



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 11/24/2020 | Report No: ESRSA01146



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Bangladesh	SOUTH ASIA	P167506	
Project Name	Accelerating and Strengthening Skills for Economic Transformation		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	11/26/2020	3/15/2021
Borrower(s)	Implementing Agency(ies)		
People's Republic of Bangladesh	Technical and Madrasha Education Division of Ministry of Education		

Proposed Development Objective

The Project Development Objective is to equip Bangladeshi youth and workers, including women and the disadvantaged, with skills demanded for the future of work and improved employment prospects.

Financing (in USD Million)	Amount
Total Project Cost	500.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The Accelerating and Strengthening Skills for Economic Transformation (ASSET) project will promote job market relevant high-quality skills development for priority sectors for youth and workers including women and the disadvantaged towards greater employability and economic recovery/growth. It will work with long-term and short-term training institutions, private industry partners, and public skills agencies to strengthen the capacity of the skills development eco-system for job market relevance and inclusiveness. It also supports expanding equitable access to skills development opportunities for vulnerable populations especially marginalized women, informal workers, and people with disabilities, and enhances skills recognition of informal workers.



D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The ASSET project will be implemented across Bangladesh. However, the exact locations will be determined only during the implementation. The key interventions consist of supporting young people with job market-oriented skills which would allow them to contribute in economic activities more effectively. As such, in overall terms, the project's impacts will far exceed any anticipated negative impacts, vastly contributing to Bangladesh's goal of building a skilled young labor force that is competent for meeting the challenges of its expanding economy. The project will adopt measures that promote inclusion, specifically targeting women/girls, indigenous/tribal people and other disadvantaged and vulnerable communities so that these particular groups equally benefit from the project's interventions.

The main E&S impacts of the project as anticipated are; (i) poor labor and working environment; (ii) occupational health and safety of project workers including induced risks regarding workplace and community health and safety both due to general construction related occupational health and safety (OHS) issues and Covid-19 specific risks; (iii) noise, vibration, and dust pollution including waste generation and management during construction works; (iv) displacement of squatters living within the premises, (v) induced risk of gender-based violence from labor employed in the civil works sites and exposure by the female students, teachers and staffs to risks of sexual exploitation and abuse (SEA), and sexual harassment (SH) in skill development institutions/establishments under the project; (vi) hiring of child labor for civil works; (vii) adverse impacts on the squatters and/or encroachers living on some of the construction sites; (viii) ensuring culturally appropriate benefits to the indigenous and other disadvantaged communities from the project's various initiatives for skill development and other interventions following the Bank's directive on Disadvantaged or Vulnerable Individuals or Groups.

The project does not anticipate any land acquisition and all civil constructions will take place on land already owned by the implementing agencies. Some squatters or small-scale informal businesses may be found in some of the sites, but no large-scale, significant and/or irreversible impact is expected. The proposed civil constructions will be essentially small-scale, and will include establishment of special training and skills centers, refurbishment of existing training centers, establishment of a Model Skills Institution which would involve site development, and infrastructure related work updating of laboratories and workshops of public Technical Training Centers (TTCs), female dormitories and/or sanitation facilities at the polytechnics. The anticipated E&S impacts of the constructions will be low to moderate including on labor influx and occupational health and safety.

A key priority focus of the project is the inclusion of young people from the vulnerable and marginalized communities including the indigenous peoples. This will require sustained attention by the PIU/client and to develop specific criteria to ensure their inclusion so that these groups get equal benefits from the project. The project's SEVCDF and Gender Action Plan elaborate the provisions for inclusion and in addition, stipulate capacity building to support institutions adopt more inclusive trainee selection processes for the innovative skills training, entrepreneurship, employment support programs and as well as productivity enhancement training for micro-enterprise owners/workers, such as business management skills, decent and safe work environment, gender-based violence, linkage with MFIs, master craftsman training, etc. Component 1 has 30% women beneficiaries targeted. The project is also anticipated to manage substantial risk of gender-based violence, due from labor employed in the civil works sites



and also exposure by the female students, teachers and staffs to risks of SEA/SH in skill development institutions/establishments under the project.

