes.

**Stakeholder:** Refers to recognizable persons, and formal and informal groups who have direct and indirect stakes in the program, such as affected persons/households, squatters, local communities, local governments, community-based and civil society organizations, education advocates.




## I. Project Background and Approach

1. The Fourth Primary Education Development Program (PEDP4) is the follow up of the Government of Bangladesh's (GoB) education program of PEDP3. Objective of PEDP4 is to provide quality education to all children of Bangladesh from pre-primary up to Grade 5 through an efficient, inclusive and equitable education system.<sup>1</sup> In terms of a result it means that all children complete a quality primary education and acquire a minimum standard of the primary curricular competencies.

2. The Program will be implemented over the course of five years from the financial year (FY) 2018/19 to FY 2022/23. The program is socially and geographically inclusive and caters for children irrespective of gender. It will cover all upazilas, districts and divisions of Bangladesh. It will provide educational opportunities to out-of-school children, children with special needs, populations in hard to reach areas, indigenous people, and ethnic minorities. The children will also learn knowledge on Disaster Risk Reduction (DRR) and Education in Emergencies (EiE). It is expected that through this sub-component of PEDP4 this large number of students will get formal knowledge of disaster risk reduction and disaster management. In the long run country will have skilled manpower in the disaster management in disaster prone areas. Response for Education in Emergencies will enhance disaster resilience and ensure preparedness in consistency with national emergency preparedness and response plans. Necessary measures will be ensured to minimize disaster risk and continue education during emergency. The Program is well aligned with the National Education Policy 2010 and the 7<sup>th</sup> Five Year Plan (2016-2020).

3. The Program will cover pre-primary to grades 5 annually supporting approximately 13.5 million children enrolled in the pre-primary and primary education system; 1 million out-of-school children; 325,000 pre-primary and primary school teachers; and primary education teacher educators, planners, managers and policy makers. The indirect beneficiaries include over 90 million family and community members in all areas of the country. The development partners (DPs)<sup>2</sup> has supported the education sector in Bangladesh for over three decades with the last phase as PEDP3. These development partners will continue supporting PEDP4 with objective of providing universal primary education for all children without any discrimination in Bangladesh. The proposed "Quality Learning for All (QLEAP)" through PEDP4 will be the continuation of this support. The Ministry of Primary and Mass Education (MoPME) is the executing agency (EA), and the Directorate of Primary Education (DPE) is the primary implementing agency (IA).

4. The scope of PEDP4 is the whole primary education sector plus one pre-primary year with a goal to provide quality education for all our children. The overall objective is to establish an efficient, inclusive and equitable primary education system delivering effective and relevant child-friendly learning to all Bangladesh's children from pre-primary through Grade V primary. Other objectives are to reduce overcrowded classrooms through need-based infrastructure development; providing sanitation and water supply to schools on a need basis and others to improve student learning outcomes and completion rate for both boys and girls through a gender -friendly and inclusive learning environment.

5. PEDP4 will support all the activities of PEDP3 including implementation of need based infrastructures in the premises of primary schools by adopting ADB's SPS 2009, 2&3 and OP 4.10 and 4.12 of WB in conjunction with GoB Land Acquisition Policy as social safeguard framework. Local Government Engineering Department (LGED) and Department of Public Health Engineering (DPHE) will be involved in constructing the need-based

<sup>1</sup>PEDP 4 Program Document Draft, July 16, p 1

<sup>2</sup>PEDP4 is to be led by the GoB, and supported by a consortium of DPs, including ADB, AusAID, CIDA, DFID, EC, JICA, Netherlands, SIDA, UNICEF and World Bank/IDA.

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infrastructures under PEDP4. It will cover activities during 2018-2023 in all over the country with special attention to physical challenged area like hill, haor and coastal areas.

## II. The Social Management Framework (SMF)

6. The Social Management Framework (SMF) is to resolve any anticipated social safeguard issues related to land use and impacts that may arise during implementation of the project. The purpose of this framework is to plan ahead the social development concerns that the project could address within its scope of works. This SMF is intended to provide general policies, guidelines, and procedures for integration of required mitigation measures of possible safeguard impacts into the selection, design and implementation of any sub-component of the project.

7. This SMF is designed to deal with anticipated social safeguard issues as well as those have been observed during the implementation so far of PEDP 3 and may arise during implementation of the PEDP4. The lessons learned from the earlier phases are taken into cognition to develop this framework in combination with the GoB policies, ADB and WB policy, along with the policies of other development partners. This SMF is being designed to further improve the country's primary education system and to provide quality education to all Bangladeshi children in every classroom including the areas populated by Small Ethnic Communities (SEC) and children of geographically challenged areas like hill, chars, haors and coastal areas.

8. Because of its activities in areas inhabited by SECs, especially the Chittagong Hill Tracts (CHT), PEDP 3 applied the ADB's SPS 3 and World Bank's Operational Policy on Indigenous Peoples (IP) (OP 4.10). These policies will also apply to PEDP 4 for the schools in these areas. On the other hand, PEDP 3 has not triggered ADB's SPS 2 or WB's OP 4.12 on Involuntary Resettlement (IR), as all repair works and additional classrooms have been constructed on existing school premises. PEDP 3 however did not require any land (acquired or contributed). It is expected that local communities will continue to actively participate in PEDP 4.

9. Accordingly, this Social Management Framework (SMF) is aimed at dealing with safeguard issues that may arise during PEDP4 implementation throughout the country, including the areas populated by SECs. The SMF proposes principles, policies, guidelines and procedure to identify and address impact issues concerning indigenous peoples. The SMF will apply to the PEDP4 and provide the bases to prepare and implement impact mitigation plans as and when schools' physical works are found to cause adverse impacts on indigenous peoples, as well as private landowners and public land users.