D. 2. Borrower's Institutional Capacity

The project adopts a multi-sectoral program approach with an integrated implementation mechanism by setting up a single Program Implementation Unit (PIU) with officials from the participating ministries on deputation under the lead implementing agency (LIA), Department of Technical Education (DTE) under Technical and Madrasah Education Division (TMED) of Ministry of Education (MoE). Other ministries involved in the implementation of the project include: (1) Bureau of Manpower, Employment and Training (BMET) of Ministry of Expatriate Welfare and Oversea Employment (MoEWOE), (2) Directorate General of Medical Education (DGME) of Medical Education and Family Welfare Division (MEFWD), Ministry of Health and Family Welfare (MoHFW), and (3) Ministry of Industry (Mol).

DTE has significant experience of implementing bank-funded projects albeit under the old OP/BPs including the STEP project most recently, and as well as with other multi-lateral agencies such as ADB. Similarly, both BMET and MEFWD were also partner implementation agencies of the Bank-funded STEP project under the old OP/BPs. ASSET will be first Bank-funded project both for Mol.

The PIU under the lead implementing agency (LIA) DTE is responsible for the overall implementation of the project including on E&S. Other implementing agencies (IAs) will deputize their respective officials in the PIU instead of setting up separate PIUs under their respective ministries/agencies which will ensure collaboration and synergy across different agencies and activities. The PIU will operate under a shared leadership structure where the Project Director (PD) will be from the LIA while the other PIAs will depute officials to join the PIU. The deputed officials from the IAs will be responsible for overseeing the specific activities related to their respective ministries and liaising with their original ministries.

The capacity assessment of the borrower/implementing agencies carried out as part of the preparation of the project ESMF indicates that the E&S performance of DTE is satisfactory although it has relied mostly on ad hoc project arrangements through the use of project management units/project implementation units to implement donor-funded projects including just concluded WB funded STEP. The same may also be said of BMET and MEFWD. In the case of ASSET project's implementation, the same approach is adopted with the PIU supported by a team of consultants, to be recruited from the market, to manage the related E&S risks. The team will include the following positions to be recruited as soon as the project become effective: (1) Environment Specialist; (2) Social Safeguards Specialist who will be responsible also for the ESS 7 on indigenous peoples; (3) Labor Management and Community Health Specialist; (4) Stakeholder Engagement and Communication Specialist and (5) Gender/GBV Specialist.

The project ESMF, in addition, includes a borrower's capacity development plan to enable DTE/PIU to meet World Bank E&S Standards but also to develop institutionalized capacities for WB ESF. The plan aims to address both system gaps and institutional capacities of the LIA while addressing the immediate E&S management needs of the ASSET project through the PIU. The staffing and capacity building requirements are incorporated in the borrower's Environmental and Social Commitment Plan (ESCP).

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS



A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The environmental risk of the project is rated as “Moderate” considering the project does not envisage any significant or irreversible environmental impact as proposed project activities are largely technical assistance in nature with some infrastructure development within existing footprints and/or premises of existing institutions.

Major tasks with environmental risks and impacts during construction include (i) establishing an international-level model diploma training programs (ii) vertical extension of Department of Technical Education office (iii) rehabilitation/renovation/refurbishment of existing building, classrooms, workshops, and library, (iv) updating and enhancement of workshop and laboratory facilities of public Technical Training Centers (TTCs), (v) construction of female dormitories and /or sanitation facilities at the polytechnics and (vi) Establishment of an automotive research institute under BSEC.

In operation phase, solid and liquid waste will be generated from regular operation and maintenance activities of the constructed/renovated infrastructures. Hazardous waste will also be generated from different laboratories/workshops/training labs. Besides, medical waste would also be generated from the established medical training institutions. This waste, if not appropriately disposed, has a potential to contaminate soil and water resources, thus negatively affecting community’s health as well as natural habitat. Standard lab and workshop safety protocol should be followed (e.g. WHO’s Laboratory Safety Guideline) during operation period.

Most of the environmental impacts are construction-related such as generation of noise, vibration, air pollution, liquid and solid wastes and health & safety. Given that the nature of all the referenced activities are small to medium scale and that they will be implemented within existing footprints, impacts are expected to be localized, manageable and reversible. Furthermore, all institutes will be required to offer as part of the training, courses on occupational health and safety, pollution and resource efficiency and climate change as it pertains to the specific trades being covered by the institutes. Moreover, due to special emphasis on digital eLearning, digitization of the learning environment and the up gradation of internet connectivity will substantially enhance the production of e-waste in the long run. The ESMF also includes procedures for screening other sub-projects to be funded under this project and the guidelines for the e-waste management.