## III. SMF Objectives

10. The principles, policies, guidelines, and procedures proposed in this SMF are to help DPE to select, design and implement the subprojects to ensure that PEDP4:

10.1 Enhances social outcomes of the activities implemented under the individual subprojects;

10.2 Identifies and mitigates adverse impacts that the individual subprojects might cause on people, which also include protection against loss of livelihood activities; and

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10.3 Ensures compliance with the social safeguards policies of ADB, WB and other development partners on SECs.

#### IV. Program Components and Social Safeguard Issues

11. The program is comprised of the following four key areas:
- (a) *Universal Access* – would aim to improve access to quality schooling with a particular focus on the poorest and the disadvantaged;
  - (b) *Quality of Teaching and Student Learning* – would aim to improve the quality of teaching, the learning environment and student learning;
  - (c) *Institutional Strengthening* – would aim to improve the efficiency and effectiveness of education service delivery; and
  - (d) *Program Planning and Management* – which aims to improve education sector management and policy development, and strengthening monitoring and evaluation, including for student learning.
12. Each key area consists of several activities which would together address various development and management issues involved in the primary education subsector. Of the four key areas, Universal Access will address various issues that keep many school-age children out of the primary education system. It includes, among other activities, formulating and implementing an action plan to mainstream the disadvantaged children; revamping and implementing a stipends program for poor children; school health and nutrition program; and improving the school physical facilities. All of these are intended to facilitate universal access and sustenance of inclusive education of children who now remain excluded from the system for various socioeconomic reasons. Activities included in the other three components would support and help achieving this goal.
13. These key areas are to fulfill the general objective of the PEDP4. These are:
- 13.1 enroll all primary school-age children in the primary level educational institutions and complete primary cycle;
  - 13.2 reduce social disparities in terms of access to education, improved student learning & improved cycle completion;
  - 13.3 give special focus on the Out of school children( OOSC) and dropout cases particularly in the urban slums and the CHTs;
  - 13.4 acquire grade-wise and subject-wise expected learning outcomes or competencies in the classrooms;
  - 13.5 improve quality of teaching learning environment in the primary schools;
  - 13.6 ensure child friendly learning to all children for pre-primary through grade 5;
  - 13.7 improve the measurement of student learning;
  - 13.8 provide learning materials to all children of primary schools;
  - 13.9 impart proper training to teachers and staff (all levels including officials);
  - 13.10 make provision for need-based infrastructure development;
  - 13.11 increase effectiveness of budget allocation for primary education;
  - 13.12 decentralize more planning functions to the Upazila and school levels; and
  - 13.13 involve parents and community to give support to their children's education.

14. Physical facilities of the schools will be extended/renovated and created a new to allow for improved learning environment and enhanced capacity for student enrolment in general, as well as those needed to ensure mainstreaming of disadvantaged children into the system. Improved learning environment in general would require various physical improvements in many of the existing schools, including provision of separate toilets for boys and girls, special arrangement for physically disable students, arsenic free water supply and the like. Increased enrolment and accessibility would require expansion of current enrolment capacity of many existing schools and building new schools in areas where they are presently non-existent or not adequate in number and capacity to cater to the school-age children.

15. To facilitate inclusive education focusing on poor and working children, girls, tribal and religious minorities, disabled, children with special needs, there would also be a need – in addition to stipend, and school feeding and health and nutrition programs – to provide certain facilities to the existing and new schools in remote areas. Many schools in the cyclone affected coastal regions and flood affected in haor areas will be rebuilt with expanded classroom capacity and combined with cyclone shelters and flood shelter for use by the local communities. School physical works have however been prioritized in terms of needs.

16. The total program target for need based infrastructure and civil works under school environment of PEDP 4 as follows:

16.1 Construct additional classrooms in existing school facilities and premises of which significant percentage have already been tendered under PEDP 3;

16.2 Installation of water-points (comprising tube-wells and other alternative sources for safe drinking water such as rain water harvesting, dug well etc.)

16.3 Construction of toilets for men and women (no more stand-alone toilets will be constructed, instead wash blocks comprising three toilets compartments, including one for disabled people, with hand wash facilities will be constructed).

16.4 Major maintenance works will support refurbishment of existing schools, as required.

16.5 The program will support the extension or renovation of DPE office in different geographical location of the country. Some small-scale construction such as extension of Primary Teachers Training Institute in various locations and storerooms all within existing premises will be undertaken. No land acquisition or displacement will take place for these purposes.

16.6 DPE expects that all physical works, including those for additional classrooms, will all be carried out within the existing compound, that is, on lands owned by the schools. Where structural designs permit enrolment capacity might as well be expanded by adding additional classrooms on top of the existing buildings, instead of building them on the ground. As of now it is assumed that land-related issues and impacts for the individual schools are not expected to be significant. So far, the project did not require any land acquisition, displacement of people, or related adverse impacts on income and livelihoods as all civil works had been constructed within existing school premises.



## V. Guidelines for Social Safeguards Screening

17. In keeping with the SMF objectives to enhance their social or intended outcomes, DPE will adhere to the following guidelines for expansion of existing and construction of new schools.

17.1 For schools that will require additional lands for expansion and construction of new building, DPE will undertake community/stakeholder consultations prior to their inclusion in the works program for mobilizing community support to get the land on donation.

17.2 To the extent feasible, DPE will try to -

- (i) carry out the extension/renovation works in the lands already owned by schools;
- (ii) use their own or other public lands for building new schools;
- (iii) avoid subprojects that will require private land acquisition.

17.3 DPE will not undertake physical works of school that have attributes as those described in the following list.

*That will affect SECs with long-term negative consequences in the following manner:*

- a. Threaten cultural tradition and way of life
- b. May severely restrict access to common property resources and livelihood activities
- c. May affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds etc.).

### Screening & Mitigation Guidelines

18. The screening exercise will basically examine whether the physical works proposed for the individual schools are in accord with the above school selection guidelines and identify any safeguard issues and what are needed to address them. Screening will also inform DPE about the ownership of the lands required for the civil works and how they might possibly be obtained, and what might transpire in terms of safeguard impact mitigation. In view of the screening results, DPE's action on a school will be consistent with the following sets of guidelines.

**18.1 Framework for SEC Plan.** Consistent with SPS (S3) of ADB and OP 4.10 of WB, it provides principles and guidelines to identify and deal with adverse impacts on SECs, and a consultation framework for adoption of mitigation and development measures, in project areas where SECs are present (Section B); and

**18.2 Guidelines for Land Use & Impact Mitigation.** Consistent with the Bangladesh Land Acquisition, 2017, SPS (S2) of ADB and OP 4.12 of WB, it provides principles, policies and guidelines for use of public and private lands and adverse impact mitigation; impact mitigation measures and standards; mitigation plan requirements and preparation process; and implementation and monitoring arrangements for mitigation plans.

## VI. Community/Stakeholder Consultations Strategy

19. Community and stakeholder consultations in this section are primarily aimed at community provision of land for expansion of existing and construction of new schools. The main objective is to explore how lands for schools could be obtained without going for time consuming, cumbersome acquisition under the 1982 ordinance.

20. Tasks in this respect may vary from one school/location to another depending on information DPE or Upazila Education Officer (UEO) may already have about the required improvements, need for new schools and, most of all, land availability. Where no such information is available with DPE/UEO, civil works for existing and new schools, including locations, will also be decided through consultations with the beneficiary communities and other stakeholders like local governments [Union Parishads, Pourasabhas (Municipal Committee), and Upazila Parishads]; civil society organizations like NGOs and community based organizations (CBOs); and others who may have been engaged in education advocacy.

21. These consultation meetings will be open and ensure free expression of interests and concerns by all participants. While discussing the project objectives and gathering community inputs/feedbacks, consultations will have a strategic focus on land availability status for the improvements required for existing and construction of new schools. The consultation topics will generally include the program objectives relating to primary education; needs for improving / expanding existing and building new schools; land requirements and availability; community inputs/feedback on program objectives and land needs; community's rights and responsibilities in this regard, and those of the DPE, UEO, DPs and other agencies participating in program design and implementation.

22. An important part of the consultation meetings would be joint verification with the communities and other stakeholders of land availability on the ground, and identification of an option as to how the required lands could be obtained and the social issues, if any, could be addressed. For existing and new schools, the joint committee comprising DPEO/UEO and the participants will address the land availability issues as specified below.

### Lands for Existing Schools

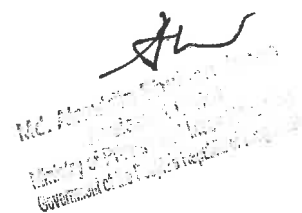
22.1. DPE/LGED will verify whether or not the existing school premise has enough land to accommodate the additional classrooms, separate toilets for boys and girls and carry out any other land-based improvements.

22.2. Where lands available within the school premise are not adequate, the verifiers will identify owners of the lands adjacent to the schools, particularly of which that would be most suited for the required civil works. In consulting the concerned landowners, they will explore whether the landowners would be willing to donate the required land area on voluntary basis.

### Lands for New Schools

23. Wherever available, DPE's priority will be to build new schools, with and without cyclone shelters/flood shelters or dormitories, on khas and other available public lands. All other options will also be explored and will include the following tasks.

23.1 With the help of local community and UP/Municipality, DPE will search for khas and other unused public lands in the area where a new school is to be built. Wherever feasible, alternative locations – within reasonable distance – will also be considered to take advantage of using public lands.

MC. Ananta Kumar  
 District Education Officer  
 Government of Bangladesh

23.2 In cases where private lands must be used, DPE will choose the school locations (i) to avoid lands that belong to small and marginal landowners; and (ii) where lands could be obtained through voluntary donation.

24. Where a decision is reached as to how lands could be obtained, DPE will also examine whether the civil works would involve any social safeguard issues.

25. Identification of appropriate sites and resolution of land issues may require multiple rounds of consultation and persuasion of potential donors and following up on making lands available for civil works. As noted earlier, a school will be included in the civil works program only after the land availability issues are resolved. As such another crucial factor is consultation timing, which will largely depend upon the knowledge and information the DPEO/UEO may have on particular schools at any stage of the program preparation and implementation.

## VII. Institutional & Implementation Arrangements

26. DPE will ensure that the SMF is implemented in its entirety or to the extent applicable. As described above, there are several major tasks that are to be performed by DPE and/or other entities which will assist them to prepare and implement the civil works programs. Following identification of the schools for expansion and location of new schools, the major tasks are:

26.1 *Community and stakeholder consultations*, which will provide information on land availability and SEC9 issues.

26.2 *Organizing the consultation meetings* informing the communities and other stakeholders and organizations. Tasks consist of:

- a) Identification of potential land donors and following up with them
- b) Search and identification of suitable public lands for new schools.