As the building sites have not been finalized, an ESMF has been developed with necessary guidelines, screening forms and template ESMP.

Social Risk Rating

Moderate

The project does not anticipate any land acquisition as all civil constructions will be carried on land that are already owned and in possession of the IAs. However, there might be presence of squatters and/or informal businesses on some of the proposed sites, a common phenomenon in Bangladesh, who could be adversely affected from these civil works. But the overall number of such project affected persons are expected to be small. The sites for constructions will be identified only during implementation but all are expected to be located in urban or peri-urban areas. Most of the labor for the civil constructions will be recruited locally and only modest labor influx from outside is anticipated.



In all cases, the anticipated risks and impacts will be largely localized, confined within the construction area and these will be mitigated through implementation of appropriate environmental and social management plans.

Notwithstanding the modest scale of labor influx, the project is anticipated to have substantial level of GBV/SEA/SH risks inherent in the training institutes of Bangladesh based on the assessment of the GBV Risk Assessment Tool for Civil Works and also, based on the GBV Risk Assessment Tool for Education (that is currently under discussion). The project will include a number of residential hostels for the female students and together with the overall academic environment in the education sector, this may expose the female students, teachers and non-academic staffs under the project to greater GBV/SEA/SH risks which could be further impacted in the aftermath of ongoing COVID-19 related lockdown. The project will mitigate the risks with measures identified in the GBV Action Plan. This comprises of a comprehensive approach with both prevention interventions and risk mitigation measures. Prevention interventions include awareness campaigns and capacity building, among others. Mitigation measures include ensuring Codes of Conduct are in place for all stakeholders, having separate GBV GRM to handle complaints regarding SEA/SH for all project actors to address grievances confidentially; ensuring that policies against SEA/SH are instituted in project funded institutions; and, including training modules on SEA/SH in teacher training activities. Both the prevention and risk mitigation measures are grounded on a review of existing policies and mechanisms that are in place in order to support institutional response to GBV/SEA/SH. An implementing NGO/Firm with experience in GBV/SEA/SH will be identified to implement the GBV Action Plan.

A considerable percentage of beneficiaries are expected to come from indigenous communities and as well as from other marginalized and disadvantaged groups. The project's Small Ethnic and Vulnerable Community Development Framework (SEVCDF) provides the necessary guidelines for preparation of area specific plans in designing and delivering project benefits which are appropriate to the needs and cultural traditions of the social groups involved.

Considering the above, the overall Social risk rating of the project is retained 'Moderate', unchanged from the concept stage. However, the GBV/SEA/SH risk is rated 'Substantial' due to having a large number of institutions involved in training programs, which may expose the participants to GBV risks, also explained above. This separate risk rating is made following revised Good Practice Note on SEA/SH as it is no longer requires that the overall social risk rating for IPFs be at least as high as the SEA/H risk.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The main anticipated E&S risks of the project are expected to be low to moderate and of manageable scale. There will be no land acquisition and all civil construction activities will take place on land that is already owned by the IAs. The borrower has prepared an Environmental and Social Management Framework (ESMF) as the specific locations of the project are yet to be identified which will be done during the implementation stage. The main E&S risks identified in the ESMF are as following: (1) displacement of squatters and/or informal businesses living on some of the construction sites; (2) occupational health and safety of project workers including induced risks regarding workplace and community health and safety; (3) noise, vibration, and dust pollution including waste generation and



management during construction of civil works; (4) hiring of child labor for civil works; (5) poor labor and working environment; (6) induced risk of gender-based violence from labor employed in the civil works sites and exposure by the female students, teachers and staffs to risks of sexual exploitation and abuse, and sexual harassment in skill development institutions/establishments under the project; and (7) ensuring culturally appropriate benefits to the indigenous and other disadvantaged communities from the project's various initiatives. As the volume of traffic will be increased, it will increase the possibility of accident. Limiting speed using speed breaker, proper signage will be introduced. The contractor will be responsible for the preparation of the traffic management plan as a part of the Contractor's ESMP.

The ESMF outlines the mitigation, monitoring, capacity building, E&S implementation arrangement and reporting system, and includes the related budget estimates. The ESMF also stipulates E&S screening for all activities and subsequent development of site-specific ESIA/ESMP of civil constructions, if recommended; and for the contractors, prior to mobilization, to prepare the Contractor's ESMP (C-ESMP), to be approved prior to the commencement of the construction activities. The C-ESMP shall include, as relevant, Occupational Health and Safety Plan, Water and Waste Management Plan, Traffic Management and Road Safety Management Plan, Labor Influx Management Plan, Workers Camp Management Plan, Borrow Area Management Plan, Material Sourcing Plan and Site Restoration Plan and Community Health and Safety Plan, among others, as per the requirements of the government laws and rules, and the Bank's standards and guidelines. All these plans will be reviewed and approved by the PIU and the World Bank before any civil constructions start. The ESMF also provides measures to address the Gender-based Violence (GBV) related risks in the project for which a separate GBV/SEA/SH Action Plan is developed following the Bank's Good Practice Note. Relevant E&S clauses will also be incorporated in the 'Bidding Documents' of civil constructions.

While finalizing civil construction plan, refurbishment or repairing of existing establishments, the borrower will take into account the requirements of operation & maintenance (O&M) during the post-construction period and prepare the necessary plans in this regard. The borrower has also developed a Resettlement Policy Framework (RPF) that stipulates provisions for, where necessary, developing site specific Resettlement Action Plan (RAP) along with mitigation and compensation measures for project affected persons affected by the project's interventions. Similarly, ESMF also includes provisions for inclusion of the vulnerable and disadvantaged groups as per the Bank's directives on Disadvantaged or Vulnerable Individuals or Groups which is further complemented by the project's Small Ethnic and Vulnerable Community Development Framework (SEVCDF). The SEVCDF provides the necessary guidelines for preparation of area specific Small Ethnic and Vulnerable Community Development Plans (SEVCDPs) to ensure delivering the project benefits which are appropriate to the needs and cultural traditions of the social groups involved.

Other instruments prepared by the borrower include Labor Management Procedures, Stakeholder Engagement Plan, Resettlement Policy Framework and Environmental and Social Commitment Plan. As the project includes a CERC component, the ESMF maybe updated within 90 days from CERC activation specifically if there are new activities not covered by the existing ESMF. However, a positive/negative list of works, services, non-consulting services and goods eligible for CERC component is included in the ESMF.

During implementation, site-specific environmental and social assessments will be conducted as necessary. These assessments will help adoption of mitigation measures against the environmental and social risks and impacts (through preparation of site-specific ESMPs if required) and address the issues of inclusion, social vulnerability of



certain groups, gender and GBV, consultation and communication strategy and any other issues identified via the assessment and the stakeholder consultations. As part of the assessment consultations with key stakeholders, including vulnerable and disadvantaged communities, will be carried out to identify their concerns and requirements, which will be included in the design of the facilities to strengthen greater support to these population sections. This will also help address potential issues related to Universal Access to project facilities.

ESS10 Stakeholder Engagement and Information Disclosure

The borrower has developed a Stakeholder Engagement Plan (SEP) for the project. It identifies the potential stakeholders which include a broad range of actors (affected parties and other interested parties) relevant to the project such as NGOs, civil society, media, grassroots communities including local communities in the vicinity of construction sites, students, women’s groups, parents/guardians, teachers and teachers’ association, local government institutions and as well as different government agencies.

The SEP includes detailed schedule of activities and information on the process for engaging the stakeholders. It lays down the stipulations for the borrower to engage in meaningful consultations with all stakeholders throughout the project life cycle paying particular attention to the inclusion of the women, female students, and vulnerable and disadvantaged groups. The SEP also provides guidelines for carrying out consultations during Covid 19 or similar emergency, and in addition, to seek stakeholder feedback and opportunities for proposed future engagement, ensuring that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context. The SEP, in addition, details the provisions for setting up of a Grievance Mechanism (GM) including specific GM for labor management and GBV/SEA/SH to address cases of grievance in a timely manner and following due process.