26.3 *Social safeguard screening*: Upazila Education Officer (UEO) will screen the chosen subprojects, in association with key community members including the land donors.

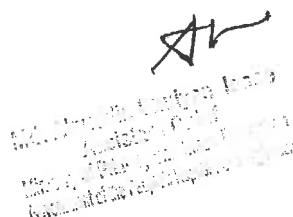
26.4 LGED and DPHE will ensure that land required for infrastructure development of the project is registered to the school.

27. At the local level, Upazila Education Officer (UEO), who is the Member Secretary of the Upazila Education Committees, will perform all process tasks specified in the SMF. A joint screening will be carried out by LGED/DPHE, SMC and UEO.

28. LGED and DPHE will appoint environmental and social safeguards consultants who will ensure safeguards screening and assist DPE in approving the plans, which DPE will be responsible to implement. The ADB and WB will check the plans on a sample basis yearly; field visits will also be carried out to validate the plans. Regarding monitoring, UEOs will gather and directly provide DPE the up-to-date monthly information on all activities related to lands and those related to civil works for individual schools.

29. A consolidated Bi-Annual Social Monitoring Report (SMR) prepared by LGED/DPHE will be submitted by DPE to the DPs.

30. DPE will supervise and monitor SMF implementation. Jointly with DPE, the DPs will evaluate the year's progress during the Joint Annual Review Mission. DPE will set up

computerized databases that will include district-wise information on planned civil works, community consultations, as well as other vital information needed to implement the SMF.

31. DPE will hand over the land for construction to the civil works Implementing Agencies (IAs) such as LGED and/or DPHE after compliance of all safeguard requirements.

32. The program will have particular institutional arrangement with specific budgetary allocation and human resources for the implementation of the sub-component for the SECs and people from char, haor, baor, and tea garden areas and coastal areas. Such arrangement may consider involving their representative government institutions which, in the case of Chittagong Hill Tracts, can be the Hill District Councils (HDCs), the CHT Regional Council (CHTRC) and the Ministry of CHT Affairs (MoCHTA), besides specific personnel in the Program Management and Implementation Office. In addition, this should also include adequate capacity building support for the relevant institutions.

### VIII. Grievance Redress

33. The Upazila Education Committee will be accountable to answer queries related to PEDP 4 and schools undertaken for improvements and new construction; address complaints and grievances about any irregularities in application of the SMF guidelines for impact assessment and mitigation; and other personal/community concerns. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly saving the complainants resorting to expensive, time-consuming legal actions.

34. If the aggrieved person/complainant is a woman, the UEC will ask a female UP /Municipality Member to participate in the hearing.

35. During community/stakeholder consultations in Chittagong Hill Tracts and other areas that are significantly inhabited by SECs, DPE will identify any existing traditional conflict resolution mechanisms. If they exist and SECs intend, the UECs will include two persons from such 'traditional conflict resolution bodies' to replace the two headmasters of the high school and primary school.

36. If resolution attempts at the upazila level fail, the UEC will refer the complaints to DPEO along with the minutes of the hearings. If a decision made at this level is found unacceptable by the aggrieved person, DPEO can refer the case to DPE with the minutes of the hearings at both upazila and district levels. A decision hearing on complaints will remain open to the public. The UECs will record the details of the complaints and the reasons that led to acceptance or rejection of the particular cases and keep records of all resolved and unresolved complaints and grievances and make them available for review as and when asked for by DPE, development partners and any entities interested in the program.

### IX. Safeguards Screening and Mitigation Guidelines

37. DPE/LGED/DPHE will screen each work package or sub-component to identify potential safeguards compliance issues and social impacts associated with the construction or renovation of the infrastructures in plain land as well as in the area with SMC population.

### X. Organizational Arrangements and Coordination focal point

38. DPE will set up an internal monitoring system including a designated coordination focal person. This is to ensure safeguards screening and report on regular basis involving

*[Signature]*

*[Signature]*  
 Director, Chittagong Hill Tracts  
 Ministry of Education, Government of Bangladesh

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the LGED and DPHE. The coordination focal person in DPE planning division will primarily be responsible for coordination with implementing agencies for biannual reports. PCU will ensure monitoring of these issues to be implemented by LGED and DPHE. In addition to that, the Inclusive Education Cell will generate the Inclusion Report with segregated data on SEC communities and submit to DPE Planning Division.