Finally, the SEP will be disclosed publicly prior to appraisal along with the other E&S documents, namely, ESMF, RPF, LMPs and SECVDF. The disclosure will also include the Bangla translations of the executive summary of these documents.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The ASSET project will include construction of a model skill development institute besides training centers and refurbishment/repairing of existing establishment/training centers. The Labor Management Procedures (LMP) of the project provide guidance for managing the labor-related issues along with terms & conditions of employing labor which stipulate that all the labor employed under the project will receive a job contract, regular wage and will not be subject to any unfair treatment and discrimination as regard the terms of employment. The LPM also stipulates provisions prohibiting child labor and forced labor in any project activities.

The project will employ direct workers for the PIU and contracted workers for the civil works. The direct workers will also include the teaching and non-teaching staffs in the different training centers and establishments. The contracted



workers will be essentially from the project area employed by the contractors. Based on the requirements of ASSET, primary supply workers will be recruited by the suppliers as required. It will be ensured (and monitored periodically by the PIU) that no children are recruited and supplied as worker. Furthermore, it will be monitored so that these workers are not subject to ‘forced labor’ in any manner. The PIU will be responsible to make sure that these standards are followed strictly. If any deviation is identified the PIU will take action as prescribed in the contract/ agreement following the LMP.

The LMP provides the provisions of Code of Conduct (CoC) for the contractors which they are obliged to adhere to. The CoC will be binding for all contractors under the project and includes provisions governing the behavior of the contracted workers on GBV and vis-à-vis the host/ neighboring communities. The contractors also shall have obligation to disseminate the contents of the CoC to the contracted employees and as well as the relevant stakeholders which include also the nearby communities in a language (usually Bangla) that is understandable to them.

The LMP also include a specific Grievance Management (GM) protocol to deal with labor-related cases of grievance. In addition, Occupational Health & Safety Plan (OHSP) for both construction related issues and Covid-19 will be prepared by the contractors following the Bank’s Note for Construction of Civil Works during Covid 19 and, World Bank Group Environment, Health and Safety (EHS) Guidelines. These provisions will be specified in the bidding documents and in the contracts. Finally, the LMP will be disclosed publicly as early as possible but prior to appraisal.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project will support construction of a model diploma institute, and renovation, rehabilitation and refurbishment of existing facilities including hostels, sanitation facilities, workshops, and classrooms. Construction of the infrastructure for the model diploma institute, and vertical extension of DTE office may generate emissions from excavation equipment, other machinery and construction traffic. The emissions may also include greenhouse gases (GHGs) from engine fuel combustion (exhaust emissions) and evaporation and leaks from vehicles (fugitive emissions). However, the project does not require a GHG calculation due to very low amount of emissions. The project will also produce solid and/or liquid wastes and construction wastes. The construction materials for renovation/upgradation will be mostly collected locally. The contractors will be encouraged to re-use the construction wastes. The ESMF identifies and proposes measures to mitigate the relevant risks & impacts (especially waste management). Poor O&M could pose environmental and public health risks. Therefore, sub-projects will be screened to identify potential risks of creating pollution or disease hazards. Based on the screening results, subsequent mitigation measures will be suggested in the ESMP and implemented.

During the construction/renovation activities ponds/canals/water streams-rivers can potentially cause some localized increase in water pollution due to poor waste management. However, this increase in turbidity is not likely to have any significant impact on overall water quality and the aquatic fauna primarily because of its temporary and localized nature. The construction camps and other site facilities such as offices and warehouses will also generate considerable quantities of effluents. Other possible causes of land or water contamination include accidental leakage or spillage of fuels, oils, and other chemicals, and waste effluents released from construction sites, setting up laboratory and workshops equipment and testing, etc.



Much like water pollution discussed above, soils in the construction/refurbish/expansion area and nearby lands that are used for agriculture will be prone to pollution from the construction activities, construction yards, workers camps and other construction areas. Fuel and hazardous material storage sites and their handling are also the potential sources for soil and water pollution. Improper siting, storage and handling of fuels, lubricants, chemicals and hazardous materials, and potential spills from these will severely impact the soil and water quality.

Solid and liquid waste will be generated from regular operation and maintenance activities of the constructed/renovated infrastructures. Hazardous waste including e-waste will also be generated from different laboratories/workshops/training labs. Besides, medical waste would also be generated from the established medical training institutions. This waste if not appropriately disposed has a potential to contaminate soil and water resources, thus negatively affecting community's health as well as natural habitat. The ESMF provides guidelines for handling the generated wastes in future.