39. The following steps will be followed for the monitoring and reporting (Figure-1).

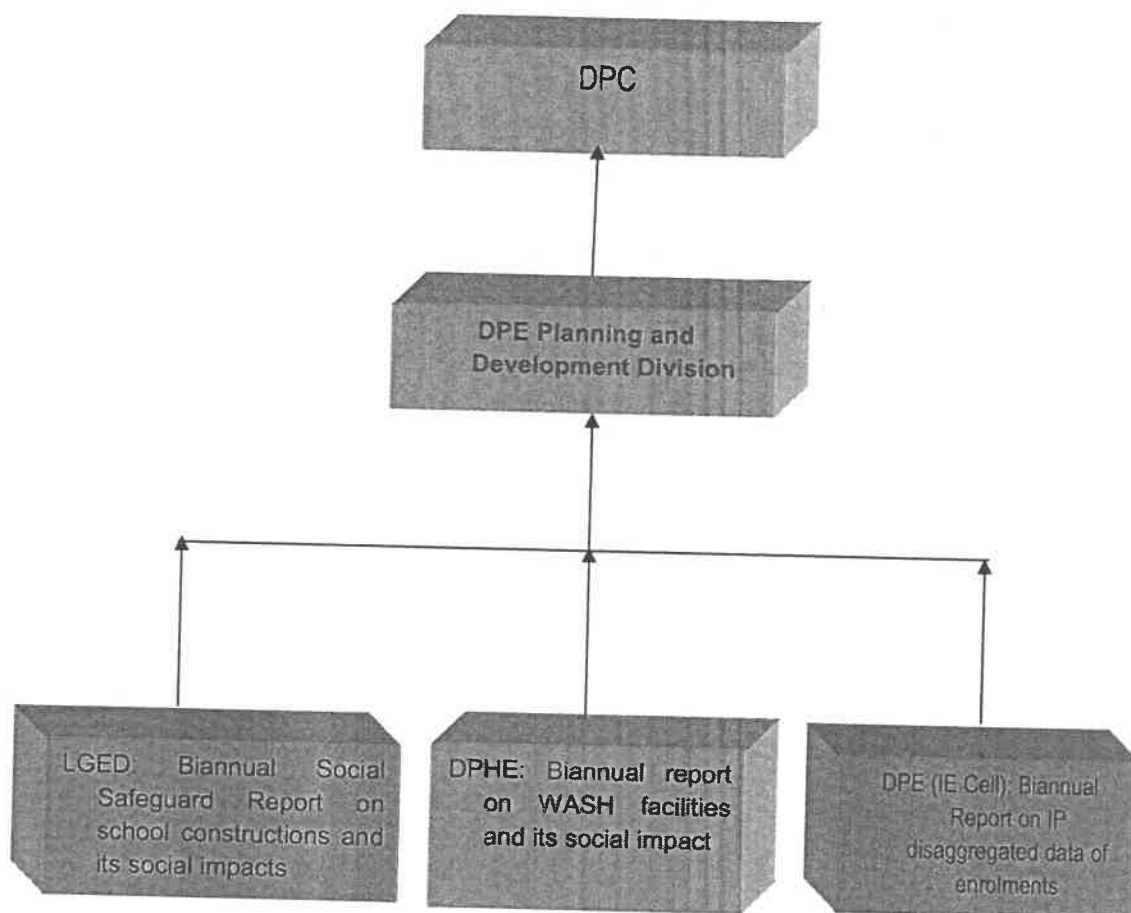


Figure-1: Steps for Monitoring and Reporting of Social Safeguards

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## XI. Approval and Disclosure

40. This SMF is a harmonized document prepared by DPE in keeping with the relevant policies of GOB, WB, ADB and other DPs involved with the program.

41. DPE will disseminate information on progress and monitoring of safeguard issues in its web portal. Cost of the additional measures (database administration and web administration) will be allocated by the program.

DPE will disclose a Bangla translation of the SMF to the public in Bangladesh by notifying in two newspapers, one in Bangla and other in English, and make it available in its website as well as in its district and upazila offices.



Md. Akbarul Haque  
Assistant Chief  
Ministry of Planning and Economic Affairs  
Government of the People's Republic of Bangladesh

# Program Safeguard Action Plan

Fourth Primary Education Development Program (PEDP4)

Directorate of Primary Education

January 2019

*Handwritten signature*

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Mr. Jonathan Eshiyen Jones  
Director of Chief  
Ministry of Primary and Mass Education  
Government of the People's Republic of Bangladesh

## A. Introduction

1. This document presents the social safeguard action to be undertaken to mitigate the social issues would arise during implementation of PEDP4. The Ministry of Primary and Mass Education (MoPME) is the executing agency (EA), and the Directorate of Primary Education (DPE) is the primary implementing agency (IA).
2. The potential social safeguard issues have been identified through examining the previous experience, PEDP3 program's social management mechanism for consistence with safeguard policy principles (IR and IP/SEC) of ADB (harmonized with WB) and GoB and its implementation practices and capacity. Suggestions are made on safeguard actions where gaps and weaknesses are found (if any). The assessment has been made based on (i) a comprehensive desk review of relevant documents of PEDP3; (ii) field visit to sample schools; (iii) consultation with stakeholders in the field (iv) feedback from the stakeholders consultation workshop in Dhaka and (iv) learning lessons from the implementation of PEDP3 with regard to involuntary resettlement (IR) and indigenous people (IP) or Small Ethnic Communities (SEC) of Bangladesh. This study also assessed good practices in the education sector that are consistent with the social safeguard principles and analyzed strengths and gaps in the institutional mechanisms of the executing and implementing agencies and technical capacity for managing safeguard compliance.
3. Based on the assessment, the program may trigger involuntary resettlement and indigenous peoples (IPs)/ Small Ethnic Communities (SEC) safeguard requirements according to principles of ADB Safeguard Policy Statement (SPS) (2009). However, the program is likely to have limited social impacts and risks by virtue of all the civil works within existing school premises. The program outputs are expected to lead to positive impacts on the IPs/SECs.

## B. Program and Social Impacts and Risks

4. **Involuntary Resettlement:** Involuntary Resettlement (IR) safeguards did not trigger for PEDP3, as all new civil works had been undertaken within the school premises, so far, and did not cause any displacement or adverse impact on livelihoods. It is envisaged that there will be no involuntary resettlement under the program (PEDP4) since infrastructure construction (civil works) will be of small-scale and within school premises. In a few exceptional cases, additional land may be required to extend school facilities beyond existing premises. In such cases, first priority will be given to use available government land, and in case of unavailability of government land, a negotiated settlement (voluntary donation of land) will be adopted to manage the required land. The MoPME/DPE has confirmed that any school requiring involuntary land acquisition will be excluded from the program scope. As land management is confined to negotiated settlement, negotiated land acquisition must be aided by SPS (2009) guidance.
5. **Small Ethnic Communities /Indigenous People:** In compliance with the safeguard policy of ADB, WB and other DPs, PEDP3 has been giving special attention to schools of those area SEC/IP people are largely prevalent, SEC/IP students are studying in large percentage. DPE through DEO/UEO has carried out awareness rising and regular consultation with SEC/IP and other local people and designed proposed infrastructures in a participatory manner. The program may trigger Indigenous peoples (IPs/SECs) safeguard requirements according to ADB's SPS (2009). However, the program is likely to have limited social impacts and risks by virtue of the limited construction of infrastructures within existing school premises. The project category is B for SEC/IP as positive impacts are expected on the SEC or IPs due to affirmative actions of the program. In addition to the infrastructures other incentive schemes are there such as scholarships, free textbooks, and residential facilities in remote locations to increase the participation of students from IP communities and other disadvantaged communities. Special arrangement is taken to appoint teachers from SEC/IP group in these areas. Separate IP/SEC



plan is not prepared as the program is embedded with measures to ensure SEC/IP participation through bottom up planning. However, framework for IP/SECplan as part of SMF prepared for PEDP3 will be followed for PEDP4 and will be agreed with the government and joint financing partners to ensure that there is no adverse impact of the program activities at school level for SECs/IPs during implementation.

### C. Safeguard Policy Principles Triggered

6. Upon review of Acquisition and Requisition of Immovable Property Ordinance 2017 (ARIPO) and other relevant documents of the Government of Bangladesh and ADB's SPS (2009), and in light of activities and potential impacts that may be associated with proposed support to PEDP4. The study finds the following safeguards principles (Table-1) to be triggered.

**Table-1: Social Safeguard Policy Principles**

Principles <sup>1</sup>	Description
<b>Involuntary Resettlement</b>	
<b>Principle 1.</b> Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/ or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks.	No IR impact is envisaged from program activities as the construction of infrastructures will be limited within the existing school premises. The criteria to approve funding for construction of infrastructure include the confirmation that land within school premises is sufficient or land availability by negotiated settlement is possible. In case of IR, the construction of infrastructure will not be approved. The framework will be updated to incorporate guidelines and agreement forms.
<b>Principle 2.</b> Carry out meaningful consultations with affected persons (if any), host communities, and concerned nongovernment organizations.	School management committees (SMCs), in coordination with district /upazila education officers (DPEOs/UEOs), carry out meaningful consultation with stakeholders including teachers for construction of infrastructures. SMC has representation of parents of school children and beneficiaries of program activities.
<b>Principle 3.</b> Improve, or at least restore, the livelihoods of all displaced persons with needed assistance	There will be no displacement and IR impact
<b>Principle 4.</b> Provide physically and economically displaced persons with needed assistance.	There will be no physical or economic displacement.
<b>Principle 5.</b> Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards. In rural areas provide them with legal and affordable access to land and resources, and in urban areas provide them with appropriate income sources and legal and affordable access to adequate housing.	No IR impact
<b>Principle 6.</b> Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who enter into negotiated settlements will maintain the same or better income and livelihood status.	The impact of program activities is not likely to affect the income and livelihood status of the people entering into negotiated settlement.
<b>Principle 7.</b> Ensure that displaced persons without title to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets.	There will be no displacement and no IR.
<b>Principle 8.</b> Prepare a resettlement plan elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule.	There will be no IR and thus no resettlement plan is required.
<b>Principle 9.</b> Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner, before project appraisal, in an accessible place and a form and language(s) understandable to affected	There will be no IR and thus no resettlement plan is required.

<sup>1</sup> ADB. 2009. Safeguard Policy Statement. Manila

persons and other stakeholders.	
<b>Principle 10.</b> Conceive and execute involuntary resettlement as part of development project or program. Include the full costs of resettlement in the presentation of project's costs and benefits.	No IR envisaged
<b>Principle 11.</b> Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout project implementation.	No IR envisaged
<b>Principle 12.</b> Monitor and assess resettlement outcomes, their impacts on the standards of living of displaced persons, and whether the objectives of the resettlement plan have been achieved by taking into account the baseline conditions and the result of resettlement monitoring.	No IR envisaged
<b>Indigenous Peoples (IPs)/Small Ethnic Communities (SECs)</b>	
<b>Principle 1.</b> Screen early on to determine: (i) whether IPs/SMCs are present in, or have collective attachment to, the project area; and, (ii) whether project impacts on IPs/SECs are likely.	The SMC and DPEO/UEO screen presence of IPs/SECs and propose appropriate actions and appropriate assistance to encourage them for school enrollment and participation. A SMF has been prepared including a framework for Small Ethnic Community Plan (SECP) to guide the screening and planning process. The SMF will be further discussed for any improvement in consultation with other development partners, particularly the WB.
<b>Principle 2.</b> Undertake a culturally appropriate and gender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on IPs/SECs. Give full consideration to options the affected IPs prefer in relation to the provision of project benefits and the design of mitigation measures.	The program envisaged affirmative action for IPs/SECs. DPEOs/UEOs and SMCs will include measures and activities for social inclusion such as scholarship program targeting to IPs/SECs communities. In addition, reservations in staff and teacher appointment are in practice.
<b>Principle 3.</b> Undertake meaningful consultation with affected IP/SEC communities and concerned IP/SEC organizations to solicit their participation	The social inclusion policies of GoB incorporate consultation with IP/SEC community. The consultations are carried out in the language appropriate to IP/SEC communities using social mobilizers or resource persons.  Consultations have been carried out through NGOs and IPs/SECs organizations and local public /community representatives while designing the program and the consultative process will continue during implementation of PEDP4 to ensure that PEDP4 strengthen accessibility to IP/SEC communities in a culturally appropriate manner.
<b>Principle 4.</b> Ascertain the consent of affected IPs/SECs communities to the following project activities: (i) commercial development of the cultural resources and knowledge of IPs/SECs; (ii) physical displacement from traditional or customary lands; and (iii) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, spiritual uses that define the identity and community.	The principle is not applicable to the program.
<b>Principle 5.</b> Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected IPs/SECs communities participate in the design, implementation, and monitoring and evaluation of management arrangements for such areas and natural resources and their benefits are equitably shared	The program will exclude any such activities.
<b>Principle 6.</b> Prepare an IPP that is based on the social impact assessment with the assistance of qualified and experienced experts and that draw on indigenous knowledge and participation by the affected IP/SEC communities	No negative impact on IP/SEC communities is expected. The program will lead to positive impact on IP/SEC through appropriate actions to ensure the benefits are equitably shared by IP/SEC communities. A separate IPP is not needed as action for IP/SEC communities are already integrated into the program scope. Instead a framework for IP/SECP as part of SMF for the program has been prepared to act as a guide.