The project will adopt resource efficient design of the constructions and use of environment-friendly building materials. Project will also make the institutes more resource efficient, use of renewable energy will be encouraged during the operation phase and some tools will be devised so that there are controls over the use. Construction activities during operation phase will mostly generate noise, vibration and solid and liquid waste. Given that all the constructions will be minor scale, the related activities are unlikely to generate any hazardous waste (such as hydrocarbon oils from construction machinery). But in all cases, site-specific Waste Management Plan will be prepared by the contractor.

Resource efficient construction material like alternate non-fire brick will be encouraged to use for building construction which may eventually reduce local air pollution indirectly.

ESS4 Community Health and Safety

Activities under this project may give rise to a number of risks to community health and safety. Construction activities may expose communities living close by or in the existing facilities under the project to health and safety risks, including issues related to noise, vibration, dust pollution and waste disposal/management. Rehabilitation and refurbishment of facilities will generate emissions from construction equipment, other machinery and vehicles. The emissions will deteriorate the ambient air quality which could affect public health. The existing training campuses and adjacent areas of the institutions are particularly vulnerable to these impacts. In addition, dust generated from the above activities will also have impacts on crops and livestock, if located in open rural area.

Noise will be produced from vehicular movement, excavation machinery, concrete mixing, and other construction activities. The schools, religious places and crowded market areas adjacent to the construction sites are particularly vulnerable to the increased noise levels. The construction camps and other site facilities will also generate considerable quantities of waste effluents. Other possible causes of land or water contamination include accidental leakage or spillage of fuels, oils, and other chemicals, and waste effluents released from construction sites, setting up laboratory and workshops equipment and testing, etc. These effluents can potentially contaminate the water sources of the area, harmful for the health and safety of the local community. Like water, soils can be contaminated and can cause safety and health hazards.



Both construction and operation phases, wastes will be generated, and it is imperative that such waste is responsibly disposed to avoid adverse environmental, human health and aesthetic impacts. Inappropriate disposal of these wastes can lead to soil and water contamination as well as health hazards for the local communities, livestock, and aquatic as well as terrestrial fauna.

The construction materials may be carried through the populated urban areas, hence, adequate traffic management, provision of alternative access points/roads, road-crossing safety procedures and signages be put in place. The ESCP mentioned the requirement of the preparation of area specific traffic management plan. Labor influx during the construction phase may affect the local community and increase the risk of GBV. The other pertains to the exposure and/or increased risks of diseases by the community due to influx of people during construction and operation. For all the construction work, the ESMP should include the obligation of the contractors to safeguard the community health and safety aspects along with OHS. The civil works will affect the local communities living and working in the vicinity of the sites. Adequate engineering, health and safety measures should be adopted to avoid any issue on community health. A Community Health & Safety Plan will be required from contractors, which will also include procedures on incident investigation and reporting, recording and reporting of non-conformances, emergency preparedness and response procedures and community awareness raising activities. Provision should be made for contractors to make arrangements of adequate cautions and warning signs for the potential risks in the site. Any accidents or fatalities on all sites should be responded to on an emergency basis and will have to be immediately reported to the Bank team. The potential exclusion risk of persons with disabilities will be assessed both from the aspects of infrastructure design as well as education services, as per the concept of universal access. WBG EHS guidelines have been followed in the preparation of the ESMF and labor related plans.

COVID-19 spread among construction and project workers will also need to be taken into consideration during implementation, given the nature of how the disease spreads from human to human. A public interaction protocol, good practices, good hygiene protocol will be posted in various locations and communities and workers will be made aware of how to contain transmission. Contractors will require developing site-specific procedures or plans and share it with the wider community, so that adequate precautions are in place to prevent or minimize an outbreak of COVID-19. Additionally, the ASSET project includes expansion and improvement of the on-campus facilities regarding security, sanitation, health-hygiene, green campus environment and practices both in academic building and hostels. Failure of maintaining those at appropriate level would increase on campus violence against women, social insecurity and poor hygienic condition.