<b>Principle 7.</b> Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timely manner	The framework for SECP, part of program SMF will be jointly discussed with the government and the joint financing partners and will be disclosed in the DOE/MoPME/DPE website.
<b>Principle 8.</b> Prepare an action plan for legal recognition of customary rights to lands and territories or ancestral domains when the project involves (i) activities that are contingent on establishing legally recognized rights to lands and territories that IPs/SECs have traditionally owned or customarily used or occupied, or (ii) involuntary acquisition of such lands.	The principle is not applicable to the program.
<b>Principle 9.</b> Monitor implementation of the IPP using qualified and experienced experts; adopt a participatory monitoring approach, wherever feasible; and assess whether the IPP's objectives and desired outcome have been achieved.	There is no separate IP plan but a framework for SECP as part of SMF has been prepared. However, the program will include reporting on the benefits accrued to vulnerable and disadvantaged communities, including IP/SEC. Progress in IP/SEC activities will be reviewed in the joint review mission by development partners and GoB.

ADB= Asian Development Bank, DPEO = District Primary Education Officer, DPE= Directorate of Primary Education, GoB= Government of Bangladesh, IP= Indigenous People, IPP= Indigenous peoples Plan, IR= Involuntary Resettlement, MoPME= Ministry of Primary and Mass Education, NGO= Non-Government Organization, SEC= Small Ethnic Community, SECP= Small Ethnic Community Plan, SMC= School Management Committee, SMF = Social Management Framework, UEO= Upazila Education Officer, WB= World Bank.

#### D. Other Social Issues

7. **Mainstreaming Gender and Inclusive Education:** Gender and Inclusive Education Action Plan for PEDP4 assured mainstreaming gender through inclusive education and adding other parameters in this sector. These include developing gender sensitive curricular in primary level and make is available for all, appointment of quality teacher with special quota for females, enhancement of their quality irrespective of sex and facilitate all the teachers with equal treatment. Finally develop gender friendly infrastructure.

8. **Inclusive education emphasizes the "all" in "Education for All."** This sub-component addresses the particular needs in formal schools of SEC/IP children, children with learning disabilities, and disabled children. The intention is to create an inclusive culture based on the principle that all learners have a right to education irrespective of their individual characteristics or differences. Under PEDP-4, the interventions initiated under PEDP-3 will be continued: an integrated strategy has been prepared and will be implemented. Block funds will now be provided through UPEPs to assist school's mainstream inclusive education with mild to moderately disabled children. Issues of inclusion will be integrated into all training activities. School level focal persons trained under the earlier stage of the program will be supported, and all children will be screened for learning difficulties (as well as health problems) on entry to school and every year. Thereafter, the SLIPs can be used to improve the quality of teaching and learning and to ensure the participation of all children. This sub-component includes study and block grants to UPEP.

9. **Communications and Social Mobilization:** Communication and social mobilization efforts can play an important role in the effort to improve the quality and inclusiveness of education and to ensure that no child is left behind. Communication interventions will be identified to promote and ensure the rights of all children to education, to create demand by the communities for access and quality education, promote enrolment and retention in pre-primary and primary education, child friendly teaching, inclusiveness and no corporal punishment in classrooms, mobilizing local, sub-national and national support for schools and reinforcing the value of education through positive social norms. A communication strategy has been carefully developed during PEDP-3, based on lessons learned from the implementation of PEDP-1 and PEDP-2. This sub-component includes study; workshop & seminar development of materials, printing and broadcasting; national events including Bangabandhu and Rangamati gold-cup

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football tournament, inter school sports, inter PTI cultural competition, etc.

10. The earlier phases of PEDP (phase 1 to 3) included communication and social mobilization (also known as *Social and Behaviour Change Communication – SBCC* or *Communication for Development – C4D*) components of which one such effective initiative was the 'Meena' animation series in promoting girls' right to education that led the wider participation of primary school age girls and helped program to achieve gender parity. Correspondingly and through the years, successive phases of PEDP implemented communication components at the national and sub-national level. In this regard, PEDP3 integrated a comprehensive Communication Strategy in 2014 to address the demand for educational services by motivating parents to invest in the complete education of their children. The sub-component is designed to complement and enable achieve PEDP-3 goals.

11. To enhance the earlier achievement; address challenges and gaps; and strengthen the planning, operationalization and monitoring of communication and social mobilization strategies to promote the goals of the education sector, SBCC/C4D will be embedded in PEDP4 to ensure the provision of '*quality education for all our children*' and to comply with the achievement of the SDG 4 goal; i.e. '*Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all*'. In PEDP4, there will be a particular emphasis on strengthening the system to operationalize and deliver on the communication and social mobilization/SBCC/C4D operational plan and interventions especially at the sub-national level.

12. ***Back to Education: An Intervention for Out of School Children (OOSC)***: In the later stage of PEDP3 this program is been initiated and encompassed in PEDP4 with an objective of enrolling all the children in the school, including who are left behind are in school on time and continuing their education in an equitable and inclusive setting that provide relevant and quality education. It is expected that by 2022, the number of out of school children (8-14 years) in Bangladesh will be reduced by 50% from the baseline value. As a result, one million OOSC will return to/enroll in formal school/education, complete the primary cycle and achieve minimum learning outcomes according to the national curriculum and assessment system. The target children are those who are in early aged but never enrolled, dropped out from lower grade and higher aged dropped out from higher grade.

13. ***Children with Special Education Needs (SEN)***: This sub-result area aims to identify children with special education needs and enable them to have primary education in mainstream primary schools PEDP4. In order to create a more conducive and supportive school environment for children with SEN in mainstream schools, the program will design modules to be integrated into the DPED curricula and in-service training program and build the capacities of instructors to deliver these modules. The focus will be on children with mild to moderate disabilities. The modalities will cover, among other things, the early identification of special needs, specialized pedagogical techniques, creating an inclusive environment at school and in the classroom, and liaison with parents and specialized services. The program will also strengthen linkages between schools and specialized services for SEN.

14. ***Education in Emergencies and Disaster Risk Reduction in Education (EiE and DRR)***: At the later stage of PEDP3 the sub-component Education in Emergencies (EiE) was designed to respond to the needs of children in the disaster affected schools. However, now new focus is given on Disaster Risk Reduction (DRR) and Education in Emergencies (EiE). Emergency education response will enhance disaster resilience and ensure preparedness in consistency with national emergency preparedness and response plans. Necessary measures will be ensured to minimize disaster risk and continue education during emergency. It is expected that through this sub-component of PEDP4 this large number of students will get formal knowledge of disaster risk reduction and disaster management. In the long run country will have skilled manpower in the disaster management in disaster prone country.

## E. Social Safeguard Program Actions

15. Given the assessment, and considering the scope and low scale of impacts, there is scope for strengthening compliance, reporting and capacity development. To that end, eight program actions are proposed to address identified gaps and weaknesses (Table 2). The Government of Bangladesh and MoPME have agreed to implement these actions. Social Safeguard compliance will be tracked jointly with other development partners in joint review missions annually.

**Table 2: Social Safeguards Program Actions**

SI No	Gap	Proposed Action	Indicator/Targets	Responsibility	Timeframe
1	Lack of clarity among implementing agency staff on application of criteria, rules, procedures and exclusions.	Refine SMF of the program and integrate guidelines for screening, assessment, record keeping, consultations and disclosure.	Revised SMF circulated to DPEO and SMC and disclosed in DPE websites.  Annual progress report includes progress and status of safeguard implementation.	DPE	June 2019 and progress reporting during review mission and onwards.
2	Inadequate institutional arrangements and undefined role for social safeguard.	Designate one Social Safeguard Focal Person at DPE.	Social Safeguard Focal Person designated at DPE.	DPE	Before effectiveness of the program.
3	Inadequate information dissemination and disclosure.	Upload social safeguard related activities in DPE websites.  DPE will disclose a Bangla translation of the SMF to the public in Bangladesh by notifying in two newspapers, one in Bangla and other in English, and make it available in its website as well as in its district and upazila offices.	Record in web site.	DPE	Continuous during implementation.
4	Allocation of resources for children with special needs and training of primary school teachers at NAAND is not clear	MoPME/DPE should work with the NAAND of MoE and make best use of the mobile training team of NAAND to train primary school teachers in situ through coordination with MoE/DSHE	Children with special needs will be part of universal education for all	MoPME	Continuous during implementation
5	Less attention on social safeguards related concern by implementing agencies	UEC will be accountable at upazila level to address safeguard related concerns and issues	Functional GRM at all level and less number of issues and grievances registered.	UEO, DPEO, SMC	UEC operationalized by effectiveness of the program

ADB= Asian Development Bank, CHT= Chittagong Hill Tracts, DPEO = District Primary Education Officer, DPE= Directorate of Primary Education, DRR= Disaster Risk Reduction, GoB= Government of Bangladesh, GRM= Grievance Redress Mechanism; IP= Indigenous People, IR= Involuntary Resettlement, MoCHTA= Ministry of Chittagong Hill Tracts Affairs, MoE= Ministry of Education, DSHE= Directorate of Secondary and Higher Education, MoHA= Ministry of Home Affairs, MoPA= Ministry of Public Administration, MoPME= Ministry of Primary and Mass Education, NAAND= National Academy for Autism and Neuro-developmental Disabilities, OOSC= Out Of School Children, SEC= Small Ethnic Community, SMC= School Management Committee, SMF = Social Management Framework, UEC= Upazila Education Committee, UEO= Upazila Education Officer, WB= World Bank.

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