The project's labor influx although anticipated to be low, may still induce the risk of gender-based violence including sexual exploitation and abuse and sexual harassment (GBV/Sea/SH). Most importantly, the project is anticipated to have substantial level of GBV/SEA/SH risks due to the ways the skills training institutes and education sector operates in general in Bangladesh. Bangladesh has high prevalence of GBV/SEA/SH cases and educational institutions are often the space where the female students and female teaching and non-teaching staffs come across GBV related experiences. Further the project will also include residential hostels for the female students and together with the overall current environment of the education sector in the country, the female students along with the female teachers and non-academic staffs are anticipated to be exposed to substantial level of GBV/SEA/SH risks.

The client has developed a project-specific GBV/SEA/SH Action Plan to mitigate and manage the related risks. The plan stipulates for a dedicated GBV/SEA/SH expert in the PIU to serve as focal point, articulates a survivor centric approach for the victims, and lays down preventive measures such as awareness raising among the stakeholders,



contractors and the nearby communities, capacity building for the IAs in managing GBV/SEA/SH risks, regular monitoring by the PIU along with curative measures such as provision of GBV service providers. It also includes a GBV/SEA/SH specific grievance mechanism with specific focal point in each skill development institutions under the projects and all civil construction sites. The action plan also incorporate provision of hiring of a NGO/Firm to monitor the overall GBV related GM that will also ensure the referral services for the survivors if needed.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The civil construction sites will be decided only during implementation, but the project does not anticipate any land acquisition as all the proposed interventions will be within the existing facilities and the lands needed are owned by the ministries or agencies concerned. However, construction, refurbishment and infrastructure-related civil works may affect squatters and/or disrupt livelihoods of people in the vicinity. The borrower has prepared a Resettlement Policy Framework (RPF) that stipulates provisions for, as relevant, developing site specific Abbreviated Resettlement Action Plan (ARAP) or Resettlement Action Plan (RAP) along with mitigation and compensation measures for project affected persons affected by the project’s interventions. However, if there is only minor, temporary economic displacement affecting a small number of people, the ARAPs may be in the form of a specific section of the relevant ESMPs rather than free-standing documents. The RPF will be disclosed publicly prior to appraisal and similarly, the site-specific ARAP/RAPs will also be disclosed both within the country and on the World Bank’s website prior to the commencement of the civil works.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ASSET is expected to be implemented nationwide and works will be implemented within existing footprints and/or premises. Thus, impacts on biodiversity and living natural resources are not expected. Nevertheless, ESMF provided clear screening criteria for sub-projects having any impacts on ecologically sensitive areas and natural habitats.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The project is expected to be implemented nationwide and it is likely that some of the project locations will fall within areas that have a considerable small ethnic community/tribal population. But in all cases, the establishments and facilities under the project are strongly likely to attract students for admission from the indigenous and other disadvantaged and vulnerable communities. The client has prepared a Small Ethnic and Vulnerable Community Development Framework (SEVCDF) that details the procedures/criteria for the active inclusion of students from small ethnic community/tribal backgrounds and specify project benefits which are appropriate to the needs and cultural traditions of the social groups involved. The project GM will also include representatives of small ethnic and vulnerable communities where relevant and take into consideration the issue of linguistic diversity as applicable.

The client will also carry out due diligence as part of the ESIA process on whether small ethnic community/tribal peoples are adversely affected from civil works construction under the project and in case such impacts are anticipated, the client will incorporate the necessary mitigation measures into the ESMPs or into a separate Small Ethnic and Vulnerable Community Development Plan (SEVCDP) following meaningful consultations with the affected



persons. The due diligence process starts prior to selection of TVET institutions and for civil construction, specific sites.

ESS8 Cultural Heritage

All constructions/refurbishments/renovations will take place within the existing campus of the institutions concerned, none of which are expected to be building of historical importance. Hence impacts on cultural heritage are not expected. However, as a standard practice, Chance Finds Procedures are included in the ESMF, and a chance finds clause will be included in works contracts requiring contractors to stop construction if examples of cultural heritage are encountered during construction. The Borrower will also have to notify and closely coordinate with the relevant authority in Bangladesh for the salvaging and restoration of such cultural heritage.

ESS9 Financial Intermediaries

Not applicable

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

Not Applicable

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: People's Republic of Bangladesh

Implementing Agency(ies)

Implementing Agency: Technical and Madrasha Education Division of Ministry of Education

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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